



**INTESA SANPAOLO
VITA**

Solvency and Financial Condition Report

Intesa Sanpaolo Vita Insurance Group
31 December 2022

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

Registered office: Corso Inghilterra, 3 – 10138 Turin

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

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

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

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

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

CONTENTS

SUMMARY OF CONTENTS	9
A. Activities and Results	17
A.1 Activities	17
A.2 Underwriting results.....	27
A.3 Investment results	35
A.4 Results of other activities	40
A.5 Other information	43
B. Governance system	45
B.1 General information about the Governance system	45
B.2 Competence and integrity requirements.....	85
B.3 Risk Management System, including the internal assessment of risk and solvency ...	87
B.4 Internal controls system	128
B.5 Internal audit function	137
B.6 Actuarial Function.....	151
B.7 Outsourcing	154
B.8 Adequacy of the system of governance	157
B.9 Other information.....	157
C. Risk profile.....	159
C.1 Underwriting risk.....	161
C.2 Market risk	172
C.3 Credit risk.....	183
C.4 Liquidity risk	187
C.5 Operational risk	191
C.6 Other material risks.....	194
C.7 Other information.....	195
D. Valuation for solvency purposes	197
D.1 Assets	199
D.2 Technical provisions	216
D.3 Other liabilities.....	232
D.4 Alternative valuation methods.....	240
D.5 Other information	243
E. Capital management.....	245
E.1 Own funds.....	245
E.2 Solvency capital requirement and minimum capital requirement	260

E.3 Use of the share price risk submodule based on the duration in the SCR calculation 269	
E.4 Differences between the Standard Formula and the internal model.....	269
E.5 Failure to meet the MCR and SCR	269
E.6 Other information	269
Glossary and Acronyms	271
QRT Intesa Sanpaolo Vita Group.....	275
QRT Intesa Sanpaolo Vita S.p.A.....	285
QRT Intesa Sanpaolo Assicura S.p.A.	297
QRT Fideuram Vita S.p.A.	307
QRT Intesa Sanpaolo Life D.A.C.....	317
INTESA SANPAOLO RBM SALUTE S.P.A.	327
INDEPENDENT AUDITORS REPORT	337



INTRODUCTION

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

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

Intesa Sanpaolo Vita S.p.A. is the Ultimate Italian Parent Company (hereinafter also referred to as "USCI") and the Parent Company of the Intesa Sanpaolo Vita Insurance Group (hereinafter also referred to as the "Insurance Group") which, as at 31 December 2022, consists of Intesa Sanpaolo Vita S.p.A., Intesa Sanpaolo Assicura S.p.A., Intesa Sanpaolo RBM Salute S.p.A., Fideuram Vita S.p.A., Intesa Sanpaolo Life D.A.C., Intesa Sanpaolo Insurance Agency S.p.A. and InSalute Servizi S.p.A.

In 2022, activities were finalised regarding the integration of Assicurazioni Vita S.p.A. (formerly Aviva Vita S.p.A.), BancAssurance Popolari S.p.A. and Lombarda Vita S.p.A. following the merger into Intesa Sanpaolo Vita S.p.A. with legal effect on 31 December 2021. In addition, as parent company of the Intesa Sanpaolo Vita Insurance Group, the merger of Cargeas Assicurazioni S.p.A. into Intesa Sanpaolo Assicura S.p.A. was finalised with legal effective date of 1 October 2022 and accounting and tax effect as of 1 January 2022.

This completed the rationalisation of the Group following the acquisitions made as part of the public exchange offer of Intesa Sanpaolo S.p.A. to the UBI Group in August 2021.

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

In addition, the company InSalute Servizi became part of the Insurance Group in 2022. The company was incorporated as part of the partnership with Reale Group. Its corporate purpose

includes the management of claims and the development of a network of affiliated healthcare facilities (TPA), supporting the insurance offer of Intesa Sanpaolo RBM Salute.

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

It should further be noted that:

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

Therefore the amounts taken from the Group Financial Statements and from those of the Group Companies, as shown in this document, follow the above-mentioned accounting standards. Comparative information for 2021 is also included, in accordance with Article 293(2)(3)(4) of the Delegated Regulation.

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

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

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

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



SUMMARY OF CONTENTS

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

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

Action and Development Lines of the Business

The Intesa Sanpaolo Vita Group recorded a net profit of 922.5 million euro, up 54.6% compared to the result recorded as at 31 December 2021 of 596.7 million euro. The profit component attributable to the Insurance Group rose 17.3% from a profit of 765.9 million euro to a profit of 898.4 million euro.

The Insurance Group reported gross life business of 16,222.7 million euro, down 2,604.3 million euro (-13.8%), in a particularly turbulent financial market environment since February, following the Russia-Ukraine crisis

The change is attributable to the increase in written premiums from traditional products +2,305.2 million euro (+38.9%), which only partially offset the reduction in gross written premiums from unit-linked products of 4,915.5 million euro (-40.9%). This trend reflects the performance of Class III during the year which was affected by uncertainty in the financial markets on the wake of the conflict in Ukraine and the current macroeconomic situation in Italy and Europe.

In the protection segment, premiums in the non-motor segment (excluding CPI - Credit Protection Insurance) rose slightly (+7.3%), driven mainly by the Corporate and Accident Lines of Business (LoB) (+25.3% and +24.3%, respectively), while the other components declined. Growth in the non-life non-motor business is the result of the insurance group's strategic choice in this segment, also confirmed in the current Business Plan.

The Insurance Group's product strategy has shown resilience in adapting to the highly volatile and uncertain macroeconomic environment of FY2022. In this context, commercial initiatives for the Life segment were implemented with a view to propose new investment options to customers by seizing the opportunities offered by a generalised increase in interest rates on the financial markets.

Thus, three new placement windows of the multi-line solution "Risparmio Insurance" were scheduled for the year, and marketing began for the Class I product "Patrimonio Domani Insurance".

In the Non-Life segment, investments continued for the development of the corporate segment with new insurance solutions (Standard and Tailor Made) being added to the catalogue and the extension of existing guarantees. Consistent with the objective of progressively orienting sales towards larger companies, a series of activities were also undertaken to strengthen the advisory capacity of the Banca dei Territori network.

The product range for individuals was further enriched with a dental care solution implemented through the cooperation between Intesa Sanpaolo Assicura and Intesa Sanpaolo RBM Salute.

Lastly, project activities continued to strengthen the coverage dedicated to the Senior and related Caregiver target within the Programme dedicated to this customer segment. In this context, the first Protection, Investment and Financing solutions were released in the second half of this year. Further releases are planned in the first half of 2023.

In terms of Group structure, InSalute Servizi has become part of the Insurance Group. The company was incorporated as part of the partnership with Reale Group. Its corporate purpose includes the management of claims and the development of a network of affiliated healthcare facilities (TPA), supporting the insurance offer of Intesa Sanpaolo RBM Salute.

With reference to the Insurance Group's governance areas, the guidelines developed during 2022 by the Insurance Group focussed on the following aspects:

- completion of the process of integration of the former UBI life companies, which were merged into Intesa Sanpaolo Vita on 31 December 2021. Migration activities of former-UBI Life Insurance Companies' products were substantially completed with completion of the integration into the Customer Area of the Intesa Sanpaolo Vita S.p.A. website and consequent updating of the section that helps policyholders of these products to access the area, with a view to ensuring continuity of service for all the company's customers. In addition, the three-year integration project of the Intesa Sanpaolo subsidiary RBM Salute was concluded. Lastly, the merger of Cargeas Assicurazioni into Intesa Sanpaolo Assicura was finalised. From an internal control point of view, all completed integrations benefit from the Intesa Sanpaolo Vita Group's target processes and systems;
- continuing the implementation of the Insurance Group's Digital Transformation, in order to ensure the continuity of essential customer services and critical business processes. In the course of this year, additional innovative functions were released for use by customers that can now enter instructions via the APP. The subject of digitisation is strategic and is also a pillar of the new Business Plan 2022/25; hence, we will continue in this direction in the coming years;
- completion of implementation activities for the IFRS17 accounting standard, in force as of 1 January 2023, with specific reference to all systems dedicated to providing input in the preparation of financial statements for all Group companies.
- creation of a single Group governance to cover regulatory and strategic ESG requirements, expansion of the offer of sustainable investment options consistent with Articles 8 and 9 of the SFDR, and publication, following membership of the Net Zero Asset Owner Alliance, of 2030 interim targets. The Division confirmed its commitment to zero emissions by 2050

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

Summary information on companies included in the scope of consolidation

The following sections provide information on the subsidiaries included in the scope of consolidation and the results reported in their statutory accounts for the year ended 31 December 2022.

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

Intesa Sanpaolo Vita confirmed a solid business performance for the year, reporting a loss of 319.1 million euro, including dividends distributed by the subsidiaries Intesa Sanpaolo Assicura S.p.A and Intesa Sanpaolo Life D.A.C totalling approximately 250.0 million euro, compared to a profit of 744.1 million euro in the previous year.

The turbulence on the financial markets triggered by the Russia-Ukraine crisis contributed considerably to the result for the period; the effects of the crisis were partly mitigated by the exercise of the option to suspend valuation losses on current securities in the amount of 4,462.6 million euro, introduced by IVASS Regulation No. 52 of 30 August 2022, as a result of which a non-available equity reserve was recognised in the amount of 941.1 million euro, using the share premium reserve for the same amount.

In this context, the Company:

posted gross life premiums of 10,101.4 million euro, compared to 8,911.2 million euro at the end of the previous year, an increase of 13%;

- new life production amounted to 9,911.4 million euro, up 15% compared to 8,651.2 million as at 31 December 2021;
- the composition of the investments portfolio for segregated accounts, after the merger of former UBI Companies, maintained a considerable quota of fixed income securities issued by governments or government agencies (equal to 63.9% of total assets in segregated accounts).
- operating expenses in the Life business amounted to 234.5 million euro compared to 279.2 million euro in the previous year, while in the non-life business they amounted to 0.1 million euro, similar to the previous year

This performance reflects a negative technical result in the Life segments of -433.1 million euro, compared to a positive technical result of 754.1 million euro in 2021. The technical contribution of the Non-Life business remained marginal, positive at 0.5 million euro (positive at 0.2 million euro as at 31 December 2021).

Intesa Sanpaolo Life Dac

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

Gross premiums amounted to 2,849.5 million euro (5,513.1 million euro in 2021). Compared to the previous year, written premiums were down 48%. Production exclusively concerned unit-linked products.

Net profit for the year, determined in accordance with IAS/IFRS as required by Irish law, amounted to 118.5 million euro compared to 192.5 million euro in 2021.

Shareholders' equity at the end of 2022, including the aforementioned profit, amounted to 1,013.7 million euro. During the 2022 financial year, a dividend of 50 million euro was paid to the parent company Intesa Sanpaolo Vita.

Intesa Sanpaolo Life has technical provisions and liabilities towards policyholders for products in its portfolio of 41.359,8 million euro (41.359,8 million euro at the end of 2021), entirely relating to

unit-linked policies. The total amount of provisions increased by 8%, mainly due to the financial market performance.

Investments recorded under assets amounted to 35,655.5 million euro (42,671.6 million euro at the end of last year).

The number of contracts in the portfolio as at 31 December 2022 is approximately 639,000 (approximately 658,000 at the close of the previous year).

Intesa Sanpaolo Assicura S.p.A.

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

The company confirmed a solid commercial performance, also due to the merger with the associate Cargeas Assicurazioni S.p.A.; however, the year-end result was affected by market developments.

In this context, the Company:

- recorded gross written premiums of 914.7 million euro, slightly increasing compared to 907.3 million euro at the end of the previous year;
- earned premiums, net of outward reinsurance were 827.3 million euro, down 2.7% from 850.0 million euro in the previous year;
- claims costs, net of outward reinsurance were 252.1 million euro, compared to 235.2 million euro in the previous year, up by 7.2%;
- the composition of the investment portfolio maintained a considerable quota of fixed income securities issued by governments or government agencies (equal to 73% of total assets and with a duration comprised between 1 and 5 years).
- Operating expenses amounted to 251.2 million euro compared to 264.3 million euro in the previous year. This performance reflects an overall positive technical balance of 259,9 million euro, compared to 311,2 million euro in 2021.

Intesa Sanpaolo RBM Salute S.p.A.

During 2022, the process of integrating RBM within the Intesa Sanpaolo Group was completed, and the distribution of products through the Banca dei Territori distribution network was consolidated.

Gross premiums written amounted to 520.8 million euro, up 2% on the previous year.

Technical provisions amounted to 197.9 million euro, and the result of financial operations was a negative -21.4 million euro, a decrease compared to the previous year

The profit for the year amounted to 81.8 million euro, while shareholders' equity, including the result for the period and the 150 million euro capital increase fully subscribed by Intesa Sanpaolo Vita, amounted to 724.1 million euro.

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

Fideuram Vita S.p.A.

the company's 2022 accounts showed a profit of 46.2 million euro compared to a profit of 75.2 million euro in the previous year.

Gross life written premiums amounted to 3,272.3 million euro, down 1,199.6 million euro year-on-year (-26.8%). there was a decrease in premiums from Class III contracts (-1,625.8 million euro) and an increase in premiums from Class I contracts (+413.5 million euro).

New life production amounted to 3,221.7 million euro, down 27.1% compared to 31 December 2021.

The composition of the investment portfolio for the segregated accounts maintained a predominant share of securities issued by governments of countries in the Euro area or by supranational entities (essentially in line with 31 December 2021);

Operating expenses amounted to 20.3 million euro compared to 20.1 million euro in the previous year.

This performance reflects a positive technical balance in the Life segments of 50.7 million euro, compared to 89.4 million euro in 2021.

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

<i>(euro millions)</i>				
Income Statement	2022	2021	Change	
Intesa Sanpaolo Vita Group				
Gross Written Premium	17,658.6	20,312.8	-2,654.2	-13.1%
Net Profit IAS/IFRS of Group	898.4	765.9	132.5	17.3%
Individual Balance Sheet				
Net Profit ISV	-319.1	744.1	-1,063.2	-142.9%
Net Profit ISA	119.7	182.2	-62.5	-34.3%
Net Profit ISL	160.1	192.5	-32.4	-16.8%
Net Profit FV	46.2	75.2	-29.0	-38.5%
Net Profit RBM	81.8	-325.7	407.5	-125.1%
Group Data				
Number of Life Contract	4,710,643	4,876,465	-165,822	-3.4%
Number of Non Life Contract	4,019,269	4,115,825	-96,556	2.3%
Number of Human Resource	1,365	1,375	-10	-0.7%

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

<i>(euro millions)</i>						
	Intesa Sanpaolo Vita	Intesa Sanpaolo Assicura	Fideuram Vita	Intesa Sanpaolo Life	Intesa Sanpaolo RBM Salute	Intesa Sanpaolo Vita Insurance Group
A. Solvency Capital Requirement (SCR)	3,564.1	242.1	540.5	511.9	277.9	4,536.6
B. Minimum Capital Requirement (MCR)	1,603.9	109.0	243.2	230.4	69.5	2,255.9
C. Eligible Own Funds to meet the SCR	7,851.6	602.9	1,211.9	1,530.8	511.4	9,208.9
D. Eligible Own Funds to meet the MCR	7,072.9	602.9	1,131.1	1,530.8	469.7	8,431.2
C. / A. Ratio Eligible Own Funds on SCR	220%	249%	224%	299%	184%	203%
D. / B. Ratio Eligible Own Funds on MCR	441%	553%	465%	665%	676%	374%

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

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

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

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

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



The solvency capital requirement of Insurance Group (SCR) at 31 December 2022 was 4.536,6 million euro.

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 2.255,9 million euro.

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

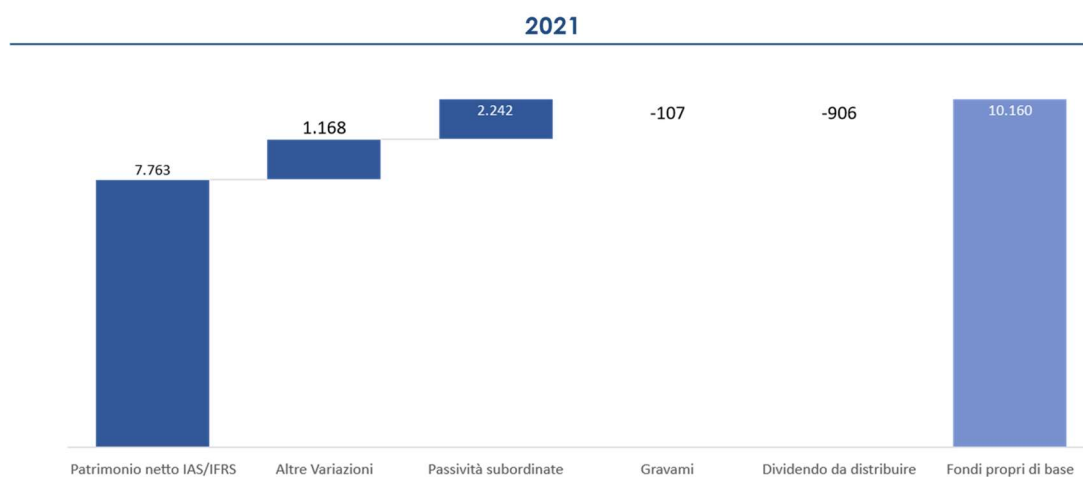
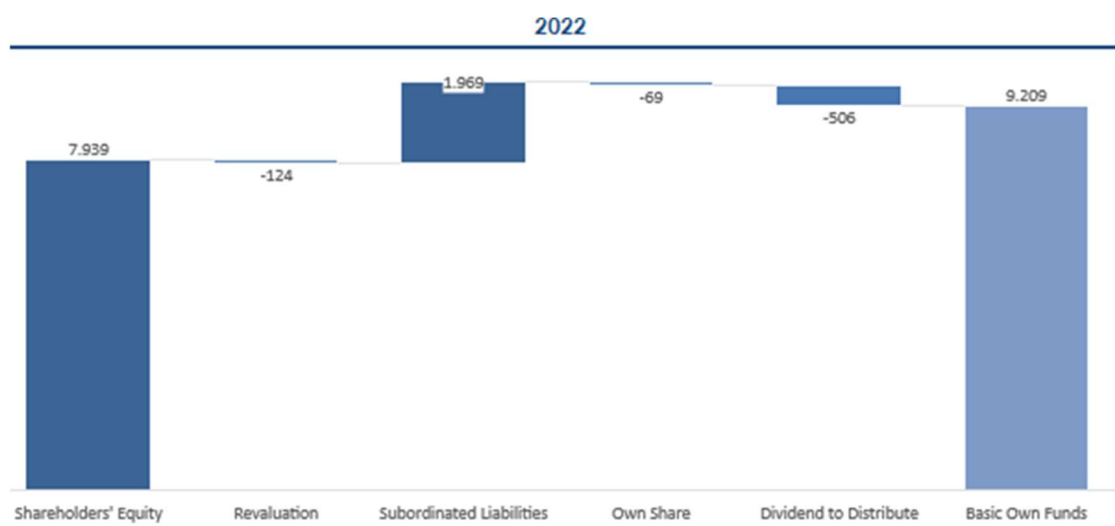
	(million euro)	
	No VA	VA
Eligible Own Funds	8,889.8	9,208.9
Solvency Capital Requirement	4,734.4	4,536.6
Solvency ratio	188%	203%

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

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

The own funds of the Insurance Group compared to the shareholders' equity in the Consolidated Financial Statements of the Insurance Group at 31 December 2022 and at 31 December 2021 are represented below.

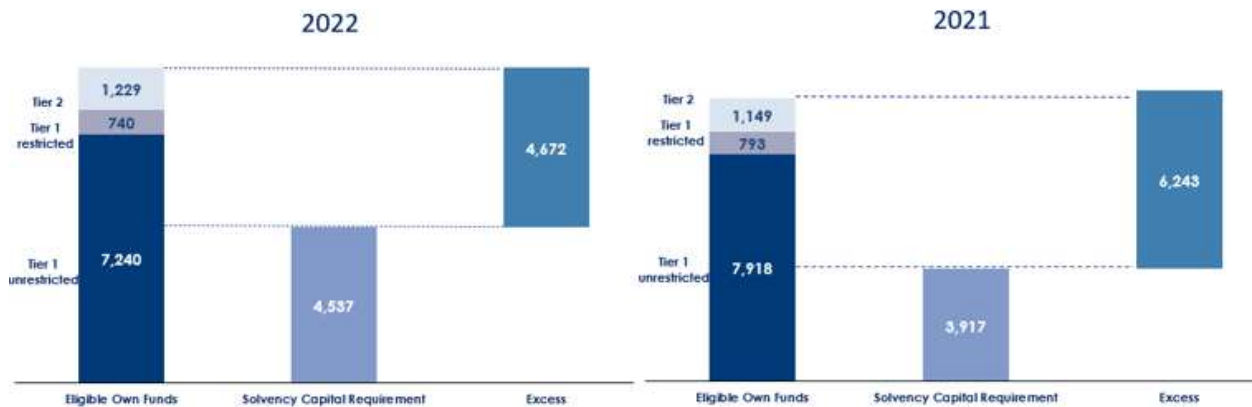
From Shareholders' Equity to Solvency II Own Funds (in millions of euro)



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

Below is a comparison between Own Funds and the Solvency Capital Requirement of the Insurance Group at 31 December 2022 and at 31 December 2021.

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



The value of eligible own funds to cover the Solvency Capital Requirement (SCR) at Group level is equal to 9,209 million euro, of which 7,240 million euro classified as Tier 1 unrestricted, 740 million euro as Tier 1 restricted and 1,229 million euro as Tier 2.

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

The value of eligible own funds to cover the Minimum Solvency Capital Requirement (MCR) at Group level is equal to 8,431 million euro, of which 7,240 million euro classified as Tier 1 unrestricted, 740 million euro as Tier 1 restricted and approximately 451 million euro as Tier 2.

A. ACTIVITIES AND RESULTS

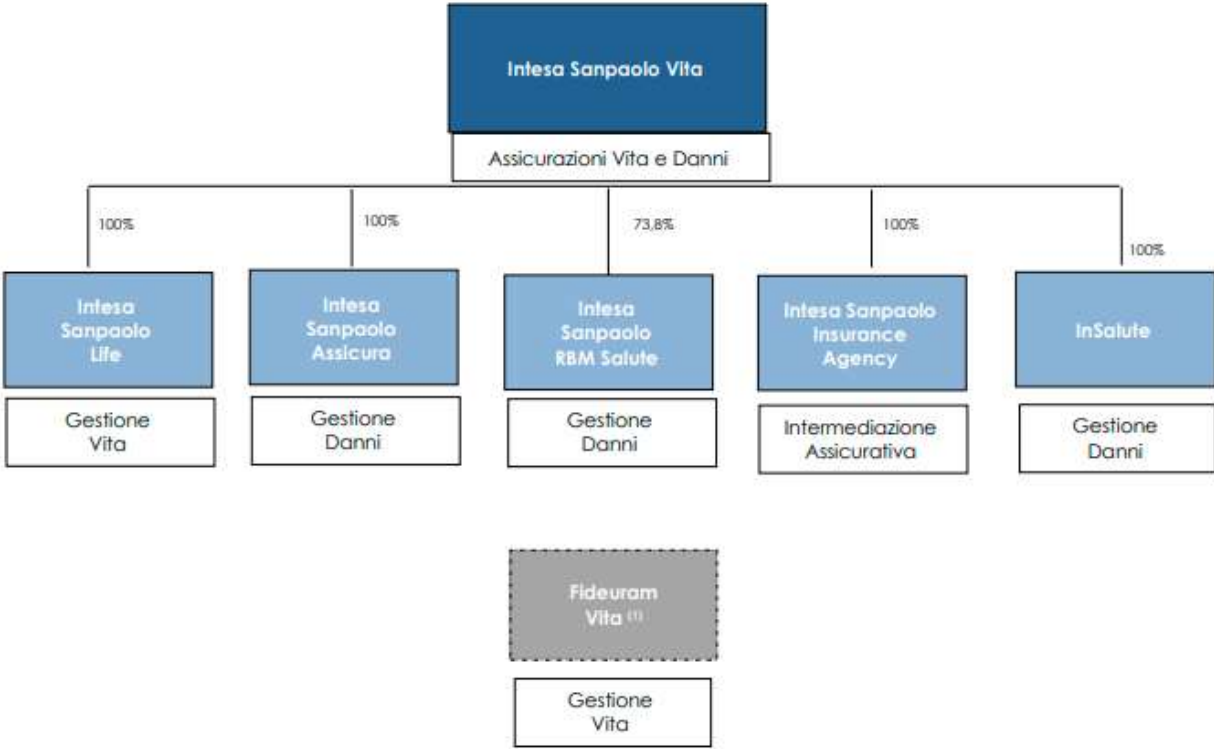
A.1 ACTIVITIES

Intesa Sanpaolo Vita Insurance Group

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

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

The Group structure at 31 December 2022 is represented below:



1) The company is consolidated based on unitary management as it is subject to unitary management pursuant to Article 96 of the Insurance Code, Legislative Decree No. 209/2005.

This configuration is the result of the reorganisation that took place in 2022, following IVASS authorisation of the merger received on 22 June 2022, whereby Cargeas Assicurazioni S.p.A. was merged into Intesa Sanpaolo Assicura S.p.A. effective 1 October 2022.

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

The Insurance Group operates in the Life insurance and Pension segments, with a leading position on the Italian market, as well as in the non-life segment, through its subsidiaries Intesa Sanpaolo

Assicura and Intesa Sanpaolo RBM Salute. The data for production referred to the 2022 financial year and compared with the previous financial year, prepared according to IAS/IFRS, are presented below.

(in milioni di euro)

Dati operativi	2022	2021	Variazione	
Produzione lorda Vita	16.222,7	18.827,1	-2.604,4	-13,8%
- Premi relativi a prodotti Tradizionali	8.234,1	5.928,9	2.305,2	38,9%
- Premi relativi a prodotti Unit Linked	7.092,5	12.008,1	-4.915,5	-40,9%
- Raccolta lorda di prodotti Previdenziali	896,1	890,1	6,1	0,7%
Produzione Danni	1.435,9	1.404,3	31,6	2,3%
Nuova produzione Vita	15.801,1	18.334,2	-2.533,1	-13,8%
Oneri netti relativi a sinistri	8.120,1	-12.075,4	20.195,5	-167,2%
Produzione netta	7.681,0	30.409,6	-22.728,6	-74,7%

Intesa Sanpaolo Vita S.p.A. primarily uses the Intesa Sanpaolo Group banking network for the marketing of its savings and investment, pension and creditor protection insurance products; it also makes use of the non-captive network, the online branch channel, the financial advisors of IW SIM S.p.A. and Intesa Sanpaolo Insurance Agency S.p.A., a multi-firm agency of the Insurance Group.

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

Fideuram Vita S.p.A. is assisted by a network of more than 6,500 private bankers in all regions and main cities of Italy, belonging to Fideuram, Sanpaolo Invest, IWBANK Private Investments SIM, to distribute its products.

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

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

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

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

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

For the distribution of its products, Intesa Sanpaolo RBM Salute has mainly relied on the direct channel. Also, as a result of the ongoing integration of the company within the Group, there was significant growth in the banking channel, which benefited of ongoing synergies with the Intesa Sanpaolo group. At the same time, there was a decrease in the broker channel and an increase in the agency channel.

In the Intesa Sanpaolo channel, the increase in written premiums was driven by the XME Protection product, which continues to attract considerable interest from the Intesa Sanpaolo Group's retail customers.

At 31 December 2022, the Group recorded a consolidated shareholders' equity of 6.142,4 million euro, including net profit of 922.5 million, compared to an opening equity of 7.762,6 million euro.

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

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

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

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

Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita S.p.A.

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

Share capital: euro 320,422,508.

Registered office in Turin, Corso Inghilterra 3. Administrative offices in Milan, Viale Stelvio 55/57.

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

A registered insurance and reinsurance company, number: 1.00066.

Parent Company of the Intesa Sanpaolo Vita Insurance Group.

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

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

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

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

Intesa Sanpaolo Vita S.p.A. primarily uses the Intesa Sanpaolo Group banking network for the marketing of its savings and investment, pension and creditor protection insurance products; it also makes use of the non-captive network, the online branch channel, the financial advisors of IW SIM S.p.A. and Intesa Sanpaolo Insurance Agency S.p.A., a multi-firm agency of the Insurance Group.

The company operates in the following areas of activity:

A. Non-life insurance obligations:

- Medical costs insurance;
- Income protection insurance.

B. Life insurance obligations:

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

During FY2022, the Company focused on the objectives of the 2022/2025 Business Plan, ensuring the development of activities aimed at process efficiency and the application of the new accounting standard IFRS17, strengthening the digitisation process and taking the necessary actions in response to changes in the regulatory framework.

Intesa Sanpaolo Vita reported a loss of 319.0 million euro at year end 2022, including dividends distributed by the subsidiaries Intesa Sanpaolo Assicura and Intesa Sanpaolo Life totalling approximately 250 million euro, compared to a profit of 744.1 million euro in the previous year.

As in previous years, the company carried out some ordinary transactions with companies in the Intesa Sanpaolo Group. These transactions took place under arm's-length conditions, based on

reciprocal financial valuations. The company did not carry out any atypical or unusual transactions during the period, nor any intragroup, related party or third party transactions.

The following intragroup transactions were significant in 2022 for the purposes of IVASS Regulation no. 30/2016:

- distribution of an extraordinary reserve of 904.0 million euro to Intesa Sanpaolo;
- sale of the shareholding in Smart Care for 0.9 million euro.

Events after 31 December 2022

On 5 April 2023, the Board of Directors of Intesa Sanpaolo Vita S.p.A., in its capacity as insurance parent company, resolved to approve the **Common draft terms of simplified cross-border merger by acquisition of Intesa Sanpaolo Life dac into Intesa Sanpaolo Vita S.p.A.**, prepared in accordance with Directive (EU) 2017/1132 of the European Parliament and of the Council of 14 June 2017 on certain aspects of company law (the "Directive No. 2017/1132") and pursuant to Articles 2501 ter and 2505 of the Italian Civil Code and Legislative Decree No. 108 of 30 May 2008 as regards the Italian legislation and the European Communities (Cross-Border Mergers) Regulations 2008 (Statutory Instrument - S.I. No. 157 of 2008) as regards the Irish legislation.

The Merger transaction will become effective for legal, accounting and tax purposes on 1 December 2023 and aims to:

- simplify the corporate structure of the ISV Group, which currently consists of three companies operating in the life business (in addition to ISV and ISL, Fideuram Vita S.p.A.) and two engaged in the non-life business (Intesa Sanpaolo Assicura S.p.A. and Intesa Sanpaolo RBM Salute S.p.A.);
- concentrating in a single product factory all the resources necessary to cover the distribution channels of the Banca dei Territori Division of Intesa Sanpaolo S.p.A. and Intesa Sanpaolo Private Banking S.p.A.;
- achieve greater operating efficiency, through the standardisation of processes and systems, as well as develop synergies in risk management and internal control systems;

Intesa Sanpaolo Assicura S.p.A.

Intesa Sanpaolo Assicura S.p.A.

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

Share capital: euro 27,912,258.

Registered office and general management in Turin, Corso Inghilterra 3. Administrative offices in Turin, San Francesco 3, and in Milan, Viale Stelvio 55/57.

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

A registered insurance and reinsurance company, number: 1.00125.

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

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

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

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

At the organisational level, commercial activities are managed at the branches through the support of the aforementioned Bank 'Specialists'. The Company also provides technical support to the Specialists on individual cases that require in-depth contractual or procedural analysis. The Banca dei Territori managers can also access the Company call centre from which they receive assistance in handling all operational cases.

In 2022, the Company continued activities to provide the compulsory IVASS training to the professionals involved, which will be delivered through a dedicated digital platform.

In the 'Motor' area, the initiative to promote green mobility (free bike assistance cover for those who purchase the ViaggiaConMe a Consumo policy) was extended until the end of 2023. In addition, communication initiatives for policies in the ViaggiaConMe range were revised in order to steer purchases towards the digital channels, with focus on existing promotions and the advantages of the offer differentiated according to the needs of specific customer segments.

In terms of commercial offers, in continuity with the previously consolidated approach, new sustainable, high-value initiatives for customers have been devised; in particular, with regard to the "Non motor retail" business, the "A prima vista" promotion active from July 2022 offers a voucher of 100 euro for six months to all new customers of Intesa Sanpaolo RBM Salute who purchase one of its modules. The voucher can be used in Salmoiraghi&Viganò and Ray-Ban shops, for the purchase of prescription glasses, graduated sunglasses and eyecare glasses, such as those with a blue light filter, for people who make extensive use of electronic devices such as smartphones, tablets, PCs and TVs, or with photochromic lenses that adjust to changes in sunlight intensity.

Customer satisfaction continued to be monitored, through digital questionnaires proposed to customers at the end of the main after-sales processes and for which there has been a high level of customer response and interest. The process of monitoring satisfaction with the services offered also continued for the telephone services offered through the Customer Operations call centre. At the same time, telephone caring activities continued for customers who do not show full satisfaction with the services offered.

In 2022, activities continued to develop and differentiate the range of products and services for the Retail target.

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

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

Non-life insurance obligations:

- Medical costs insurance;
- Income protection insurance;
- Motor vehicle liability insurance;
- Other motor insurance;
- Marine, aviation and transport insurance;
- Fire and other damage to property insurance;
- General liability insurance;
- Credit and suretyship insurance;
- Legal expenses insurance;
- Assistance;
- Miscellaneous financial loss.

2022 saw an increase in collected premiums, for a total of 914.6 million euro, up by 0.8% compared to the final figure for 2021 (907.3 million euro).

The increase in written premiums is mainly attributable to the contribution from the merger with Cargeas Assicurazioni S.p.A. The Home and Family products performed well (+3.9% compared to 31 December 2021), similarly to the Health and Accident products (+5.1% compared to 31 December 2021) and Corporate products (+23.2% compared to 31 December 2021); written premiums for Motor products (-25.3% compared to 31 December 2021) and Credit Protection (-15.5% compared to 31 December 2021) decreased.

The Loss Ratio, which is a primary indicator of the cost effectiveness of the technical management of a non-life insurance undertaking, in terms of claims vs. earned premiums, was equal to 30% in 2022, down by 2% compared to 28% in 2021. The group's Non-life company carried out various ordinary transactions with companies in the Intesa Sanpaolo Group. These transactions took place under arm's-length conditions, based on reciprocal financial valuations. The company did not carry out any atypical or unusual transactions during the period, nor any intragroup, related party or third party transactions.

The main significant intra-group transaction pursuant to IVASS Regulation No. 30/2016 relating to FY2022 concerns the distribution of an extraordinary capital reserve amounting to 200.1 million euro to Intesa Sanpaolo Vita.

Fideuram Vita S.p.A.

Fideuram Vita S.p.A.

Company exercising the insurance business in the Life segment.

Share capital: euro 357,446,836.

Head office in Rome, Via Ennio Quirino Visconti 80.

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

A registered insurance and reinsurance company, number: 1.00175.

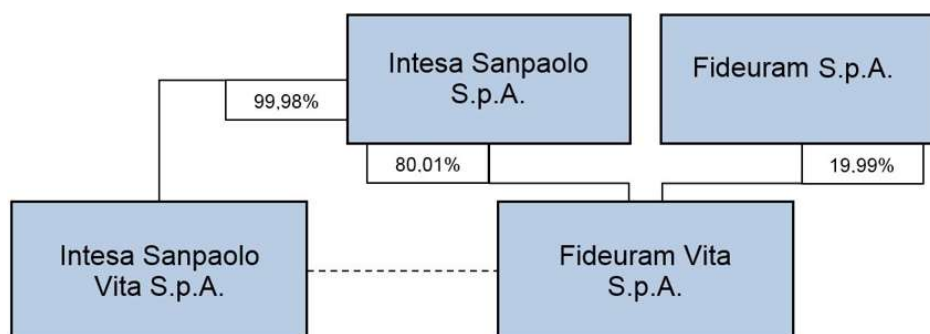
Fideuram Vita S.p.A. is held 80.01% by Intesa Sanpaolo S.p.A. and 19.99% by Fideuram-Intesa Sanpaolo Private Banking S.p.A., in brief Fideuram S.p.A.. Both companies have their registered office in Turin, Piazza San Carlo 156. The secondary office of Intesa Sanpaolo S.p.A. is in Milan, Via Monte di Pietà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

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

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

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

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



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

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

Fideuram Vita S.p.A. operates exclusively in the Life segment, in segments I, III, V and VI and offers the following solutions and products:

Life insurance obligations:

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

Fideuram Vita S.p.A. closed FY2022 with a net positive result of 46.2 million euro, achieved amid turbulent financial markets since the first part of the year, following the onset of the Russia-Ukraine crisis.

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

The following intragroup transactions were significant in 2022 for the purposes of IVASS Regulation no. 30/2016:

- opening and closing of a deposit with an Intesa Sanpaolo Group company as counterparty for 51.6 million euro;
- the signing of new policies with related parties of the Intesa Group, for 203.4 million euro;

[Intesa Sanpaolo Life D.A.C.](#)

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

Share capital: euro 625,000.

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

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

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

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

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

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

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

During 2022, the main events affecting the Company were the following:

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

In particular, in 2022 Intesa Sanpaolo Life issued a new insurance product and developed new internal funds that contributed to the range of funds offered as part of existing products.

The Insurance products are recognised in the financial statements, with premiums, payments and change in technical provisions being recorded in profit and loss; the commission from acquisitions and collections is recognised in profit and loss in the year of accrual. Deferred acquisition costs mainly include expenses incurred for the undertaking in the portfolio of a particular type of long-

term insurance contracts, that are amortised line by line for a period equal to the duration of each contract, which is less than ten years.

During 2022, Intesa Sanpaolo Life collected premiums of approximately 2.8 billion euro, mainly regarding unit-linked products, against early exits of 4.4 billion euro.

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

During the reporting period, the Company carried out the following material intragroup transactions for a total amount of 400.4 million euro:

- payment of commissions and for outsourcing services with companies of the Intesa Group as counterparties;
- payment of a dividend;
- entering into derivative contracts with an Intesa Group bank as counterparty.

Intesa Sanpaolo RBM Salute S.p.A.

Intesa Sanpaolo RBM Salute S.p.A.

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

Share capital: euro 305,208,000.

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

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

A registered insurance and reinsurance company, number: 1.00161.

As at 31 December 2022, Intesa Sanpaolo RBM Salute S.p.A. was controlled, managed and coordinated by Intesa Sanpaolo Vita S.p.A., that has a share equal to 73.8%, and belongs to the Insurance Group.

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

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

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

During 2022, Intesa Sanpaolo RBM Salute was confirmed as one of the main players in the healthcare sector. At present, ISP RBM provides insurance for the main Healthcare Funds and the biggest healthcare policies on the market.

For the distribution of its products, Intesa Sanpaolo RBM Salute has mainly relied on the direct channel. Also as a result of the ongoing integration of the company within the Group, there was significant growth in the banking channel, which benefited of ongoing synergies with the Intesa Sanpaolo group. At the same time, there was a decrease in the broker channel and an increase in the agency channel.

In the Intesa Sanpaolo channel, the increase in written premiums was driven by the XME Protection product, which continues to attract considerable interest from the Intesa Sanpaolo Group's retail customers.

A.2 UNDERWRITING RESULTS

Intesa Sanpaolo Vita Insurance Group

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

- gross production for the year, net of reinsurance, totalled approximately 16.218,4 million euro for the Life Business and 1.276,5 million euro for the Non-life Business, giving a total of 17.494,9 million euro. The Life segment is predominantly made up of products linked to the production of products connected with the "profit sharing contracts" LoB, equal to 8,219.9 million euro corresponding to 50% of the entire amount, up on the previous year;
- the Claims portion (including payouts for coupon redemptions and other payments), of 18,494.3 million euro, was down by 47.6% compared to the previous year. 51.6% relates mainly to segregated accounts, while 48.4% relates to products connected to unit-linked or pension policies;
- the change in other technical provisions increased by 20,901 million euro. this is due to the combined effect of the increase in technical provisions, mainly caused by commercial performance and financial revaluation of the insured.
- the total expenses of the Insurance Group amounted to 1.256,8 million euro, which included 864.6 million euro for the Life Business and 364.4 million euro for the Non-life Business. This figure indicates a decrease of approximately 6% compared to the previous year. These costs include agents' commission.

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

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting performance	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Insurance with profit participation	8,219,947	5,864,430	-9,548,904	-9,615,151	298,109	2,269,850	-230,353	-250,601				
Index-linked and unit-linked insurance	7,897,501	12,838,061	-8,808,496	-9,499,770	14,568,527	-8,360,697	-610,763	-655,369	-14,319	-7,799	11,787,743	-7,198,951
Other life insurance	101,009	186,423	-136,873	-58,126	75,867	131,376	-23,510	-41,578				
Total amount	16,218,458	18,888,913	-18,494,273	-19,173,047	14,942,503	-5,959,471	-864,625	-947,548	-14,319	-7,799		

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Medical expenses insurance	427,464	386,768	-336,091	-504,610	-2,447	-52,008	-57,509	-64,715				
Income protection insurance	382,956	328,267	-142,621	-80,898	474	2,105	-130,371	-116,959				
Motor vehicle liability insurance	79,477	109,526	-44,702	-60,982	-	-	-28,023	-32,686				
Other motor insurance	18,061	24,596	-9,932	-12,723	219	-55	-5,096	-7,869				
Marine, aviation and transport insurance	117	148	-303	15	27	-	-65	-27				
Fire and other damage to property insurance	188,039	180,257	-39,084	-31,467	11	-784	-88,570	-84,313	-13,535	-16,521	313,747	70,550
General liability insurance	90,684	84,695	-7,623	-7,378	-2	-	-33,159	-31,631				
Credit and suretyship insurance	785	1,001	-301	163	2	-	-123	-309				
Legal expenses insurance	5,329	7,682	198	-655	-	-	1,799	-224				
Assistance	13,178	14,629	-308	-344	-	-	-5,551	-7,463				
Miscellaneous financial loss	70,443	62,173	-2,367	-380	3	-7	-17,735	-16,467				
Total amount	1,276,533	1,199,742	-583,135	-699,259	-1,714	-50,749	-364,402	-362,663	-13,535	-16,521		

The rest of this Section reports on the underwriting results of the individual companies as shown in each Quantitative Reporting Template (QRT S.05.01) and also the underwriting results reclassified

to provide a comparison with the Separate Financial Statements prepared according to national accounting standards.

Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita S.p.A reported a loss of -319.1 million euro at year end 2022, including dividends distributed by the subsidiaries Intesa Sanpaolo Assicura S.p.A and Intesa Sanpaolo Life D.A.C totalling approximately 250 million euro, compared to a profit of 744.1 million euro in the previous year.

The result for the period is characterised by the turbulence on the financial markets that began in the first part of the year, following the start of the Russia-Ukraine crisis.

In this respect, the Company's statutory accounts:

- posted gross life premiums of 10,101.4 million euro, compared to 8,911.2 million euro at the end of the previous year, an increase of 13%;
- new life production amounted to 9,911.4 million euro, up 15% compared to 8,651.2 million as at 31 December 2021;
- the composition of the investments portfolio for segregated accounts, after the merger of former UBI Companies, maintained a considerable quota of fixed income securities issued by governments or government agencies (equal to 63.9% of total assets in segregated accounts).

With reference to the Group's governance areas, the guidelines developed during 2022 by the Company, also as Parent of the Insurance Group, focussed on the following aspects:

- completion of the process of integration of the former UBI life Companies, which were merged into Intesa Sanpaolo Vita S.p.A on 31 December 2021. Migration activities of former-UBI Life Insurance Companies' products were substantially completed with completion of the integration into the Customer Area of the Intesa Sanpaolo Vita S.p.A. website and consequent updating of the section that helps policyholders of these products to access the area, with a view to ensuring continuity of service for all the Company's customers. In addition, the three-year integration project of the Intesa Sanpaolo subsidiary RBM Salute S.p.A. was concluded. It had been launched in 2020. Finally, the merger of Cargeas Assicurazioni S.p.A. into Intesa Sanpaolo Assicura S.p.A. was finalised. From an internal control point of view, all the integrations carried out benefit from the target processes and systems of the Intesa Sanpaolo Vita Insurance Group;
- continuing the implementation of the Intesa Sanpaolo Vita Insurance Group's Digital Transformation, in order to ensure the continuity of essential customer services and critical business processes. In the course of this year, additional innovative functions were released for use by customers that can now enter instructions via the APP. The subject of digitisation is strategic and is also a pillar of the new Business Plan 2022/25; hence, we will continue in this direction in the coming years;
- completion of implementation activities for the IFRS17 accounting standard, in force as of 1 January 2023, with specific reference to all systems dedicated to providing input in the preparation of financial statements for all Insurance Group Companies.
- creation of a single Intesa Sanpaolo Vita Insurance Group governance to cover regulatory and strategic ESG requirements, expansion of the offer of sustainable investment options consistent with Articles 8 and 9 of the SFDR, and publication, following membership of the Net Zero Asset Owner Alliance, of 2030 interim targets. The Division confirmed its commitment to zero emissions by 2050.

As regards the above, Intesa Sanpaolo Vita S.p.A., at the date of approval of the financial statements:

- maintains its extremely important position in the domestic life market and, through its subsidiaries, continues to expand in the non-life market, also following the complete integration of the former UBI Companies;
- supports the network underpinning its commercial activity in a currently difficult market, also through promotional initiatives;
- continues to implement a risk reduction policy, constantly pursuing high levels of capital solvency.

On 11 February 2022, the share capital increase for valuable consideration of the subsidiary Intesa Sanpaolo RBM Salute was completed to strengthen the Company's capital; the amount of the increase was 36.2 million euro which was fully subscribed by the Parent Company Intesa Sanpaolo Vita S.p.A.

Upon completion of the transaction, the new share capital of Intesa Sanpaolo RBM Salute, following the necessary authorisations by IVASS and subsequent registration with the relevant Companies' Register, amounts to 305,208,000 euros.

Therefore, the shareholding previously held by Intesa Sanpaolo Vita S.p.A. increased from 70.3% of the share capital to 73.8%, with the minority shareholder RBHold holding the remaining 26.2%. The year 2022 was characterised by the inclusion, within the scope of Intesa Sanpaolo Vita S.p.A., of the segregated accounts from the former-UBI Companies: Assicurazioni Vita S.p.A., Lombarda Vita S.p.A. and BancAssurance Popolari S.p.A.

With a view to summarising the management logic adopted, we note that 2022 was characterised by an abrupt rise in the rate curves for the main geographical areas, especially Europe and the USA. This led to management choices mainly designed to increase the portfolios' duration and to diversify investment instruments given the new levels of yields and spreads in the various asset classes.

Premiums written in the year for the Life business were equal to 10,099.5 million euro, up by 13% compared to the figure for 2021 (8,905.2 million euro). The figure for the non-life business fell by 12%, from 496.0 thousand euro to 435.2 thousand euro.

Claims costs for the life business, net of amounts payable, decreased by 3% to 11,583.4 million euro from the previous year's figure of 12,003.5 million euro. In the non-life business, this figure was negligible. Below are the underwriting results divided according to Solvency II Line of business represented in the QRT S.05.01. The company only performs its underwriting activity in the Republic of Italy.

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Insurance with profit participation	7,587,210	5,643,650	-9,047,924	-9,123,017	540,664	2,072,227	-221,565	-242,468				
Indexlinked and unit-linked insurance	2,415,618	3,079,587	-2,399,793	-2,824,259	3,135,182	-1,477,294	-99,894	-116,451	-11,547	-4,762	1,911,852	-2,776,927
Other life insurance	96,692	181,963	-135,687	-56,242	76,148	131,446	-23,253	-41,308				
Total amount	10,099,520	8,905,200	-11,583,403	-12,003,518	3,751,994	726,380	-344,712	-400,226	-11,547	-4,762		

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Medical expenses insurance	3	3	-	-	-	-	-	-	-	-	-30	182
Income protection insurance	433	493	-218	-103	-	-	2	-247	-212	-		
Total amount	435	496	-218	-103	-	-	2	-247	-212	-		

The underwriting result was calculated on the basis of the data in the QRT S.05.01 (Premiums for the period – Claims + Changes in technical provisions – Operating Costs) and partially represents the company's underwriting result. This highlights an underwriting result that takes into account

the “Technical Interest” in the Life segment, and other “Expenses and Income” that were not included in the QRT S.05.01.

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

	<i>(euro thousands)</i>	
	2022	2021
Net premiums	10,099,955	8,905,696
Claims incurred	-11,583,621	-12,003,621
Changes in technical provisions	3,751,994	726,382
Operating cost	-356,506	-405,200
Underwriting Result (QRT S.05.01)	1,911,822	-2,776,744

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

	<i>(euro thousands)</i>	
	2022	2021
Net premiums	10,099,955	8,905,696
Claims incurred	-11,583,621	-12,003,621
Changes in technical provisions	3,751,994	726,382
Underwriting expenses	-136,971	-159,355
<i>Claims management expenses</i>	6,890	-4,702
<i>Acquisition expenses</i>	-143,861	-154,653
Technical interest	1,916,238	2,535,914
Underwriting Result	4,047,595	5,015

Intesa Sanpaolo Assicura S.p.A.

2022 saw an increase in written premiums, for a total of 914.6 million euro, up by 0.8% compared to the prior year figure (907.3 million euro).

The increase in written premiums is mainly attributable to the contribution from the merger with Cargeas Assicurazioni S.p.A.. The Home and Family products performed well (+3.9% compared to 31 December 2021), similarly to the Health and Accident products (+5.1% compared to 31 December 2021) and Corporate products (+23.2% compared to 31 December 2021); written premiums for Motor products (-25.3% compared to 31 December 2021) and Credit Protection (-15.5% compared to 31 December 2021) decreased.

Claims-related expenses net of recoveries and the effects of reinsurance and the change in the claims provision rose from 235.2 million euro in 2021 to 252.1 million euro, an increase on the previous year. The ratio of claims to premiums for the period, net of reinsurance effects, was equal to 30%, against 28% in 2021.

Total operating expenses, net of commissions and profit-sharing from reinsurers, amounted to 251.2 million euro as at 31 December 2022 (264.3 million euro as at 31 December 2021), a decrease of 5.0% or 13.1 million euro.

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

(euro thousands)

Line of Business	Premiums earned		Claims Incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Medical expenses insurance	16,867	20,776	-6,976	-4,404	463	-1,406	-4,559	-4,652				
Income protection insurance	344,623	285,498	-100,524	-71,741	474	2,103	-121,716	-97,951				
Motor vehicle liability insurance	79,477	69,897	-44,702	-43,730	0	0	-28,023	-21,206				
Other motor insurance	18,061	12,870	-9,932	-5,561	219	-27	-5,096	-3,961				
Marine, aviation and transport insurance	117	87	-303	-48	27	0	-65	-39				
Fire and other damage to property insurance	188,039	144,490	-39,084	-19,366	11	-679	-88,570	-64,373	-7,081	-4,962	306,823	281,163
General liability insurance	90,684	70,372	-7,623	-6,858	-2	0	-33,159	-23,880				
Credit and suretyship insurance	785	535	-301	137	2	0	-123	5				
Legal expenses insurance	5,329	984	198	-100	0	0	1,799	2,656				
Assistance	13,178	10,898	-308	-206	0	0	-5,551	-5,331				
Miscellaneous financial loss	70,117	56,052	-2,366	142	3	-7	-17,585	-15,852				
Total amount	827,277	672,460	-211,922	-151,733	1,196	-16	-302,647	-234,585	-7,081	-4,962		

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

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

(euro thousands)

	2022	2021
Net premiums	827,277	672,460
Claims incurred	-211,922	-151,733
Changes in technical provisions	1,196	-16
Operating cost	-309,727	-239,547
Underwriting Result (QRT S.05.01)	306,824	281,163

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

(euro thousands)

	2022	2021
Net premiums	827,277	672,460
Claims incurred	-211,922	-151,733
Changes in technical provisions	1,196	-16
Underwriting expenses	-225,022	-186,439
<i>Claims management expenses</i>	-40,223	-24,564
<i>Acquisition expenses</i>	-184,799	-161,875
Underwriting Result	391,529	334,271

Fideuram Vita S.p.A.

With reference to the QRT S.05.01 annexed to this Report, which has been summarised and compared against the results for 2022, please note the following.

gross life written premiums of 3,272.3 million euro were down by 1,199.6 million euro year-on-year (-26.8%), with a decline in premiums written in class III (-1,625.8 million euro) and an increase in premiums written in class I (+413.5 million euro);

new life production amounted to 3,221.7 million, down 27.1% over 31 December 2021, underperforming the Italian Insurance Market, including companies with freedom to provide services, that recorded a 30.9% growth over the previous year (September 2021);

- The composition of the investment portfolio for the segregated accounts maintained a predominant share of securities issued by governments of countries in the Euro area or by supranational entities (or 66.7% of total assets in the segregated accounts, in line with 31 December 2021);

Special emphasis is placed on the Company's strategic vision on investments geared towards generating value for both the customer and the Group in the ESG area, consistent with the Sustainability Policy adopted by the Company.

Claims paid, net of settlement costs, amounted to 2,467.8 million euro, down by 13.4%.

Sums paid and to pay, net of the amount payable by reinsurers, amounted to 2,485.4 million, decreasing by 13.5% compared to 2021.

Operating expenses amounted to 20.3 million euro compared to 20.1 million euro in the previous year.

This performance reflects a positive technical balance in the Life segments of 50.8 million euro, compared to 89.4 million euro in 2021.

The total underwriting result was 5,065.2 million euro compared to -2,167 million euro in 2021. The change is mainly attributable to the decrease in class III and VI technical reserves due to the decrease in the market value of managed assets.

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

(euro thousands)

Line of Business	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Other expenses		Total underwriting Result	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Insurance with profit participation	632,737	220,780	-500,980	-492,134	-242,555	197,623	-8,788	-8,133				
Index-linked and unit-linked insurance	2,632,373	4,245,529	-1,973,725	-2,366,402	4,555,190	-3,934,801	-28,850	-28,811	-2,773	-3,036	5,065,221	-2,167,151
Other life insurance	4,317	4,459	-1,186	-1,883	-282	-70	-257	-271				
Total amount	3,269,427	4,470,768	-2,475,891	-2,860,419	4,312,353	-3,737,248	-37,895	-37,215	-2,773	-3,036		

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

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

(euro thousands)

	2022	2021
Net premiums	3,269,427	4,470,768
Claims incurred	-2,475,892	-2,860,419
Changes in technical provisions	4,312,354	-3,737,248
Operating cost	-40,668	-40,252
Underwriting Result (QRT S.05.01)	5,065,221	- 2,167,151

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

	(euro thousands)	
	2022	2021
Net premiums	3,269,427	4,470,768
Claims incurred	-2,475,892	-2,860,419
Changes in technical provisions	4,312,354	-3,737,248
Underwriting expenses	-9,986	-8,209
<i>Claims management expenses</i>	-4,002	-2,932
<i>Acquisition expenses</i>	-5,984	-5,277
Technical interest	-5,111,172	2,118,904
Underwriting Result	-15,269	-16,204

Intesa Sanpaolo Life D.A.C

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

During the year the Company's written premiums amounted to 2,849.5 million euro, down on the previous year (5,513.0 million euro). On the other hand payments, mainly due to surrenders, amounted to 4,435.0 million euro, essentially stable on the 4,309.1 million euro of the previous year.

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

Line of Business	(euro thousands)									
	Premiums earned		Claims incurred		Changes in other technical provisions		Expenses incurred		Total underwriting Result	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Index-linked and unit-linked insurance	2,849,511	5,512,945	-4,434,979	-4,309,109	6,878,155	-2,948,602	-482,018	-510,107	4,810,670	-2,254,873
Total amount	2,849,511	5,512,945	-4,434,979	-4,309,109	6,878,155	-2,948,602	-482,018	-510,107		

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

	(euro thousands)	
	2022	2021
Net premiums	2,849,511	5,512,945
Claims incurred	-4,434,979	-4,309,109
Changes in technical provisions	6,878,155	-2,948,602
Operating cost	-482,018	-510,107
Underwriting Result (QRT S.05.01)	4,810,670	-2,254,873

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

	(euro thousands)	
	2022	2021
Net fund margin	350,728	397,015
Acquisition expenses	-127,428	-144,530
Net deferred income	-506	-1,368
Other	104	168
Underwriting Result	222,897	251,284

Intesa Sanpaolo RBM Salute S.p.A.

Premium income increased by approximately 2% compared to the previous year, thanks to the synergies implemented after the company became part of the Intesa Sanpaolo Group, with the integration of the Company's health offering into the XME Protezione product and the new range of collective products distributed through the Banca dei Territori Division, which met with an excellent response from customers.

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

Gross premiums recognised, equal to 520.8 million euro - and referring nearly entirely to the health insurance segment, equal to 519.7 million euro - were up 2% compared to the previous year (509.4 million euro in 2021).

Claims-related expenses net of recoveries and the effects of reinsurance, declined from 505.6 million euro in 2021 to 386.5 million euro.

Operating expenses amounted to 67.9 million euro, an increase compared to the previous year (56.5 million euro) due to the management of the integration process of Intesa Sanpaolo RBM Salute into the Intesa Sanpaolo Group, the strengthening of various Company structures and the increased incidence of commissions due to the use of the bank channel for the distribution of the new product created from the synergy with the Banca dei Territori Division.

Technical operations generated a positive result of 8 million euro (positive for 252 million euro at 31 December 2021), with a combined technical account ratio, net of reinsurance, of 97.5% (compared to 150.9% in 2021).

With regard to reinsurance policy, the year 2022 saw the signing of new reinsurance treaties in the Health and Assistance lines of business. Total premiums transferred to reinsurers were down (58 million euro compared to 140 million euro in the previous year), accounting for about 11% of gross premiums written. The result at 31 December 2022 recognised a revenue of 6.4 million euro, of which 6.6 million euro attributable to quota arrangements and a negative 0.2 million euro for arrangements in excess of claims.

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

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

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

Line of Business	Premiums earned		Claims incurred		Changes in other technical		Expenses incurred		Other expenses		Total underwriting Result	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Medical expenses insurance	410,595	348,163	-329,115	-493,071	-2,910	-50,602	-52,950	-56,527	-	-		
Income protection insurance	37,901	-	-41,879	-	-	-	-8,408	-	-6,454	-	6,954	-252,037
Miscellaneous financial loss	325	-	-1	-	-	-	-150	-	-	-	-	-
Total amount	410,595	348,163	-329,115	-493,071	-2,910	-50,602	-52,950	-56,527	-6,454	-		

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

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

	(euro thousands)	
	2022	2021
Net premiums	448,821	348,163
Claims incurred	-370,995	-493,071
Changes in technical provisions	-2,910	-50,602
Operating cost	-67,962	-56,527
Underwriting Result (QRT S.05.01)	6,954	-252,037

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

	(euro thousands)	
	2022	2021
Net premiums	448,821	348,163
Claims incurred	-370,995	-493,071
Changes in technical provisions	-2,910	-50,602
Underwriting expenses	-48,507	-42,024
<i>Claims management expenses</i>	-16,248	-12,554
<i>Acquisition expenses</i>	-32,259	-29,470
Underwriting Result	26,409	-237,534

A.3 INVESTMENT RESULTS

Intesa Sanpaolo Vita Insurance Group

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

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

	(euro thousands)			
Asset Class	2022	2021	Change	
Real estate investments	52	51	-	-
Partecipations	-145	-900	0.1%	0.3%
Loans and receivables	6,523	7,409	-2.3%	-2.6%
Financial assets available-for-sale	2,213,069	2,378,559	-776.8%	<100%
Financial assets held-for-trading	33,145	-98,284	-11.6%	34.5%
Financial assets designates at fair value through profit or loss	-9,747,776	5,198,972	3421.7%	>100%
Cash and cash equivalents	2,079	-4,625	-0.7%	1.6%
Financial liabilities held-for-trading	7,535	-21,846	-2.6%	7.7%
Financial liabilities designated at fair value through profit or loss	7,281,054	-4,512,694	-2555.8%	<100%
Other financial liabilities	-80,418	-79,363	28.2%	27.9%
Total investments	-284,882	2,867,278	100%	<100%

The closing balance of investment income from financial management, net of capital and financial charges, was equal to -284 million euro compared to 2,867 million euro in the prior year.

The Group's investment operations carried out in 2022 were consistent with the guidelines defined by the Finance Policy of the Group Companies and, in particular, in compliance with the general principles of prudence and of promoting the quality of assets in the medium and long term.

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

Intesa Sanpaolo Vita S.p.A.

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

Following the market turbulence that characterised the course of 2022 and that negatively affected the Company's equity and financial situation, the Company exercised the option under IVASS Regulation no. 52/2022, as amended and supplemented by IVASS Order no. 127 of 14 February 2023, which implemented Article 45, paragraphs 3-octies, 3-novies and 3-decies of Decree-Law no. 73 of 21 June 2022, converted with amendments into Law no. 122 of 4 August 2022; by virtue of the option, given the exceptional turbulence of financial markets, companies that do not adopt international accounting standards are allowed to depart from the Italian Civil Code rules on the valuation of current securities, in the financial year in progress at the date of entry into force of the aforementioned decree.

By virtue of the aforementioned rule, the Company measured its securities allocated to the "non-current" segment for the year 2022 on the basis of their carrying amount in the 2021 financial statements instead of their realisable value. This led to the suspension of value adjustments totalling 4,462.6 million euro with the resulting benefit being reflected in the result for the year. As a result of not making any write-down, a portion of the share premium reserve was allocated to the creation of an unavailable profit reserve in shareholders' equity in the amount of 941.1 million euro. At the year-end valuation stage, the Company's non-current securities generated total net value adjustments of -1,618,448 thousand, compared to -311,033 thousand last year, up by -1,307,415 thousand.

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

<i>(euro thousands)</i>			
Asset Class	2022	2021	
Total investments (Shareholder return)			
Government bonds	931,143	1,360,974	
Corporate bonds	-246,135	439,321	
Equity	547,601	745,480	
Derivatives	-64,667	-95,349	
Other investments	-	-	
Total investments (Shareholder return)	1,167,942	2,450,426	
Total investments (Policyholder return)			
Government bonds	-127,260	-14,194	
Corporate bonds	-17,890	-567	
Equity	-2,774,980	2,016,869	
Derivatives	-27,281	-130,277	
Other investments	-	-	
Total investments (Policyholder return)	-2,947,411	1,871,831	
Total investments	-1,779,469	4,322,257	

The determining factor of the year's results was financial management, with income from investments, net of capital and financial charges amounting to -1.779,5 million euro, decreasing compared to the previous year (4.322,2 million euro). The most significant change was seen in the instruments linked to Class D investment products.

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

<i>(euro thousands)</i>		
	2022	2021
Investment income and expense	-1,703,086	4,247,793
Investment management expense	-74,921	-73,577
Technical interest	-1,916,238	-2,535,914
Investment Result	-3,694,246	1,638,301

Intesa Sanpaolo Assicura S.p.A.

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

<i>(euro thousands)</i>			
Asset Class	2022	2021	
Government bonds	-	48.366	5.643
Corporate bonds	-	6.096	-
Equity	-	27.654	7.937
Structured Bonds	-	998	109
Derivatives	-	-	-
Other investments	-	-	-
Total investments	-83.114	13.688	

The closing balance of investment income from financial operations, net of capital and financial charges, was -83.1 million, down compared to 13.7 million euro in 2021.

Intesa Sanpaolo Assicura does not hold any investments in securitisations.

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

	<i>(euro thousands)</i>	
	2022	2021
Investment income and expense	26,052	24,192
Investment management expense	-109,174	-10,588
Investment Result	-83,122	13,603

Fideuram Vita S.p.A.

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

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

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

The closing balance of investment income from financial management, net of capital and financial charges, was equal to -4,545 million euro.

	<i>(euro thousands)</i>	
Asset Class	2022	2021
Total investments (Shareholder return)		
Government bonds	147,095	132,730
Corporate bonds	-	12,504
Equity	3,310	5,640
Investment funds Collective Investment Undertakings	15,231	5,685
Structured Bonds	-	4,694
Derivatives	-380	-1,685
Total investments (Shareholder return)	148,058	157,061
Total investments (Policyholder return)		
Government bonds	-5,923	-4,893
Corporate bonds	-	70,226
Equity	-	4,219,813
Investment funds Collective Investment Undertakings	-	228,393
Structured Bonds	-	3,149
Derivatives	-74,569	-82,268
Total investments (Policyholder return)	-4,602,073	2,703,619
Total investments	-4,454,015	2,860,679

Income from Class C net investments, made in relation to traditional policies and free assets, amounted to 148.1 million euro, slightly down from the previous year. The breakdown of this item is as follows:

- ordinary net income of 204.5 million euro;
- realised gains and losses of -5.8 million euro;
- net value adjustments of -50.6 million euro.

Class D net income referring to assets underlying Unit-Linked policies and pension Funds, wholly attributable to insured, amounted to -4,602 million euro, including net gains realised and net gains from valuation. In 2021, this item was positive by 2,072 million euro.

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

	<i>(euro thousands)</i>	
	2022	2021
Investment income and expense	4,545,229	2,831,045
Investment management expense	-8,418	-7,351
Technical interest	5,111,172	-2,118,904
Investment Result	557,525	704,790

Intesa Sanpaolo Life D.A.C.

The company's share of the return on investments was equal to 2.9 million euro. The result derives from a prudent policy of investing in secure short-term liquid assets with a high credit rating.

	<i>(euro thousands)</i>	
Asset Class	2022	2021
Policyholder Investment Return	-5,347,213	1,688,526
Shareholder Investment Return	2,942	8,994

Intesa Sanpaolo Life does not hold any investments in securitisations.

Intesa Sanpaolo RBM Salute S.p.A.

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

	<i>(euro thousands)</i>	
Asset Class	2022	2021
Government bonds	430,132	288,815
Corporate bonds	-	-
Equity	45	50
Derivatives	-	-
Other investments	-	-
Total investments	430,177	288,865

The closing balance of investment income from financial operations, net of capital and financial charges, was a negative 21.4 million, down on negative 1.2 million in 2021.

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

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

	<i>(euro thousands)</i>	
	2022	2021
Investment income and expense	-21,434	-1,143
Investment management expense	-	-
Investment Result	-21,434	-1,143

A.4 RESULTS OF OTHER ACTIVITIES

Intesa Sanpaolo Vita Insurance Group

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

This item amounted to 387,495 thousand euro (317,760 thousand euro as at 31 December 2021) and mainly consisted of other technical income, predominantly attributable to management fees on unit-linked products and exchange rate differences related to investments.

The item, amounting to 814,272 thousand euro (921,032 thousand euro at 31 December 2021), includes the net provisions for risks and charges of 25,205 thousand euro, the adjustments in the value of tangible and intangible assets of 16,968 thousand euro, the exchange differences to be recorded in the income statement of 30,016 thousand euro, plus other technical costs of 683,143 thousand euro. This last amount is mainly comprised of trail commission paid to the sales network.

(euro thousands)

	Income		Expense		Result	
	2022	2021	2022	2021	2022	2021
Other income/expenses	387,495	317,760	-814,272	-921,032	-426,777	-603,272
Extraordinary income/ expense	-	-	-	-	-	-
Other activities	387,495	317,760	-814,272	-921,032	-426,777	-603,272

Intesa Sanpaolo Vita S.p.A.

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

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

(euro thousands)

	Income		Expense		Result	
	2022	2021	2022	2021	2022	2021
Other income/expenses	-	-	-101,168	-86,581	-101,168	-86,581
Extraordinary income/ expense	9,784	37,510	-1,230	-3,531	8,554	34,159
Other activities	9,784	37,510	-102,398	-89,932	-92,614	-52,422

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

(euro thousands)

Overall performance	2021	2020
Underwriting performance	-85,843	-294,939
Investment performance	-354,478	1,202,301
Performance of other activities	337,935	-52,602
Other P&L items	-1,396	-1,378
Taxes	-215,274	-109,251
Net result	-319,055	744,131

Intesa Sanpaolo Assicura S.p.A.

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

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

(euro thousands)

	Income		Expense		Result	
	2022	2021	2022	2021	2022	2021
Other income/expenses	14,240	4,443	-7,495	-8,103	6,745	-3,660
Extraordinary income/ expense	683	621	-1,539	-308	-856	313
Other activities	14,923	5,064	-9,034	-8,411	5,889	-3,347

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

(euro thousands)

Overall performance	2021	2020
Underwriting performance	616,551	520,710
Investment performance	-83,122	13,603
Overhead and administrative expenses	-363,981	-268,071
Performance of other activities	12,632	-3,346
Other P&L items	-555	-260
Taxes	-61,832	-80,426
Net result	119,693	182,210

Fideuram Vita S.p.A.

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

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

(euro thousands)

	Income		Expense		Result	
	2022	2021	2022	2021	2022	2021
Other income/expenses	6,085	-13,028	5,945	-13,442	140	414
Extraordinary income/ expense	158	-218	514	-579	-356	361
Other activities	6,243	-13,246	6,459	-14,021	-216	775

Other income amounts to 6.1 million euro and relates mainly to amounts recovered from other Insurance Group companies for the cost of personnel on secondment (5.2 million euro). The Other costs item amounts to -13 million euro and mainly includes 5.5 million of costs paid to third parties, 4.1 million euro of interest payable on subordinated loans, 2.7 million euro for the amortisation of intangible assets.

The balance for the other income components is negative by -449 million euro, mainly attributable to the share of management costs deducted from the unit-linked policies, retroceded to the distributors. This item also includes the trail commission payable on certain profit-sharing policies, the management costs for Class D investments and other technical items.

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

	<i>(euro thousands)</i>	
Overall performance	2022	2021
Underwriting performance	-15,269	-16,204
Investment performance	557,525	704,791
Overhead and administrative expenses	-22,264	-24,692
Performance of other activities	-7,003	-7,563
Other P&L items	-449,045	-552,222
Taxes	-17,791	-28,934
Net result	46,153	75,176

Intesa Sanpaolo Life D.A.C

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

	<i>(euro thousands)</i>	
	2022	2021
Operations expenses	-35,557	-30,423
Fund administration expenses	-8,812	-8,995
Other income and expenses	-679	-606
Other P&L items	-92,418	-2,417
Other technical income and expenses		-
Net result	-137,467	-42,441

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

	<i>(euro thousands)</i>	
	2022	2021
Underwriting performance - local report	222,897	251,284
Investment performance	2,942	8,994
Other P&L items	-137,467	-42,441
Taxes	-14,069	-27,718
Net result	74,304	190,119

Intesa Sanpaolo RBM Salute S.p.A

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

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

<i>(euro thousands)</i>						
	Income		Expense		Result	
	2022	2021	2022	2021	2022	2021
Other income/expenses	127,648	1,725	-6,570	-175,425	121,078	-173,700
Extraordinary income/ expense	2,554	2,061	-1,204	-2,821	1,350	-760
Other activities	130,202	3,786	-7,774	-178,246	122,428	-174,460

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

<i>(euro thousands)</i>		
Overall performance	2022	2021
Underwriting performance	21,830	-237,534
Investment performance	-21,434	-1,143
Overhead and administrative expenses	-13,789	-14,503
Performance of other activities	-	-
Other P&L items	122,428	-174,460
Taxes	-27,202	101,922
Net result	81,833	-325,718

A.5 OTHER INFORMATION

With regard to the current market environment as affected by the events in Russia and Ukraine, the Group has no significant exposure to these countries.



B. GOVERNANCE SYSTEM

B.1 GENERAL INFORMATION ABOUT THE GOVERNANCE SYSTEM

Intesa Sanpaolo Vita Insurance Group

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

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

The Insurance Group Regulations provide for the following in particular:

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

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

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

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

The USCI informs the other Insurance Group companies of:

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

Insurance Group companies are required to:

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

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

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

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

The consolidated data includes:

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

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

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

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

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

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

Coordination between the executive and supervisory bodies and key functions

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

The methods of communication transmissions among the Core Functions are agreed between the parties concerned and are such as to ensure the timeliness and traceability of the exchange; finally, sent documentation is archived and stored by the respective sending Organizational Unit.

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

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

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

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

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

Remuneration system and salary policies

The Insurance Group Companies are required to implement the Remuneration Policies of the Insurance Group - defined by Intesa Sanpaolo Vita as Ultimate Parent Company (USCI) - as well

as the governance regulation of the Parent Company Intesa Sanpaolo by setting out, where necessary, specific mechanisms that also take into account sector regulations and governance constraints, which are mainly contained in the provisions of IVASS Regulation no. 38/2018.

In the preparation of the Remuneration Policies document for the year 2022, in line with the previous year, account was taken of the enactment of European Regulation 2019/2088 on sustainability reporting in the financial services sector, which, inter alia, requires financial market participants to include information in their remuneration policies on how these policies are consistent with the integration of sustainability risks into the risk management system.

The Remuneration Policies applied in 2022 were based on the following principles:

- **correlation between remuneration and risks undertaken:**
- steering management and personnel behaviour towards achieving objectives in a framework of rules centred on the control of business risks;
- remuneration systems aligned with financial and non-financial risk management policies, in line with indications in the Insurance Group's Risk Appetite Framework;
- definition of a fixed component that is sufficiently high to enable the variable part to significantly decrease and reset to zero if certain conditions occur.
- **orientation of medium- and long-term objectives taking into account the Group's risk tolerance:**
 - definition of Incentive Systems that allow the performance to be oriented over a multi-year accrual period and the sharing of the medium to long-term results achieved in implementation of the Intesa Sanpaolo Group's Business Plan; merit:
 - in terms of salary flexibility, in order to recognise bonuses related to achieving results and undertaking risks, competitiveness such as focussing on key resources and senior managers, and their competitive salary positioning in relation to the market and recognition of above-average bonuses to top performers;
- **Fairness:**
 - in terms of correlation between fixed remuneration and level of responsibility measured through the Global Banding system or seniority/professional role, as well as differentiation of remuneration targets and of the weight of the variable component on the global remuneration according to the relevant professional area and/or geographic market, for a same Banding band or seniority/professional role;
- **gender neutrality:**
 - granting an equal level of remuneration for equal work performed, regardless of gender; attention to the gender pay gap and its evolution over time.

sustainability, in terms of keeping the expenses from adopting the policy within values that are compatible with available financial resources;

- through selective actions on fixed remuneration based on strict market benchmarks; mechanisms for adjusting the provisions intended to finance the overall incentives according to the profitability and results achieved by the Insurance Group; appropriate caps on both the overall incentives and the size of individual bonuses;
- **compliance with regulatory requirements:**

-
- in compliance with codes of conduct and other self-regulatory provisions, with focus on Key Personnel including Risk Takers and Core Functions, as well as fairness in relations with customers.

Remuneration policy of the Company's governing bodies

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

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

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

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

In general, there are no differences in the determination of the remuneration of directors, whether they are employees of the Group or independent professionals. The remuneration of Group employees appointed as directors in subsidiaries is paid to the company that has entered into the employment contract.

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

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

As a rule, the members of the corporate bodies are entitled to reimbursement of the out-of-pocket expenses incurred in the performance of their office. Finally, a Directors & Officers liability cover ('D &O' policy), which also includes a professional indemnity cover, is taken out in favour of the officers of the Insurance Group.

Staff segmentation

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

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

- A. Key Personnel (including ISP Group Risk Takers);

B. Middle Management (managers who are not identified as key personnel);

C. Professional.

Remuneration components

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

Fixed component

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

The fixed component includes:

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

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

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

Variable component

The variable component is linked to personnel performance and is symmetrical with respect to the results actually achieved and the risks prudently assumed; it includes a **short-term annual variable component** (the Annual Incentive Schemes and the Variable Company Bonus (PAV)) and a **long-term variable component** which has the same duration as that of the 2022-2025 ISP Group's Business Plan the Performance-based plan (for Key Personnel) and the LECOIP 3.0 plan for Professionals.

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

Pay mix

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

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

- allow for a flexible management of labour costs, as the variable portion may significantly decline, even down to zero, depending on the performance actually achieved during the year in question;
- discourage behaviours focused on the achievement of short-term results, particularly if these involve taking on greater risk.

Ratio of variable to fixed remuneration

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

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

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

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

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

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

- overall bonus funding condition, i.e. mechanisms for determining the amount of financial resources available to fund the incentive schemes related to the performance of predefined conditions. The failure to fulfil even one of these condition means that the Intesa Sanpaolo Group bonus pool is not activated. The principle of financial sustainability is set out also at an individual Company level, both on an ex-ante and ex-post basis; in line with the regulations applicable to the banking parent company (i.e., the EBA Guidelines on sound remuneration policies) in 2022, the gate and bonus funding conditions of the annual Incentive Schemes were amended and, by symmetry, also the malus conditions, by introducing - also for the ISP Group - the verification of the leverage ratio and the minimum amount of eligible own funds

and liabilities (MREL) with respect to the limits set out in the Risk Appetite Framework, as well as the outcome of the ICAAP and the recommendations on (dividend) distributions by the relevant authorities and the European Supervisory Authorities; moreover, in line with the ISP Group, an adjustment mechanism has been adopted on the total bonus allocated to each Division according to the degree of deviation from the target Economic Value Added (EVA) in order to strengthen the link with Pillar 2 metrics as requested by the Supervisory Authority to the banking parent company.

- **performance measurement** based on several dimensions, both through economic-financial KPIs (profitability, growth, productivity, and cost of risk/sustainability), and non-financial quantitative and qualitative KPIs (e.g. projects, managerial qualities, virtuous conduct aimed at achieving the Business Plan). In keeping with 2018, a cross-sectional ISP Group 'Environmental, Social and Governance (ESG)' KPI was confirmed for 2022, identified as one of the strategic actions. In addition, a transversal KPI has been confirmed for Key Personnel of the Core Functions, again for 2022, represented by the objective of "Risk Culture - Promotion of awareness at all levels of the organisation with respect to emerging risks with special focus on those related to technological innovation through information, awareness and training actions".

Furthermore, the 2022 Remuneration Policies provide for the application of variable remuneration deferral mechanisms, also with financial instruments, over a multi-year period, and the payment of the amounts deferred in subsequent years always occurs when the minimum regulatory conditions are met in addition to being subject to malus and clawback mechanisms.

With the aim of increasing awareness on the subject of remuneration of the Corporate Bodies, of the Heads of the Core Functions and of Key Personnel as defined by the Regulation, an analytical disclosure of quantitative data on the remuneration and fees assigned to said persons is envisaged as part of the reporting to shareholders and to IVASS pursuant to Articles 59(2) and 93(6) of Regulation No. 38 of 3 July 2018 and detailed in table annex No. 3 to the Regulation.

The Remuneration Report of the Insurance Group was prepared pursuant to Article 71(2) n) of the Regulation and meets the obligations of the combined provisions of Articles 93(6) and 59(1)(2) of the Regulation to report to the Shareholders' Meeting on 2022 Remuneration and Incentive Policies and on the adoption of these policies.

The Intesa Sanpaolo Vita Insurance Group's Report was defined by the Board of Directors of the USCI on 5 May 2022 and submitted to the Shareholders' Meeting for approval on the same date.

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

Operations with shareholders and persons of influence

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

The Insurance Group Companies have internal procedures and internal regulations which are designed to identify and regulate operational situations that could give rise to potential conflicts

of interest deriving from group relations, their own business relations, or those of Intesa Sanpaolo Group companies.

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

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

Self-assessment of the management board

Article 71, paragraph 2 bb) of the IVASS Regulation 38/2018, in setting out the responsibilities of the management board of the USCI at an Insurance Group level with a view to improving the efficiency of the operational process as part of its strategic and organisational duties, and to assess the adequacy of the insurance companies' structure, requires the Board of Directors of the USCI to assess, at least once a year, the composition and efficient functioning of the executive body of the USCI overall, and of its committees, expressing guidelines for the professional roles who should be included on the Board, also considering the group structure, and proposing any corrective actions. It also requires the Board to verify that there is a numerically adequate presence, in relation to the activity carried out, of independent members, i.e. those without executive powers and who supervise with autonomous judgement on the company affairs, with a view to ensure that they are carried out in the interests of the company and in line with the objectives of sound and prudent management.

For the above purposes, each Director of the USCI in office in 2022 was sent three questionnaires referring to the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee respectively, with questions on the role of the USCI of Intesa Sanpaolo Vita and the Insurance Group.

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

(i) confirmed the following for 2022:

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

- the Board's decision-making process was fuelled by prompt, effective information flows, and was overall effective despite the remote participation methods largely used also in 2022 and the minutes of all discussions and resolutions were considered to be complete and accurate;

- the size of the Board of Directors, the Remuneration Committee and the Internal Control and Risks Committee was such as to ensure effective functioning in relation to the complexity, size and objectives of the Company and Insurance Group;

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

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

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

The analysis, which was presented to the Board of Directors on 22 February 2023, indicated that the overall framework was on average positive for 2022, with the composition, functioning and size of the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee considered to be adequate also in its capacity as USCI.

In 2022, following IVASS authorisation of the merger received on 22 June 2022, Cargeas Assicurazioni S.p.A. was merged into Intesa Sanpaolo Assicura S.p.A. effective 1 October 2022.

Intesa Sanpaolo Vita S.p.A.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Board of Statutory Auditors of Intesa Sanpaolo Vita S.p.A. in office at 31 December 2022 was appointed during the Shareholders' Meeting of 6 April 2022 and comprises 5 members, of whom 3 standing members, appointed by the Chair, and two substitute members, who all meet the requirements of integrity, professionalism and independence as required by current legislation.

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

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

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

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

Management committees:

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

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

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

The Remuneration Committee consists of three non-executive members of the Board of Directors, a majority of whom is independent pursuant to Article 2387 of the Italian Civil Code, the Chairman being appointed from among them. the Committee has advisory functions and submits proposals to the Board of Directors with respect to the definition of remuneration policies in favour of the corporate bodies and personnel of the Company and the Insurance Group.

The USCI Head of Personnel and Organisation participates in the Remuneration Committee as Secretary; the Chairman of the Committee, in relation to individual items on the agenda, may from time to time arrange to invite to meetings other persons from the Company, other Group companies or Intesa Sanpaolo S.p.A., whose presence is considered helpful in fulfilling the Committee's functions regarding each item on the agenda. In particular, in meetings where issues related to remuneration policies are examined, the Chairman convenes the Core Functions involved, so that they may present the Reports on the activities falling within their respective responsibilities as per Article 58(1) of Regulation 38. The meetings of the Remuneration Committee are held according to a calendar defined in view of fulfilling its various tasks and in any case at least twice a year when the remuneration policies are reviewed and to provide adequate information to the Shareholders' Meeting on the application of said policies, also for the other Companies of the Insurance Group.

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

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

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

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

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

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

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

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

Their main tasks are detailed below:

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

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

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

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

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

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

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

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

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

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

The Compliance Function is independent and hierarchically separate from operational functions.

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

The Chief Compliance Officer was appointed by the governing body and also holds the position of AML Officer and Data Protection Officer (DPO) within Intesa Sanpaolo Vita.

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

The overall architecture of the risk management and control system regarding privacy is set out in the Guidelines of the Parent Company Intesa Sanpaolo, which establish - for Insurance Group

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

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

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

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

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

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

- monitors the risk of money laundering, terrorist financing, embargo violation and risk of corruption, and in this context, the suitability of the internal controls system and procedures adopted;
- carries out AML steering and coordination activities in the Group;
- advises corporate functions on anti-money laundering, anti-corruption, combating terrorism and managing embargoes
- verifies that the company's procedures are consistent with the aim of preventing and combating breaches of applicable external and internal regulations, and in particular:
 - reviews level one suspicious activity reporting, and prepares cases for final evaluation by the Head of Suspicious Activity Reporting;
 - prepares adequate information flows for the corporate bodies of the Company and other entities involved;
 - ensures information required by legislation is correctly entered in the AUI (Single Electronic Archive);
 - prepares an adequate training plan to ensure the continual professional development of personnel and staff, assisted by other company functions responsible for training;
 - sends aggregate data on the above records to the FIU (Financial Information Unit) each month;
 - carries out second level controls, in particular on operating entities
 - carries out Enhanced Due Diligence;
- reports to the Parent Company Intesa Sanpaolo;
- as regards new products, assists relevant functions in advance, in order to identify adequate controls to monitor and mitigate the risk of money laundering and terrorist financing (AML Clearing);

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- carries out the assessment of the residual risk profile of money laundering, terrorist financing and breach of embargoes on the basis of the "AFC Risk Assessment" methodology, coordinating its exercise also at Group level;
 - oversees, for all Group companies, the regulatory area across the Insurance Group in relation to Legislative Decree 231/2001.

The Actuarial Department's main tasks are as follows:

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

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2022.

Coordination between the executive and supervisory bodies and key functions

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

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

Core and control functions are coordinated, through the involvement of the functions in the Controls Coordination Committee, and through the exchange of information flows. The auditing

firm, the Board of Statutory Auditors, the Supervisory Board and the Administration and Finance Governance (GAF) and Regulatory Agenda Organisational Unit also come under the scope of the internal control system Policy of Intesa Sanpaolo Vita Group, as participants in the system of controls.

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

Each control function performs its activities through a dedicated department.

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

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

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

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

During 2022, the scope of the Insurance Group was updated as a result:

- of the incorporation in February of an instrumental company initially called newcoTPA S.p.A. and subsequently (June) renamed InSalute Servizi S.p.A.;
- of the merger of Cargeas Assicurazioni S.p.A. into Intesa Sanpaolo Assicura S.p.A. which became effective on 1 October 2022.

The main organisational changes of Intesa Sanpaolo Vita are reported below:

- the 'Personnel, Change Management and Sustainability' unit was reorganised
- by relocating the 'Sustainability' unit within the 'Life Business Coordination Area';
- by placing under its reporting control the second-line unit 'Organisation renamed Organisation and Digital Processes for the acquisition of the relevant activities, and as a result of these changes, the unit was renamed 'Personnel and Organisation';
- Intesa Sanpaolo RBM Salute S.p.A. was also placed under the "Non-Life Business Coordination Area" reporting control and a second line unit called "Reinsurance" was established, which is active towards all Italian companies of the Intesa Sanpaolo Vita Group;
- the Chief Risk Officer unit was reorganised, with the creation of new Organisational Units and the allocation of responsibilities according to the risks being monitored.

Modifiche al sistema di Governance

During the year, the Company's Governance System did not significantly change except in the component relating to the organizational structure, in particular organizational changes were made, which add up to those described at the Insurance Group level.

The main changes took place in March:

- the "Personnel, Change Management and Sustainability" unit of Intesa Sanpaolo Vita was reorganized:
 - relocating, as mentioned, the "Sustainability" unit within the "Life Company Coordination Area";
 - placing the second-line unit "Organization" reporting to him and as a result of these changes, the unit was renamed "Personnel and Organization";
 - the "Digital Transformation" unit was reorganized with the reassignment of some of the activities previously located in the Personnel and Organization Areas and the CFO;
 - the structure of the Chief Financial Officer was reorganized, in particular as regards the securities back office activities and management planning and control.

The Chief Risk Officer structure was then reorganized in November, providing for the creation of new second and third line units to identify the specific risks faced within each structure.

Remuneration system and remuneration policies

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

The Remuneration Report of Intesa Sanpaolo Vita S.p.A. meets the obligations in Article 5(2)(l) and 42 of the Regulation, as well as Article 59 on reporting to the Shareholders' Meeting concerning 2022 Remuneration and Incentive Policies and the adoption of 2021 Remuneration Policies.

The Remuneration Report was defined on 5 May 2022 by the Board of Directors and approved by Shareholders' Meeting held on the same date.

Operations with shareholders and persons of influence

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

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

Self-assessment of the management board

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

To ensure these requirements were met, including those concerning what is known as the "interlocking ban" (in Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), on 6 April 2022, the Board of Directors performed the annual periodic eligibility assessment for the newly appointed Directors Luigi Maranzana (Chairman), Nicola Maria Fioravanti (Chief Executive Officer and General Manager), Elio Fontana (Deputy Chairman of the Board of Directors), Giuseppe Attanà, Maria Anna Angela Vincenza Costanza, Chiara Frigerio, Rossella Leidi and Antonio Nucci (Directors), and on 5 May 2022 for the director Paolo Baessato.

The Supervisory Authorities were notified of all assessments.

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

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

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

For this purpose, during 2022 each Director in office was sent three questionnaires referring respectively to the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee. The questionnaires were prepared on the basis that the individual contribution of each director and the frequency of their attendance at meetings are crucial factors with regard to the objective of taking informed, shared decisions.

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

(i) confirmed the following for 2022:

- the climate within the Board, the Internal Control and Risks Committee and the Remuneration Committee favoured an open, constructive debate among all members, and fostered the contribution of ideas from the diverse experiences, facilitating the adoption of broad-consensus decisions;
- the Board's decision-making process was fuelled by prompt, effective information flows despite the remote participation methods largely used also in 2022 and the minutes of all discussions and resolutions were considered to be complete and accurate;
- the size of the Board of Directors, the Remuneration Committee and the Internal Control and Risks Committee was such as to ensure effective functioning in relation to the complexity, size and objectives of the Company;

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

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

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

The analysis, which was presented to the Board of Directors on 22 February 2023, indicated that the overall framework is positive and once again for 2021 the assessment of the composition, functioning and size of the Board of Directors, the Internal Control and Risks Committee and the Remuneration Committee was considered to be adequate.

[Intesa Sanpaolo Assicura S.p.A.](#)

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

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

The Board of Directors of Intesa Sanpaolo Assicura appointed by the ordinary Shareholders' meeting of 16 March 2021 and in office until the approval of the Financial Statements at 31 December 2023 comprises 8 members including a Chair, a deputy chair and a CEO, who also holds the office of General Manager.

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

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

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

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

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

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

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

The Board of Statutory Auditors of Intesa Sanpaolo Assicura, in office at 31 December 2021 was appointed by the Shareholders' Meeting of 7 April 2022 and comprises 5 members, of whom 3 standing members, appointed by the Chair, and two substitute members, who all meet the requirements of integrity, professionalism and independence as required by current legislation.

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

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

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

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

There are 3 advisory committees:

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

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

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

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2022.

Coordination between the executive and supervisory bodies and key functions

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

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

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

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

Changes to the system of Governance

During 2022 the following changes were made to the company's governance system:

- in March, a first-line organisational unit called 'Retail Products and Technical and Operational Management' was set up, which comprises the development activities of the individual products of the Non-Life/CPI and Motor business lines and the technical management activities previously allocated to the first-line organisational unit 'Operations';
- in October, a unit called "Legal Protection" was established within the organisational unit "Retail Products and Technical and Operational Management" to oversee the related business which has been growing as a result of the merger of Cargeas into ISA (effective 1 October 2022).

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

Remuneration system and remuneration policies

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

The Remuneration Report of Intesa Sanpaolo Assicura meets the obligations in Article 5(2)(l) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders'

Meeting concerning 2022 Remuneration and Incentive Policies and the adoption of 2021 Remuneration Policies.

The Remuneration Report was defined on 18 May 2022 by the Board of Directors and approved by Shareholders' Meeting held on the same date.

The above also applies to the remuneration policies of Cargeas Assicurazioni until 1 October 2022, i.e. the date of the merger with Intesa Sanpaolo Assicura. Cargeas Remuneration Report was defined on 17 May 2022 by the Board of Directors of the Company and approved by Shareholders' Meeting on the same date.

Transactions with shareholders and persons of influence

Intesa Sanpaolo Assicura has:

- with the sole shareholder Intesa Sanpaolo Vita: *outsourcing* contracts for the provision of services in the areas of Procurement (management of purchases of goods and services), Legal and Corporate Affairs, Administration, Management Control, Taxation, Securities and Treasury, Personnel Security, Investments: valuation activities, Complaint Management, Organisation, Reinsurance Accounting, Support Services, CPI and CQS Portfolio Management, Regulatory and Labour Relations, Personnel Cost Planning, Data Office, ALM, GAF, Management of the delegate's obligations on environmental matters, Information Security, Management of DPO obligations, Distribution Monitoring, Capital Management, Fiscal Controls, Analytics, Performance Monitoring, Analysis, Cost Management, Information Systems, Digital Transformation, Personnel Management, Reinsurance, Systems, Administration, Finance Risk and DWH, Business Information Systems, Sustainability, Management Support in addition to those of the control functions as already described;
- with its indirect parent company Intesa Sanpaolo - outsourcing agreements for the supply of services relating to Internal Communication, Cybersecurity and Business Continuity Management, Property and Logistics, Operations, Organisation and General Services, Development Policies and Learning Academy, Human Resources, Safety, Information Systems, Company Protection, Banca dei territori, Procurement, Cost management, Institutional Affairs and external communications; as well as insurance product distribution agreements.

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

Self-assessment of the management board

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

To ensure these requirements were met, including those concerning what is known as the "interlocking ban" (Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), on 7 April 2022, the Board of Directors in office carried out an annual assessment of the eligibility of its members, with a positive outcome, notified to the Supervisory Authority;

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

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

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

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

For this purpose, during 2022 each director in office was sent a questionnaire prepared on the basis that the individual contribution of each director and the frequency of their attendance at meetings are crucial factors with regard to the objective of taking informed, shared decisions.

Consideration was also given to the circumstance that board meetings were mainly held remotely and continued to deal with some items on the agenda without illustrating them but rather responding to questions and requests for clarification submitted in advance by the Directors and Statutory Auditors.

In addition, compared to 2021, the questionnaire was supplemented with two questions aimed at verifying, on the basis of the information provided to the Board of Directors, the work performed by the Audit and Risk Committee and by the Remuneration Committee of the USCI.

The answers given to the questions in the questionnaire led:

(i) to state, in general, that again in 2022:

- the climate within the Board of Directors favoured an open, constructive debate among all members, and fostered the contribution of ideas from the diverse experiences, facilitating the adoption of broad-consensus decisions; it was particularly noted by two Directors that Board discussions had been appreciable in terms of quality and quantity and the high level of professionalism involved;
 - the decision-making process within the Board of Directors was based on adequate and timely information flows and was considered effective, despite the predominantly remote mode of participation again in 2022, although it was noted by one Director that personal interaction and discussion remained preferable and more effective, albeit the teleconferencing facilities made available were more than adequate;
 - the minutes of all discussions and resolutions were considered to be complete and accurate;
 - the size and composition of the Board of Directors were such as to ensure effective functioning in relation to the complexity, size and objectives of the Company, although one Director suggested increasing the number of female members to ensure more adequate gender representation;
- (ii) an adequate personal contribution to board meetings by each Director and an adequate assessment of the value and quality of the overall performance of the other members;
- (iii) to consider the activities carried out by the Remuneration Committee and the USCI Audit and Risk Committee as adequate for the purpose of an informed and responsible decision-making process by the Board of Directors .

The analysis, which was presented to the Board of Directors on 22 February 2023, indicated that the overall framework on average is positive and once again for 2022 the assessment of the composition, functioning and size of the Board of Directors was considered to be adequate, and the activities carried out by the above mentioned Committees were likewise assessed as adequate.

Fideuram Vita S.p.A.

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

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

The Board of Directors appointed during the Shareholders' meeting held on 7 April 2022 with a number of 7 members, enlarged to 8 on 3 May 2022, and in office until the approval of the Financial Statements at 31 December 2024 comprises 8 members including a Chair, a Vice Chair, a CEO who also holds the office of General Manager.

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

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

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

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

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

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

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

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

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

The Board of Statutory Auditors was appointed at the Shareholders' Meeting on 7 April 2023 and was in office until approval of the Financial Statements at 31 December 2021.

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

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

The following management advisory committees are in place:

- the Management Committee, which shares proposals for company strategies and the monitoring of the Company's economic performance, and also for the definition, priorities and analysis of the progress of main project initiatives. It is also competent for sharing the structure of new products for Product Oversight Governance (POG) purposes, and supports the CEO and General Manager in approving the products plan and substantial changes to it
- the Investment Committee which provides an opinion on the structuring and definition of investment and financial policies, formulating proposals on the operational guidelines to be approved by the Board of Directors. During annual planning, it proposes the capital and income forecasts which may be reviewed during the year. Based on the guidance approved by the Board of Directors, the Committee proposes the performance of activities related to operational and tactical ALM, by implementing investments and monitoring the ALM position of the Company;
- the Risks Committee, which is responsible for supporting Senior Management in defining the Company's risk profiles and the related economic capital levels, monitoring the risk profiles on the basis of data reported by the relevant departments and supporting Senior Management in establishing any corrective strategies.

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

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

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

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2022.

Coordination between the executive and supervisory bodies and key functions

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

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

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

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

Changes to the system of Governance

In 2022. The Company's first-line unit called 'Commercial' was reorganised.

Other aspects of the governance system (Committees, roles of administration and control bodies and core functions) have remained unchanged, including the specifications for pension products

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Fideuram Vita are in line with the principles described in the relevant paragraph in the Insurance Group section of this document.

The Remuneration Report of Fideuram Vita meets the obligations in Article 5(2)(I) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders' Meeting concerning 2022 Remuneration and Incentive Policies and the adoption of 2021 Remuneration Policies.

The Remuneration Report was defined on 16 May 2022 by the Board of Directors and approved by Shareholders' Meeting held on the same date.

Transactions with shareholders and persons of influence

Fideuram Vita has:

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

Self-assessment of the management board

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

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

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

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

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

For the above reasons, each Director in office in 2022 received a questionnaire for an analytical self-assessment concerning 2022, as in depth as possible, based on international methodologies and best practices.

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

- the USCI's Corporate Life Unit preparing the questionnaire, with sections for self-analysis of the structure, functioning, efficiency and areas for improvement of the board, identifying conventional parameters in order to measure the degree of adequacy, priorities of any corrective actions and identify directors' perception of the analysis elements in the questionnaire;
- sharing the questionnaire with the Chairman;
- individual Directors compiling the questionnaire anonymously, with the chance to make observations or recommendations;
- the quantitative and qualitative analysis of replies, by the Chairman, assisted by the Secretary of the Board of Directors;
- sending the questionnaire analysis results to all Board Directors and Auditors, and presenting the analyses carried out to the Board meeting of 21 February 2023;
- the Board of Directors giving an opinion on the composition and functioning of the Board, overall.

Intesa Sanpaolo Life D.A.C

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

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

At 31 December 2022, the Board of Directors of Intesa Sanpaolo Life comprised seven members (one executive director, three independent non-executive directors and three group non-executive directors).

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

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

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

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

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

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

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

The Board of Directors has set up an effective Risk Management System. This system is supervised by the Head of Risk Management (CRO) who reports directly to the Board of Directors. This function is responsible for ensuring that the Risk Management system is an integral part of the company's strategy and decision-making processes. The key responsibilities include assisting the Board of Directors in relation to:

- preparation of the risks register;
- maintaining the definition of the risk appetite;

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

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

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

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

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

The *Head of Compliance (HoC)* takes part as a permanent guest in the *Risk & Compliance* and *Investment & Product* committees and in the meetings of the *Product Sub-Committee (OPGC)* and by invitation in the *Audit & Reporting Committee*.

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

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

The Head of Actuarial Function performs their duties in accordance with the Solvency II regulations. The Head of the Actuarial Function produces a report at least once a year for the Board of Directors (the Actuarial Function Report which includes the Actuarial Report on Technical Provisions). The report summarises all the main activities overseen by the Actuarial Function, including, where necessary, identifying any shortcomings in the governance system. It also provides recommendations on how these deficiencies can be resolved.

The Head of Actuarial Function (HoC) takes part as a permanent guest in the *Risk & Compliance* and *Investment & Product* committees and by invitation in the *Audit & Reporting Committee*.

The main activities of the Actuarial Function are summarised in the function's Terms of Reference (they correspond to the provisions of the Domestic Actuarial Regime) and include an assessment of the adequacy of the models and data used to calculate the Technical Provisions (Actuarial Report on Technical Provisions), and provide an opinion on the underwriting, reinsurance and ORSA process of the Company.

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

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

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

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

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

The company has assessed its Governance system as being adequate, compared to the nature, scope and complexity of the risks of the company's activities in 2022.

Coordination between the executive and supervisory bodies and key functions

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

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

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

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

Changes to the system of Governance

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

Remuneration system and remuneration policies

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

Transactions with shareholders and persons of influence

Intesa Sanpaolo Life has outsourcing agreements with the parent company Intesa Sanpaolo Vita for the supply of services concerning application user licences, Audit, CISO, DOF, GAF, Digital Transformation and Sustainability.

The company did not carry out any major transactions during the year 2022 with any persons that exercise a considerable influence on the company or with the members of the management, executive or supervisory boards.

Self-assessment of the management board

The 2022 assessment of the Board of Directors was conducted by the Chairman of the Board of Directors in accordance with the guidelines of the Corporate Governance Code. The Chairman will present the results to the Board during the first half of 2023. Overall the assessment of previous years was positive, with minor aspects for improvement that were addressed in the governance plan. The next external review will take place in 2024.

Intesa Sanpaolo RBM Salute S.p.A.

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

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

The Board of Directors of Intesa Sanpaolo RBM Salute appointed by the ordinary Shareholders' meeting of 1 March 2023 and in office until the approval of the Financial Statements at 31 December 2024 comprises 5 members including a Chair and a CEO, who also holds the office of General Manager.

All the members of the Board of Directors and the General Manager in office in 2022 meet the integrity, professionalism and independence requirements stipulated by current legislation.

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

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

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

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

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

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

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

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

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

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

There are 3 advisory committees:

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

data reported by the relevant departments and supporting Senior Management in establishing any corrective strategies.

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

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

The Company has deemed its *governance* system to be compliant with the principles set out in the Guidelines on the Corporate Governance System of Intesa Sanpaolo RBM Salute S.p.A. and, taking into account the improvement actions undertaken with regard to the internal control system, the organisational structure and the risk management system, overall suitable to the nature, scope and complexity of the risks inherent in the activities carried out by the company in the financial year 2022.

Coordination between the executive and supervisory bodies and key functions

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

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

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

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

Changes to the system of Governance

During the year, the Company did not make any significant changes to the organisational structure, mainly reallocating responsibilities within the same organisational structure

Remuneration system and remuneration policies

The remuneration system and remuneration policies of Intesa Sanpaolo RBM Salute are in line with the principles described in the relevant paragraph in the Insurance Group section of this document.

The Remuneration Report of Intesa Sanpaolo RBM Salute meets the obligations in Article 5(2)(l) and 42 of the Regulation, as well as Article 59 of the Regulation on reporting to the Shareholders' Meeting concerning 2022 Remuneration and Incentive Policies and the adoption of 2021 Remuneration Policies.

The Remuneration Report was defined on 17 May 2022 by the Board of Directors and approved by Shareholders' Meeting held on the same date.

Transactions with shareholders and persons of influence

Intesa Sanpaolo RBM Salute has:

- with the sole shareholder Intesa Sanpaolo Vita outsourcing contracts in place for the provision of services in the areas of Procurement (Management of purchases of goods and services), Legal and Corporate Affairs, Complaint Management, Organisation, Securities Management, Information Systems Management, Information Security Management, Personnel Management, Technical Accounting, Securities Accounting, Taxation, Tax audits, Investment Management, Business Information Systems, Financial Administrative Governance, and PEC Box Management; Analytics, Sustainability, Reinsurance, Digital Transformation and Treasury (only for claims managed by InSalute Servizi S.p.A.) in addition to the control functions as described above;
- outsourcing agreements in place with the indirect parent company Intesa Sanpaolo for the supply of services relating to Internal Communication, Cybersecurity and Business Continuity Management, Property and Logistics, Operations, Organisation and General Services, Development Policies and Learning Academy, External Relations, Human Resources, Safety, Information Systems, Transformation Center, Company Protection.

Self-assessment of the management board

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

To ensure these requirements were met (in compliance with the new Decree of the Ministry of Economic Development No. 88 of 2 May 2022), including those concerning what is known as the "interlocking ban" (Article 36 of Decree Law 201/2011, converted with amendments by Law no. 214/2011), the Board of Directors in office since 1 March 2023 assessed, during the board meeting of 27 March 2023, the eligibility of newly appointed members, with a positive outcome, which will be notified to the Supervisory Authority.

In connection with these assessments all the Directors accepted an obligation to keep the Company regularly updated on any changes in their situations.

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

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

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

For this purpose, each director (in office in 2022) was sent a questionnaire for 2022 prepared on the basis that the individual contribution of each Director and the frequency of their attendance at meetings are crucial factors with regard to the objective of taking informed, shared decisions.

Consideration was also given to the circumstance that board meetings were mainly held remotely and continued to deal with some items on the agenda without illustrating them but rather responding to questions and requests for clarification submitted in advance by the Directors and Statutory Auditors.

In addition, compared to 2021, the questionnaire was supplemented with two questions aimed at verifying, on the basis of the information provided to the Board of Directors, the work performed by the Audit and Risk Committee and by the Remuneration Committee of the USCI.

The answers given to the questions in the questionnaire led:

- (i) to state, in general, that again in 2022:
 - the climate within the Board of Directors favoured an open, constructive debate among all members, and fostered the contribution of ideas from the diverse experiences, facilitating the adoption of broad-consensus decisions;
 - the Board's decision-making process was fuelled by prompt information flows, and was overall effective despite the remote participation methods largely used also in 2022;
 - the minutes of all discussions and resolutions were considered to be complete and accurate;
 - the size and composition of the Board of Directors were such as to ensure effective functioning in relation to the complexity, size and objectives of the Company, although there was an assessment of inadequacy in relation to the issue of gender representation with respect to the current composition of the Board of Directors;
- (ii) an adequate assessment of the value and quality of the overall performance of the other members by each Director;
- (iii) an adequate assessment of the strategic supervision function of the Board of Directors;
- (iv) to consider the activities carried out by the Remuneration Committee and the USCI Audit and Risk Committee as adequate for the purpose of an informed and responsible decision-making process by the Board of Directors .

Therefore, the analysis indicated that the overall framework on average is positive and once again for 2022 the assessment of the composition, functioning and size of the Board of Directors was considered to be adequate, and the activities carried out by the above mentioned Committees were likewise assessed as adequate.

B.2 COMPETENCE AND INTEGRITY REQUIREMENTS

Intesa Sanpaolo Vita Insurance Group

On 2 December 2022, the Board of Directors of Intesa Sanpaolo Vita S.p.A., following the entry into force of the Decree of the Ministry of Economic Development no. 88 of 2 May 2022 concerning the adoption of the Regulation on the requirements and criteria for the eligibility of company officers and those performing key functions pursuant to article 76 of the Insurance Code, as set forth in Legislative Decree no. 209 of 7 September 2005, approved the updated wording of the "Policy for the identification and assessment of eligibility requirements for Intesa Sanpaolo Vita S.p.A. officers" which is applicable as follows:

- (i) with regard to Company Officers: from the date of appointment following the approval of this Policy, with the version approved by the Board of Directors on 4 August 2021 applicable up to that time;
- ii) with reference to the Owners of Core Functions: from the date of appointment following the approval of this Policy; for officers already appointed, the first assessment of the eligibility requirements indicated in this Policy shall take place no later than April 2025 and up until that date, the version approved by the Board of Directors on 4 August 2021 will still be applicable;
- iii) with reference to all other recipients of this Policy: from the date of its approval.

Intesa Sanpaolo Vita S.p.A.

See above.

Intesa Sanpaolo Assicura S.p.A.

Following the entry into force of the Decree of the Ministry of Economic Development no. 88 of 2 May 2022 concerning the adoption of the Regulation on the requirements and criteria for the eligibility of company officers and those performing key functions pursuant to article 76 of the Insurance Code, as set forth in Legislative Decree no. 209 of 7 September 2005, at its Board meeting on 16 December 2022, Intesa Sanpaolo Assicura S.p.A implemented the "Policy for the identification and assessment of eligibility requirements for company officers" adopted by Intesa Sanpaolo Vita in its capacity as USCI and approved the updated wording of the "Policy for the identification and assessment of eligibility requirements of Intesa Sanpaolo Assicura S.p.A. officers" which is applicable as follows:

- i) for Officers (i.e. persons in charge of administration, management and control functions): from the date of appointment following the approval of the new Policy, with the version approved by the Board of Directors on 16 March 2021 applicable up to that time;
- ii) with reference to the Owners of Core Functions: from the date of appointment following the approval of the New Policy; for officers already appointed, the first assessment of the eligibility requirements indicated in the New Policy shall take place no later than April 2025 and up until that date, the Policy approved by the Board of Directors on 16 March 2021 will still be applicable;
- iii) with reference to all other recipients of this Policy: from the date of its approval.

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

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

Fideuram Vita S.p.A.

Following the entry into force of the Decree of the Ministry of Economic Development no. 88 of 2 May 2022 concerning the adoption of the Regulation on the requirements and criteria for the eligibility of company officers and those performing key functions pursuant to article 76 of the Insurance Code, as set forth in Legislative Decree no. 209 of 7 September 2005, at its Board meeting on 19 December 2022, Fideuram Vita implemented the "Policy for the identification and assessment of eligibility requirements for company officers" adopted by Intesa Sanpaolo Vita in its capacity as USCI and approved the updated wording of the "Policy for the identification and assessment of eligibility requirements of Fideuram Vita S.p.A officers" which is applicable as follows:

(i) with regard to Company Officers: from the date of appointment following the approval of this Policy, with the version approved by the Board of Directors on 15 March 2021 applicable up to that time;

ii) with reference to the Owners of Core Functions: from the date of appointment following the approval of this Policy; for officers already appointed, the first assessment of the eligibility requirements indicated in this Policy shall take place no later than April 2025 and up until that date, the version approved by the Board of Directors on 15 March 2021 will still be applicable;

iii) with reference to all other recipients of this Policy: from the date of its approval.

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

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

Intesa Sanpaolo Life D.A.C.

The rules on assessing the criteria for fitness for office are prepared in accordance with the instructions contained in the code of corporate governance, and with the same document issued by Intesa Sanpaolo Vita, Parent Company of the Insurance Group, which has been adopted by the Board of Directors of Intesa Sanpaolo Life.

These rules conform to the Fitness and Probity Standards of the Central Bank of Ireland. The policy is reviewed and approved by the Board of Directors at least once a year.

According to the Central Bank of Ireland, the specific expertise required for key functions depends on the role, but will traditionally relate to some or all of the following areas:

- the insurance and financial market;
- strategy and business models;
- governance systems;
- actuarial and financial analysis;
- the regulatory framework and legal requirements.

The Central Bank of Ireland requires due diligence on all persons within the Company who hold key positions, and reserves the power to approve their appointments, continually check requirements and declare a loss of eligibility.

Under Irish law, due diligence is intended to demonstrate that persons in key positions:

- are competent and capable;
- are honest and conduct themselves in an ethical, honourable way;
- are financially stable.

CBI has approved the appointments of all the managers of key functions and senior managers.

For further details refer to the section on the Insurance Group.

Intesa Sanpaolo RBM Salute S.p.A.

Following the entry into force of the Decree of the Ministry of Economic Development no. 88 of 2 May 2022 concerning the adoption of the Regulation on the requirements and criteria for the eligibility of company officers and those performing key functions pursuant to article 76 of the Insurance Code, as set forth in Legislative Decree no. 209 of 7 September 2005, at its Board meeting on 20 December 2022, Intesa Sanpaolo RBM Salute S.p.A implemented the "Policy for the identification and assessment of eligibility requirements for company officers" adopted by Intesa Sanpaolo Vita in its capacity as USCI and approved the updated wording of the "Policy for the identification and assessment of eligibility requirements of Intesa Sanpaolo RBM Salute S.p.A. officers" which is applicable as follows:

- i) for Officers (i.e. persons in charge of administration, management and control functions): from the date of appointment following the approval of the new Policy, with the version approved by the Board of Directors on 16 March 2021 applicable up to that time;
- ii) with reference to the Owners of Core Functions: from the date of appointment following the approval of the New Policy; for officers already appointed, the first assessment of the eligibility requirements indicated in the New Policy shall take place no later than April 2025 and up until that date, the Policy approved by the Board of Directors on 16 March 2021 will still be applicable;
- iii) with reference to all other recipients of this Policy: from the date of its approval.

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

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

B.3 RISK MANAGEMENT SYSTEM, INCLUDING THE INTERNAL ASSESSMENT OF RISK AND SOLVENCY

Intesa Sanpaolo Vita Insurance Group

Risk management process, and role of the risk management function

The system of risk management and control for the whole of the Insurance Group conforms to the requirements of supervisory insurance regulations and is consistent with the corresponding regulations on the control system, of the parent company Intesa Sanpaolo, which define the

reference principles and responsibilities of the corporate bodies, and those of the audit functions which help to ensure that the system of internal controls operates correctly.

The process of managing the risks of the Insurance Group is governed in line with the own risk self-assessment (Own Risk and Solvency Assessment - ORSA) and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Policies and Guidelines concerning the management of all the risks to which the Insurance Group is exposed.

Intesa Sanpaolo Life adopted these documents as a reference for the definition of its own company guidelines in this area, in accordance with applicable regulations, reporting to the USCI any incompatibility with regulations in the country where it does business.

There are four main phases in the Insurance Group's risk management process:

1. Risk identification and assessment;
2. Risk management;
3. Monitoring risk exposure;
4. Reporting.

The first main phase, specifically the Risk Assessment, gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions¹ to identify and assess risk profiles that are directly supervised.
- Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this stage, the Owner identifies any actions to implement or implemented, to mitigate risk;
- Validation: this includes the stage where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
- Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Group and mitigation actions may be proposed.

On conclusion of the Risk Assessment process, the Group manages identified risks by following the conditions and tolerance limits stated in Risk Appetite Framework and in the Policies, which constitute the risk management framework. The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Group Companies to:

¹ The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

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- measure their vulnerability to extraordinary yet plausible events;
 - allow Senior Management to understand the relationship between the risk assumed and the risk appetite, as well as the adequacy of available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Internal Control and Risks Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds and limits on the main risk factors. The main limits and thresholds relate to the following risks:

- Solvency: the levels of solvency ratio, the levels of individual risk types in relation to Own Funds, the level of Economic Capital (ECAP);
- Liquidity: the level of highly liquid securities, cash flow matching and the insurance liquidity coverage ratio;
- Stability of earnings: IAS profit level and *Combined Ratio* for non-life business;
- Investments;
- Operational Risks: the level of operational losses;
- Compliance risks: number of customer complaints compared to the number of policies, by type of insurance product.

Internal risk and solvency assessment

The new prudential regulations which entered into force on 1 January 2016 are based on three pillars. They require companies in the second pillar to perform a self-assessment of risks, both current and forward-looking, in order to determine a governance system which allows the effective and efficient management and control of risks, by tasking the Supervisory Board with the assessment, through the Supervisory Review Process, of the reliability and consistency of the results and by adopting, where needed, the appropriate corrective measures. The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and Risk Appetite objectives.

The internal risk and solvency assessment is carried out through the ORSA process, which has been adopted by the Insurance Group and is split into 2 preliminary transverse activities, and five separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Vita sets out above all the standards to guide the Insurance Group in taking on risks and monitoring them in order to ensure a continuous and excellent service toward customers and to create value for all *stakeholders*.
- defining the methodologies for risk and capital measurement: the methods used to measure risks are defined and proposed, along with the risk and capital measurement and control

models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: in order to evaluate the risk profile, the Companies of the Intesa Sanpaolo Vita Group must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo Vita and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requests a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds at individual and consolidated level compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following sub-phases:
 - determination of available own funds;
 - assessment of capital adequacy.
- Preparation and approval of the ORSA Report: Intesa Sanpaolo Vita documents the findings of the ORSA process for all Insurance Group companies in a single report. The "Consolidated internal risk and solvency assessment document" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at an Insurance Group level and at the level of some Insurance Group subsidiaries at the same date and in the same reporting period;
- Independent review of the ORSA process: the ORSA process is included in the audit and is periodically audited by Audit. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

Within the ORSA process, the Board of Directors of the USCI, the Senior Management of the USCI and the Internal Control and Risks Committee of the USCI have a fundamental role.

The USCI Board of Directors, in its remit also for the Group: determines and is responsible for the adequacy and effectiveness of the risk management system as part of which it approves the risk management strategy, the risk appetite of the Group, the risk management policies and related limits.

With specific reference to the ORSA process, the Board of Directors sets out and approves the relative Policy, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by Group Companies. In addition, the USCI Board of Directors, on the proposal of the USCI Internal Control and Risks Committee:

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- determines the Group's Risk Appetite, in line with its global solvency requirements, identifying the types of risk, which it considers it will undertake, establishing the Group's related risk tolerance limits, which it reviews at least once a year;
 - approves the Insurance Group Risk Map;
 - approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
 - ensures that the Group level risk management policy is implemented consistently and continuously within the Group, taking into account the structure, size and specificity, as well as the risks of each Group Company and the mutual interdependencies;
 - critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
 - approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
 - approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
 - assesses the ORSA process with the support of the core functions;
 - approves the ORSA Report expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
 - approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

USCI Senior Management, in its remit also for the Group, is responsible for the overall implementation, maintenance and monitoring of the corporate governance system at Group level, consistent with the Directives of the Board of Directors and in compliance with the roles and tasks attributed to it.

With reference to the internal assessment of the Group's risk and solvency:

- circulates the Policies on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the Group's Current and Prospective Risk Assessment Policy (ORSA), contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with Group tolerance limits.

The USCI Internal Control and Risks Committee, in its remit also for the Group, assists the USCI Board of Directors in determining the guidelines of the internal control and risk management system at Group level, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Furthermore, it controls the specific risk profile of Group Companies.

With specific reference to the ORSA process, the Internal Control and Risks Committee:

- takes steps to ensure the full use of the results of the ORSA for the strategic and decision-making purposes of Group Companies;
- assesses the proposals to submit to the Board of Directors for final approval on:

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- ORSA process description;
 - risk appetite level;
 - risk map;
 - current and forward-looking capital level;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the regulatory requirements both in current and forward-looking terms and of the stress tests submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the USCI.

The assessment of the capital requirement during the period of the analysis is measured by considering the forward-looking exposure to a potentially broader risk perimeter than Pillar I, the stress tests and the impacts in terms of value and capital used in commercial strategies.

Furthermore, the following is taken into account:

- any scheduled issue of capital;
- maturity, including both contractual maturity and any other earlier repayment or surrender opportunity, of the own-fund items;
- the effects that any issue, surrender or repayment or other measurement changes of an own-fund item can have under the applicable capital management system;
- the extent to which the company is based on own-fund items subject to provisional measures;
- application of the dividend distribution policy and how it affects own funds.

The multi-year capital management plan is defined in line with the strategic objectives of the Insurance Group and in coordination with the Strategic ALM and Capital Management Department, which liaises with the Capital & Liquidity Management and Recovery Plan Unit of the parent company Intesa Sanpaolo.

The capital requirement is assessed for the Insurance Group and on an individual basis, taking into account the risk tolerance thresholds identified in the RAF and the forward-looking risk and solvency assessment according to ORSA standards and strategic planning.

During the year the following are periodically monitored:

- the cohesion between the strategic plan, the performance of the business and the profitability of the companies and at an Insurance Group level;
- the cohesion of the assumptions underlying the capital management plan and the related actions, compared to the ordinary performance at Insurance Group level;
- the maintaining of management solvency levels and of the capital management plan based on the sensitivity and stress tests.

Intesa Sanpaolo Vita S.p.A.

Risk management processes, and role of the risk management function

The process of managing the risks of Intesa Sanpaolo Vita S.p.A is governed in line with the own risk self-assessment (Own Risk and Solvency Assessment – ORSA) and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

- Risk identification and assessment;
- Risk management;
- Monitoring risk exposure;
- Reporting.

The first main phase, specifically the risk assessment, gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- **Analysis:** this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions² to identify and assess risk profiles that are directly supervised.
- **Assessment:** this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this stage, the Owner identifies any actions to implement or implemented, to mitigate risk;
- **Validation:** this includes the stage where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
- **Risk Map:** this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Risk Appetite Framework and in the specific Risk Management Policies, which constitute the risk management framework.

² The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow senior management to understand the relation between the risk taken on and its *risk appetite*, in addition to the adequacy of the available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Company has adopted early-warning thresholds and limits on the main risk factors to which it is exposed. The main limits and thresholds relate to the following risks:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: the level of highly liquid securities, cash flow matching;
- Investments;
- Operational risks: the level of operational losses.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and promoting quality of assets;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;
- Enhancement of risk diversification factors;
- An asset allocation objective that adequately reflects the time frame of the liability and the economic returns hoped for by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The Policy on investments is adopted by taking into account that the assets covering the technical provisions are adequate considering the nature of the risks and the obligations, and the duration of the liabilities, in the best interests of all policyholders, customers, beneficiaries and anyone entitled to insurance benefits.

The investment policy defines the composition of the medium-to-long-term investment portfolio, indicating the security, quality, liquidity, profitability and availability level for the entire asset portfolio.

With regard to details of how the company meets its obligation to invest all assets in accordance with the “prudent person” principle, it should be noted that asset investment activities are not done in consideration of the direct, immediate obligations towards the insured parties and therefore they are not subject to the limitations included in the rules on separate management. At the same time, the capital profitability enhancement targets must be met.

The setting of operational limits for this type of activity is based on the principle that, with a view to the prudent management of assets and the solvency of the company, the share of assets needed to cover the economic capital must be invested in highly solvent, highly liquid assets, and only a surplus can be directed towards higher-risk investments.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The company has fulfilled the regulatory requirements regarding application of the volatility adjustment:

- by defining the scope of application of the VA;
- by preparing a liquidity plan;
- by conducting a quantitative analysis to support the use of the VA.

With reference to the extrapolation of the risk-free rate, with and without the volatility adjustment mentioned in Article 44, 2a) of Directive 2009/138/EC, please note that the rates curve published by EIOPA has been used.

Risk Free Rate at 31/12/2022		
Tenor	NO VA	VA
1	3.18%	3.37%
2	3.30%	3.49%
3	3.20%	3.39%
4	3.15%	3.34%
5	3.13%	3.32%
6	3.11%	3.30%
7	3.09%	3.28%
8	3.09%	3.28%
9	3.09%	3.28%
10	3.09%	3.28%
11	3.10%	3.29%
12	3.09%	3.28%
13	3.07%	3.26%
14	3.05%	3.24%
15	3.02%	3.21%
16	2.97%	3.16%
17	2.92%	3.11%
18	2.86%	3.05%
19	2.81%	3.00%
20	2.77%	2.96%
21	2.74%	2.92%
22	2.72%	2.90%
23	2.70%	2.89%
24	2.70%	2.88%
25	2.70%	2.87%
26	2.70%	2.87%
27	2.70%	2.87%
28	2.71%	2.88%
29	2.72%	2.88%
30	2.73%	2.89%

The table below shows the impact of zeroing the VA, which is indicated in terms of a change in own funds and in terms of the solvency ratio, in order to verify any non-compliance with the threshold of 100%, as a result of the zeroing.

	(million euro)	
	No VA	VA
Eligible Own Funds	8,889.8	9,208.9
Solvency Capital Requirement	4,734.4	4,536.6
Solvency ratio	188%	203%

The Solvency Ratio without the application of the VA remains above the minimum threshold and limits provided for in the Risk Appetite Framework.

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives.

In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;
- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of regulatory capital;
- assess overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of regulatory capital and the RAF;
- make available the ORSA results to Senior Management in order to allow their use in the operating and strategic decision-making processes (e.g. capital management, planning, budgeting, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Intesa Sanpaolo Vita and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Vita sets out above all the standards to guide the Insurance Group in taking on risks and monitoring them in order to ensure a continuous and excellent service toward customers and to create value for all stakeholders.
- defining the methodologies for risk and capital measurement: the methods used to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the individual and Group risk profile, Intesa Sanpaolo Vita must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.

-
- Self-assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo Vita and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requests a forward-looking internal assessment of risk and solvency.
 - Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds at individual and consolidated level compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following sub-phases:
 - determination of available own funds;
 - assessment of capital adequacy.
 - Preparation and approval of the ORSA Report: Intesa Sanpaolo Vita documents the findings of the ORSA process for all Insurance Group companies in a single report. The "Single internal risk and solvency assessment document" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at group level and at the level of some group subsidiaries at the same date and in the reporting period.
 - Independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the Company have a fundamental role.

The Board of Directors of the Company determines and is responsible for the adequacy and effectiveness of the risk management system as part of which it approves the risk management strategy, the risk appetite of Intesa Sanpaolo Vita, the risk management policies and related limits.

With specific reference to the ORSA process, the Board of Directors sets out and approves the relative Policy, ensures timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. Moreover, the Board of Directors, on the proposal of the Internal Control and Risks Committee:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the risks map of Intesa Sanpaolo Vita;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;

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- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
 - assesses the ORSA process with the support of the core functions;
 - approves the ORSA Report expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
 - approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the rules on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the Company's Current and Prospective Risk Assessment Policy (ORSA), contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the Company's tolerance limits.

The Internal Control and Risks Committee assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Internal Control and Risks Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Internal Control and Risks Committee periodically analyses the results of economic capital monitoring, the regulatory requirements both in current and forward-looking terms and of the stress tests submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company aims to ensure an adequate level of oversight of the entire data production/transformation process starting from when the data is produced through to its transformation and inclusion in the reporting systems. For this purpose, the Company implements a monitoring and diagnosis system to recognise and resolve any irregularities through appropriate corrective actions.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- **Governability:** the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- **Usability:** accessibility of information by users is ensured through adequate instruments for the activities carried out;
- **Integrity and confidentiality:** data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- **Availability:** availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- **Retention and filing:** specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- **Adaptability:** the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- **accuracy:** the absence of distortion in processes to register, collect and subsequently process data.

Internally, the following principles are considered to be criteria that characterise the accuracy of data:

- **certifiability:** the compatibility of controlled information with a source considered to be correct;
- **suitability:** the compatibility of information in two different sets (e.g. input flow and system table) related to each other;
- **consistency:** the compatibility of information in the same set (or information unit, e.g. the same flow or same table). This criterion also establishes the absence of unexpected data duplications;
- **stability or relevance:** data fluctuations within the limits of an expected variation interval;

-
- **completeness:** recording of all events, transactions and information with the relevant attributes necessary for processing.

Internally, the following principles are considered to be criteria that characterise the completeness of data:

- coverage: the presence of all cases/records expected;
- existence: the compilation of data that cannot have zero values;
- **timeliness:** the availability of data produced by the information system within the times required by the end user;
- **integrity:** the absence of unauthorised data alteration or manipulation, which may compromise accuracy and completeness;
- **sufficiency:** the adequacy of the number of observations and level of detail of data available to meet the required input for adopting the methodologies.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- Definition of data;
- Definition of controls;
- Performance of controls and assessment of data quality;
- Identification and resolution of irregularities;
- Monitoring and reporting.

Considering the applicable legal framework, Data Quality management principles are applied gradually to "elements that may affect the undertaking's risk profile and its solvency situation", starting from the data used to calculate the capital requirement and technical provisions.

Specific company positions are responsible for the data and information comprising information assets, both in the case of data produced internally and data supplied by third parties.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Group ensures the quality of the data used in the calculation processes.

Processing was carried out starting from certified excerpts of the closing of asset and liability portfolios by the management systems of each Insurance Group company, subject to data quality checks in accordance with regulatory requirements. All the files used are also stored in a special repository of the SolvencyII database.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo Vita is conducted in accordance with the Insurance Group process. Reference is therefore made to the details of the paragraph on the Insurance Group.

Risk management process, and role of the risk management function

The process of managing the risks of Intesa Sanpaolo Assicura is governed in line with the own risk self-assessment (Own Risk and Solvency Assessment – ORSA) and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

- Risk identification and assessment;
- Risk management;
- Monitoring risk exposure;
- Reporting.

The first main phase, specifically the risk assessment process, gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- Analysis: this includes all activities to collect information, identify and record risks, with the association of an Owner and involvement of other Specialised Functions to identify and measure the risk profiles they directly supervise;
- Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this stage, the Owner identifies any actions to implement or implemented, to mitigate risk;
- Validation: this includes the stage where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
- Risk map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Risk Appetite Framework and in the specific Risk Management Policies, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;

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- allow top management to understand the relation between the risk undertaken and its risk appetite, in addition to the adequacy of available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Company has adopted early-warning thresholds and limits on the main risk factors to which it is exposed. The main limits and thresholds relate to the following risks:

- solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- sustainability of earnings: Combined Ratio on the total portfolio and Loss Ratio on the main lines of business;
- liquidity: the level of highly liquid securities and cash flow matching;
- investments
- operational risks: the level of operational losses.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and of promoting asset quality;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;
- enhancement of risk diversification factors;
- objective asset allocation that adequately reflects the time frame of the liability and the economic returns expected by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance, and strictly adhere to the provisions of IVASS Regulation no. 24/2016.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The Company does not apply the volatility adjustment to the calculation of insurance liabilities.

Below is the valuation regarding the extrapolation of the risk free rate without the volatility adjustment mentioned in Article 44, paragraph 2a, of Directive 2009/138/EC. The curve corresponds to the EIOPA curve.

Risk Free Rate at 31/12/2022

Tenor	NO VA
1	3.18%
2	3.30%
3	3.20%
4	3.15%
5	3.13%
6	3.11%
7	3.09%
8	3.09%
9	3.09%
10	3.09%
11	3.10%
12	3.09%
13	3.07%
14	3.05%
15	3.02%
16	2.97%
17	2.92%
18	2.86%
19	2.81%
20	2.77%
21	2.74%
22	2.72%
23	2.70%
24	2.70%
25	2.70%
26	2.70%
27	2.70%
28	2.71%
29	2.72%
30	2.73%

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives. In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;
- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;

-
- assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;
 - make the results of ORSA available to Senior Management, so they may be used in operating and strategic decision-making processes (e.g. capital management, planning, budget process, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework process.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Intesa Sanpaolo Assicura and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Assicura follows the general principles defined by the parent company for the acceptance and monitoring of risks, in order to ensure a continuous and excellent service toward customers and to create value for all stakeholders;
- defining the methodologies for risk and capital measurement: the methods to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the individual and Insurance Group risk profile, Intesa Sanpaolo Assicura must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
- building an effective risk management system to support the achievement of the company goals while protecting policyholders;
- determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
- performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-Assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo Assicura and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requires a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following sub-phases:
 - determination of available own funds;
 - assessment of capital adequacy.
- preparation and approval of the ORSA Report: Intesa Sanpaolo Assicura contributes to the results of the ORSA process which are contained in a single report. The "Single internal risk and

solvency assessment report" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at Insurance Group level and at the level of some group subsidiaries at the same date and in the same reporting period;

- independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

In this regard, Intesa Sanpaolo Assicura S.p.A., in accordance with the Supervisory Authorities, assessed the advisability of adopting specific parameters (USP), to calculate the capital requirement for pricing and reserving risk. In this regard, on 29 April 2021, the Company has received authorisation from the Supervisory Authority to use company-specific parameters to calculate the capital requirement for the pricing and reserving risk sub-modules; at the same time, Intesa Sanpaolo Vita received authorisation to use the Group's specific parameters. The results of the assessment of the capital requirement, calculated using the specific parameters, are reported in the Company's risk profile chapter.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the USCI have a fundamental role.

With specific reference to the ORSA process, the Board of Directors sets out and approves the policy for the current and forward-looking risk assessments, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. In addition, the Board of Directors:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the Company's risks map;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
- assesses the ORSA process with the support of the core functions;
- approves the results of the ORSA process, expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
- approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the Policies on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the Company's Current and Prospective Risk Assessment Policy (ORSA), contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the Company's tolerance limits.

The Internal Control and Risks Committee of the USCI assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Risk Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the economic capital and regulatory requirements both in current and forward-looking terms and of the stress tests submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company aims to ensure an adequate level of oversight of the entire data production/transformation process starting from when the data is produced through to its transformation and inclusion in the reporting systems. For this purpose, the Company implements

a monitoring and diagnosis system to recognise and resolve any irregularities through appropriate corrective actions.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- governability: the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- usability: accessibility of information by users is ensured through adequate instruments for the activities carried out;
- integrity and confidentiality: data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- availability: availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- conservation and archiving of data: specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- adaptability: the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- accuracy: the absence of distortion in processes to register, collect and subsequently process data.

Internally, the following principles are considered to be criteria that characterise the accuracy of data:

- certifiability: the compatibility of controlled information with a source considered to be correct;
- suitability: the compatibility of information in two different sets (e.g. input flow and system table) related to each other;
- consistency: the compatibility of information in the same set (or information unit, e.g. the same flow or same table). This criterion also establishes the absence of unexpected data duplications;
- stability or relevance: data fluctuations within the limits of an expected variation interval;
- completeness: registration of all events, operations and information with relevant attributes necessary for processing.

Internally, the following principles are considered to be criteria that characterise the completeness of data:

- coverage: the presence of all cases/records expected;
- existence: the compilation of data that cannot have zero values;
- timeliness: the availability of data produced by the information system within the times required by the end user;

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- integrity: the absence of unauthorised data alteration or manipulation, which may compromise accuracy and completeness;
 - sufficiency: the adequacy of the number of observations and level of detail of data available to meet the required input for adopting the methodologies.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- definition of data;
- definition of controls;
- performance of controls and assessment of data quality;
- identification and resolution of irregularities;
- monitoring and reporting.

Considering the applicable legal framework, Data Quality management principles are applied gradually to "elements that may affect the undertaking's risk profile and its solvency situation", starting from the data used to calculate the capital requirement and technical provisions.

Specific company positions are responsible for the data and information comprising information assets, both in the case of data produced internally and data supplied by third parties.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Group ensures the quality of the data used in the calculation processes.

Processing was carried out starting from certified excerpts of the closing of asset and liability portfolios by the management systems of each Insurance Group company, subject to data quality checks in accordance with regulatory requirements. All the files used are also stored in a special repository of the SolvencyII database.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo Assicura is conducted in accordance with the Insurance Group process. Refer to the details of the section on the Insurance Group.

Fideuram Vita S.p.A.

Risk management process, and role of the risk management function

The process of managing the risks of Fideuram Vita S.p.A is governed in line with the own risk self-assessment (Own Risk and Solvency Assessment – ORSA) and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

- Risk identification and assessment;

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- Risk management;
 - Monitoring risk exposure;
 - Reporting.

The first main phase, specifically the risk assessment process, gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- **Analysis:** this includes all activities to collect information, identify and record risks, with the association of an Owner and involvement of other Specialised Functions to identify and measure the risk profiles they directly supervise;
- **Assessment:** this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this stage, the Owner identifies any actions to implement or implemented, to mitigate risk;
- **Validation:** this includes the stage where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
- **Risk map:** this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Risk Appetite Framework and in the Policies, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow top management to understand the relation between the risk undertaken and its risk appetite, in addition to the adequacy of available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Company has adopted early-warning thresholds and limits on the main risk factors to which it is exposed. The main limits and thresholds relate to the following risks:

- **Solvency:** the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;

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- Liquidity: the level of highly liquid securities, cash flow matching;
 - Investments;
 - Operational risks: the level of operational losses.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and of promoting asset quality;
- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;
- enhancement of risk diversification factors;
- objective asset allocation that adequately reflects the time frame of the liability and the economic returns expected by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The Policy on investments is adopted by taking into account that the assets covering the technical provisions are adequate considering the nature of the risks and the obligations, and the duration of the liabilities, in the best interests of all policyholders, customers, beneficiaries and anyone entitled to insurance benefits.

The investment policy defines the composition of the medium-to-long-term investment portfolio, indicating the security, quality, liquidity, profitability and availability level for the entire asset portfolio.

With regard to details of how the company meets its obligation to invest all assets in accordance with the “prudent person” principle, it should be noted that asset investment activities are not done in consideration of the direct, immediate obligations towards the insured parties and therefore they are not subject to the limitations included in the rules on separate management. At the same time, the capital profitability enhancement targets must be met.

The setting of operational limits for this type of activity is based on the principle that, with a view to the prudent management of assets and the solvency of the company, the share of assets needed to cover the economic capital must be invested in highly solvent, highly liquid assets, and only a surplus can be directed towards higher-risk investments.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The company has fulfilled the regulatory requirements regarding application of the volatility adjustment:

- by defining the scope of application of the VA;
- by preparing a liquidity plan;
- by conducting a quantitative analysis to support the use of the VA.

With reference to the extrapolation of the risk-free rate, with and without the volatility adjustment mentioned in Article 44, 2a) of Directive 2009/138/EC, please note that the rates curve published by EIOPA has been used.

Risk Free Rate at 31/12/2022		
Tenor	NO VA	VA
1	3.18%	3.37%
2	3.30%	3.49%
3	3.20%	3.39%
4	3.15%	3.34%
5	3.13%	3.32%
6	3.11%	3.30%
7	3.09%	3.28%
8	3.09%	3.28%
9	3.09%	3.28%
10	3.09%	3.28%
11	3.10%	3.29%
12	3.09%	3.28%
13	3.07%	3.26%
14	3.05%	3.24%
15	3.02%	3.21%
16	2.97%	3.16%
17	2.92%	3.11%
18	2.86%	3.05%
19	2.81%	3.00%
20	2.77%	2.96%
21	2.74%	2.92%
22	2.72%	2.90%
23	2.70%	2.89%
24	2.70%	2.88%
25	2.70%	2.87%
26	2.70%	2.87%
27	2.70%	2.87%
28	2.71%	2.88%
29	2.72%	2.88%
30	2.73%	2.89%

The table below shows the impact of zeroing the VA, which is indicated in terms of a change in own funds and in terms of the solvency ratio, in order to verify any non-compliance with the threshold of 100%, as a result of the zeroing.

	(million euro)	
	No VA	VA
Eligible Own Funds	1,357.0	1,361.0
Solvency Capital Requirement	499.0	495.0
Solvency ratio	272%	275%

The Solvency Ratio without the application of the VA remains above the minimum threshold and limits provided for in the Risk Appetite Framework.

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives.

In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;
- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;
- assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;
- make the results of ORSA available to Senior Management, so they may be used in operating and strategic decision-making processes (e.g. capital management, planning, budget process, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Fideuram Vita and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Fideuram Vita, in conjunction with the general guidelines of the Insurance Group for undertaking and monitoring risks, has the objective of continually guaranteeing an excellent service for customers and of creating value for all stakeholders;
- defining the methodologies for risk and capital measurement: the methods used to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the risk profile, Fideuram Vita has to identify all risks which the individual Company is or could be exposed to. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-Assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Fideuram Vita is exposed taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the

assessment includes also any material risks not considered in Pillar I and requires a forward-looking internal assessment of risk and solvency.

- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds at individual and consolidated level compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following sub-phases:
 - determination of available own funds;
 - capital adequacy verification.
- Preparation and approval of the ORSA Report: Intesa Sanpaolo Vita documents the findings of the ORSA process for all Insurance Group companies in a single report. The "Single internal risk and solvency assessment document" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at group level and at the level of some group subsidiaries at the same date and in the reporting period.
- Independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the USCI have a fundamental role.

With specific reference to the ORSA process, the Board of Directors sets out and approves the policy for the current and forward-looking risk assessments, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. In addition, the Board of Directors:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the Company's risks map;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
- assesses the ORSA process with the support of the core functions;
- approves the results of the ORSA process, expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;

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- approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the Policies on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- implements the Company's Current and Prospective Risk Assessment Policy (ORSA), contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the Company's tolerance limits.

The Internal Control and Risks Committee of the USCI assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Risk Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the economic capital and regulatory requirements both in current and forward-looking terms and of the stress tests submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company aims to ensure an adequate level of oversight of the entire data production/transformation process starting from when the data is produced through to its transformation and inclusion in the reporting systems. For this purpose, the Company implements a monitoring and diagnosis system to recognise and resolve any irregularities through appropriate corrective actions.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

- Governability: the data, the aggregation and perimeter definition procedures, and the extraction, recording, transformation and loading procedures of the data in archives are documented and classified to ensure traceability and monitoring;
- Usability: accessibility of information by users is ensured through adequate instruments for the activities carried out;
- Integrity and confidentiality: data must be protected against unauthorised access in order to protect their accuracy, completeness and absence of tampering in compliance with applicable internal and external regulations;
- Availability: availability of data, when required by company processes, and availability of the resources needed for the purpose is ensured in compliance with the provisions in the document "Insurance Group Business Continuity Guidelines";
- Retention and archiving: specific data conservation procedures are provided for each data category ensuring the availability of the information in compliance with current regulations and any specific requirements expressed by users;
- Adaptability: the data are generated and aggregated to provide adequately address the internal and external information needs and the development of the company.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- accuracy: the absence of distortion in processes to register, collect and subsequently process data.

Internally, the following principles are considered to be criteria that characterise the accuracy of data:

- certifiability: the compatibility of controlled information with a source considered to be correct;
- suitability: the compatibility of information in two different sets (e.g. input flow and system table) related to each other;
- consistency: the compatibility of information in the same set (or information unit, e.g. the same flow or same table). This criterion also establishes the absence of unexpected data duplications;
- stability or relevance: data fluctuations within the limits of an expected variation interval;
- completeness: registration of all events, operations and information with relevant attributes necessary for processing.

Internally, the following principles are considered to be criteria that characterise the completeness of data:

- coverage: the presence of all cases/records expected;

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- existence: the compilation of data that cannot have zero values;
 - timeliness: the availability of data produced by the information system within the times required by the end user;
 - integrity: the absence of unauthorised data alteration or manipulation, which may compromise accuracy and completeness;
 - sufficiency: the adequacy of the number of observations and level of detail of data available to meet the required input for adopting the methodologies.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- Definition of data;
- definition of controls;
- performance of controls and assessment of data quality;
- Identification and resolution of irregularities;
- Monitoring and reporting.

Considering the applicable legal framework, Data Quality management principles are applied gradually to "elements that may affect the undertaking's risk profile and its solvency situation", starting from the data used to calculate the capital requirement and technical provisions.

Specific company positions are responsible for the data and information comprising information assets, both in the case of data produced internally and data supplied by third parties.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Group ensures the quality of the data used in the calculation processes.

Processing was carried out starting from certified excerpts of the closing of asset and liability portfolios by the management systems of each Insurance Group company, subject to data quality checks in accordance with regulatory requirements. All the files used are also stored in a special repository of the SolvencyII database.

Internal risk and solvency assessment

The internal risk and solvency process of Fideuram Vita is conducted in accordance with the Insurance Group process. Refer to the details of the section on the Insurance Group.

Intesa Sanpaolo Life D.A.C.

Risk management process, and role of the risk management function

As regards Intesa Sanpaolo Life, the Risk Management function of the Parent Company: i) provides its Irish counterpart with the principles used to draw up the internal regulations, methodologies and verification methods used, to ensure that risk is managed and measured in

the same way, and ii) check that these regulations are implemented, by attending the Risk & Compliance Committee, as a permanent attendee, so that it can analyse and discuss the main risk control dynamics, in view of decisions to be taken by the Management Board.

Activities are regularly coordinated, partly through the use of common systems to standardise the management of financial and operational risks.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo Life is conducted in accordance with the Insurance Group process. Refer to the details of the section on the Insurance Group. In addition to the Group reports, Intesa Sanpaolo Life provides an annual ORSA report at company level. This is based on the reports prepared by the Insurance Group, investigates the specific risks of the Irish company and includes the analysis required by the regulations and the country guidelines.

Intesa Sanpaolo RBM Salute S.p.A.

Risk management process, and role of the risk management function

The process of managing the risks of Intesa Sanpaolo RBM Salute is governed in line with the own risk self-assessment (Own Risk and Solvency Assessment – ORSA) and risk appetite (Risk Appetite Framework or RAF). The Level 1 documentation referred to above is complemented by the Operational Rules and Guidelines concerning the management of all the risks to which the Company is exposed.

There are four main phases in the risk management process:

1. Risk identification and assessment;
2. Risk management;
3. Monitoring risk exposure;
4. Reporting.

The first major phase gives Senior Management an immediate overview of the risk exposure, which can guide their decision-making processes and help to define the priority actions, also in terms of strategic planning.

There are 4 phases of the risk assessment process, which are carried out at least once a year (or when specific events occur):

- Analysis: this includes all activities to obtain information, identify and record risks with the association of an Owner and involvement of other Specialist Functions³ to identify and assess risk profiles that are directly supervised.

³ The term "Specialist Functions" means the Functions in charge of managing some specific risks, i.e. second level Core Functions, the DPO, the IT Security and AML Function, as governed by company regulations.

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- Assessment: this includes a self-assessment in terms of probability, impact and risk mitigation by the risk Owner. In this stage, the Owner identifies any actions to implement or implemented, to mitigate risk;
 - Validation: this includes the stage where the risk Owner assesses the result of the analysis and the Risk Management Function works with other Core Functions to verify whether the assessment result is aligned with their evidence;
 - Risk Map: this includes activities to prepare a report on the risk exposure of each Insurance Group Company and the Group as a whole.

The risk assessment process also includes the hard-to-quantify risks considered to be significant for the Company and risk mitigation actions may be proposed.

On conclusion of the risk assessment process, the Group manages each risk by following the conditions and tolerance limits stated in the Rules, which constitute the risk management framework.

The final phase involves monitoring and quantification of the risks.

The monitoring process provides for the constant application of stress tests. The stress tests consist of a set of techniques used by the Company to:

- measure their vulnerability to extraordinary yet plausible events;
- allow top management to understand the relation between the risk undertaken and its risk appetite, in addition to the adequacy of available capital.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee will suggest improvements in order to consolidate the capital stability to the Board of Directors of the company concerned, also considering solvency at Insurance Group level.

In addition to this activity, there is a structured information gathering process, which is necessary to calculate the indicators and parameters defined for the size of the risk according to the Risk Appetite Framework, which is intended to control the Limits and Early Warnings.

Within the Risk Appetite Framework the Insurance Group has imposed early-warning thresholds on the main risk factors. The main limits relate to the following risks:

- Solvency: the levels of solvency ratio and the levels of individual risk types, in relation to Own Funds;
- Liquidity: cumulative Cash Flow Matching over a year;
- sustainability of earnings; the combined ratio level;
- the level of operational losses.

The “prudent person” principle

Depending on the nature, scope and complexity of the risks of its business, the Company will set investment policies for all its assets, in line with the prudent person principle.

Financial portfolio management must be aimed at the following:

- the general criteria of prudence and promoting quality of assets;

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- profitability assessment, adequately taking into consideration all related market, credit, concentration and liquidity risks;
 - Enhancement of risk diversification factors;
 - An asset allocation objective that adequately reflects the time frame of the liability and the economic returns hoped for by the Company.

The Company's Policy on investments is consistent with its strategy and risk policies, and take into account the risk appetite, risk tolerance and the possibility of identifying, measuring, monitoring and managing the risks involved with each type of asset.

The use of derivatives must be consistent with the principles of sound and prudent management, with a view to mitigating risks. It must take place in alignment with the Company's financial situation and operating performance, and strictly adhere to the provisions of IVASS Regulation no. 24/2016.

Assessing the appropriateness of credit ratings

In order to measure the credit rating of assets in the company's portfolios, apart from the ratings given by the main rating agencies (Standard & Poor's, Moody's and Fitch Ratings), priority is given to an internal assessment done by the company itself in accordance with the internal models of the Parent Company Intesa Sanpaolo.

This internal assessment is done for all issuers towards whom there is a significant exposure.

The process of defining internal ratings is described in more detail in the Investment Rules.

Assessments of credit rating are used where required by the Solvency II Regulations (i.e. spread and counterparty risks). The Company carries out formal checks on all flows of information regarding credit ratings received from external bodies. The Risk Management operating system also involves a process of user authorisation, following each rating update received from an external body.

The outsourcing agreements with rating agencies providing the company with credit ratings do not contain any limitations on the reporting of external rating information or on the ECAI selected in the quantitative reporting models.

Considerations on the extrapolation of the risk-free rate and volatility adjustment

The Company does not apply the volatility adjustment to the calculation of insurance liabilities.

Below is the valuation regarding the extrapolation of the risk free rate without the volatility adjustment mentioned in Article 44, paragraph 2a, of Directive 2009/138/EC. The curve corresponds to the EIOPA curve.

Risk Free Rate at 31/12/2022

Tenor	NO VA
1	3.18%
2	3.30%
3	3.20%
4	3.15%
5	3.13%
6	3.11%
7	3.09%
8	3.09%
9	3.09%
10	3.09%
11	3.10%
12	3.09%
13	3.07%
14	3.05%
15	3.02%
16	2.97%
17	2.92%
18	2.86%
19	2.81%
20	2.77%
21	2.74%
22	2.72%
23	2.70%
24	2.70%
25	2.70%
26	2.70%
27	2.70%
28	2.71%
29	2.72%
30	2.73%

Internal solvency risk assessment

The main objective of ORSA is to ensure that the companies adopt processes to assess all the current and forward-looking risks of their business and determine the corresponding hedging capital in line with the strategic and RAF objectives. In detail, the Company, by executing the ORSA process, aims to:

- assess, at least on a yearly basis, the risk profile both in the short and long term in line with the time horizon considered for strategic planning (including the capital management plan). This assessment comprises the so-called Pillar 2 risks;

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- assess the significance of the deviation between the risk profile and assumptions underlying the calculation of the regulatory capital;
 - assess the overall solvency needs considering the planning time horizon, ensuring compliance at all times with requirements in terms of the regulatory capital and RAF;
 - make the results of ORSA available to Senior Management, so they may be used in operating and strategic decision-making processes (e.g. capital management, planning, budget process, product development, investments, etc.).

The risk management process is an integral part of the organisation and decision-making processes of the company, as it is prepared in accordance with the ORSA process, and with the Risk Appetite Framework process.

The internal solvency risk assessment is carried out through the ORSA process, which has been adopted by Intesa Sanpaolo Assicura and by the Insurance Group and is split into 2 preliminary transverse activities, and 5 separate, specific phases.

The preliminary activities are:

- defining the Risk Appetite Framework: Intesa Sanpaolo Assicura follows the general principles defined by the parent company for the acceptance and monitoring of risks, in order to ensure a continuous and excellent service toward customers and to create value for all stakeholders;
- defining the methodologies for risk and capital measurement: the methods to measure risks are defined and proposed, along with the risk and capital measurement and control models and systems needed to address unexpected losses. The proposed methodologies are consistent and comply with the requirements set out by current supervisory regulations.

The detailed phases are as follows:

- identifying and monitoring risks: to assess the individual and Insurance Group risk profile, Intesa Sanpaolo Assicura must identify all the risks to which the individual company and the entire Insurance Group is or may be exposed. This identification is aimed at:
 - building an effective risk management system to support the achievement of the company goals while protecting policyholders;
 - determining the risk capital both for regulatory and internal purposes and to assess capital adequacy;
 - performing the internal assessment of the risk profile with regard to that underlying the standard formula.
- Self-Assessment: the objective of this phase is to assess the regulatory capital requirement and the economic capital considering all the relevant risks to which Intesa Sanpaolo RBM Salute and the Insurance Group companies are exposed, and taking into account the strategic and business objectives. Unlike the Pillar 1 requirements, the assessment includes also any material risks not considered in Pillar I and requires a forward-looking internal assessment of risk and solvency.
- Capital adequacy assessment: the objective of this phase is to assess the capital adequacy in terms of own funds compared to the level of risk assumed. The phase to determine the available own funds and to compare it with the economic capital is broken down in the following subphases:
 - determination of available own funds;
 - assessment of capital adequacy.

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- preparation and approval of the ORSA Report: Intesa Sanpaolo Assicura contributes to the results of the ORSA process which are contained in a single report. The "Single internal risk and solvency assessment report" is a consolidated document (supervisory report on the internal risk and solvency assessment) covering the internal risks and solvency assessment carried out at Insurance Group level and at the level of some group subsidiaries at the same date and in the same reporting period;
 - independent review of the ORSA process: the ORSA process is included in the audit scope, and is periodically audited by the Audit function. The results of the audits are submitted to the Board of Directors in the periodic reports, and used by it for the process assessment and challenge activity.

Within the ORSA process, the Board of Directors, the Senior Management of the Company and the Internal Control and Risks Committee of the USCI have a fundamental role.

With specific reference to the ORSA process, the Board of Directors sets out and approves the policy for the current and forward-looking risk assessments, ensures their timely adaptation to significant changes in strategic policies, organisational arrangements and the business environment and promotes full use of the ORSA results for strategic purposes and in the decisions implemented by the Company. In addition, the Board of Directors:

- determines the Risk Appetite in line with its global solvency needs, identifying the types of risk it will assume, consistently establishing the relative risk tolerance limits of the Company, which it reviews at least once a year;
- approves the Company's risks map;
- approves the methodologies to measure, review, manage and control significant risks, contained in the Policies on their management;
- ensures that the risk management policy is implemented consistently and continuously within the Company, taking into account its structure, size and specificity, as well as the risks and the mutual interdependencies;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;
- approves the level of regulatory capital and current and forward-looking economic capital quantified based on the risks identified in the risk map;
- approves the level of current and forward-looking own funds to hedge all the risks identified in the risk map;
- assesses the ORSA process with the support of the core functions;
- approves the results of the ORSA process, expressing a final opinion on the current and forward-looking capital adequacy supported by the relevant reasons;
- approves the capital needs plans and resolves upon the capitalisation measures and other corrective/mitigation measures to protect current and forward-looking capital adequacy.

With reference to the internal risk and solvency assessment, Senior Management:

- circulates the Policies on risk management and is responsible for their implementation;
- critically assesses the outcome of the Risk Assessment process and monitors the follow-up actions to be taken based on its outcome;

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- implements the internal risk assessment and solvency policy of the Company, contributing to ensuring the definition of operating limits and ensuring the prompt verification of the limits themselves, as well as the monitoring of risk exposure and compliance with the tolerance limits of the Company.

The Internal Control and Risks Committee of the USCI assists the Board of Directors in determining the guidelines of the internal control and risk management system, in the periodic verification of its adequacy and its effective functioning, and in the identification and management of the main business risks. Moreover, it monitors the specific risk profile of the Company.

With specific reference to the ORSA process, the Risk Committee:

- takes steps to ensure the full use of the results of the ORSA for strategic and decision-making purposes of the Company;
- assesses the proposals to submit to the Board of Directors for final approval on:
 - ORSA process description;
 - risk appetite level;
 - risk map;
 - methodologies for measuring, assessing, managing and controlling risks;
 - stress test methodologies;
 - level of current and forward-looking economic capital;
 - level of own funds to cover current and forward-looking capital - ORSA Report.

The Risk Committee periodically analyses the results of monitoring the economic capital and regulatory requirements both in current and forward-looking terms and of the *stress tests* submitted by Risk Management.

The Functions involved in the ORSA evaluations include the Actuarial Function with regard to sharing and contributing to stress tests and sensitivity analyses.

The internal risk assessment is prepared annually, and is examined and approved by the Board of Directors of the Company.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Company assures the quality of the data used in the calculation processes.

To guarantee the quality of data the Company has set up a data quality management framework in accordance with the Solvency II requirements. The framework is designed to ensure ongoing compliance with the data quality requirements contained in the European standards on the appropriateness, completeness and accuracy of information. European regulations require that Companies adopt processes and procedures aimed at ensuring that the data used to calculate provisions comply with these standards.

The Company considers information to be of primary importance for the organisation and for the pursuit of the strategic and business objectives; in this regard, the Company outlined a data governance system aimed at ensuring a high level of quality and monitoring of the entire data production/transformation process, starting from generation, through subsequent transformations and up to the supply of target systems.

Specifically, the Data Governance system is established to ensure compliance with the following requirements:

-
- **accuracy:** the absence of distortion in processes to register, collect and subsequently process data.

Internally, the following principles are considered to be criteria that characterise the accuracy of data:

- **certifiability:** the compatibility of controlled information with a source considered to be correct;
- **suitability:** the compatibility of information in two different sets (e.g. input flow and system table) related to each other;
- **consistency:** the compatibility of information in the same set (or information unit, e.g. the same flow or same table). This criterion also establishes the absence of unexpected data duplications;
- **stability or relevance:** data fluctuations within the limits of an expected variation interval;
- **completeness:** recording of all events, transactions and information with the relevant attributes necessary for processing.

Internally, the following principles are considered to be criteria that characterise the completeness of data:

- **coverage:** the presence of all cases/records expected;
- **existence:** the compilation of data that cannot have zero values;
- **timeliness:** the availability of data produced by the information system within the times required by the end user;
- **integrity:** the absence of unauthorised data alteration or manipulation, which may compromise accuracy and completeness;
- **sufficiency:** the adequacy of the number of observations and level of detail of data available to meet the required input for adopting the methodologies.

In compliance with the regulatory provisions, data quality must be assessed according to the following dimensions (or "quality standards"):

- **accuracy:** the data must be input without errors and omissions in a consistent and timely manner for the purposes for which it is processed. By way of example, the controls on the structure of the information flow (presence of the primary key and mandatory data, presence of duplicate records, etc.) and on the requirements of timeliness in the provision of data can be considered accuracy controls;
- **completeness:** the data must have sufficient granularity and historical depth for the purposes for which it is processed. For example, the assessment of completeness requires the implementation of periodic procedures to ascertain that no data have been excluded. From a technical point of view, to ensure the completeness of the individual data flow, mechanisms are to be put in place to prevent deliberate or accidental causes, such as abnormal interruptions of IT procedures, from resulting in the production of incomplete data;
- **appropriateness:** the data must be directly related to the purposes for which it is processed. For example, the assessment of the appropriateness requires procedures for the periodic review of compliance of the data with company needs including through performance controls, comparisons with benchmarks or balancing of data with certified sources.

The Data Quality process (or Data Quality Management) is aimed at pursuing the objectives of accuracy, completeness and appropriateness of data as set out by European and Italian regulations. It involves the following four main phases:

- definition of data;
- definition of controls;
- performance of controls and assessment of data quality;
- identification and resolution of irregularities;
- monitoring and reporting.

Considering the applicable legal framework, Data Quality management principles are applied gradually to "elements that may affect the undertaking's risk profile and its solvency situation", starting from the data used to calculate the capital requirement and technical provisions.

Specific company positions are responsible for the data and information comprising information assets, both in the case of data produced internally and data supplied by third parties.

For the assessment of solvency using the standard formula and in the internal risk assessment, the Group ensures the quality of the data used in the calculation processes.

Processing was carried out starting from certified excerpts of the closing of asset and liability portfolios by the management systems of each Insurance Group company, subject to data quality checks in accordance with regulatory requirements. All the files used are also stored in a special repository of the SolvencyII database.

Internal risk and solvency assessment

The internal risk management process for Intesa Sanpaolo RBM Salute is conducted in accordance with the Group process. Refer to the details of the section on the Insurance Group.

B.4 INTERNAL CONTROLS SYSTEM

Intesa Sanpaolo Vita Insurance Group

The internal control system of the Insurance Group involves all the company structures and every member of staff, each within his/her own field of competence and responsibility, in order to ensure constant and effective monitoring of risks.

The Board of Directors of Intesa Sanpaolo Vita, responsible for the Group, is in charge of the Group's internal control, and ensures that the Top Management of the USCI implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main risks of the Group are adequately identified and managed.

The Senior Management of Intesa Sanpaolo Vita, including with reference to the role of the USCI, ensures that staff are made aware of their own role and responsibilities so as to be effectively engaged in controls understood to be an integral part of their activity. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and reporting channels. It also verifies

the exercise of powers assigned to attorneys-in-fact as regards transactions deemed major in terms of dimensions and characteristics, conducted with the powers granted to them.

The Insurance Group's Internal Controls System is structured on multiple levels.

- **Level I Control** - line controls: consist in the checks carried out both by those who perform a given activity and by those who are responsible for supervision, generally within the same organizational unit. These are the controls carried out by the production units or embedded in the automated procedures or carried out as part of back-office activities. These are an essential part of the Internal Controls System and require the development and rooting of a "culture of control" in order to ensure the achievement of company goals. The operational and business departments are directly responsible for the risk management process; during the course of their daily operations, these units – in cooperation with the level II functions and, where applicable, the Organisation function – must identify, measure, evaluate, monitor, control, mitigate and communicate the risks arising from ordinary business operations, in accordance with the risk management process. The organisational units must comply with the operational limits imposed upon them by the risk objectives and by the procedures for risk management governed in relevant internal documentation. These controls must be provided for and described in the procedure and set out in the mapping of processes.
- **Level II Control** - risk monitoring: these are specific activities assigned to independent bodies other than the organisational units; their aim is to ensure, among others:
 - the correct implementation of the risk management process;
 - the conformity of the company's operations to the regulations, including the self-governance rules, and helping to set the methods for measuring risks, checking compliance with the limits assigned to the different organizational units and checking consistency of the activities with objectives and risk levels set by the competent company bodies. Specifically, this level includes controls on the risks identified in the risk map resulting from the Risk Assessment process (for example, underwriting risks, credit risks, asset-related and investment risks, operational risks and reputational risks and compliance risks. This group of checks comprises activities carried out by functions such as: the Risk Management, Actuarial, AML, Compliance, Tax controls and GAF and Regulatory Agenda Functions. The Actuarial Function is tasked with the control and supervision of the calculations of the Solvency II technical provisions and assesses the activities carried out by the actuarial units.
- **Level III Control** - internal audit (hereinafter "Audit"): activities to assess whether the Internal Controls System (including the level I and level II controls) are complete, functional and adequate. These activities are identified as controls aimed at identifying violations of procedures and regulations and at periodically assessing whether the organisational structure is complete, adequate and reliable.

Some organisational units, as in the case of the Specialist Functions defined in the Integrated Internal Controls System Regulation of Intesa Sanpaolo, may identify, in the course of their activities, risks and/or shortcomings deemed to be significant for the solvency and/or reputation of the company and Insurance Group by carrying out specific control tasks. In order to set up an integrated and cohesive controls system, the organisational units carry out their functions considering not only the actual corporate situation of the USCI, but also the Insurance Group's overall operating activity and the risks to which it is exposed.

They monitor any risks identified in compliance with the rules approved by the management board on specific risks at a Group level (e.g., underwriting and reserving, liquidity etc.). If

critical aspects are identified, they are reported to the control functions and Senior Management according to the procedures and conditions for the preparation of systematic reports.

In addition to the Level 1, 2 and 3 controls mentioned above, in relation to the core business, the following activities are also the subject of specific risk observing:

- Planning and management control;
- Data quality;
- purchasing cycle, financial reporting, taxation and supervision of the Insurance Group
- IT security and business continuity.

The Insurance Group encourages a favourable control environment, which is a set of behaviours and actions that testify to the importance attached to internal control by the company organisation - this is a prerequisite for its effectiveness and is based on:

- integrity and ethical values;
- dissemination of regulations applicable to the group;
- control activities and the segregation of tasks;
- timely and reliable financial reporting to stakeholders and availability of all the information necessary to evaluate the trend in the company's business, as produced by the standard accounting and management processes and by the ancillary information systems that ensure compliance with data quality standards, which require accuracy, completeness, timeliness, cohesion, transparency and relevance.

This information is brought to the attention of the Board of Directors of companies periodically, with varying levels of detail, in the form of financial and income schedules that summarise management performance.

All the information to be disclosed externally is assessed and authorised in advance by the Unit tasked with producing it. Specifically, financial information must be assessed by those in charge of drawing up accounting documents.

This system ensures the continuous integrity, completeness and correctness of the stored data and of the represented information also for the purpose of enabling a reconstruction of the activity, and the identification of the persons in charge, while ensuring that recorded information can be checked easily.

Implementation of the compliance audit function

In line with provisions in IVASS Regulation no. 38/2018, the Compliance Function was set up in each Company and a Head was appointed.

The compliance activities for Intesa Sanpaolo Assicura, Fideuram Vita and Intesa Sanpaolo RBM Salute are carried out by Intesa Sanpaolo Vita under an outsourcing agreement. Intesa Sanpaolo Life has a local compliance function.

The Compliance Function of the Intesa Sanpaolo Vita Insurance Group performs management and coordination activities vis à vis the Compliance Functions of each Group Company and functionally reports to the Intesa Sanpaolo Compliance Governance and Control Head Office.

The Group's insurance companies and the Intesa Sanpaolo Insurance Agency implement the Policy of the *Compliance Function of the Intesa Sanpaolo Vita Insurance Group*. Furthermore, the aforementioned Policy is adapted, where necessary, to the corporate environment and the local regulations of the individual Group insurance companies; they also implement the *Compliance Rulebook*, which is the operational interpretation of the aforementioned Policy.

The Policy is approved by the Board of Directors and, together with the *Compliance Rulebook*, is updated at least annually.

For details on the implementation of the compliance function, refer to the following sections in relation to the individual Insurance Group companies.

[Intesa Sanpaolo Vita S.p.A.](#)

Internal control system

Refer to the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo Vita recognises the strategic importance of controlling compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The Compliance Policy of the Insurance Group, approved by the Company's Board of Directors, defines the model for managing Compliance risks, including conduct risk and ESG risks.

It describes the compliance macro-processes to correctly identify, assess and manage these risks; as well as the governance arrangements with respect to the specialised functions, setting out their roles and responsibilities.

It is part of the overall risk management model defined in the Company's Corporate Governance System Guidelines and is updated at least annually.

The Compliance Rulebook of the Insurance Group completes the regulatory framework on methodology.

The *Chief Compliance Officer*, who also acts as DPO, reports directly to the Board of Directors in accordance with the regulations and by analogy with the organisational model of the Intesa Sanpaolo Parent Company's Control Functions.

The *Chief Compliance Officer Area* of Intesa Sanpaolo Vita consists of two organisational units: "Group Compliance and Specialist Oversight" and "Life and Non-Life Product Compliance" (hereinafter collectively the "Compliance Function"). In addition, the *Chief Compliance Officer Area* of Intesa Sanpaolo Vita also includes the *Anti Money Laundering (AML)* unit.

The duties and responsibilities of the Compliance Function are described in the Organisational Code and in Directives on the corporate governance system and in the Policy on the internal control system.

The Compliance Function pursues the objectives and performs the tasks assigned by the legislation in force at the time; it is responsible for carrying out a risk-based assessment of the

adequacy of the procedures, processes, policies and internal organisation, in order to prevent compliance risk.

The methodology used to manage compliance risk, which is defined at Insurance Group level, provides for the need to grade the duties of the compliance function in accordance with the regulations requiring specialised forms of control, based on the various regulatory areas involved in the company's business. The Compliance Function still has the ultimate responsibility for defining the methods used to assess compliance risk, to identify the right procedures to prevent and manage this risk, and to check that they are adequate.

For all other applicable regulatory areas with potential compliance risks, for which Specialist Functions have been identified with the necessary expertise, compliance oversight duties have been assigned to these functions, save for the responsibility of the Compliance Function to:

- provide support to the Specialised Functions, for the application of non-compliance risk assessment methodologies defined at ISP Group level and procedures to mitigate it;
- make an independent assessment on compliance risk and the adequacy of oversight adopted by the Specialist Functions for their mitigation;
- give Company Bodies, in periodic reports, an overall view of areas at most risk, overseen by the Specialist Functions.

Based on this model, the Compliance Risk Assessment (CRA) is prepared annually, to measure compliance risk by assessing the risks and oversights on an aggregate basis for each applicable direct and indirect regulatory area.

The aggregate assessment of the risks and oversight leads to the formation of a ranking of regulatory areas, which is used to define and prioritise the assessments.

The Compliance Function may in any case take action in any regulatory area where significant Compliance risks are deemed to exist.

More specifically, the Compliance Function also continuously identifies the regulations applicable to the Company and assesses the adequacy of the controls on non-compliance risk, by planning activities in advance, and by performing specific activities in sensitive areas.

The Compliance Function also proposes organisational changes and consolidation of oversight in order to mitigate Compliance risk, and continuously assesses the adequacy of procedures being issued.

It prepares the Policies required by the relevant regulations and drafts reports on specific issues (e.g. Opinion on Remuneration and Incentive Policies and Report on the Control of Distribution Networks).

The Compliance Function also supervises and takes part in Product Governance (POG) activities, with the aim of consolidating protection of the insured, guaranteeing the product's conformity to a pre-defined customer target, from as early on as the product launch and design phase. Pursuant to Article 5 of IVASS Regulation 45/2020, it carries out checks and analyses on the correct definition and effectiveness of all stages of the approval and review procedure for each product, including information on the insurance products developed, the distribution strategy, and the direct distribution carried out by the company, highlighting any critical issues.

As part of the POG Process, the Compliance Function also clears policies, checking that the pre-contract and contract documentation, commercial manuals and advertising material reflect the indications of regulations.

Lastly, the participation of the Compliance Function in company projects is particularly important in terms of the prior management of compliance risk, and of providing special support and advice.

Intesa Sanpaolo Assicura S.p.A.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Intesa Sanpaolo Assicura guarantees that personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Intesa Sanpaolo Assicura is developed in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo Assicura recognises the strategic importance of controlling compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The Compliance Function of Intesa Sanpaolo Vita carries out compliance activities on behalf of Intesa Sanpaolo Assicura under an outsourcing agreement, save for the appointment within the Company of the Head of the Compliance Function who also acts as DPO.

The Head reports directly to the Board of Directors, in accordance with the regulations and by analogy with the model adopted by the Insurance Group.

The Compliance policy of Intesa Sanpaolo Assicura is prepared in accordance with the same document issued by the Intesa Sanpaolo Vita Insurance Group, updated at least annually and approved by the Board of Directors.

The Policy defines the model for managing Compliance risks, including conduct risk and ESG risks. It describes the compliance macro-processes to correctly identify, assess and manage these risks; as well as the governance arrangements with respect to the specialised functions, setting out their roles and responsibilities.

It is part of the overall risk management model defined in the Company's Corporate Governance System Guidelines.

The Compliance Rulebook of the Insurance Group completes the regulatory framework on methodology.

For details on the roles, responsibilities and Compliance process, refer to the section on Intesa Sanpaolo Vita as the activities of Intesa Sanpaolo Assicura's Compliance Function are implemented in a similar manner.

Fideuram Vita S.p.A.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Fideuram Vita guarantees that the personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Fideuram Vita is developed in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Fideuram Vita recognises the strategic importance of controlling the compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The Compliance Function of Intesa Sanpaolo Vita carries out compliance activities on behalf of Fideuram Vita under an outsourcing agreement, save for the appointment within the Company of the Head of the Compliance Function who also acts as DPO.

The Head reports directly to the Board of Directors, in accordance with the regulations and by analogy with the model adopted by the Insurance Group.

The Compliance policy of Fideuram Vita is prepared in accordance with the same document issued by the Intesa Sanpaolo Vita Insurance Group, updated at least annually and approved by the Board of Directors.

The Compliance Policy defines the model for managing Compliance risks, including conduct risk and ESG risks. It describes the compliance macro-processes to correctly identify, assess and manage these risks; as well as the governance arrangements with respect to the specialised functions, setting out their roles and responsibilities.

It is part of the overall risk management model defined in the Company's Corporate Governance System Guidelines.

The Compliance Rulebook of the Insurance Group completes the regulatory framework on methodology.

For details on the roles, responsibilities and Compliance process, refer to the section on Intesa Sanpaolo Vita as the activities of Fideuram Vita's Compliance Function are implemented in a similar manner.

Intesa Sanpaolo Life D.A.C.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Intesa Sanpaolo Life guarantees that personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Intesa Sanpaolo Life is conducted in accordance with the Group process and the local laws and regulations. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo Life recognises the strategic importance of controlling the compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental aspects of the insurance business.

The Compliance policy of Intesa Sanpaolo Life is prepared in accordance with the same document of the Insurance Group, is updated at least annually and adopted by the Board of Directors.

The Compliance Policy defines the model for managing Compliance risks, including conduct risk and ESG risks. It describes the compliance macro-processes to correctly identify, assess and manage these risks; as well as the governance arrangements with respect to the specialised functions, setting out their roles and responsibilities.

The Compliance Rulebook of the Company, drawn up according to the Compliance Rulebook of the Insurance Group, completes the regulatory framework on methodology.

The Head of Compliance, who is responsible for coordinating the AML functions and also acts as DPO, reports directly to the Board of Directors, by analogy with the organisational model for the core functions of Intesa Sanpaolo Vita, in its capacity as USCI.

The Compliance Function is responsible for carrying out a risk-based assessment of the adequacy of the procedures, processes, policies and internal organisation, in order to prevent compliance risks.

The methodology used to manage compliance risk, which is also defined at Insurance Group level, provides for the need to grade the duties of the compliance function in accordance with the regulations requiring specialised forms of control, based on the various regulatory areas involved in the company's business.

The Compliance Function still has the ultimate responsibility for defining the methods used to assess compliance risk, to identify the right procedures to prevent and manage this risk, and to check that they are adequate.

For all other applicable regulatory areas with potential compliance risks, for which Specialist Functions have been identified with the necessary expertise, compliance oversight duties have been assigned to these functions, save for the responsibility of the Compliance Function to:

- provide support to the Specialised Functions, for the application of non-compliance risk assessment methodologies defined at ISP Group level and procedures to mitigate it;
- make an independent assessment on compliance risk and the adequacy of oversight adopted by the Specialist Functions for their mitigation;
- give Company Bodies, in periodic reports, an overall view of areas at most risk, overseen by the Specialist Functions.

Based on this model, the Compliance Risk Assessment is prepared annually, to measure compliance risk by assessing the risks and oversights on an aggregate basis for each applicable direct and indirect regulatory area.

The aggregate assessment of the risks and oversight leads to the formation of a ranking of regulatory areas, which is used to define and prioritise the assessments. The Compliance Function may in any case take action in any regulatory area where significant Compliance risks are deemed to exist.

More specifically, the Compliance Function also continuously identifies the regulations applicable to the Company and assesses the adequacy of the controls on Compliance risk (which are identified in the various regulatory areas within its remit), by planning activities in advance, and by performing specific activities in sensitive areas.

The Compliance Function also proposes organisational and procedural proposals aimed at adapting the controls on Compliance risk, and continuously assesses the adequacy of procedures awaiting issue.

It prepares the Policies within its remit and drafts reports on specific issues (e.g. Opinion on Remuneration and Incentive Policies and Report on the Control of Distribution Networks).

The Compliance Function also takes part in Product Governance (POG) activities, with the aim of consolidating protection of the insured, guaranteeing the product's conformity to a pre-defined customer target, from as early on as the product launch and design phase. As part of the POG Process, the Compliance Function also clears policies, checking that the pre-contract and contract documentation, commercial manuals and advertising material reflect the indications of regulations.

Lastly, the participation of the Compliance Function in company projects is particularly important in terms of the prior management of compliance risk, and of providing special support and advice.

Intesa Sanpaolo RBM Salute S.p.A.

Internal control system

The Board of Directors is responsible for the company's internal control and risk management system and checks that Senior Management implements the system correctly, assessing its

adequacy and proper functioning and ensuring that the main business risks are adequately identified and managed.

The Senior Management of Intesa Sanpaolo RBM Salute guarantees that personnel are made aware of their roles and responsibilities. For this purpose, it ensures that the system of authorities is formalised and is known by staff, as well as the procedures governing the allocation of tasks, the operational processes and the reporting channels.

The internal control system for Intesa Sanpaolo RBM Salute is conducted in accordance with the Group process. Refer to the details of the section on the Insurance Group.

Implementation of the compliance audit function

Intesa Sanpaolo RBM Salute recognises the strategic importance of controlling the compliance risk, in the firm belief that respect for regulations and fair business dealings are fundamental parts of the insurance business.

The Compliance Function of Intesa Sanpaolo Vita carries out compliance activities on behalf of Intesa Sanpaolo RBM Salute under an outsourcing agreement, save for the appointment within the Company of the Head of the Core Function.

The Head reports directly to the Board of Directors, in accordance with the regulations and by analogy with the model adopted by the Insurance Group. The DPO role is covered by a person within the company.

The Compliance policy of Intesa Sanpaolo RBM Salute is prepared in accordance with the same document issued by the Intesa Sanpaolo Vita Insurance Group, updated at least annually and approved by the Board of Directors.

The Compliance Policy defines the model for managing Compliance risks, including conduct risk and ESG risks. It describes the compliance macro-processes to correctly identify, assess and manage these risks; as well as the governance arrangements with respect to the specialised functions, setting out their roles and responsibilities.

It is part of the overall risk management model defined in the Company's Corporate Governance System Guidelines.

The Compliance Rulebook of the Insurance Group completes the regulatory framework on methodology.

For details of the roles, responsibilities and Compliance process, refer to the section on Intesa Sanpaolo Vita as the compliance audit function of Intesa Sanpaolo RBM Salute is implemented in the same way.

B.5 INTERNAL AUDIT FUNCTION

Intesa Sanpaolo Vita Insurance Group

The mission assigned to the Audit Function (the "Function") is to "Ensure a constant, independent and impartial assessment activity on the adequacy and efficiency of the internal controls system and its suitability to ensure the effectiveness and efficiency of business processes, the protection

of corporate assets and of the Insurance Group, the reliability and integrity of financial and management information, compliance of the activity with current regulations, directives and company procedures.

Ensuring constant assessment and monitoring of the other components of the Group's corporate governance system.

Provide advice to the Group's corporate functions, including through participation in projects in order to create added value and improve the effectiveness of control processes, risk and compliance management, and governance.

Oversee the system of internal controls and the other elements of the group's corporate governance system, by providing governance and guidance for the relevant local audit departments.

Support the company governance and ensure Senior Management, company bodies and competent institutions (IVASS, Bank of Italy, etc.) receive timely and systematic disclosures on the state of the controls system, on the results of the activities carried out and on the progress of corrective actions.

Internal auditing is done by the Audit function of the Intesa Sanpaolo Vita Insurance Group as the ultimate Italian parent company, it reports functionally to the Chief Audit Officer of the parent company Intesa Sanpaolo.

The Head of the Audit Function of the Intesa Sanpaolo Vita Insurance Group coordinates the Controls Coordination Committee, a body with an information and advisory role that operates to consolidate the coordination and the mechanisms of inter-functional cooperation as part of the internal controls system of the Insurance Group.

Finally, the "Group Rules on *Whistleblowing systems*" lay down reporting obligations to the Corporate Bodies by the Head of whistleblowing systems, who is identified in the Head of *Audit* of the Italian Ultimate Parent Company Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors.

The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the Company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit function to update their reports, the dashboard, the repository (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee, the Board of Statutory Auditors and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months, to the Internal Control and Risks Committee, the Board of Statutory Auditors and the Board of Directors (every three months to the Audit & Reporting Committee of Intesa Sanpaolo Life) on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the Internal control and risks Committee, the Board of Directors and the Board of Statutory Auditors (Audit & Reporting Committee for Intesa Sanpaolo Life) on any particularly serious situations, breaches or deficiencies; during periodic meetings, it reports to the Supervisory Board, in the event of interventions concerning compliance risks;
- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;

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- every year to the Heads of Open-end Pension Funds, on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
 - the Parent Company Intesa Sanpaolo, sending the documents according to the procedures and timing set out in the relevant operational guide.
 - reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
 - if there is a need to inform IVASS in response to tangible evidence of serious violations that could significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit function will agree with the Board of Statutory Auditors (Audit & Reporting Committee for Intesa Sanpaolo Life) on an independent form of collaboration designed to ensure that all relevant information about the results of the audits is promptly transmitted, to guarantee continuous updates on the supervision of the internal controls system.

Considering the responsibilities assigned to the Supervisory Board by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of the Audit function.

Lastly, the function maintains relations with the auditing firm.

Independence and objectivity

The Audit function will report directly to the Company's Board of Directors and is independent from the operational units. The Audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company entities and to documentation related to the audited business area, including information instrumental to the assessment of the adequacy of controls on outsourced company functions;
- organic links with all the centres in charge of internal control functions; human and technological resources which are adequate in quantitative and qualitative terms, to

continuously carry out audits, analyses and other tasks necessary to carry out the Function's duties;

- sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1)(l) of IVASS Regulation no. 38/2018;
- is appointed and removed from office by the Board of Directors, having consulted the Board of Statutory Auditors and always the Internal Control and Risks Committee, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
- if independence or objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences.
- If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to Senior Management and to the Board of Directors.

The Audit function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to the current regulations (IVASS Regulation no.38/2018 Article 25), Audit personnel have been included in the company's "Policy on fitness for office and requirements" in terms of integrity, professionalism and independence to be assessed. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

Intesa Sanpaolo Assicura S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function. The relevant activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain

their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors.

The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting of the USCI by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit function to update their reports, the dashboard (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee of the USCI and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and Board of Directors on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the Board of Directors and Board of Statutory Auditors on any particularly serious situations, breaches or deficiencies;
- during periodic meetings, it reports to the Supervisory Board, in the event of interventions concerning compliance risks;

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- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
 - the parent company Intesa Sanpaolo, by ending the documents according to the procedures and timing set out in the relevant operational guide;
 - reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
 - if there is a need to inform IVASS in response to tangible evidence of serious violations that could significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit function will agree with the Board of Statutory Auditors on an independent form of collaboration designed to ensure that all relevant information about the results of the audits is promptly transmitted, to guarantee continuous updates on the supervision of the internal controls system.

Considering the responsibilities assigned to the Supervisory Board by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of Audit.

The function also maintains relations with the auditing firm.

Independence and objectivity

The Audit function will report directly to the Company's Board of Directors and is independent from the operational units. The company's audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company entities and to documentation related to the audited business area, including information instrumental to the assessment of the adequacy of controls on outsourced company functions;
- organic links with all the centres in charge of internal control functions;

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- human and technological resources which are adequate in quantitative and qualitative terms, to continuously carry out audits, analyses and other tasks necessary to carry out the Function's duties;
 - sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1) of IVASS Regulation no. 38/2018;
- is appointed or revoked by the Board of Directors, having consulted the Board of Statutory Auditors, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
- if independence or objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences.
- If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to senior management and to the Board of Directors.

The Audit function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to current regulations (IVASS Regulation 38/2018 Article 25), Audit personnel have been identified based on the company's "Policy on fitness for office and requirements" in terms of meeting requirements of integrity, professionalism and independence. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

Fideuram Vita S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function. The relevant activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy, effectiveness and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain

their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors. The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting of the USCI by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the Company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit Function to update their reports, the dashboard, the repository (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and Board of Directors on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the internal control and risks Committee of the USCI, the Board of Directors and the Board of Statutory Auditors on any particularly serious situations, breaches or deficiencies;
- during periodic meetings, it reports to the Supervisory Board, in the event of interventions concerning compliance risks;

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- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
 - every year to the Heads of Open-end Pension Funds, on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
 - the Parent Company Intesa Sanpaolo, sending the documents according to the procedures and timing set out in the relevant operational guide.
 - reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
 - if there is a need to inform IVASS in response to tangible evidence of serious violations that may significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit Function establishes, with the Board of Statutory Auditors, an independent form of collaboration aimed at ensuring complete and timely sending of the relevant information on the results of assessments carried out to ensure continuous update on the monitoring of the internal controls system.

Considering the responsibilities assigned to the Supervisory Board by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of the Audit function.

Lastly, the function maintains relations with the auditing firm.

Independence and objectivity

The Audit Function will report directly to the company's Board of Directors and is independent from the operational units. The company's audit function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company entities and to documentation related to the audited business area, including information instrumental to the assessment of the adequacy of controls on outsourced company functions;

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- organic links with all the centres in charge of internal control functions;
 - human and technological resources which are adequate in quantitative and qualitative terms, to continuously carry out audits, analyses and other tasks necessary to carry out the Function's duties;
 - sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit Function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1)(I) of IVASS Regulation no. 38/2018;
- is appointed and removed from office by the Board of Directors, having consulted the Board of Statutory Auditors and the USCI Internal Control and Risks Committee, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
- if independence or objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences.
- If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to Senior Management and to the Board of Directors.

The Audit Function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to current regulations (IVASS Regulation 38/2018 Article 25), Audit personnel have been identified based on the company's "Policy on fitness for office and requirements" in terms of meeting requirements of integrity, professionalism and independence. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

Intesa Sanpaolo Life D.A.C.

The Audit function of Intesa Sanpaolo Vita performs audit activities for Intesa Sanpaolo Life, under an outsourcing agreement.

Refer to the information given in the section on Intesa Sanpaolo, in accordance with the applicable regulations.

Independence and objectivity

The company's audit operations have been outsourced to the USCI, through its Audit function, under an outsourcing agreement. Refer to the section on Intesa Sanpaolo Vita.

Intesa Sanpaolo RBM Salute S.p.A.

The Audit Function of the Company comprises a specific Organisational Unit, directly reporting to the Board of Directors and has appointed the Head of the function. The relevant activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

The mission assigned to the Audit Function is to ensure a constant, independent and impartial assessment of the adequacy and efficiency of the internal controls system, and make sure that it guarantees the effectiveness and efficiency of business processes, the protection of assets and of the Insurance Group and the reliability and integrity of financial and management information, while ensuring that all activities comply with current regulations, directives and company procedures.

The Audit Function provides support and advice to other company functions, participating in projects to create added value, improve the effectiveness of the control processes and maintain their adequacy to the development of structures and internal processes. The function also supports the company governance and provides Senior Management, company bodies and institutions such as IVASS and the Bank of Italy with timely and systematic disclosures on the state of the controls system, the results of the activities and on the progress of corrective actions.

The Head of the Audit Function produces an annual action plan for the Board of Directors. The annual plan takes into account the evidence provided during the Controls Coordination Committee meeting of the USCI by the control functions and the level of attention required from the various processes/Organisational Units depending on the risk level.

The Head is tasked with assigning processes and/or entities the corresponding level of attention based on elements that are as objective as possible. Planning is therefore based on the analysis and assessment of the potential risks carried out through risk assessment methods, the processing of indicators relating to the operations of the Company to identify potentially abnormal transactions and/or situations or through a comparative examination of the information and findings continuously collected from the Organisational Units.

The results of audit activities are presented in audit reports, prepared according to a standard format and containing suggestions for eliminating the deficiencies found. The recipients of the audit reports are the Organisational Units of the Company, specifically the audited units, and Senior Management.

The submission of the report is the start of a process that sheds light on the causes of any irregularities and identifies, schedules and implements corrective actions. For this purpose, the Audit function will meet with the management of the audited unit in an exit meeting, as well as the other business units that were involved in identifying and developing all the corrective actions. At the end of the meeting a draft plan for the development of corrective actions to be submitted to the Board of Directors is formalised and the latter is tasked with determining the measures to be taken. The actions will then be used by the Audit Function to update their reports, the dashboard, the repository (which contains all the audit points highlighted during the activity, and the actions planned to remedy them), and for the follow-up actions.

Checks on the corrective actions proposed by the Audit Function during its interventions are carried out quarterly. The follow-up activity carried out consists of a written report with the summary of the interventions implemented to eliminate any findings during the audit and those not yet implemented. The report will identify the reasons for any delay in implementing corrective measures by the stated deadline.

With regard to audit reporting activities, the Head of the Audit Function will report:

- quarterly, to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and the Board of Directors on the results and recommendations in relation to audits conducted in the period;
- every six months to the Internal Control and Risks Committee of the USCI, the Board of Statutory Auditors and Board of Directors on the activity carried out in the period, providing written results of its audits, identifying discrepancies and highlighting the improvement actions adopted or to be adopted;
- urgently to the internal control and risks Committee, the Board of Directors and the Board of Statutory Auditors on any particularly serious situations, breaches or deficiencies;
- during periodic meetings, it reports to the Supervisory Board, in the event of interventions concerning compliance risks;
- every year, to the administrative body, Senior Management and the control body with regard to the activities carried out on anti-money laundering and terrorist financing and the related results, without prejudice to the principle of confidentiality on reports of suspicious transactions;
- the Parent Company Intesa Sanpaolo, sending the documents according to the procedures and timing set out in the relevant operational guide.
- reports to the other control functions by sending extracts of reports on its audit activities, and a Dashboard at least every six months;
- if there is a need to inform IVASS in response to tangible evidence of serious violations that may significantly prejudice the sound and prudent management of the Company, the Audit function will implement the provisions of internal procedures, informing the Chair of the Board of Directors and the Chair of the Board of Statutory Auditors.

The Audit Function has links with all other Core and Control Functions of the Company and of the Insurance Group entities; it will exchange information either through specific meetings and by sending documentation and reports, attending discussion groups with the supervisory functions, or by sitting on committees.

The Audit Function establishes, with the Board of Statutory Auditors, an independent form of collaboration aimed at ensuring complete and timely sending of the relevant information on the results of assessments carried out to ensure continuous update on the monitoring of the internal controls system.

Considering the responsibilities assigned to the Supervisory Board by the Board of Directors and the professional contents of the activities that characterise it, the Body, in carrying out its monitoring and control tasks, is supported by the Head of the Audit function.

Lastly, the function maintains relations with the auditing firm.

Independence and objectivity

The Audit Function will report directly to the Company's Board of Directors and is independent from the operational units. The company's Audit Function reports in functional but not hierarchical terms to the head of the Audit function of the Insurance Group.

The Head of the Audit Function discusses the mission of internal auditing and the mandatory elements of the Internal Professional Practices Framework with Senior Management and the Board of Directors.

The internal audit Policy describes how the Company's Audit Function maintains the required independence.

The Audit function has the following characteristics:

- an organisational structure that guarantees its independence and autonomy so that its objective judgement is not compromised;
- free access to all company entities and to documentation related to the audited business area, including information instrumental to the assessment of the adequacy of controls on outsourced company functions;
- organic links with all the centres in charge of internal control functions;
- human and technological resources which are adequate in quantitative and qualitative terms, to continuously carry out audits, analyses and other tasks necessary to carry out the Function's duties;
- sufficient knowledge to assess the risks of fraud and the way in which these are managed by the organisation, however it is not necessary for the Department to have the knowledge of those whose primary responsibility is the invest identification and investigation of fraud.

The independent action of the Audit function is also ensured by the Head who:

- has specific expertise and professionalism and meets the eligibility requirements for the position to carry out the activity, as governed by the Rules adopted pursuant to article 25(1)(I) of IVASS Regulation no. 38/2018;
- is appointed and removed from office by the Board of Directors, having consulted the Board of Statutory Auditors and the USCI Internal Control and Risks Committee, which sets the tasks, powers, responsibilities and reporting procedures to the Board;
- has no hierarchical and functional relations with the audited areas;
- reports its activity directly to the Board of Directors and to the Board of Statutory Auditors;
- confirms to the Board of Directors, at least on an annual basis, the organizational independence of the internal audit activity;
- informs the Board of Directors of any interference in determining the scope or objective of internal audits, in carrying out the work, in disclosing the results and discussing the implications;
- if independence or objectivity has been compromised or appears to be compromised, it will inform the relevant parties of the circumstances of these influences.
- If there are any breaches of the code of ethics or standards that may affect the scope or work done during the internal audit activity, it will disclose any non-conformities and their impact, to Senior Management and to the Board of Directors.

The Audit Function is staffed by people with the necessary skills, abilities and knowledge to conduct their work competently and professionally.

According to current regulations (IVASS Regulation 38/2018 Article 25), Audit personnel have been identified based on the company's "Policy on fitness for office and requirements" in terms of meeting requirements of integrity, professionalism and independence. Therefore, each year, the Board of Directors will assess whether the Audit team meets these requirements.

B.6 ACTUARIAL FUNCTION

Intesa Sanpaolo Vita Insurance Group

The activities of the Actuarial function are carried out in accordance with the provisions of Article 272 of Delegated Regulation (EU) 2015/3 and Article 48 of the Solvency II Directive (2009/138/EC).

Apart from performing its duties for the Company, the Actuarial Function of the USCI has introduced a series of controls, in its capacity as the Actuarial function of the USCI parent company.

The Group Companies must send the Actuarial function of the Parent Company all the information needed for the relevant control activity.

The Group Actuarial Function carries out independent audits, and in performing its coordination and steering duties, supervises the contents of documents prepared by the Actuarial Function of individual companies, as well as the completeness of audit activities carried out, with reference to the following areas:

- Solvency II Technical Provisions;
- Underwriting policies and reinsurance agreements;
- contribution to the risk management system and to the internal risk and solvency assessment; in this context, the Actuarial Function contributes to the assessments that lead to the identification of specific Group parameters (GSP), and those necessary to quantify them.

Intesa Sanpaolo Vita S.p.A.

The Actuarial Function of Intesa Sanpaolo Vita reports directly to the Board of Directors to ensure its independence in control activities.

In particular, the Head of the Actuarial Function:

- is responsible for the fulfilment of the function's duties;
- must meet the requirements of competence, integrity and experience (in the same way as other members of Function identified as key resources);
- with regard to Solvency II, the Head of the Actuarial function reports at least once a year to the Board of Directors, expressing an opinion on the adequacy of the technical provisions, the underwriting and reserving policy, and the reinsurance agreements. Specifically, the opinion on the technical provisions included in the Solvency Report will consist of an analysis of their adequacy and reliability both in terms of process and numerical results. This opinion can be

accompanied, if necessary, by a series of recommendations and indications relating to potential improvement areas;

- reports annually to the Board of Directors on its activities plan, indicating the actions it will take, considering the main risks the company is exposed to and activities to control on a priority basis (including activities relative to regulatory compliance).
- submits, at least once a year, a report to the Board of Directors summarising, in line with the activity plan, the activities carried out and the audits performed, the assessments made, the outcomes, the critical issues and shortcomings detected and the recommendations made for their removal, as well as the status and timing of the implementation of improvement measures, if any.

The Head of the Actuarial Function is provided free access to the information needed to carry out his/her responsibilities to the extent allowed by law.

The Head of the Actuarial Function and the company representative sign the report on the current and foreseeable performance, as required by section 32 of Annex 14 to ISVAP Regulation no. 22/2008.

In addition, the Actuarial function:

- is an active participant in the preparation of reorganisation and/or financing plans for the Company;
- contributes to the assessment of requirements for exercising the option to temporarily suspend capital losses for non-current securities for the purpose of preparing the financial statements and the half-yearly report;
- participates in the *Product Oversight Governance* process with technical-actuarial checks on new products or on substantial changes to existing products, in the pre-marketing phase and in the subsequent post-sales monitoring phase;
- liaises with other core functions, organisational units and committees, by exchanging information, in accordance with the relevant internal rules.

The company's Actuarial function also performs a series of duties as part of the audits on the adequacy of the technical provisions, as provided for in IVASS Provision no. 53/2016. In particular, the Head of the Actuarial function prepares and signs the technical report on the provisions of the direct Italian portfolio which the Company intends to include in the financial statements. In the report, the Actuarial function describes in detail the procedures and assessments carried out with reference to the basic techniques used to calculate the technical provisions. It specifically highlights any implicit valuations and the reasons for them, confirms the accuracy of the procedures, reports on the audits of the procedures used to calculate the provisions and for the correct recording of the portfolio, and gives an opinion on the sufficiency of all the technical provisions.

[Intesa Sanpaolo Assicura S.p.A.](#)

The Actuarial Function of Intesa Sanpaolo Assicura reports directly to the Board of Directors to ensure its independence in control activities.

The activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

Refer to the information given in relation to roles and responsibilities in the section on Intesa Sanpaolo Vita.

With reference to the direct Italian portfolio provisions, which the company intends to recognise in the company's statutory accounts, the Head of the Actuarial Function also signs the report on technical provisions only for the following lines: Third-party Motor (Land-based) (Line 10) and Third-party marine, lake and river craft (Line 12). Together with the legal representative of Intesa Sanpaolo Assicura, they will also sign the annual CARD claims report as required by IVASS provision no. 43/2016.

As regards risk management, the Actuarial Function contributes to assessments that identify specific business parameters (USP), and parameters to determine them, as well as controls on the consistency of data used to calculate specific parameters and the parameters used to determine technical provisions.

Fideuram Vita S.p.A.

The Actuarial function of Fideuram Vita reports directly to the Board of Directors to ensure its independence in control activities.

The activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

Refer to the information given in relation to roles and responsibilities in the section on Intesa Sanpaolo Vita.

Intesa Sanpaolo Life D.A.C.

The Head of the Actuarial Function reports directly to the Board of Directors in order to guarantee independence in control activities.

The roles and responsibilities are in line with the structure in force at the Parent Company and correspond to the specific requirements of the Local Regulator.

Intesa Sanpaolo RBM Salute S.p.A.

The Actuarial Function of Intesa Sanpaolo RBM Salute reports directly to the Board of Directors to ensure its independence in control activities.

The activities of the Function are carried out by Intesa Sanpaolo Vita under a specific outsourcing agreement.

Refer to the information given in relation to roles and responsibilities in the section on Intesa Sanpaolo Vita.

B.7 OUTSOURCING

Intesa Sanpaolo Vita Insurance Group

Activities may be outsourced due to the need to achieve cost savings (for example services that would require investments and overheads if they were performed internally can be done by a specialised firm that can rely on economies of scale); specialised companies with best practices in a specific business such as financial management may also be used; the need to focus efforts on the core business, sourcing non-characteristic activities externally (e.g. outsourcing of communication management services). objectives to streamline the organisational model of the Insurance Group.

Intesa Sanpaolo Vita has adopted and updates the Policy on outsourcing and selecting suppliers of the Insurance Group, that defines the principles used to regulate the decision-making process, the responsibilities, duties and controls applicable to the outsourcing of activities and company functions within the Intesa Sanpaolo Vita Insurance Group, and to other third parties, thus strengthening the control of risks related to outsourcing decisions.

The Policy:

- establishes that the Insurance Group Companies may, if appropriate, outsource some of the activities and/or processes within their production cycle based on the need to achieve economies of scale and of purpose;
- regulates the criteria for identifying which services should be outsourced, based on the possibility of obtaining intragroup (in reference to the Intesa Sanpaolo Group) or external suppliers, according to the guidelines of the Regulator and of the Parent Company;
- regulates the criteria for choosing service providers based on ethical, documentary and technical criteria, and their financial status.

Intesa Sanpaolo Vita S.p.A.

Intesa Sanpaolo Vita mainly uses Intesa Sanpaolo Group companies for the outsourcing of essential services; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) nor mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

All the outsourced services, and relations with outsourcers themselves are governed by service agreements, which define the object and terms of the services, the rights, obligations, responsibilities, penalties, duration of the agreements, renewal, termination conditions and any reciprocal commitments related to termination, the Service Level Agreement, the parameters used to monitor service levels, and the process used to determine payment.

The policy on outsourcing and selecting suppliers of Intesa Sanpaolo Vita regulates the audits and evaluations that the business units receiving the services must perform, and defines the reports that need to be produced for Senior Management, the Board of Directors and the Regulator, as well as any reports to the Supervisory Board.

In assessing whether the outsourced activity is essential or non-essential, the safeguards adopted by the company comply with the industry regulatory principles expressed by IVASS Regulation no.

38/2018 and Eiopa regulations. The monitoring of the correct execution of activities complies with the agreed standards and service levels, with a view to providing the best possible service to customers; as well as the ability to re-internalize the outsourced activity if necessary, the quantitative and temporal aspect of the activity with reference to its duration and related costs.

Intesa Sanpaolo Assicura S.p.A.

Intesa Sanpaolo Assicura has implemented the Policy on outsourcing of the Insurance Group and adopted its own Policy on outsourcing and selecting suppliers of Intesa Sanpaolo Assicura to outsource essential services in particular; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) nor mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

In line with the organisational model of the Intesa Sanpaolo Vita insurance parent company, the company plans to outsource services relating to the following areas:

- IT systems;
- investments management
- claims management.

The suppliers used are specialised and qualified leading companies that undergo internal due diligence processes or companies that are part of the Intesa Sanpaolo Group. The Company's corporate governance system ensures controls of a similar standard to those that would be implemented if the activities were carried out directly by the Company.

In assessing whether the outsourced activity is essential or non-essential, the safeguards adopted by the company comply with the industry regulatory principles expressed by IVASS Regulation no. 38/2018 and Eiopa regulations. The monitoring of the correct execution of activities complies with the agreed standards and service levels, with a view to providing the best possible service to customers; as well as the ability to re-internalize the outsourced activity if necessary, the quantitative and temporal aspect of the activity with reference to its duration and related costs.

Fideuram Vita S.p.A.

Fideuram Vita has implemented the "Policy on outsourcing and selecting suppliers of the Insurance Group" and adopted its own "Policy on outsourcing and selecting suppliers", mainly for Intesa Sanpaolo Group Companies and the Insurance Group, for outsourcing essential services in particular; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) not mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

In line with the organisational model of the Intesa Sanpaolo Vita insurance parent company, the company plans to outsource services relating to the following areas:

- IT systems;
- investments management

The suppliers used are specialised and qualified leading companies that undergo internal due diligence processes or companies that are part of the Intesa Sanpaolo Group. The Company's corporate governance system ensures controls of a similar standard to those that would be implemented if the activities were carried out directly by the Company.

In assessing whether the outsourced activity is essential or non-essential, the safeguards adopted by the company comply with the industry regulatory principles expressed by IVASS Regulation no. 38/2018 and Eiopa regulations. The monitoring of the correct execution of activities complies with the agreed standards and service levels, with a view to providing the best possible service to customers.

Intesa Sanpaolo Life D.A.C.

Intesa Sanpaolo Life adopted the Outsourcing Risk Policy in 2012. It defines the governance, due diligence processes, approval and monitoring processes followed by the company in accordance with the requirements of the Central Bank of Ireland and European regulations (Solvency II).

Intesa Sanpaolo Life has also adopted the Group outsourcing guidelines.

The Corporate Governance Office function is responsible for maintaining and updating the policy at least once a year as defined in the policy itself.

The Policy sets out the roles and responsibilities within the Company, detailing the internal supplier selection process, the regulations to observe for preparing contracts and the activities for and frequency of monitoring supply performance, in accordance with contracts and internal regulations.

The Policy indicates the requirements that the company needs to assess before entering into a new outsourcing agreement:

- Defining the process and obligations to report to the Central Bank of Ireland in the case of a critical outsourcer;
- Defining the Fitness and Probity standards to be considered;
- Listing the criteria to be included in the selection process.

Each quarter, the Corporate Governance function reports to the Board of Directors on the adequacy of control oversight and the actions considered necessary for more efficient and effective controls.

Intesa Sanpaolo RBM Salute S.p.A.

Intesa Sanpaolo RBM Salute has implemented the Policy on outsourcing of the Insurance Group and adopted its own Policy on outsourcing and selecting suppliers for outsourcing essential services in particular; this choice, which is prevalent but not exclusive (horizontal outsourcing of broad-ranging services) nor mandatory, guarantees, as business areas become more complex to manage, a greater focus on business continuity, service quality, the containment and integrated management of costs, as well as certified professional ability and financial status of the supplier.

In line with the organisational model of the Intesa Sanpaolo Vita insurance parent company, the company plans to outsource services relating to the following areas:

- IT systems;
- investments management
- claims management

The suppliers used are specialised and qualified leading companies that undergo internal due diligence processes or companies that are part of the Intesa Sanpaolo Group. The Company's corporate governance system ensures controls of a similar standard to those that would be implemented if the activities were carried out directly by the Company.

B.8 ADEQUACY OF THE SYSTEM OF GOVERNANCE

The Board of Directors of the USCI for the Group and for for Intesa Sanpaolo Vita and those of the other Group Companies receive regular updates about the assessment of the internal control and risk management system, from the control functions, as part of their periodic reports. The report presented during 2022 by these functions did not highlight any areas of concern in the internal control or risk management system that would affect the proper functioning of the company or of the Insurance Group. In particular the corporate governance system was reviewed, as provided for by Regulation 38, Article 71 (2)(cc), as regards:

- the adequacy of the organisational model;
- the suitability of the system of powers;
- the adequacy and effectiveness of the risk management system;
- the effectiveness and efficiency of the internal control system;
- the effectiveness of the information transmission system;
- the requirements of professionalism, integrity and independence of those who carry out administrative, management and control functions, of the heads and of those who carry out core functions and of other staff able to affect the risk profile.

The outcome of the review process shows that the corporate governance system of the Group and of its insurance Companies is adequate for the nature, scope and complexity of risks concerning the Company's activities.

B.9 OTHER INFORMATION

Intesa Sanpaolo Vita Insurance Group

In 2022, planned corrective actions were implemented. These resulted from proceedings initiated in July 2021 by the Italian Competition Authority (AGCM) against Intesa Sanpaolo RBM Salute.

Following cancellation of the sanction by the Lazio Regional Administrative Court (to which the Company had appealed in October 2021) in November, the ICA appealed to the Council of State in December 2022

Intesa Sanpaolo Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Assicura S.p.A.

See above, in relation to the Insurance Group.

Fideuram Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Life D.A.C.

See above, in relation to the Insurance Group.

Intesa Sanpaolo RBM Salute S.p.A.

See above, in relation to the Insurance Group.

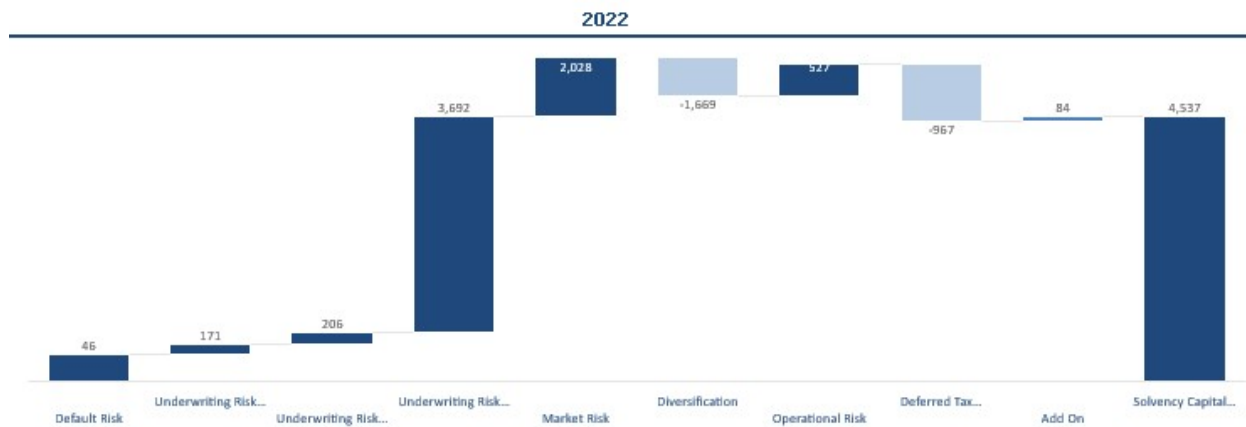
C. RISK PROFILE

Below is the composition of the Insurance Group's capital requirement divided by major risk type.

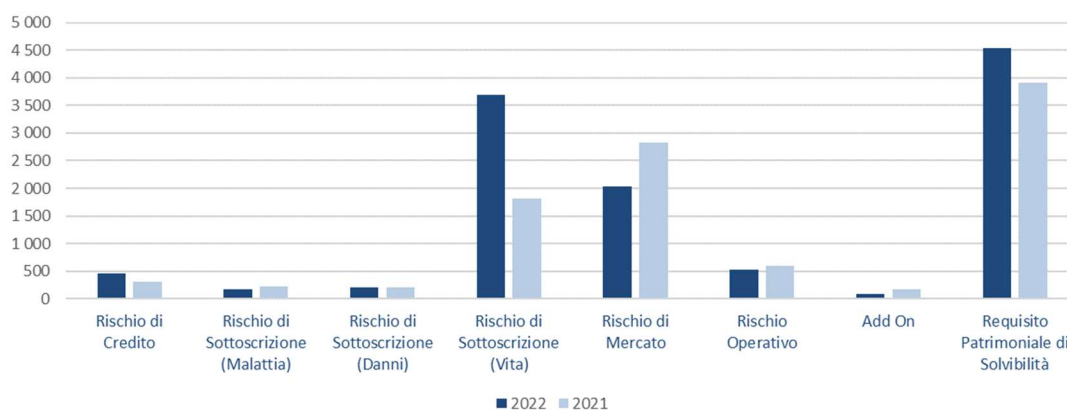
	2022	2021	Delta	
Solvency Capital Requirement	4,536,557.4	3,916,527.9	620,029.4	15.8%
Add On	84,082.2	176,175.2	-92,093.1	-52.3%
Deferred Tax Adjustment	-967,041.4	-831,232.8	-135,808.5	16.3%
Solvency Capital Requirement ante adj	5,419,516.6	4,571,585.5	847,931.1	18.5%
Operational Risk	526,607.6	598,600.1	-71,992.5	-12.0%
Basic Solvency Capital Requirement	4,892,908.9	3,972,985.4	919,923.6	23.2%
Diversification	-1,668,886.2	-1,435,917.8	-232,968.3	16.2%
Market Risk	2,028,480.4	2,832,758.2	-804,277.8	-28.4%
Interest Rate Risk	230,139.1	87,465.3	142,673.8	>100%
Equity Risk	755,657.1	1,200,860.8	-445,203.8	-37.1%
Property Risk	128,574.6	99,606.0	28,968.6	29.1%
Spread Risk	1,032,622.8	1,365,551.4	-332,928.6	-24.4%
Concentration Risk	1,948.0	29,304.1	-27,356.0	-93.4%
Currency Risk	579,959.0	782,944.6	-202,985.6	-25.9%
Diversification	-700,420.2	-732,974.1	32,553.8	-4.4%
Underwriting Risk (Life)	3,692,181.2	1,821,778.3	1,870,403.0	>100%
Mortality Risk	254,606.6	169,748.3	84,858.3	50.0%
Longevity Risk	87,922.4	211,677.8	-123,755.4	-58.5%
Disability Risk	-	-	-	-
Expenses Risk	389,160.1	380,155.2	9,005.0	2.4%
Revision Risk	-	-	-	-
Lapse Risk	3,419,692.7	1,492,136.2	1,927,556.5	>100%
Cat Risk	83,810.7	85,461.7	-1,651.0	-1.9%
Diversification	-543,011.4	-517,400.9	-25,610.5	4.9%
Underwriting Risk (Non-Life)	205,678.9	210,317.7	-4,638.8	-2.2%
Premium & reserve Risk	173,989.6	189,999.9	-16,010.3	-8.4%
Lapse Risk	60,686.5	49,778.9	10,907.5	21.9%
Cat Risk	57,698.4	41,448.7	16,249.7	39.2%
Diversification	-86,695.6	-70,909.9	-15,785.7	22.3%
Underwriting Risk (Health)	170,777.3	233,241.6	-62,464.3	-26.8%
Cat Risk	15,942.1	26,920.9	-10,978.8	-40.8%
Mass Accident Risk	1,483.7	1,360.9	122.8	9.0%
Concentration Risk	848.2	2,398.3	-1,550.2	-64.6%
Pandemic Risk	15,850.3	26,779.3	-10,929.1	-40.8%
Diversification	-2,240.0	-3,617.7	1,377.6	-38.1%
Non- SLT Risk	166,092.7	225,050.3	-58,957.5	-26.2%
Reserve Risk	153,857.7	215,254.5	-61,396.8	-28.5%
Lapse Risk	62,566.9	65,674.4	-3,107.5	-4.7%
Diversification	-50,331.8	-55,878.7	5,546.8	-9.9%
Diversification	-11,257.6	-18,729.6	7,472.0	-39.9%
Default Risk	464,677.3	310,807.4	153,869.8	49.5%

The "Add-On" item in the table above, for the Insurance Group, is due to the adoption by the Company Intesa Sanpaolo RBM Salute S.p.A. of a temporary Conservative Margin, which was updated at 31 December 2022 following discussions with the Supervisory Authority. The Conservative Margin value, updated annually, is 134 million euro, replacing the previous Conservative Margin value of approximately 245 million euro.

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



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



The table and graph show an increase in the Solvency Capital Requirement, compared to the valuation at 31 December 2021, of approximately 16%, i.e. 620 million euro. The increase in the Solvency Capital Requirement is mainly due to the increase in Life Underwriting Risk as a result of the increase in risk-free interest rates partially offset by a reduction in Market Risk.

C.1 UNDERWRITING RISK

Intesa Sanpaolo Vita Insurance Group

C.1.1 Exposures and their measurement

The Insurance Group defines the underwriting risk as the risk of loss or adverse change to the value of the insurance liabilities due to inadequate price setting assumptions (price setting risk), or the assumptions used in establishing the technical provisions.

The companies belonging to the Intesa Sanpaolo Vita Insurance Group, under Article 1(r)-bis of the Private Insurance Code, adopt the standard formula for the calculation of the Solvency Capital Requirement (Article 45-quinquies to 45-undecies).

At 31 December 2022 the value of the technical risks of the Life business, according to the Standard Formula, was 3,692 million euro. The main risk of this type to which the Company is exposed is that related to policyholder behaviour (surrender risk).

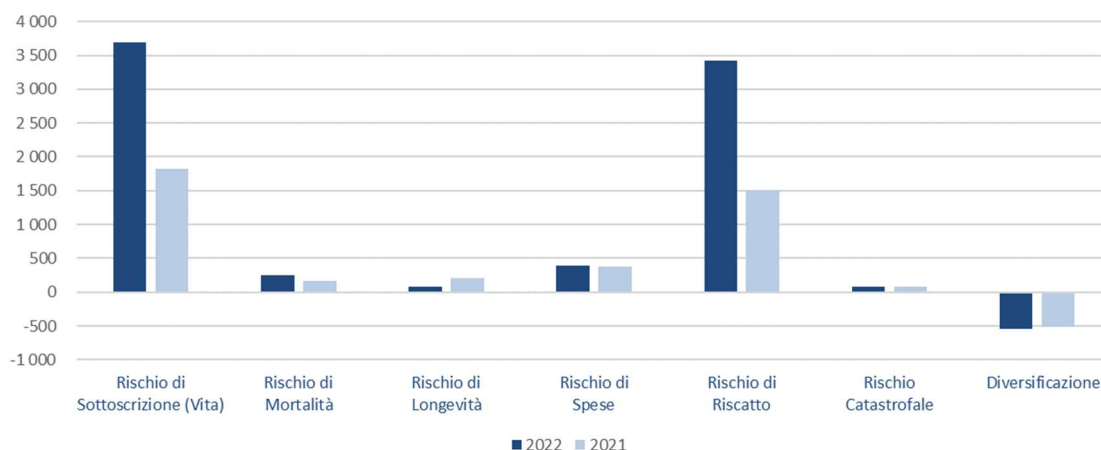
The capital absorption of the Non-life technical risks amounts to 206 million euro while that of the Health technical risks amounts to 171 million euro. The main risks of this type to which the Insurance Group is exposed are the pricing and reserving risks.

The tables below show a breakdown of the submodules of the Insurance Group's technical risks:

	(thousands euro)			
Module	2022	2021	Delta	
Underwriting Risk (Life)	3,692,181.2	1,821,778.3	1,870,403.0	>100%
Mortality Risk	254,606.6	169,748.3	84,858.3	50.0%
Longevity Risk	87,922.4	211,677.8	-123,755.4	-58.5%
Disability Risk	-	-	-	0.0%
Expenses Risk	389,160.1	380,155.2	9,005.0	2.4%
Revision Risk	-	-	-	0.0%
Lapse Risk	3,419,692.7	1,492,136.2	1,927,556.5	>100%
Cat Risk	83,810.7	85,461.7	-1,651.0	-1.9%
Diversification	-543,011.4	-517,400.9	-25,610.5	4.9%

Compared to the previous valuation of 31 December 2021, underwriting risk (Life) rose by approximately 1,870 million euro. Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk - Life (in millions of euro)



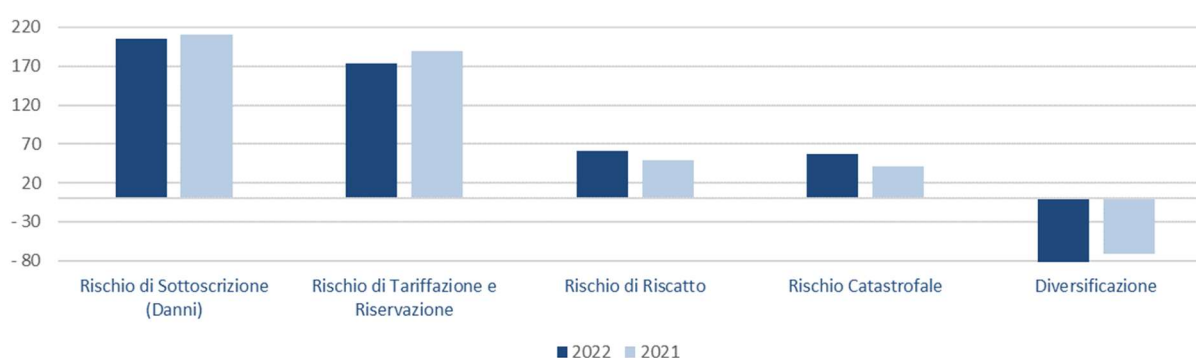
Compared to the previous valuation of 31 December 2021, underwriting risk (Life) was essentially unchanged; the decrease in pricing and reserving risks was largely offset by the increase in catastrophe and surrender risks.

(thousands euro)

Module	2022	2021	Delta	
Underwriting Risk (Non-Life)	205,679	210,318	-4,639	-2%
Premium & reserve Risk	173,990	190,000	-16,010	-8%
Lapse Risk	60,686	49,779	10,908	22%
Cat Risk	57,698	41,449	16,250	39%
Diversification	-86,696	-70,910	-15,786	22%

Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk - Non-life (in millions of euro)



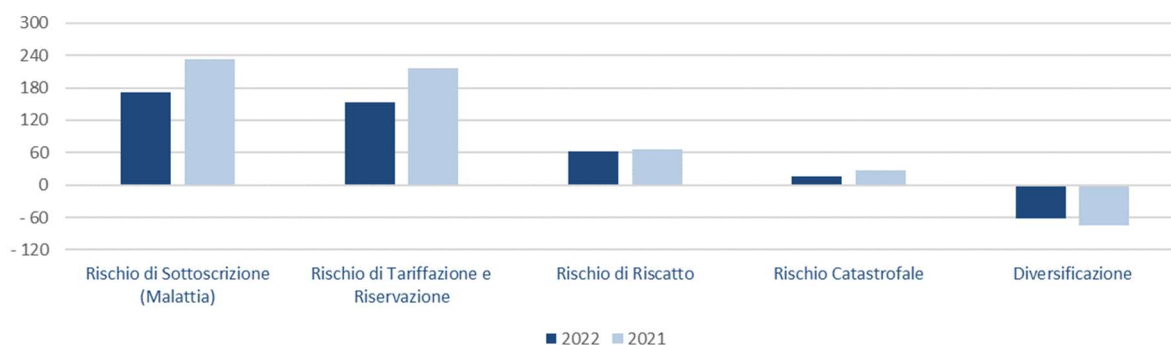
Compared to the previous valuation of 31 December 2021, the underwriting risk (Health) declined by 26.8% for a total of approximately 62 million euro. The reduction is mainly attributable to the decrease in pricing and reserving risk as a result of the reduction in budgeted premiums and the improvement in company-specific parameters.

(thousands euro)

Module	2022	2021		Delta
Underwriting Risk (Health)	170,777.3	233,241.6	-62,464.3	-26.8%
Cat Risk	15,942.1	26,920.9	-10,978.8	-40.8%
Mass Accident Risk	1,483.7	1,360.9	122.8	9.0%
Concentration Risk	848.2	2,398.3	-1,550.2	-0.6
Pandemic Risk	15,850.3	26,779.3	-10,929.1	-40.8%
Diversification	-2,240.0	-3,617.7	1,377.6	-0.4
Non- SLT Risk	166,092.7	225,050.3	-58,957.5	-26.2%
Reserve Risk	153,857.7	215,254.5	-61,396.8	-28.5%
Lapse Risk	62,566.9	65,674.4	-3,107.5	-4.7%
Diversification	-50,331.8	-55,878.7	5,546.8	-9.9%
Diversification	-11,257.6	-18,729.6	7,472.0	-39.9%

Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk - Health (in millions of euro)



The diversification effect between the various sub-lines is 12.8% for the underwriting risk (Life), for the Non-life underwriting risks it is 29.7%, while for the Health underwriting risk it is 26.5%.

With regard to measurement methods, specific monitoring processes are put in place within the Insurance Group's risk management framework, which incorporates a regular stress test activity for Underwriting risks.

The stress tests are represented by a set of techniques used by the Insurance Group to:

- measure their vulnerability to extraordinary yet plausible events;
- allow Senior Management to understand the relationship between the risk assumed and its risk appetite, as well as the adequacy of the available capital.

The stress testing activity involves hypothesising a joint shock of selected risks and the related calculation of loss. The Risk Management function of the Insurance Group Parent together with the Risk Management functions assess the impact on the capital availability of each insurance company of the Insurance Group and the Group as a whole, and the related impact in terms of the regulatory and economic capital requirement.

Should the results of the stress tests show that there is potential non-compliance with the minimum regulatory requirements and/or that the controls for each risk are inadequate, the Risk Committee

will suggest improvements in order to consolidate the Insurance Group's capital stability to the Board of Directors of the company concerned.

Depending on the nature, scope and complexity of the risks of the company's business, the Insurance Group companies define investment policies for the entire portfolio, based on the principle of a reasonable person, as already described in section B.3 "System of risk management, including the internal assessment of risk and solvency".

The risk of underwriting is also managed through the definition and monitoring of Risk Appetite limits for some indicators representative of such a risk. As regards underwriting risk, the Group's Risk Appetite framework establishes limits on the ratio between the capital requirement for underwriting risk and eligible own funds of the Group. The Group monitors the guaranteed minimum levels.

Below are the figures for the Insurance Group companies' exposures to Technical risks, in terms of use of capital. The figures are also compared against those for 31 December 2021.

C.1.2 Concentration of risks

The Insurance Group has a risks concentration policy that defines the concentrations considered to be significant, together with the calculation methods in order to mitigate the risk that they could have negative effects on the solvency and financial situation of the Insurance Group.

The objective of the policy is to define a risk concentration policy that would be consistent with the risks management strategy and policy and with the investment policies.

Risk concentrations are identified by assessing the impact they may have on the company's capital and solvency, in the wake of adverse scenarios on the main risk factors whether they be financial or technical.

The criteria used to identify them are based, in accordance with IVASS Regulation no. 30/2016, on the percentage they have compared to the total group technical provisions, or compared to the group technical requirements depending on their nature.

For the life, non-life and health segments present at the year-end date, the capital requirement associated with the catastrophic risk (CAT) net of any reinsurance is calculated. That value is compared to the capital requirements of the ISV Group, calculated for the last annual report.

For the Underwriting risk, the Insurance Group has set the concentration threshold for the capital requirement associated with the Natural Disaster risk at 5%, Underwriting risk taking into account the standard operations and limits on operations as provided for in the Framework Decision on Investments. This has been calculated as the ratio between the capital requirements for the Company's catastrophe module, and the Group Solvency Capital Requirement.

There were no significant concentrations as of the reporting date of 31 December 2022.

C.1.3 Sensitivity analysis

Stress tests analyse the solvency and stability of the company, in adverse, extreme scenarios.

As part of the self-assessment, the Insurance Group carries out stress tests by combining the underwriting and market risks in a way that presents the solvency and stability impacts in a collective and reasonably realistic manner.

The results of these analyses are presented in the ORSA Report.

Intesa Sanpaolo Vita S.p.A.

C.1.1 Exposures and their measurement

At 31 December 2022 the value of the technical risks of the Life business, according to the Standard Formula, was 2,875 million euro. The main risks of this type to which the Company is exposed are those related to policyholder behaviour (surrender risk), followed by demographic risks and costs risk.

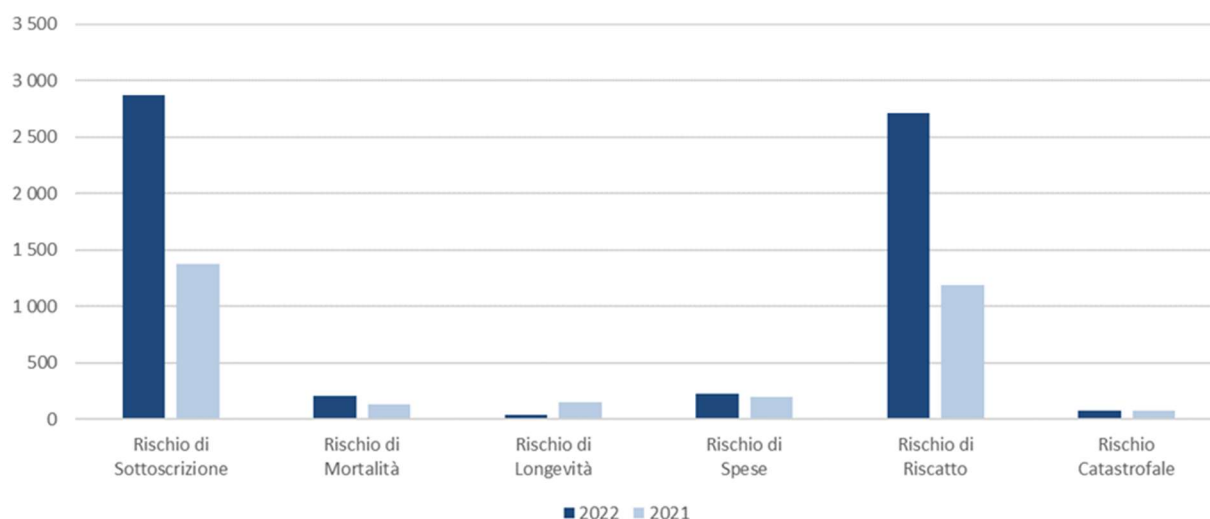
(thousands euro)

Module	2022	2021	Variazione	
Underwriting Risk	2,874,872.2	1,377,948.8	1,496,923.4	>100%
Mortality Risk	209,011.4	134,418.4	74,593.0	55.5%
Longevity Risk	45,854.4	151,168.5	-105,314.0	-69.7%
Disability Risk	-	-	-	0%
Expenses Risk	225,239.1	199,665.6	25,573.5	12.8%
Revision Risk	-	-	-	0%
Lapse Risk	2,710,069.5	1,186,343.8	1,523,725.7	>100%
Cat Risk	77,259.7	78,296.8	-1,037.2	-1.3%
Diversification	-392,561.9	-371,944.3	-20,617.6	5.5%

The diversification effect is 12% of underwriting risk.

Compared to the previous valuation of 31 December 2021, the Underwriting risk rose by 109% for a total of approximately 1,497 million euro. The greater difference from the previous valuation is due to the increase in the surrender risk, lapse mass, (+ 1,524 million euro) as a result of the sharp rise in risk-free interest rates during the year. Below is a chart summarising the changes between the two valuations.

Underwriting Risk (in millions of euro)



The risk of underwriting is also managed through the definition and monitoring of Risk Appetite limits for some indicators representative of such a risk. As regards underwriting risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for underwriting risk and eligible own funds of the Company.

C.1.2 Risk mitigation techniques

On the valuation date, the company did not consider underwriting risk mitigation techniques in the calculation of the solvency requirements under the Solvency II regulations. Outward reinsurance is residual, and there are no collateral guarantees.

The risk containment strategies designed to reduce the volatility of income statement results and the resulting technical balance of the portfolio.

For the Life business lines, the aim is to protect the portfolio through reinsurance agreements, in order to mitigate any peak exposures and to protect against the risks of catastrophe that could affect multiple people in the same event.

At the time of its formation, Intesa Sanpaolo Vita received fully paid-up share capital that is sufficient to cover the normal risks of its underwriting without any need for substantial recourse to proportional reinsurance agreements.

The responsibility for reinsurance strategies lies with the Reinsurance area, while the annual reinsurance plan must be shared with Risk Management and the Actuarial Function.

Intesa Sanpaolo Assicura S.p.A.

C.1.1 Exposures and their measurement

At 31 December 2022, the valuation according to the standard formula, by adopting the USP parameters, of the technical risks for the Non-life business was approximately 205 million euro, while for the technical risks of the Health business it was approximately 109 million euro. The main risks of this type to which the Company is exposed are pricing and reserving risks.

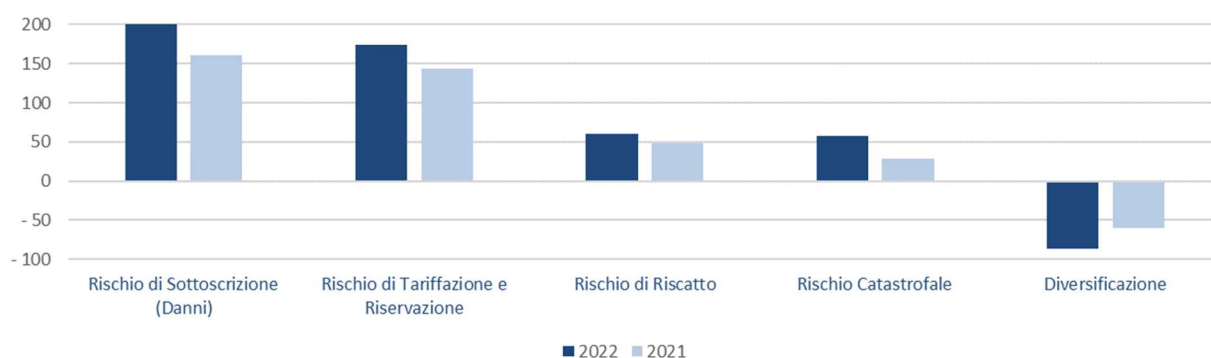
(thousands euro)				
Module	2022	2021	Delta	
Underwriting Risk (Non-Life)	205,446.5	160,567.1	44,879.4	28.0%
Premium & reserve Risk	173,857.2	143,572.6	30,284.6	21.1%
Lapse Risk	60,686.5	48,477.5	12,208.9	25.2%
Cat Risk	57,472.5	28,192.3	29,280.2	>100%
Diversification	-86,569.7	-59,675.3	-26,894.3	45.1%

(thousands euro)				
Module	2022	2021	Delta	
Underwriting Risk (Health)	109,090.8	126,938.4	-17,847.6	-14.1%
Cat Risk	1,950.0	2,932.0	-982.1	-33.5%
Mass Accident Risk	1,407.2	1,216.6	190.6	15.7%
Concentration Risk	475.3	2,398.3	-1,923.0	-80.2%
Pandemic Risk	1,263.4	1,168.2	95.2	8.1%
Diversification	-1,196.0	-1,851.1	655.1	-35.4%
Non- SLT Risk	108,586.9	126,173.7	-17,586.7	-13.9%
Reserve Risk	89,287.8	113,770.2	-24,482.5	-21.5%
Lapse Risk	61,796.6	54,553.9	7,242.7	13.3%
Diversification	-42,497.4	-42,150.5	-347.0	0.8%
Diversification	-1,446.1	-2,167.3	721.1	-33.3%

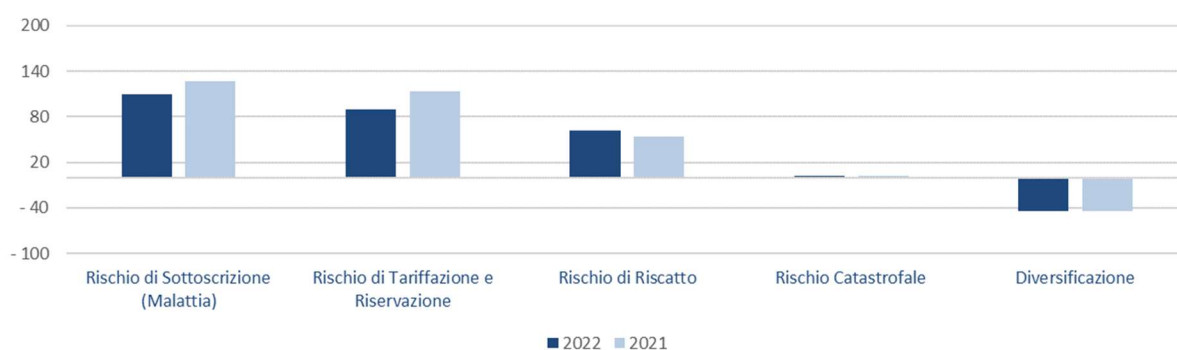
The diversification effect is equal to 30% for the Non-Life business and 29% for the Health business.

Compared to the solvency valuation of 31 December 2021, the underwriting risk of the Non-Life business increased by 28%, for a total of 44.9 million euro, while the underwriting risk of the Health business decreased by 14%, for a total of 17.8 million euro. The increase in Non-Life underwriting risks is mainly attributable to the merger of Cargeas Assicurazioni, while the decrease in Health underwriting risks is mainly attributable to the reduction in company-specific parameters. Below are charts summarising the changes between the two valuations.

Underwriting Risk - Non-life (in millions of euro)



Underwriting Risk - Health (in millions of euro)



C.1.2 Risk mitigation techniques

On the valuation date the company used outward reinsurance as a way to mitigate the underwriting risk.

At the time of its formation, Intesa Sanpaolo Assicura received fully paid-up share capital sufficient to cover the normal risks of its underwriting without any need for reinsurance arrangements available on the market.

The risk containment strategy aims to reduce the volatility of the income statement results and the ensuing technical balance of the portfolio based on the impact on the solvency margin of the various business lines provided for by regulations.

Under the Solvency II rules, Intesa Sanpaolo Assicura considers the effects of reinsurance with reference to the calculation of the pricing risk, the reserving risk, the surrender risk, the catastrophe risk and the Best Estimate Liability. Subject to considerations on materiality of the re-insured items, all these components are calculated both gross and net of reinsurance, in order to value the use

of reinsurance as a strategic resource for the effective transfer of risk and thus to limit the capital requirement.

The responsibility for reinsurance strategies lies with the Reinsurance area of Intesa Sanpaolo Vita, while the annual reinsurance plan must be shared with Risk Management and the Actuarial Function.

The reinsurance system is calibrated to suit the specific features of the policies and is intended to reduce the potential exposures from the placement of policies. Intesa Sanpaolo Assicura places retail products for motor, home and health insurance, with a high content of service, Credit Protection Insurance, Business Protection policies for SMEs and corporate products for collective accident insurance Standard/Tailor Made, Cyber Standard/Tailor Made e D&O Standard/Tailor Made. From this point of view, the company protects the portfolio with non-proportional arrangements in excess of claims, to mitigate peak exposures and catastrophe risks (earthquakes, atmospheric events, large claims), and only for specific types of cover or policies, by means of proportional arrangements. During the year, coinsurance policies were signed and were then assigned under optional reinsurance, with high percentages of risks not applicable to the current reinsurance arrangements.

Fideuram Vita S.p.A.

C.1.1 Exposures and their measurement

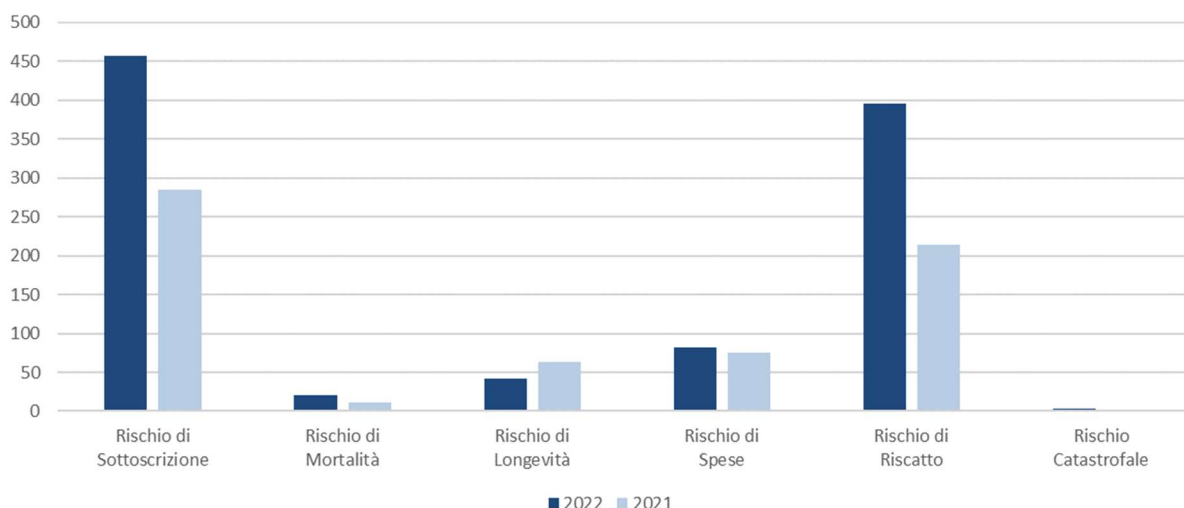
As at 31 December 2022, underwriting risk amounted to 458 million euro, an increase of 76 million euro (+20%) compared to the previous year-end figure, due, in particular, to the increased exposure to surrender risk, which is the risk to which the Company is most exposed.

	(thousands euro)			
Module	2022	2021		Delta
Underwriting Risk	457,635	382,082	75,553.7	19.8%
Mortality Risk	20,674	11,958	8,716.5	72.9%
Longevity Risk	42,068	60,509	-18,441.4	-30.5%
Disability Risk	-	-	-	na
Expenses Risk	82,464	78,480	3,984.1	5.1%
Revision Risk	-	-	-	na
Lapse Risk	395,669	314,038	81,630.6	26.0%
Cat Risk	3,073	3,759	-686.1	-18.3%
Diversification	-86,312	-86,662	349.9	-0.4%

The diversification effect weighs 16% within underwriting risk.

Compared to the previous valuation of 31 December 2021, underwriting risk rose by approximately 76 million euro. The greater difference from the previous valuation is due to the increase in surrender risk (approx. + 82 million euro) as a result of the sharp rise in risk-free interest rates during the year. Below is a chart summarising the changes between the two valuations.

Underwriting Risk (in millions of euro)



The risk of underwriting is also managed through the definition and monitoring of Risk Appetite limits for some indicators representative of such a risk. As regards underwriting risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for underwriting risk and eligible own funds of the Company.

C.1.2 Risk mitigation techniques

On the valuation date, the company did not consider underwriting risk mitigation techniques in the calculation of the solvency requirements under the Solvency II regulations. Outward reinsurance is residual, and there are no collateral guarantees.

To limit exposures regarding specific portfolios, a proportional arrangement in excess to protect products with death and accident cover was used; moreover, an arrangement in excess of claims to protect Catastrophe risk for the part held in all portfolios was used.

Recourse to optional reinsurance was not necessary in the year, which was limited to cases in which the risk does not apply to the existing reinsurance arrangements.

All reinsurance was finalised with leading and specialist operators.

With particular attention to the mitigation of the Company's risks, insurance cover is arranged with leading reinsurers. Within the framework agreement the Company identifies the criteria used to select these reinsurers. In detail:

- the structure and composition of the shareholder body and their membership of a group or conglomerate;
- the financial stability and solidity of the reinsurers;
- the regulatory framework of the country in which the reinsurer is based;
- the level of concentration of the counterparty's risk, on an individual and group basis.

Intesa Sanpaolo Life D.A.C.

C.1.1 Exposures and their measurement

As at 31 December 2022, the valuation under the standard formula of technical risks amounted to approximately 365 million euro (442 million euro as at 31 December 2021), down from the previous year's figure, in line with the change in liabilities. The main risks of this type to which the Company is exposed are the risks related to policyholders' behaviour (surrender risk), followed by the expense risk and mortality risk.

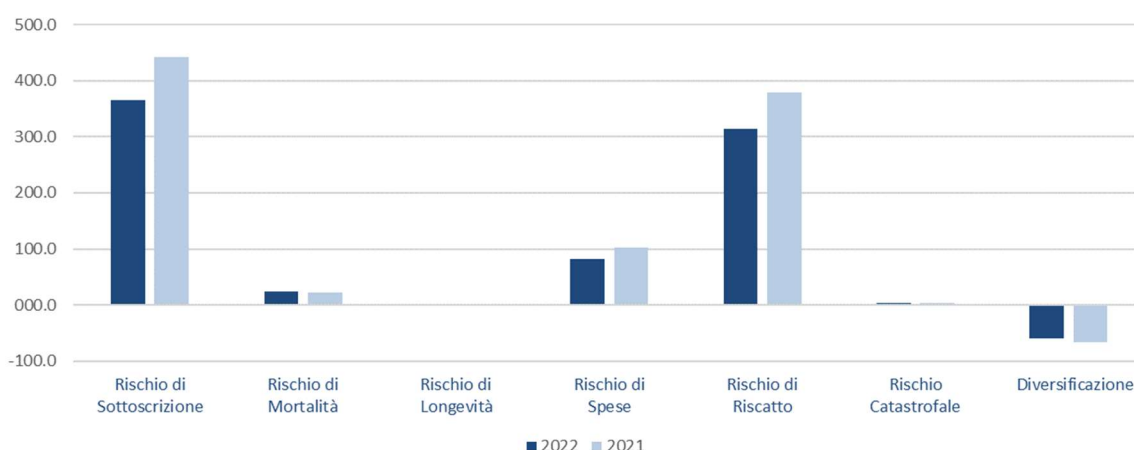
The table below shows the percentage of the sub-modules on the total underwriting risk diversification.

Module	(thousands euro)			
	2022	2021	Delta	
Underwriting Risk	364,904.9	442,110.4	-77,205.5	-17.5%
Mortality Risk	24,921.1	23,372.3	1,548.8	6.6%
Longevity Risk	-	-	-	na
Disability Risk	-	-	-	na
Expenses Risk	81,457.2	102,009.9	-20,552.7	-20.1%
Revision Risk	-	-	-	na
Lapse Risk	313,954.3	379,167.0	-65,212.7	-17.2%
Cat Risk	3,478.2	3,405.8	72.4	2.1%
Diversification	-58,905.9	-65,844.6	6,938.7	-10.5%

The effect of diversification among the various sub-lines was 14% of the underwriting risk, essentially in line with the figure for 2021 (13%).

Compared to the previous valuation of 31 December 2021, the underwriting risk decreased by 17%, i.e. 77 million euro. Below is a bar chart summarising the changes between the two valuations.

Underwriting Risk (in millions of euro)



C.1.2 Risk mitigation techniques

The Company uses "smart product design" as the main form of mitigation; this includes variations in the level of cover according to age band, and the inclusion of surrender penalties in the first few years of the policy term. The Company also carefully analyses surrender history and mortality rates in order to formulate the assumptions to maximise the mitigation of underwriting risk.

Intesa Sanpaolo RBM Salute S.p.A.

C.1.1 Exposures and their measurement

At 31 December 2022, the valuation according to the standard formula, of the technical risks for the Non-life business was approximately 1 million euro, while for the technical risks of the Health business it was approximately 93 million euro. The main risks of this type to which the Company is exposed are pricing and reserving risks.

(thousands euro)				
Module	2022	2021	Delta	
Underwriting Risk (Non-Life)	893	33	860	>100%
Premium & reserve Risk	572	20	552	>100%
Lapse Risk	-	-	-	na
Cat Risk	557	21	536	>100%
Diversification	-236	-9	-228	>100%

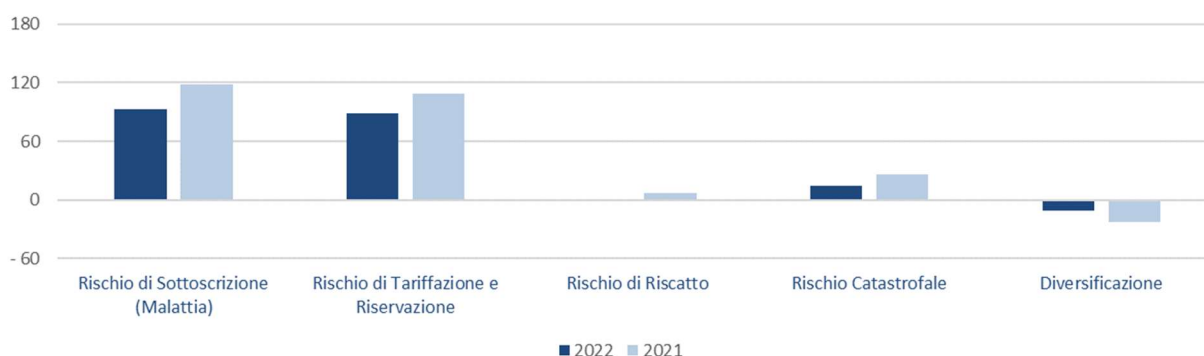
(thousands euro)				
Module	2022	2021	Delta	
Underwriting Risk (Health)	93,173	117,987	-24,813	-21%
Cat Risk	14,611	25,575	-10,963	-43%
Mass Accident Risk	77	116	-40	-34%
Concentration Risk	848	-	848	na
Pandemic Risk	14,587	25,574	-10,988	-43%
Diversification	-900	-116	-784	>100%
Non- SLT Risk	88,440	108,965	-20,525	-19%
Reserve Risk	88,437	108,768	-20,331	-19%
Lapse Risk	770	6,551	-5,780	-88%
Diversification	-767	-6,354	5,587	-88%
Diversification	-9,878	-16,553	6,675	-40%

The diversification effect is equal to 10% for the Health business and 21% for the Non-Life business.

Compared to the solvency valuation of 31 December 2021, underwriting risk for the Health business decreased in terms of both "Pricing and Reserving" risk and "Catastrophe" risk, by a total of about -24.8 million euro (about 21%).

Below are charts summarising the changes between the two valuations in the Health business.

Underwriting Risk - Health (in millions of euro)



C.1.2 Risk mitigation techniques

On the valuation date the company used outward reinsurance as a way to mitigate the underwriting risk.

The risk containment strategy aims to reduce the volatility of the income statement results and the ensuing technical balance of the portfolio based on the impact on the solvency margin of the various business lines provided for by regulations.

Under the Solvency II rules, Intesa Sanpaolo RBM Salute S.p.A considers the effects of reinsurance with reference to the calculation of the underwriting risk and the Best Estimate Liability. Subject to considerations on materiality of the re-insured items, all these components are calculated both gross and net of reinsurance, in order to value the use of reinsurance as a strategic resource for the effective transfer of risk and thus to limit the capital requirement.

The reinsurance system is calibrated to suit the specific features of the policies and is intended to reduce the potential exposures from the placement of policies. Intesa Sanpaolo RBM Salute S.p.A. places collective and retail health products (accident and illness) with high protection content.

C.2 MARKET RISK

Intesa Sanpaolo Vita Insurance Group

C.2.1 Exposures and their measurement

The Insurance Group defines market risk as the risk of a loss or adverse change in the financial situation deriving directly or indirectly from fluctuations in the level and volatility of the market prices of the assets, liabilities and financial instruments.

The companies belonging to the Insurance Group, under Article 1(r)-bis of the Private Insurance Group, adopt the standard formula for the calculation of the Solvency Capital Requirement (Articles 45-quinquies to 45-undecies).

At 31 December 2022, the value of the Market risks, according to the Standard Formula, was approximately 2,028 million euro. The main risks of this type, to which the Insurance Group is exposed, are the spread and share price risks.

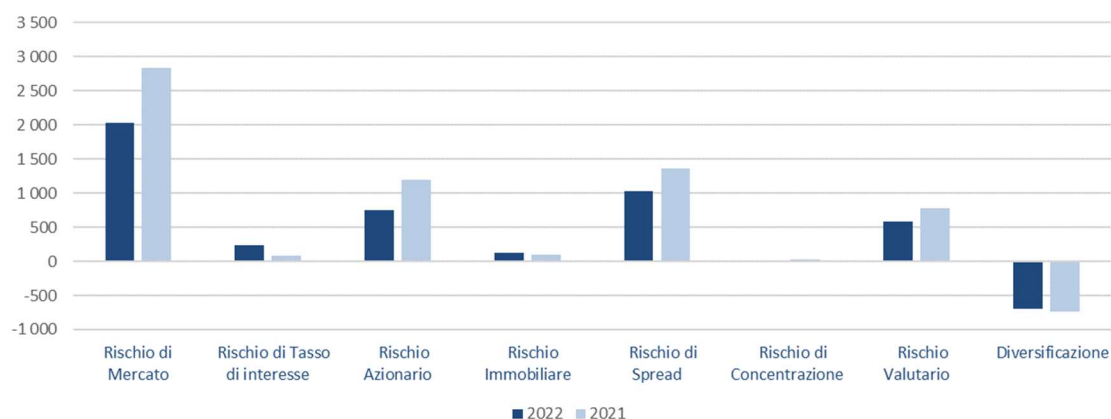
The tables below show a breakdown of the submodules of the Group's Market risks:

	(thousands euro)			
Module	2022	2021	Delta	
Market Risk	2,028,480	2,832,758	-804,278	-28%
Interest Rate Risk	230,139	87,465	142,674	100%
Equity Risk	755,657	1,200,861	-445,204	-37%
Property Risk	128,575	99,606	28,969	29%
Spread Risk	1,032,623	1,365,551	-332,929	-24%
Concentration Risk	1,948	29,304	-27,356	-93%
Currency Risk	579,959	782,945	-202,986	-26%
Diversification	-700,420	-732,974	32,554	-4%

The effect of diversification among the various sub-lines was 26% of market risk; compared to the previous valuation of 31 December 2021, market risk fell for a total of 804 million euro.

Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



With regard to measurement methods, specific monitoring processes are put in place within the Group's risk management framework. Further details in this regard can be found in section C.1.1 "Underwriting risk - Exposures and their measurement".

In reference to the assets portfolio, the Company defines its investment policies in line with the prudent person principle as already mentioned in section B.3 "Risk Management system".

The market risk is managed within the risk management framework already mentioned in section B.3 "Risk Management system".

The Company also controls this risk using the principles, processes and operational limits defined in the investment rules and in the rules regarding the management of assets and liabilities. All the assets are invested in accordance with the risk appetite limits and the limits contained in the Framework Agreement on Investments.

As regards market risk, the Group's Risk Appetite framework establishes limits on the ratio between the capital requirement for market risk and eligible own funds of the Company.

Below are the figures for the Insurance Group companies' exposures to Market risks, in terms of use of capital. The figures are also compared against those for 31 December 2021.

C.2.2 Concentration of risks

The Insurance Group as already described in section C.1.2 "Concentration of risks" has a risks concentration policy that defines the significant concentrations and the related calculation methods.

The Insurance Group has defined various concentration thresholds in relation to Market risk, taking into account the normal, standard operations and limitations imposed by the Framework Decision on Investments.

The following risk concentrations have been identified as potentially significant. For each of them, the metrics and methods of calculating the concentration have been indicated, for which the scope of application, where referring to financial instruments, is made up of the following portfolios:

-
- Class C and class D guaranteed of the company Intesa Sanpaolo Vita;
 - Class C and class D guaranteed of the company Fideuram Vita;
 - The entire financial portfolio of the company Intesa Sanpaolo Assicura, Intesa Sanpaolo RBM Salute, Cargeas;
 - The Shareholder Fund of Intesa Sanpaolo Life;

Geographical concentration

For each country, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions of the Insurance Group, calculated for the last annual report. The threshold is 1.5% of the value of the Insurance Group's technical provisions.

Sector concentration - financial sector

For each issuer group in the financial sector, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions of the ISV Group, calculated for the last annual report. The threshold is 0.1% of the value of the Group's technical provisions.

Sector concentration - corporate sector

For each issuer group in the corporate sector, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions of the ISV Group, calculated for the last annual report. The threshold is 0.1% of the value of the Group's technical provisions.

Sector concentration – government sector

For each issuer group in the government sector, the market value of all the direct and indirect bond and equity exposures is added together. That value is compared to the total technical provisions of the ISV Group, calculated for the last annual report. The threshold is 0.1% of the value of the Group's technical provisions.

Concentration by currency

For each currency other than the euro, the capital requirement is calculated (asset side only) for that currency, associated with the Currency risk submodule. That value is compared to the capital requirements of the ISV Group, calculated for the last annual report. The concentration for the capital requirement associated to the currency risk has been identified at 5% which is calculated as a ratio between the capital requirement for the currency risk element of the company, and the group SCR.

C.2.3 Risk mitigation techniques

The risk containment strategy aims to reduce the volatility of the income statement results and the ensuing technical balance of the portfolio based on the impact on the solvency margin of the various lines of business provided for by the regulations.

In order to mitigate the financial risks to which it is exposed, the company uses financial derivatives that differ depending on the objective.

Below is a list of the main financial risks that can be mitigated by using derivatives:

- Rate risk;
- Spread risk;
- Equity risk;
- Currency risk.

When planning their activities, the Companies intend to pursue the path launched in previous years and use risk mitigation techniques (including derivatives) whenever the market conditions deviate significantly from the average long-term levels, or ahead of particular phases in which there is likely to be an increase in volatility, or simply when there are latent gains or losses to be safeguarded, or managed in a more flexible, efficient manner.

In such situations, apart from the potential increase in distortion effects, due to the presence of cover included in the policies and behavioural dynamics on the part of the policyholders, additional adverse economic impacts can occur due to forced losses, heightened by weak liquidity in the reference markets and/or lower ability to liquidate the portfolio assets.

C.2.4 Sensitivity analysis

Stress tests analyse the solvency and stability of the company, in adverse, extreme scenarios.

As part of the self-assessment, the Company carries out stress tests by combining the underwriting and market risks in a way that presents the solvency and stability impacts in a collective and reasonably realistic manner. The results of these stress tests are presented in the ORSA Report.

Intesa Sanpaolo Vita S.p.A.

C.2.1 Exposures and their measurement

The Company Intesa Sanpaolo Vita has significant exposure to market risk.

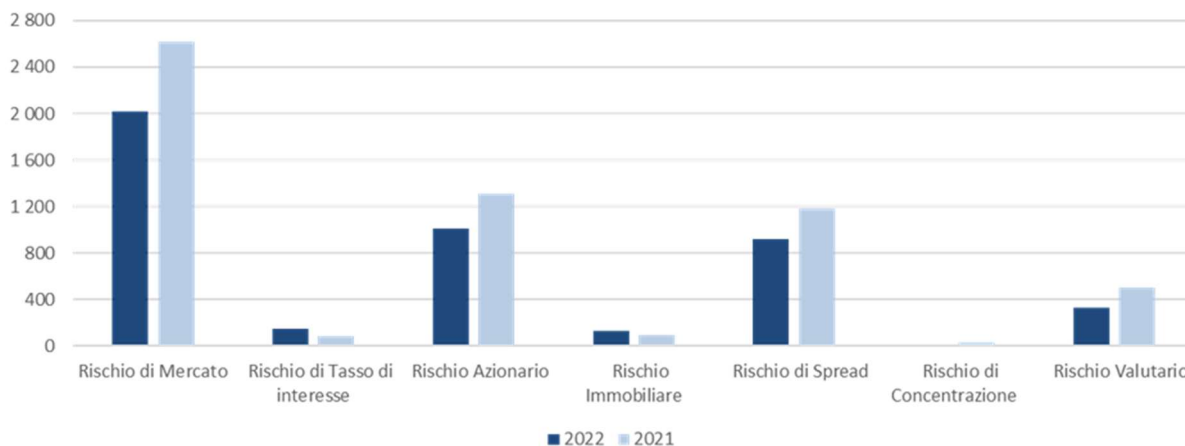
At 31 December 2022 the value of the market risks, according to the Standard Formula, was equal to approximately 2,020 million euro. The main risks of this type to which the Company is exposed, are the spread and share price risks.

	(thousands euro)			
Module	2022	2021	Delta	
Market Risk	2,019,555	2,617,000	-597,445	-23%
Interest Rate Risk	149,317	84,951	64,366	76%
Equity Risk	1,010,058	1,310,068	-300,011	-23%
Property Risk	125,205	89,134	36,071	40%
Spread Risk	919,898	1,178,005	-258,107	-22%
Concentration Risk	-	25,769	-25,769	-100%
Currency Risk	331,680	499,721	-168,040	-34%
Diversification	-516,604	-570,649	54,045	-9%

The diversification effect is 26% of market risk.

Compared to the previous valuation of 31 December 2021, the Market risk fell by 23% for a total of 597 million euro. The decrease is mainly due to the decrease in Share Price and Spread risks with a change of 300 million euro and 158 million euro, respectively. Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



As regards market risk, the Company's Risk Appetite framework establishes a limit on the ratio between the capital requirement for market risk and eligible own funds of the Company.

C.2.2 Disclosures to the public on the Policy of engagement and agreements with asset managers (in compliance with IVASS Regulation 46/2020)

European Directive 2017/828 (on the encouragement of long-term shareholder engagement-SHRD II), and implementing legislation in Italy (Legislative Decree 49/2019 amending Legislative Decree 58/98) establish that Insurance Undertakings, also in their capacity as entities establishing pension funds, notify the public of any adoption of a policy describing the procedures supplementing the engagement of shareholders in listed companies having their registered office in a member state in their investment strategy.

At present, with reference to equity investments, the Company opted for the following:

- **it did not adopt an engagement policy** based on the remaining shares held directly compared to volumes managed and equity assets in the portfolio, and therefore it did not carry out activities covered by the policy concerning **a)** the monitoring of investees as regards significant matters, such as strategy, financial and non-financial results, risks, capital structure, social and environmental impact and corporate governance, **b)** engagement with investees, through the exercise of voting rights and other rights related to shares, **c)** cooperation with other shareholders or in communication with the company's stakeholders, including the management of current and potential conflicts of interest;
- for the remainder of the portfolio, **it stipulated specific management mandates with the following delegated managers:**

Eurizon Capital Real Asset SGR S.p.A.

Eurizon Capital SGR S.p.A.
Epsilon SGR S.p.A.

That, to adopt the engagement policy with reference to the exercise of voting rights for equity investments, it disclosed information on the vote, indicated in documents available at:

- Eurizon Capital SGR S.p.A. and Eurizon Capital Real Asset SGR S.p.A.
https://www.eurizoncapital.com/Lists/AllegatiDocumento/Pagine/20200710164806_EC%20SGR_Politica%20di%20impegno_30062020.pdf
- Epsilon SGR S.p.A.
https://www.epsilonmgr.it/it/societa/Documents/EPSSGR_Politica%20di%20impegno.pdf

The management mandates govern, among others, the following aspects:

- the procedures adopted by the Company to provide incentives for the delegated manager to align the strategy and investment decisions with the profile and duration of liabilities of managed volumes; in particular, the same results are achieved through identifying different types of benchmark and portfolio diversification. The Company continually monitors the alignment of the portfolio duration with that of liabilities (the duration mismatch), by adopting suitable safeguards to monitor compliance with limits and the investment choices adopted by the delegated manager;
- the procedures adopted by the delegated manager, in performing the mandate, comply with the guidelines established by the Company with reference to the characteristics of each portfolio. To monitor financial results, time intervals are adopted, consistent with the medium/long term time horizon of the strategic asset allocation.
As regards assessments of non-financial variables, with particular reference to guidelines to include ESG factors in investment strategies, the Company monitors the engagement and voting activities of the delegated managers;
- the procedures adopted by the company to put in place specific organisational oversight suitable for guaranteeing the monitoring of the delegated manager's activities, also in the long term. In particular, if investment limits are exceeded, recovery procedures defined with the delegated manager according to efficient procedures and times, are put in place. In this context, the Company checks the progress of results of activities carried out by the delegated manager, based on portfolio choices made, and an analysis of performance and market views;
- the duration of management mandates stipulated by the Company in relation to each delegated manager.
The mandates with Eurizon Capital SGR S.p.A., Epsilon SGR S.p.A. and Eurizon Capital Real Asset SGR S.p.A. for assets underlying insurance investment products are indefinite (with the Company having the right to early withdrawal);
The mandates with Eurizon Capital SGR S.p.A. and Epsilon SGR S.p.A. for assets underlying pension funds have an annual duration with automatic renewal.

The mandates do not establish specific turnover limits, considering the main characteristics of the products and investment management policies. In any case, the manager's operations are monitored based on specific organisational safeguards.

Intesa Sanpaolo Assicura S.p.A.

C.2.1 Exposures and their measurement

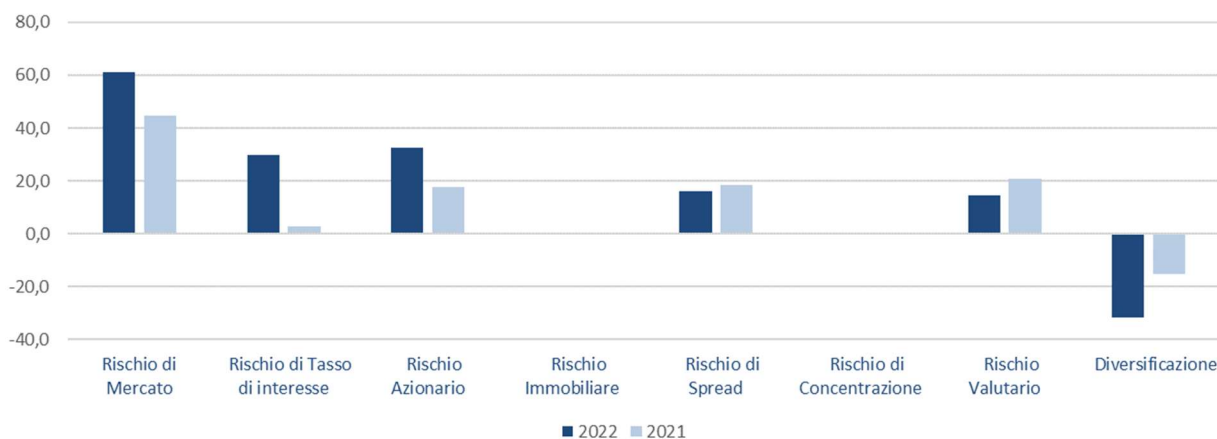
At 31 December 2022 the value of the Market risks, according to the Standard Formula, was 61 million euro. The main risks of this type to which the Company is exposed, are interest rate and share price risks.

Module	(thousands euro)			
	2022	2021	Delta	
Market Risk	61,190.3	44,792.3	16,398.1	36.6%
Interest Rate Risk	29,664.7	2,899.3	26,765.4	>100%
Equity Risk	32,378.0	17,810.0	14,568.0	81.8%
Property Risk	-	-	-	na
Spread Risk	16,137.9	18,619.8	-2,482.0	-13.3%
Concentration Risk	-	-	-	na
Currency Risk	14,421.7	20,717.6	-6,295.9	-30.4%
Diversification	-31,411.9	-15,254.4	-16,157.5	>100%

The diversification effect relative to market risk is equal to 34%.

Compared to the solvency valuation at 31 December 2021, the market risk rose by 37% for a total of approximately 16 million euro. The increase in market risk is mainly attributable to the increase in share price and interest rate risk, partially offset by the reduction in spread risk and currency risk. Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



Fideuram Vita S.p.A.

C.2.1 Exposures and their measurement

At 31 December 2022 the value of Market risks, according to the Standard Formula, was 308 million euro. The main risks of this type to which the Company is exposed, are share price risk followed by currency risk and spread risk.

The table below shows the percentage of the sub modules on the total market risk:

Module	(thousands euro)			
	2022	2021	Delta	
Market Risk	308,166	359,260	-51,094	-14%
Interest Rate Risk	26,126	14,668	11,458	78%
Equity Risk	174,764	215,551	-40,787	-19%
Property Risk	2,685	3,391	-707	-21%
Spread Risk	72,990	109,396	-36,406	-33%
Concentration Risk	-	-	-	na
Currency Risk	122,198	116,553	5,644	5%
Diversification	-90,596	-100,298	9,702	-10%

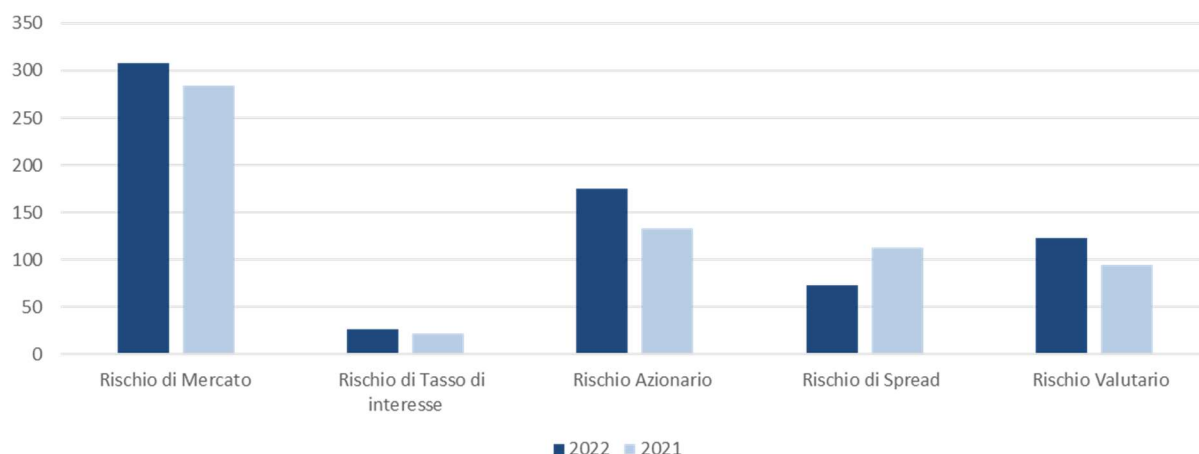
The diversification effect weighs 22% within Market risk.

Compared to the previous valuation of 31 December 2021, the Market risk fell by 14% for a total of 51 million euro.

The decrease was mainly due to market performance that reduced the value of the company's investments and thus the capital requirement.

Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



As regards market risk, the Company's Risk Appetite framework establishes a limit on the ratio between the capital requirement for market risk and eligible own funds of the Company.

C.2.2 Disclosures to the public on the Policy of engagement and agreements with asset managers (in compliance with IVASS Regulation 46/2020)

European Directive 2017/828 (on the encouragement of long-term shareholder engagement-SHRD II), and implementing legislation in Italy (Legislative Decree 49/2019 amending Legislative Decree 58/98) establish that Insurance Undertakings, also in their capacity as entities establishing pension funds, notify the public of any adoption of a policy describing the procedures

supplementing the engagement of shareholders in listed companies having their registered office in a member state in their investment strategy.

At present, with reference to equity investments, the Company opted for the following:

- **it did not adopt an engagement policy** based on the remaining shares held directly compared to volumes managed and equity assets in the portfolio, and therefore it did not carry out activities covered by the policy concerning **a)** the monitoring of investees as regards significant matters, such as strategy, financial and non-financial results, risks, capital structure, social and environmental impact and corporate governance, **b)** engagement with investees, through the exercise of voting rights and other rights related to shares, **c)** cooperation with other shareholders or in communication with the company's stakeholders, including the management of current and potential conflicts of interest;
- for the remainder of the portfolio, **it stipulated specific management mandates with the following delegated managers:**

Fideuram Asset Management Ireland Dac.,
Fideuram Asset Management SGR S.p.A.,
Eurizon Capital Real Asset SGR S.p.A.,

that, to adopt the engagement policy with reference to the exercise of voting rights for equity investments, it disclosed information on the vote, indicated in documents available at:

- Fideuram Asset Management Ireland
<http://www.fideuramireland.ie/it/policy/>
http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/Sustainable%20and%20Responsible%20Investment%20Policy.pdf
http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/Engagement%20Policy.pdf
http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/Voting%20Rights%20Policy.pdf
- Fideuram Asset Management SGR
http://www.fideuramireland.ie/upload/File/pdf/Policy_FidInvestimenti/8.%20CA_30.10.20_Allegato%20B%20Politica%20di%20impegno%20di%20Fideuram%20Investimenti%20SGR%20S.p.A_def.docx.pdf
- Eurizon Capital Real Asset SGR
https://www.eurizoncapital.com/Lists/AllegatiDocumento/Pagine/20200710164806_EC%20SGR_Politica%20di%20impegno_30062020.pdf

The management mandates govern, among others, the following aspects:

- the procedures adopted by the Company to provide incentives for the delegated manager to align the strategy and investment decisions with the profile and duration of liabilities of managed volumes; in particular, the same results are achieved through identifying different types of benchmark and portfolio diversification. The Company continually monitors the alignment of the portfolio duration with that of liabilities (the duration mismatch), in compliance with the limits in the Investment Policies, Regulations on Separate Management, by adopting suitable safeguards to monitor compliance with limits and the investment choices adopted by the delegated manager;

-
- the procedures adopted by the delegated manager, in performing the mandate, comply with the guidelines established by the Company with reference to the characteristics of each portfolio.
To monitor financial results, time intervals are adopted, consistent with the medium/long term time horizon of the strategic asset allocation.
As regards assessments of non-financial variables, with particular reference to guidelines to include ESG factors in investment strategies, the Company monitors the engagement and voting activities of the delegated managers;
 - the procedures adopted by the company to put in place specific organisational oversight suitable for guaranteeing the monitoring of the delegated manager's activities, also in the long term. In particular, if investment limits are exceeded, recovery procedures defined with the delegated manager according to efficient procedures and times, are put in place. In this context, the Company checks the progress of results of activities carried out by the delegated manager, based on portfolio choices made, and an analysis of performance and market views;
 - the duration of management mandates stipulated by the Company in relation to each delegated manager.
The mandates with Asset Management SGR S.p.A. and Eurizon Capital Real Asset SGR S.p.A. for assets underlying insurance investment products are indefinite (with the Company having the right to early withdrawal);
The mandate with Fideuram Asset Management Ireland Dac. for assets underlying the Pension Funds expires on 31 December 2024.

The mandates do not establish specific turnover limits, considering the main characteristics of the products and investment management policies. In any case, the manager's operations are monitored based on specific organisational safeguards

Intesa Sanpaolo Life D.A.C.

C.2.1 Exposures and their measurement

As at 31 December 2022, the valuation according to the standard formula for market risks amounted to approximately 298 million euro (355 million euro as at 31 December 2021), down from the previous year in line with the change in liabilities. Share price risks followed by currency risks and interest rate risks were the main risks of this type to which the Company is exposed in line with the previous year.

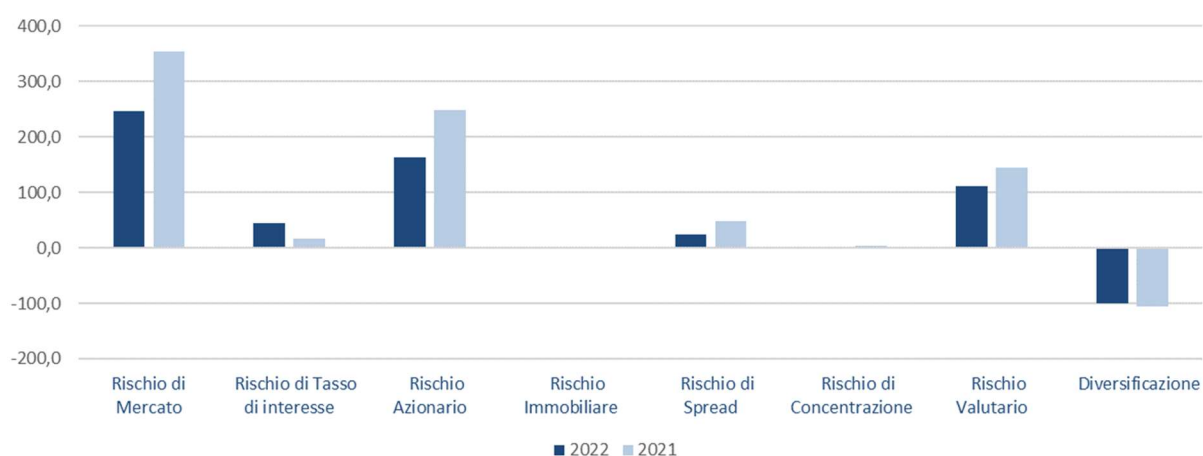
The following table shows the amount of each sub module of market risk, and the diversification effect:

(thousands euro)						
Module	2022	2021	Delta			
Market Risk	246,204.1	354,740.4	-	108,536.3	-30.6%	
Interest Rate Risk	44,825.3	16,237.1		28,588.2	>100%	
Equity Risk	163,765.8	248,479.7	-	84,713.9	-34.1%	
Property Risk	-	-		-	na	
Spread Risk	23,597.1	47,650.6	-	24,053.5	-50.5%	
Concentration Risk	1,948.0	3,535.2	-	1,587.2	-44.9%	
Currency Risk	111,659.1	145,268.7	-	33,609.6	-23.1%	
Diversification	-	99,591.2	-	106,430.8	6,839.6	-6.4%

The effect of diversification among the various sub-lines was 29% of market risk, slightly up on previous year's figure of 23%.

The capital absorbed by market risk has decreased compared to the figures for 31 December 2021 by 31% overall. The main drivers of this decrease were the negative financial markets performance and the slowdown in written premiums, which led to a decrease in the value of investments, and thus in stress test results. The bar chart shows the changes compared to the previous year.

Market Risk (in millions of euro)



Intesa Sanpaolo RBM Salute S.p.A.

C.2.1 Exposures and their measurement

At 31 December 2022 the value of the Market risks, according to the Standard Formula, was 10 million euro. The main risks of this type to which the Company is exposed, is interest rate risk.

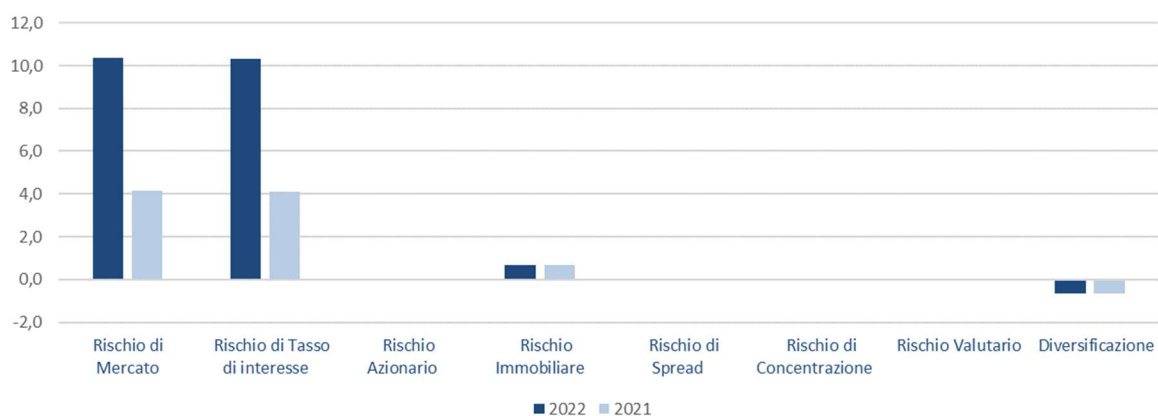
					(thousands euro)
Module	2022	2021	Delta		
Market Risk	10,344.9	4,148.5	6,196.4	>100%	
Interest Rate Risk	10,322.2	4,088.7	6,233.6	>100%	
Equity Risk	-	22.8	- 22.8	-100.0%	
Property Risk	685.0	685.0	-	na	
Spread Risk	-	-	-	na	
Concentration Risk	-	-	-	na	
Currency Risk	-	-	-	na	
Diversification	- 662.3	- 647.9	- 14.4	2.2%	

The diversification effect relative to market risk is equal to 6%.

Compared to the solvency valuation at 31 December 2021, the market risk rose by 149% for a total of approximately 6 million euro. The increase in market risk is mainly attributable to higher investments in the market and the speculative increase in interest risk.

Below is a bar chart summarising the changes between the two valuations.

Market Risk (in millions of euro)



C.3 CREDIT RISK

Intesa Sanpaolo Vita Insurance Group

C.3.1 Exposures and their management

The Insurance Group defines credit or counterparty risk as the risk of loss deriving from default by the counterparty on deposits, derivatives or credit exposures.

The companies belonging to the Insurance Group, under Article 1(r)-bis of the Private Insurance Group, adopt the standard formula for the calculation of the Solvency Capital Requirement (Articles 45-quinquies to 45-undecies).

At 31 December 2022, Credit risks represented about 10% of the Group's Basic Capital Requirement, for a total of approximately 465 million euro.

Compared to the previous valuation of 31 December 2021, Credit Risk increased by 50% to a total of 154 million euro due to the liquidity held against premiums written on the Risparmio Insurance product.

As regards Credit Risk, the Insurance Group's Risk Appetite framework establishes a limit on the ratio between the capital requirement for Credit Risk and eligible own funds of the Company.

Below are the figures for the Group Companies' exposures to Credit risks, in terms of use of capital. The figures are also compared against those for 31 December 2021.

C.3.2 Concentration of risks

The Intesa Sanpaolo Vita Group has not identified the concentration of credit risk as being potentially significant in the Rules on risk concentration. However, there are limits on operations contained in the Investments Framework Decision and types of contract that reduce the risk of concentration.

C.3.3 Risk mitigation techniques

The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

C.3.4 Sensitivity analysis

The Companies' risk profile highlights a limited exposure to credit risk and therefore the companies did not consider it necessary to use additional quantitative sensitivity analyses for this risk.

Intesa Sanpaolo Vita S.p.A.

C.3.1 Exposures and their management

At 31 December 2022, the value of the counterparty risks, according to the Standard Formula, was 314 million euro.

The Company's exposure in terms of counterparties shows a high level of credit quality.

As regards credit risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for market risk and eligible own funds of the Company.

Compared to the previous valuation of 31 December 2021, credit risk increased by 69% for a total of 128 million euro, mainly due to the increased liquidity held by the Company.

C.3.3 Risk mitigation techniques

For the exposures to derivatives, it must be remembered that these operations are all regulated by ISDA contracts with annexed CSA that standardise the following clauses, among others:

- *Function transferability;*
- *Change of credit rating;*

-
- *Change of control;*
 - *Resolution;*
 - *Termination amount.*

The clauses in the ISDA contracts regulate events that could have an adverse impact on both parties, such as a downgrading of credit rating or change of control and therefore limit the unexpected risks of exposure to the Default risk, on existing derivatives contracts.

Intesa Sanpaolo Assicura S.p.A.

C.3.1 Exposures and their management

At 31 December 2022 the value of the counterparty risks, according to the Standard Formula, was 49 million euro.

During 2022, the Company did not carry out any derivatives transactions and therefore there are no open positions. The main exposures relate to accounts receivable from insureds.

Compared to the solvency valuation at 31 December 2021, credit risk rose by 45% for a total of approximately 15 million euro. The increase in credit risk is mainly due to the increase in receivables from policyholders.

The Company's exposure in terms of counterparties shows a high level of credit quality.

C.3.3 Risk mitigation techniques

The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

As regards exposures with reinsurers, the Company uses reinsurance by selecting reinsurers that have a high credit standing.

Fideuram Vita S.p.A.

C.3.1 Exposures and their management

At 31 December 2022, the value of the counterparty risks, according to the Standard Formula, was 26 million euro.

The Company's exposure in terms of counterparties shows a high level of credit quality.

As regards credit risk, the Company's Risk Appetite framework establishes limits on the ratio between the capital requirement for market risk and eligible own funds of the Company.

Compared to the previous valuation of 31 December 2021, credit risk fell slightly by 12% for a total of 3,7 million euro.

C.3.3 Risk mitigation techniques

Currently, the Company does not consider it necessary to use specific techniques to mitigate credit risks. The high credit quality is guaranteed through the selection of counterparties and

management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

Intesa Sanpaolo Life D.A.C.

C.3.1 Exposures and their management

At 31 December 2022, the value of counterparty risks, according to the Standard Formula, was approximately 28 million euro (25 million euro at 31 December 2021).

The main components of the Company's credit risk relate to banking counterparties that hold its liquidity in the form of deposits and credits to third parties.

The capital absorbed by credit risk rose by 13.9% compared to the figures at 31 December 2021.

C.3.3 Risk mitigation techniques

The Company sets limits on investment in its proprietary portfolio, based on the counterparties' ratings. There are also methods to diversify investments. The Company, through its Risk Committee, regularly evaluates the level of exposure to risk in accordance with the Company's risk appetite.

Intesa Sanpaolo RBM Salute S.p.A.

C.3.1 Exposures and their management

At 31 December 2022 the value of the counterparty risks, according to the Standard Formula, was 63 million euro.

During 2022, the Company did not carry out any derivatives transactions and therefore there are no open positions. The main exposures relate to banking counterparties holding the Company's liquidity in the form of deposits, and accounts receivable from insured.

Compared to the solvency valuation at 31 December 2021, credit risk rose by 25% for a total of approximately 12.8 million euro. The increase in credit risk is due to a combined increase in receivables from policyholders and liquidity held at the valuation date.

C.3.3 Risk mitigation techniques

The high credit quality is guaranteed through the selection of counterparties and management of related exposures in accordance with the risk preferences defined in the Risk Appetite Framework.

As regards exposures with reinsurers, the Company uses reinsurance by selecting reinsurers that have a high credit standing.

C.4 LIQUIDITY RISK

Intesa Sanpaolo Vita Insurance Group

C.4.1 Exposures and their management

The Insurance Group defines liquidity risk as the risk of not being able to meet its obligations to policyholders and other creditors due to problems in converting investments into liquidity without suffering losses.

The Companies are exposed to the financial and liquidity risks with the aim of ensuring that they reflect the characteristics of their insurance obligations, thus favouring the diversification of assets and prudent management.

The companies' objectives include achieving solidity of the liquidity position as stated in the Group Risk Appetite Statement.

During the activity planning period there are not expected to be any changes in the exposure to liquidity risk as the Company's investment strategy is aimed at maintaining highly liquid securities in order to deal with any adverse scenarios quickly, without incurring significant losses.

The liquidity risk is managed within the risk management framework already mentioned in section B.3 "Risk management system, including the internal risk and solvency assessment".

The Companies also control this risk using the principles, processes and operational limits defined in the Rules on managing liquidity risk.

If the analysis highlights any imbalances or need for financial resources, either in normal conditions or under stress conditions, specific monitoring is put in place.

The liquidity risk is measured at least once a quarter, by analysing the mismatches between the asset and liability flows generated from the technical operations only, checking that it is higher than zero for each portfolio and for the entire portfolio of each Company, with a time frame of up to twelve months in stress situations.

The liquidity risk is of principal importance within the fundamental risk dimensions of the Risk Appetite Framework and is monitored using the following metrics:

- amount of highly liquid securities;
- indicator level of cumulative Cash Flow Matching.

C.4.2 Concentration of risks

The Insurance Group, as already described in section C.1.2 "Concentration of risks - Underwriting Risks", has a risks concentration policy that defines the significant concentrations and the related calculation methods.

For each financial instrument valued with a fair value of 3, the market value of all direct exposures are added together. That value is compared to the total technical provisions of the ISV Group, calculated for the last annual report. In case of alternative investment funds, the total commitment is considered instead of the market value of the exposures. The threshold is 0.2% of the value of the group's technical provisions.

C.4.3 Risk mitigation techniques

The companies operate with the aim of achieving cohesion between the Financial Reporting activities and the liability structure in order to reduce its exposure to liquidity risk.

Currently, the companies do not consider it necessary to use specific techniques to mitigate the liquidity risk, as there is a robust liquidity monitoring system.

C.4.4 Profits expected from future premiums

As required by the regulations, the companies have carried out a quantitative assessment on the appropriateness of the composition of the assets in terms of their type, duration and liquidity for the purposes of complying with the company's obligations as they arise. No specific critical issues have been detected.

The Group Companies have conducted an assessment to identify the cash flows and profits generated only from the future premiums component, relating to policies in existence on the valuation date, which each Company expects to receive according to the conditions of these policies; this assessment will measure the value of the profits expected in future premiums (EPIFP).

C.4.5 Sensitivity analysis

Stress tests analyse the solvency and stability of the company, in adverse, extreme scenarios.

The liquidity position of companies under stress is reflected by the shocks defined in the stress tests imposed for the other risks.

In addition to the impact of liquidity on stress tests conducted as part of the self-assessment, there is quarterly monitoring of the liquidity coverage as part of the monitoring of the Risk Appetite Framework.

Intesa Sanpaolo Vita S.p.A.

C.4.1 Exposures and their management

The Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

The liquidity risk is of principal importance within the Risk Appetite Framework. The Company monitors exposure to liquidity risk with the following metrics:

- highly liquid securities;
- Cumulative Cash Flow Matching.

C.4.4 Profits expected from future premiums

With regard to Intesa Sanpaolo Vita, for the valuation at 31 December 2022, the total EPIFP was 945 million.

C.4.5 Sensitivity analysis

The ALM function monitors the liquidity risk each quarter, by applying various levels of stress on the Assets side, and a shock on the surrender risk, on the Liabilities side.

On the Asset side, for the purposes of assessing the gains from the assets considered in the analysis, the realisable assets were subject to 3 levels of stress, with a hypothetical shock rate.

On the Liabilities side, an increase in surrenders is used.

Intesa Sanpaolo Assicura S.p.A.

C.4.1 Exposures and their management

The Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

C.4.4 Profits expected from future premiums

As regards Intesa Sanpaolo Assicura, for the valuation at 31 December 2022, the total EPIFP was 55.4 million euro.

C.4.5 Sensitivity analysis

The AML function monitors liquidity risk quarterly. The purpose of monitoring is to identify any current and forward-looking cash imbalances of the Company in given stress scenarios.

Fideuram Vita S.p.A.

C.4.1 Exposures and their management

The Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

C.4.4 Profits expected from future premiums

With regard to Fideuram Vita, for the valuation at 31 December 2021, the total EPIFP was 170 million euro.

C.4.5 Sensitivity analysis

The liquidity position of the Company under stress is reflected by the shocks defined in the stress tests identified for the other risks which analyse company solvency and stability in adverse scenarios.

Intesa Sanpaolo Life D.A.C.

C.4.1 Exposures and their management

The Company has a limited exposure to liquidity risk due to the nature of the products distributed (unit-linked). Moreover, since a significant portion of available equity is reflected in the present value of expected future profits on the existing portfolio, a close monitoring of cash flows is in place in relation to this situation.

Having said that, the Company manages liquidity risk in accordance with the provisions determined at Group level. Refer to the details of the section on the Insurance Group.

C.4.4 Profits expected from future premiums

As regards Intesa Sanpaolo Life, for the valuation at 31 December 2022, the total EPIFP was equal to 43.26 million euro.

C.4.5 Sensitivity analysis

The Company evaluates the impact of certain stressors on liquidity, in the self-assessment process with particular reference to easily liquidated assets. The stressors are placed on technical variables and on market variables. A shock is also imposed, by raising the taxation rate for the mathematical reserves.

Intesa Sanpaolo RBM Salute S.p.A.

C.4.1 Exposures and their management

The Company Intesa Sanpaolo RBM Salute S.p.A defines liquidity risk as the risk of not being able to meet its obligations to policyholders and other creditors due to problems in converting investments into liquidity without suffering losses.

During the activity planning period there are not expected to be any changes in the exposure to liquidity risk as the Company's investment strategy is aimed at maintaining highly liquid securities in order to deal with any adverse scenarios quickly, without incurring significant losses.

Liquidity risk is managed within the risk management framework, in particular as defined in the Framework Agreement of Investments and related attachments.

If the analysis highlights any imbalances or need for financial resources, either in normal conditions or under stress conditions, specific monitoring is put in place.

C.4.4 Profits expected from future premiums

As regards Intesa Sanpaolo RBM Salute, for the valuation at 31 December 2022, the total EPIFP was 2.6 million euro.

C.4.5 Sensitivity analysis

The AML function of the USCI monitors liquidity risk. The purpose of monitoring is to identify any current and forward-looking cash imbalances of the Company in given stress scenarios.

C.5 OPERATIONAL RISK

Intesa Sanpaolo Vita Insurance Group

C.5.1 Exposures and their management

The Insurance Group has implemented the definition of operational risk as indicated in ISVAP Regulation no. 38/2018 and the one provided by the Intesa Sanpaolo Group as indicated below: "the risk of sustaining losses arising from the inadequacy or malfunction of internal procedures, human resources and internal systems, or from external events".

For the economic loss component, the following risks are included in operational risk: legal, conduct, compliance, financial crime, IT and cyber, physical security, operating continuity, financial disclosure, third parties and model risk. Strategic and reputational risks are excluded.

On 31 December 2022 the value of the operational risks, according to the Standard Formula, was 527 million euro before the diversification effect. Compared to the previous valuation of 31 December 2021, operational risk decreased by 12%, i.e. 71 million euro.

There are not expected to be any significant changes in the operational risks during the planning period.

By adopting the framework of the Parent Company Intesa Sanpaolo for the management of operational risks, the Insurance Group contributes to the internal model of Intesa Sanpaolo which quantifies a risk indicator (capital absorption) that includes the insurance perimeter.

This framework consists of two main processes: Loss Data Collection and self-diagnosis (assessment of the operational context and scenario analysis).

This work is done with the assistance of the Operational, Technology and Information Risk Management unit of the Parent Company's Enterprise Risk Management Head Office Department.

The absorption of capital for the Company's operational risk which derives from the internal model of the Parent Company Intesa Sanpaolo, is used for the self-assessment of the risk itself for the Pillar II valuation.

C.5.2 Concentration of risks

The Insurance Group has not identified the operational risk concentration as being potentially significant, in the Rules on risk concentration.

C.5.3 Risk mitigation techniques

The operational risk in the Standard Formula is calculated using a linear formula. The operational risk increases as the size of the Insurance Group companies' business increases, except where the company has a very low Basic Capital Requirement. The Standard Formula does not provide for any diversification of that risk with the other risks to which the companies of the Insurance Group are exposed, nor any mitigation techniques that can reduce exposure.

In order to mitigate operational risks, a system of controls has been set up within the Risk Appetite Framework with the aim of keeping operational risks within certain limits.

The Insurance Group, together with the Parent Company Intesa Sanpaolo, has also implemented a Business Continuity Management System (BCMS) to minimise the potential financial, regulatory and reputational impact of interruptions to company operations.

This system may be defined as a holistic management process involving the advance identification of the threats to the Group and its individual Companies and their potential impacts on its critical business processes, aimed at the implementation of primarily organisational, infrastructural and technological countermeasures that guarantee its survival, even when it has lost all or part of the assets supporting its operational capability.

The Intesa Sanpaolo Group and, in particular, the Insurance Group are focused on ensuring the continuity of services, processes and critical functions, in order to contribute to the stability of financial markets, maintain customers' trust, safeguard revenues and mitigate risks.

C.5.4 Sensitivity analysis

The shocks defined in the Standard Formula for the valuation of the operational risk sensitivity tend not to represent the company's' risk profile as they refer to the quantity of business underwritten, or to the future commitments towards the policyholders and not to the operational context (which is all of the systems, procedures and actions by personnel) and its vulnerability to endogenous and exogenous variables.

In reference to the internal valuation framework the companies do not consider it necessary to use additional quantitative sensitivity tests.

Intesa Sanpaolo Vita S.p.A.

C.5.1 Exposures and their management

On 31 December 2022 the value of operational risks, according to the Standard Formula, was approximately 358 million euro. Compared to the previous valuation of 31 December 2021, operational risk fell by 22%, i.e. by approximately 79 million euro.

The main sources of operational risk identified are related to the following circumstances:

- "Customers, products and operating practices" attributable to customer relations, in particular concerning legal proceedings brought by customers;
- "Performance, delivery and management of processes" attributable to unintentional errors in managing operations.

Intesa Sanpaolo Assicura S.p.A.

C.5.1 Exposures and their management

At 31 December 2022, the value of the operational risks of Intesa Sanpaolo Assicura according to the Standard Formula, was equal to approximately 28 million euro. Compared to the previous valuation of 31 December 2021, operational risk rose by 27%, i.e. by approximately 6 million euro.

The main sources of risk identified from the loss data collection process are related to the following circumstances:

- "external offences", attributable to fraudulent activities of persons qualified as external to the Company, usually carried out to obtain personal advantages to the detriment of the Company (frauds connected with the settlement of motor claims);

Fideuram Vita S.p.A.

C.5.1 Exposures and their management

At 31 December 2022 the value of the operational risks, according to the Standard Formula, was 53 million euro. Compared to the previous valuation of 31 December 2021, operational risk rose by 56% (the requirement was 34 million euro at the end of 2021).

The main source of operational risk identified was related to the circumstance "Performance, delivery and management of processes" attributable to unintentional errors in managing the Company's operations.

Intesa Sanpaolo Life D.A.C.

C.5.1 Exposures and their management

At 31 December 2022, the value of operational risks, according to the Standard Formula, was 82 million euro (88 million euro at 31 December 2021). Compared to the previous valuation of 31 December 2021, capital absorption for operational risk fell by 7%, i.e. by approximately 6 million euro.

The main source of operational risk identified was again related to : "Performance, delivery and management of processes" attributable to unintentional errors in managing operations.

Intesa Sanpaolo RBM Salute S.p.A.

C.5.1 Exposures and their management

At 31 December 2022, the value of the operational risks of Intesa Sanpaolo RBM Salute, according to the Standard Formula, was equal to approximately 15 million euro. Compared to the solvency valuation of 31 December 2022, operational risk was stable.

The main source of risk identified from the loss data collection process concerns the "Customers, products and operating practices" and refers to the adoption of improper operating practices with clients, in particular related to a commercial practice in the offer of insurance services, which may violate the legislation on unfair commercial practices potentially prohibiting its distribution or continuation.

C.6 OTHER MATERIAL RISKS

C.6.1 Exposures and their management

The Group has no significant exposure to other measurable risks other than those provided for in Pillar I of the Standard Formula.

As mentioned in section B.3 "System of risk management internal assessment of risk and solvency", the material risks that the company has identified, and which are not entirely included in the calculation of the solvency capital requirements, according to the Standard Formula, include:

- reputational risks, referring to those events that may tarnish the reputation or image of each Insurance Group company;
- strategic risks, which refer to the risk of losses due to wrong strategic choices and includes financial, management, logistics and product subcategories. This category also includes group risks (risks deriving from intragroup operations, the risk of contagion and the risk of conducting an insurance business in different companies and jurisdictions);
- environmental, Social and Governance risks, which refer to the risk that the activities related to the insurance business may undermine ESG principles or fail to contribute to their enhancement. This type of risk may have multiple effects and may also affect other risk categories.

The controls in place for these risks are on the whole adequate.

The Insurance Group defines the risks to which it is exposed using a risk exposure-risk mitigation logic and risk map. Exposure to risk is determined according to the combination between probability and impact, and is assessed on a scale of 1 to 6; the assessment of risk mitigation, or the efficiency of risk mitigation and monitoring systems, consists of five levels: absent, scarce, adequate, good and excellent.

C.6.2 Concentration of risks

Not applicable.

C.6.3 Risk mitigation techniques

Reputational risks, Strategic risks and Environmental, Social and Good Governance (ESG) risks, among others, are monitored as part of the Risk Assessment. In particular, the safeguards in place are assessed and those to be activated for further risk mitigation are identified, as further described in Chapter B. In addition, certain indicators within the RAF limits contribute to the management of these risks.

For Reputational Risks, the Insurance Group has also adopted a dedicated Policy aimed at defining guidelines for the management of reputational risks through reference principles and the definition of roles and responsibilities attributed to the various Corporate Functions.

With regard to Environmental, Social and Good Governance risks, the 'Policy for the Integration of ESG (Environmental, Social and Governance) Sustainability Factors' is kept up-to-date.

In order to integrate ESG factors into its investment choices, the Insurance Group adopts the following criteria.

SRI exclusions and restrictions: issuers operating in sectors deemed not "socially responsible": restrictions or exclusions are applied with respect to the Investment Universe of the individual managed portfolios.

ESG exclusions and restrictions (so-called 'critical issuers'): exclusions and restrictions apply to issuers defined as 'critical', i.e., companies characterised by a higher exposure to environmental, social and corporate governance risks or those with a lower ESG sustainability rating level (equal to 'CCC' assigned by the specialised info-provider 'MSCI ESG Research') in the corporate bond and equity investment universe.

C.6.4 Sensitivity analysis

Not applicable.

C.7 OTHER INFORMATION

Intesa Sanpaolo Vita Insurance Group

The Group, and each company, have input all the relevant information about their own risk profiles, in the above sections.



D. VALUATION FOR SOLVENCY PURPOSES

This section provides information about the values of the assets and liabilities used for the purposes of the solvency of the Insurance Group and of each company. The provides a comparison between:

- the balance sheet figures in the Group Solvency Report and the Group Consolidated Financial Statements prepared in accordance with IAS/IFRS;
- the balance sheet figures in the Solvency Report of each Company of the Insurance Group and the respective financial statements prepared in accordance with national accounting standards.

The main regulatory references relating to the preparation of the Solvency Report are the following:

- Article 75 of European Directive No. 138/2009;
- Article 35 quater of Legislative Decree No. 74/2015 which enacts the above Directive;
- IVASS Regulation No. 18/2016 concerning rules for determining technical provisions;
- IVASS Regulation No. 34/2017, concerning the provisions on corporate governance relating to the valuation of assets and liabilities other than technical provisions, and the related valuation criteria;
- Delegated Regulation No. 35/2015 of the European Commission – Reference to Title I – Chapter II;
- "Guidelines" issued by EIOPA (European Insurance and Occupational Pensions Authority).

The Solvency Report has been prepared according to a market-consistent approach to value the assets and liabilities, in particular:

- assets are measured at the amount at which they could be exchanged between consenting parties in an operation carried out at normal market conditions;
- liabilities are valued at the amount of which they could be transferred or settled between informed, consenting parties, in an arm's-length transaction without any adjustment to take into account the credit rating of the insurance company.

Moreover, the assets and liabilities are also valued on a going concern basis, with express reference to IAS/IFRS, which are usually the reference standards utilised to value assets and liabilities for solvency purposes, unless stipulated otherwise, and if the valuation criteria provided for in IAS are in line with the above-mentioned market consistent valuation approach.

Therefore, the Insurance Group's Solvency Report involved the following phases:

- a valuation of individual assets and liabilities in application of the criteria provided for in Delegated Regulation No. 35/2015, in line, where applicable, with the valuations given for the purposes of the Group Consolidated Financial statements prepared in accordance with IAS/IFRS;
- re-presentation of the assets and liabilities of each company based on the classification criteria applied to the compilation of the QRT S.02.01 (Balance Sheet).

Annexed to this report are the QRT for the Solvency Report (S.02.01.02) for the Insurance Group and individual companies at 31 December 2022. Each QRT includes a list of the assets and liabilities of the Insurance Group and of each company, which is attached to this Report.

The valuation criteria used for the assets and liabilities contained in the QRT, in line with the provisions of article 10 of the above-mentioned Delegated Regulation are the following:

- assets and liabilities are valued at market prices quoted on active markets according to the definition of the international accounting standards;
- when no such market prices are available, the prices recorded on active markets for similar assets and liabilities are used, and adjusted to reflect any differences considering the specific characteristics of the asset or liability (such as condition, location, the extent to which the valuation input relates to comparable elements, the volume or level of activity in the markets from which the input was taken);
- if it is impossible to apply the above mentioned valuation criteria, the Group and individual companies have used alternative valuation methods, minimising the use of specific input from the company and using market input as far as possible, including the elements indicated below:
 - prices quoted for identical or similar assets or liabilities, in non-active markets;
 - input other than the observable listed prices, including interest rates and performance curves observed at commonly-quoted intervals, implied volatility and credit spread;
 - input corroborated by the market, which may not be directly observable but is based on observable market data, or supported by it.

If no observable input is available, including situations of low activity on the market on the valuation date, non-observable input is used, which reflects the scenarios that the market traders would use in determining the price, including the risk hypotheses. In evaluating the risk hypotheses, companies take into account the risk of a particular valuation technique used to measure the fair value and the risk related to the input used in the valuation technique.

Section 3 of the Delegated Regulation provides for methods on the solvency valuation of the insurance company's technical provisions that are specific and separate from the measurement criteria used in the annual Financial Statements and IAS/IFRS.

D.1 ASSETS

Intesa Sanpaolo Vita Insurance Group

With reference to the QRT S.02.01.02 annexed to this Report, a list is given of the items in the Solvency Report.

GOODWILL

The goodwill in the Solvency Report is valued at zero in line with Delegated Regulation No. 35/2015.

		<i>(euro thousands)</i>	
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Goodwill	-	1,059,904	-1,059,904

Goodwill in the IAS/IFRS Consolidated Financial Statements, reported for a total of 1,059,904 thousand euro, consists of 634,580 thousand euro from Intesa Sanpaolo Vita, 279,392 thousand euro from Intesa Sanpaolo RBM Salute and for 145,932 thousand euro from Intesa Sanpaolo Assicura.

Deferred Acquisition Costs

Deferred acquisition costs in the Solvency Accounts are valued at zero in line with Delegated Regulation No. 35/2015.

		<i>(euro thousands)</i>	
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred acquisition cost	-	394,594	-394,594

Intangible assets

The intangible assets in the Solvency Report are valued at zero in line with Delegated Regulation No. 35/2015. The intangible assets recognised in the Consolidated Financial Statements and the Separate Financial Statements cannot be sold separately and it is not possible to demonstrate any fair value, on an active market, for an identical or similar asset.

		<i>(euro thousands)</i>	
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Intangible assets	-	162,833	-162,833

Deferred tax assets

The calculation of the deferred taxes given in the Solvency Report was made in application of IAS 12 and Articles 20-22 of IVASS Regulation No. 34/2017. Deferred taxes are calculated on the temporary differences between the book value of the assets and liabilities on the solvency report and their fiscal value.

In line with IAS 12, the Insurance Group records tax assets for deferred taxes to the extent that it is probable that the deductible temporary differences or fiscal losses could lead to a corresponding reduction in the future liabilities for current taxes.

The recoverability analysis is based on an examination of the presence, in future years, of a presumable reversal of the deductible temporary differences of corresponding taxable temporary differences (for the same tax, and towards the same tax authority) for which the corresponding liabilities for deferred taxes were recorded.

Any part not covered by the above point is determined by taking into account:

- The presence of temporal restrictions that limit the carrying forward of tax losses and/or temporary differences to future years;
- The expected profitability, which can be deduced from the results of the plans approved by the executive bodies corroborated by an analysis of the capacity to generate taxable income during previous years that would reabsorb any past fiscal losses. The presence of significant taxable amounts at the end of the period is a reasonable measure of the company's long-term profitability, on the basis of which it is possible to evaluate the recoverability of any temporary deductible differences that would be expected to be cancelled out in years after those covered by the plan.

The Group's solvency report includes:

- deferred tax assets (DTA) totalling 2,684.9 million euro, compared to 989.9 million euro entered in the Consolidated Financial Statements; the solvency value represents 1.5% of the total assets in the financial statements;
- deferred tax liabilities (DTL) totalling 3,560.7 million euro, compared to 1,188.1 million euro recognised in the Consolidated Financial Statements; the solvency value represents 2.0% of the total assets in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the Insurance Group companies:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred tax assets	2,684,864	989,870	1,694,994
Deferred tax liabilities	3,560,733	1,188,098	2,372,635

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the value of the consolidated financial statements and the Solvency II value of the investments and technical provisions.

These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding portfolio policies.

Property, plant and equipment held for own use

This item totalled 29,148 thousand euro compared to 28,782 thousand euro reported in the consolidated financial statements. The difference of 365 thousand euro is attributable to the different valuation method used for the Intesa Sanpaolo RBM property; market value supported by the appraisal of an independent expert (Solvency value) compared to the valuation at amortised cost in the consolidated financial statements.

	<i>(euro thousands)</i>		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	29,148	28,782	366

Investments

The Financial Investments portfolio measured at fair value reported in the Solvency II accounts amounts to 87,844.0 million euro.

The following table shows the breakdown by investment types.

	<i>(in migliaia di euro)</i>	
Investments	2022	%
Holdings in related undertakings, including participations	20,533	0.0%
Equities	1,997,862	2.3%
Bonds	72,862,294	82.9%
Collective Investment Undertakings	12,865,360	14.6%
Derivatives	97,910	0.1%
Investments (other than assets held for index-linked and unit-linked co	87,843,960	100.0%

The Group's investment operations carried out in 2022 were consistent with the guidelines defined by the Investment Framework Resolution of the Group Companies and, in particular, in compliance with the general principles of prudence and of promoting the quality of assets in the medium and long term.

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

Assets held for index-linked and unit-linked policies

The asset item classified as "Assets held for index linked or unit-linked insurance policies" includes all the financial assets defined as "Class D" in the balance sheet of the Consolidated Financial Statements.

These financial assets correspond to assets for which the investment risk is borne by the policyholder.

This item is made up of investments used to cover the commitments pertaining to LoB III policies, whose benefits are directly linked to the value of the assets in internal unit and index linked funds or to the value of units of UCITS, and to the financial investments linked to pension policies (open pension funds of Intesa Sanpaolo Vita and Fideuram Vita).

These investments are stated at current value in both the IAS/IFRS and Solvency II financial statements.

	<i>(euro thousands)</i>		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Assets held for index-linked and unit-linked contracts	86,372,838	86,372,838	-

Compared to 2021 the asset component of unit-linked policies decreased by -14.4%, from 100,925 million euro to 86,378 million euro. The weighting of this item in the total assets is 46.8%.

With regard to the valuation methods for the individual companies, there were no differences from those reported at Group level.

Amounts recoverable from reinsurance

This item contains all the recoverables regarding the Outward Reinsurance used by the Insurance Group as a technique to mitigate the underwriting risks.

In the same way as occurs for the technical provisions for direct business, the shares paid by the reinsurers are reprocessed, compared to the Financial Statements using Solvency II criteria, which take into account the expected cash flows connected to recoveries relating to direct business obligations, discounted according to the above mentioned risk-free rate curve.

The valuation of the reinsurance impact is described in the section below, on technical provisions.

The group data is given below:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Non-Life excluding Health	55,115	76,483	-21,368
Health similar to Non-Life	34,614	50,566	-15,953
Life excluding Health and Index-linked and unit-linked	-	36,169	-36,169
Reinsurance recoverables	89,728	163,219	-73,490

(euro thousands)

With regard to the item "Amounts recoverable from reinsurance", which in the consolidated financial statements amounts to 163,219 thousand euro, please note that the item "Life, excluding health, index and unit-linked" was written off to zero under Solvency, following an analysis of technical forms, pricing and treaties also on a prospective basis.

Loans and Receivables

This item includes:

- "Mortgages and loans" relating to loans on Life policies for products that contain this clause in the insurance policy. No valuation differences emerged between the consolidated financial statements and the solvency reports;
- "Insurance receivables from intermediaries" relating to receivables from direct insurance transactions with intermediaries, particularly the retail network of Intesa Sanpaolo or the financial advisers of Banca Fideuram, for Fideuram Vita. These last receivables are valued at nominal value without considering adjustments due to losses for uncollectable amounts. By their nature these receivables are due and payable in the short term;
- "Reinsurance receivables" payable in the short term by the reinsurers. Also for these receivables, the market value is in line with the related value as stated in the Consolidated Financial Statements;
- "Receivables (commercial, non-insurance)" relating to non-insurance receivables such as interest, tax credits and other types of accounts receivable.

The data for the Insurance Group is given below:

	<i>(euro thousands)</i>
	Solvency II value
Loans and mortgages	711
Insurance and intermediaries receivables	375,501
Reinsurance receivables	3,389,827
Receivables (trade, not insurance)	3,389,827

The item Receivables (trade, non-insurance) includes the reclassification of amounts relating to the offsetting of tax assets and liabilities (IRES advances, etc.) mainly relating to Intesa Sanpaolo Vita.

Other items

This item includes all the assets of residual importance compared to the above.

In detail they include "Cash and cash equivalents" and other assets not belonging to the items mentioned in the above sections.

The valuation of the other Financial Statement assets is based on the presumed realisation value. This approach is in line with the valuations made in the Solvency Report.

The data for the insurance group is as follows:

	<i>(euro thousands)</i>
	Solvency II value
Cash and cash equivalents	3,093,196
Any other assets, not elsewhere shown	385,429

Intesa Sanpaolo Vita S.p.A.

Deferred Acquisition Costs

Deferred acquisition costs in the Solvency Accounts are valued at zero in line with Delegated Regulation No. 35/2015.

	<i>(euro thousands)</i>	<i>(euro thousands)</i>	<i>(euro thousands)</i>
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred acquisition cost	-	-	-

Intangible assets

The intangible assets recognised in Intesa Sanpaolo Vita's financial statements are brought down to nil balance as the conditions for the assets in question to be sold separately are not met and no value can be demonstrated for identical or similar assets.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Intangible assets	-	45,115	- 45,115

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 2,339 million euro, compared to 384 million euro DTA entered in the statutory financial statements (Italian accounting standards); the solvency value represents 2.1% of the total assets in the financial statements;
- deferred tax liabilities (DTL) totalling 2,974 million euro, compared to 4.2 million euro DTL entered in the annual financial statements according to Italian accounting standards; the solvency value represents 2.8% of the total liabilities in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	2,339,191	384,422	1,954,769
Deferred tax liabilities	2,974,627	4,213	2,970,414

Deferred taxes mainly relate to temporary differences arising from adjustments between the statutory value and the Solvency II value of investments and technical provisions.

These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding portfolio policies.

On the reporting date there were no tax loss carry forwards or unused tax credits for which the corresponding deferred tax assets had not been recognised.

Real estate, plant and equipment held for own use

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	9,235	5,285	3,950
Financial liabilities other than debts owed to credit institutions	3,866	-	3,866

The valuation difference is due to the application to the Solvency Accounts of the international accounting standard IFRS 16, which has introduced significant changes to the recognition of leasing in the financial statements based on the *right-of-use* model. As required by IFRS 16, this item includes contractual commitments related to property rentals and leased cars with right of use.

Holdings in related undertakings, including equity investments

For Intesa Sanpaolo Vita the shares held in subsidiaries, including equity investments, are the following:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Holdings in related undertakings, including participations	3,007,548	1,474,059	1,533,489

The Solvency Report of the company includes in that item the value of “assets in excess of liabilities” on the solvency report of the subsidiaries, thus expressing the market consistent method as provided for in Delegated Regulation No. 35/2015.

The annual Financial Statements prepared in accordance with statutory provisions provide for equity investments to be measured at cost, adjusted to reflect impairment losses.

Investments (Capital instruments, bonds, UCITS, derivatives)

Below is a summary of the main items in the asset investments for Intesa Sanpaolo Vita:

	Solvency II value	Statutory accounts value	(euro thousands)
			Impact on Reconciliation reserve
Equity	1,905,696	1,451,950	453,746
Equity - Listed	1,807,079	1,376,045	431,034
Equity - Unlisted	98,617	75,905	22,712
Bonds	66,125,374	72,915,557	6,790,183
Government bonds	50,460,075	56,629,570	6,169,494
Corporate bonds	12,939,616	13,388,397	448,781
Structured note	2,697,752	2,868,930	171,177
Collateralised securities	27,931	28,660	730
Collective investments undertakings	11,684,478	11,553,666	130,812
Derivatives	96,870	46,247	50,623
Investments	79,812,418	85,967,420	6,155,002

Total investments in Equity Instruments, Bonds, UCITS and Derivatives account for 71.1% of total assets in the financial statements. The main part of the investments of this category is allocated to government bonds (63.2%) while 16.2% are invested in corporate bonds. The remaining 20.5% is divided between equities (approximately 2.4%), collective investment undertakings (14.6%), Structured Securities (3.4%) and derivatives (0.1%).

The total value relating to financial investments in the solvency balance is equal to 79,812 million euro, while the amount referring to the separate financial statements prepared in accordance with Italian accounting principles corresponds to 85,967 million euro. The difference of -6,155 million euro is attributable to the recognition of unrealized gains resulting from the fair value measurement of all financial instruments, determined in accordance with IFRS 13, compared to the statutory valuation at the minimum between the cost and market for working capital and cost for long-term assets.

By virtue of the aforementioned rule, the Company measured its securities allocated to the “non-current” segment for the year 2022 on the basis of their carrying amount in the 2021 financial statements instead of their realisable value. This led to the suspension of value adjustments totalling 4,462.6 million euro with the resulting benefit being reflected in the result for the year.

Assets held for index-linked and unit-linked policies

	Solvency II value	Statutory accounts value	(euro thousands)
			Impact on Reconciliation reserve
Assets held for index-linked and unit-linked contracts	22,667,403	22,667,403	-

Compared to 2021 the asset component of unit-linked policies decreased by 3 million euro, from 25,855 million euro to 22,667 million euro. The weighting of this item in the total assets is 20.2%. In both the Financial Statements prepared in accordance with the national accounting standards and the Solvency II accounts, assets are measured at current value.

Amounts recoverable from reinsurance

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Health similar to Non-Life	-	8 -	8
Life excluding Health and Index- linked and unit - linked	-	36,169 -	36,169
Reinsurance recoverables	-	36,177 -	36,177

With regard to the item "Amounts recoverable from reinsurance", which in the financial statements amounts to 36,177 thousand euro, please note that the item "Life, excluding health, index and unit-linked" was written off to zero under Solvency, following an analysis of technical forms, pricing and treaties also on a prospective basis.

Loans and Receivables

The following table summarises the nature of the Loans and Receivables item:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Loans and mortgages	185	185	-
Insurance and intermediaries receivables	19,157	19,157	-
Reinsurance receivables	6,252	6,252	-
Receivables (trade, not insurance)	2,086,813	2,185,517 -	98,704

In particular, the item Receivables of 2,086 million euro differs from the amount in the statutory financial statements by -98.7 million euro due to the discounting of the tax credit on actuarial reserves.

Other items

The valuation does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Cash and cash equivalents	2,288,389	2,288,389	-
Any other assets, not elsewhere shown	107,250	107,250	-

In the item other assets not shown elsewhere which is recognised for 107 thousand euro. Miscellaneous assets mainly include amounts related to redemptions of unit-linked policies with effective date at the end of 2022 and bank date in January 2023, as well as collections not yet accounted for

Intesa Sanpaolo Assicura S.p.A.

Intangible assets

The intangible assets recognised in Intesa Sanpaolo Assicura's statutory accounts are brought down to nil balance as the conditions for the assets in question to be sold separately are not met and no value can be demonstrated for identical or similar assets.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Intangible assets	-	15,606	-15,606

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 39.8 million euro, compared to 19.6 million euro DTA entered in the annual Financial Statements according to Italian accounting standards; the solvency value represents 1.7% of the total assets on the financial statements;
- total deferred tax liabilities (DTL) of 182.6 million euro, compared to the annual Financial Statements prepared in accordance with Italian accounting standards, which does not show DTL; the solvency value represents 20.1% of the total liabilities in the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred tax assets	39,804	19,626	20,178
Deferred tax liabilities	182,647	-	182,647

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the statutory value and the Solvency II value of the investments and the technical provisions. These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding TP.

On the reporting date there were no tax loss carry forwards or unused tax credits for which the corresponding deferred tax assets had not been recognised.

Holdings in related undertakings, including equity investments

Intesa Sanpaolo Assicura does not hold any equity investments.

Real estate, plant and equipment held for own use

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Property, plant & equipment held for own use	3,132	1,303	1,829
Financial liabilities other than debts owed to credit institutions	1,652	-	1,652

The difference is due to a different valuation methodology, where IFRS 16 was applied in the Solvency Report.

Investments (Capital instruments, bonds, UCITS, derivatives)

Below is a summary of the main items in the various capital instruments for Intesa Sanpaolo Assicura:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	261	242	19
Equity - Listed	261	242	19
Equity - Unlisted	-	-	-
Bonds	1,259,031	1,267,231	-8,200
Government bonds	1,133,984	1,142,103	-8,119
Corporate bonds	111,116	111,196	-80
Structured note	13,930	13,932	-1
Collateralised securities	-	-	-
Collective investments undertakings	435,957	435,957	-
Derivatives	-	-	-
Investments	1,695,249	1,703,430	-8,181

The total investments represent 72.7% of total assets in the financial statements. The main part of the investments in this category is allocated to government stocks, 48.6%. 18.7% refers to collective investments while the remaining 0.1% part refers to equities and subordinated loans.

The difference between the amount of the asset and liability items relating to financial investments recognised in the annual Financial Statements prepared in accordance with Italian accounting standards, of -8 million euro, and the amount determined for solvency purposes relates to the recognition of the unrealised gains resulting from the fair value measurement of all financial instruments determined in accordance with IFRS 13.

Amounts recoverable from reinsurance

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Health similar to Non-Life	55,112	76,483	-21,371
Non-Life excluding Health	17,048	30,996	-13,948
Reinsurance recoverables	72,160	107,479	-35,319

The Solvency Report includes the best estimate of cash flows connected to recoveries relating to direct business obligations, discounted on the basis of the risk free rate curve.

This different valuation compared to the national accounting standards results in a difference of -35,319 thousand euro between the Financial Statements and the Solvency Report.

Loans and Receivables

The valuation does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Loans and mortgages	115	115	-
Insurance and intermediaries receivables	237,673	237,673	-
Reinsurance receivables	36,306	36,306	-
Receivables (trade, not insurance)	136,094	136,094	-

Other items

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Cash and cash equivalents	92,086	92,086	-
Any other assets, not elsewhere shown	20,488	20,488	-

Fideuram Vita S.p.A.

Intangible assets

The intangible assets recognised in the financial statements are brought down to nil balance as the conditions for the assets in question to be sold separately are not met and no value can be demonstrated for identical or similar assets.

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Intangible assets	-	58,854	-58,854

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 226.3 million euro, compared to 18.2 million euro DTA entered in the annual Financial Statements according to Italian accounting standards; the solvency value represents 0.62% of the total assets on the financial statements;
- deferred tax assets (DTL) totalling 345.7 million euro, compared to 1.4 million euro DTL entered in the annual financial statements according to Italian accounting standards; the solvency value represents 0.98% of the total liabilities on the financial statements.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Deferred tax assets	226,305	18,180	208,125
Deferred tax liabilities	345,701	1,420	344,281

Also for Fideuram Vita S.p.A., the deferred taxes mainly relate to temporary differences that refer to the adjustments between the *statutory value* and the Solvency II value of the investments and the technical provisions.

These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding portfolio policies.

On the reporting date there were no tax loss carry forwards or unused tax credits for which the corresponding deferred tax assets had not been recognised.

Real estate, plant and equipment held for own use

	Solvency II value	Statutory accounts value	(euro thousands) Impact on Reconciliation reserve
Property, plant & equipment held for own use	9,896	-	9,896

The Company, adopting IFRS 16 which came into force on 1 January 2019, has recognised the right of use of assets of rental, hire or free loan agreements in the financial statements.

Holdings in related undertakings, including equity investments

Fideuram Vita S.p.A. does not hold any equity investments.

Investments (Capital instruments, bonds, UCITS, derivatives)

Below is a summary of the main items in the various capital instruments for Fideuram Vita S.p.A.:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	91,656	76,423	15,233
Equity - Listed	91,522	76,289	15,233
Equity - Unlisted	134	134	-
Bonds	4,693,805	5,231,521	-537,715
Government bonds	3,635,329	4,102,301	-466,972
Corporate bonds	841,019	901,122	-60,104
Structured note	217,295	227,935	-10,640
Collateralised securities	162	162	-
Collective investments undertakings	682,617	734,934	-52,317
Derivatives	1,040	1,026	14
Investments	5,469,118	6,043,903	-574,785

The total investments in this category represent 15.08% of total assets. The main part of the investments of this type is allocated to government bonds (85.80%) while 15.40% are invested in corporate bonds. The remaining component (12.50%) refers to collective investments. Marginal contribution of equities.

Also for this company, the difference between the values in the balance sheet of the annual Financial Statements prepared in accordance with Italian accounting standards and those of the Solvency Report is due to the same reason as that indicated for Intesa Sanpaolo Vita.

Following the market turbulence that characterised the course of 2022 and that negatively affected the Company's equity and financial situation, the Company exercised the option under IVASS Regulation no. 52/2022, as amended and supplemented by IVASS Order no. 127 of 14 February 2023.

Therefore, by virtue of the aforementioned rule, the Company measured its securities allocated to the "non-current" segment for the year 2022 on the basis of their carrying amount in the 2021 financial statements instead of their realisable value. This led to the suspension of value adjustments totalling 451.5 million euro with the resulting benefit being reflected in the result for the year. As a result of not making any write-down, a portion of the extraordinary reserve was allocated to the creation of an unavailable profit reserve in shareholders' equity in the amount of 223.8 million euro.

Assets held for index-linked and unit-linked policies

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Assets held for index-linked and unit-linked contracts	29,530,941	29,530,941	-

Compared to 2021 the asset component of unit-linked policies decreased by 13.2%, from 34,018 million euro to 29,531 million euro, mainly due to the recovery of financial markets. The weighting of this item in the total assets is 81.42%.

Amounts recoverable from reinsurance

The run-off of the reinsurance agreements with Fideuram Vita S.p.A., do not generate recoverable amounts.

Loans and Receivables

The valuation does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Loans and mortgages	410	410	-
Insurance and intermediaries receivables	923	923	-
Reinsurance receivables	1,410	1,410	-
Receivables (trade, not insurance)	471,708	502,349	-30,641

Other items

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Cash and cash equivalents	356,834	356,834	-
Any other assets, not elsewhere shown	201,236	201,236	-

Intesa Sanpaolo Life D.A.C.

Deferred Acquisition Costs

The difference of purchase fees to depreciate is indicated below.

(in migliaia di euro)

	Valore Bilancio di Solvibilità	Valore Bilancio d'esercizio	Impatto su riserva di riconciliazione
Provvigioni d'acquisto da ammortizzare	-	275.830	-275.830

The 275,8 thousand euro shown in its component of the financial statements is entirely composed of Deferred Acquisition Costs (DAC) which, by their nature, are written off in the Solvency Accounts.

Intangible assets

The intangible assets recorded in the local IAS/IFRS financial statements, amounting to 1,46 million euro, were written off in accordance with the Solvency Report rules.

Deferred tax assets

The company's Solvency Report shows deferred tax assets of 5.6 million euro, which coincides with the amount on the annual accounts prepared in accordance with the International accounting standards (IAS/IFRS). Deferred tax liabilities (DTL) totalled approximately 73.9 million euro, compared to 1.2 million euro of DTL entered in the Financial Statements prepared under IAS/IFRS; the solvency value represents 0.22% of the total liabilities on the financial statements. Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	5,580	5,580	-
Deferred tax liabilities	73,885	1,168	72,717

The main difference in the adjustment of the DT relates to the portion of technical provisions for the liability items and the deferred costs of acquisition for the asset side. On this last item, the adjustment effect will be cancelled out over the years, in relation to the gradual unwinding of the deferred acquisition costs.

Real estate, plant and equipment held for own use

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	538	538	-

The item consists mainly of rights of use of real estate and residually of furniture and furnishings, hardware, printer licences and equipment.

Holdings in related undertakings, including equity investments

Intesa Sanpaolo Life does not hold any equity investments.

Investments (Capital instruments, bonds, UCITS, derivatives)

Below is a summary of the main items in the various capital instruments for Intesa Sanpaolo Life:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	203	203	-
Equity - Listed	203	203	-
Equity - Unlisted	-	-	-
Bonds	352,401	352,401	-
Government bonds	267,588	267,588	-
Corporate bonds	84,813	84,813	-
Structured note	-	-	-
Collateralised securities	-	-	-
Collective investments undertakings	62,309	62,309	-
Derivatives	-	-	-
Investments	414,913	414,913	-

These assets are valued at fair value by using the prices obtained from the financial markets, for instruments listed on active markets, or using internal valuation techniques for other instruments. If the market prices are not available, the prices available from brokers or dealers can also be used. When there is no listing on an active market or the market does not operate regularly, the fair value of financial instruments is mainly determined through valuation techniques whose purpose is to determine the price of a hypothetical market transaction. The total investments in this category account for just 1.2% of total assets. Investments in government stocks represent 64% while 15% is invested in collective investments. The remaining 20% relates to corporate bonds.

In this case there are no differences between the Solvency and the Statutory Accounts as the valuation principles applied according to Irish law for the drafting of the Statutory Accounts, are IAS/IFRS standards and therefore they are aligned with the fair value principles used for Solvency II.

Assets held for index-linked and unit-linked policies

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Assets held for index-linked and unit-linked contracts	34,174,494	34,174,494	-

Compared to 2021 the asset component of unit-linked policies decreased by 16.8%, from 41,051 million euro to 34,174 million euro. The weighting of this item in total assets is 96.5%.

Amounts recoverable from reinsurance

The run-off of the reinsurance agreements with Intesa Sanpaolo Life, do not generate recoverable amounts.

Loans and Receivables

The valuation does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Loans and mortgages	-	-	-
Insurance and intermediaries receivables	-	-	-
Reinsurance receivables	-	-	-
Receivables (trade, not insurance)	659,297	659,297	-

Receivables consist mainly of tax credits (Law 209/02) and residually of receivables for commissions to be received and receivables for sales incentives and other receivables.

Other items

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Cash and cash equivalents	143,496	143,496	-
Any other assets, not elsewhere shown	33,760	33,760	-

Intesa Sanpaolo RBM Salute S.p.A.

Deferred Acquisition Costs

Deferred acquisition costs in the Solvency Accounts are valued at zero in line with Delegated Regulation No. 35/2015.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Intangible assets	-	-	-

Intangible assets

The intangible assets recorded in the statutory accounts of Intesa Sanpaolo RBM Salute are zeroed.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Intangible assets	-	4,553	- 4,553

Deferred tax assets

The Company's Solvency Report includes:

- deferred tax assets (DTA) totalling 74 million euro, higher than the DTA entered in the annual Financial Statements prepared according to Italian accounting standards; the solvency value represents 7% of the total assets in the financial statements;
- deferred tax liabilities (DTL) amounted to 7 million euro.

Below is a breakdown of assets and liabilities for deferred taxes recorded for the company:

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deferred tax assets	73,984	73,984	-
Deferred tax liabilities	7,000	-	7,000

Deferred taxes mainly relate to temporary differences that refer to the adjustments between the statutory value and the Solvency II value of the investments and the technical provisions. These temporary differences are reversed with the approximation of the maturity or sale of the financial instruments or the liquidation of the corresponding TP.

Real estate, plant and equipment held for own use

The property held by the Company measured at fair value according to the survey of an independent expert generated the difference between the solvency value and value represented according to Italian accounting standards.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Property, plant & equipment held for own use	6,346	3,406	2,940

Holdings in related undertakings, including equity investments

Intesa Sanpaolo RBM Salute does not hold any equity investments.

Investments (Capital instruments, bonds, UCITS, derivatives)

Below is a summary of the main items in the various capital instruments for Intesa Sanpaolo RBM Salute:

	<i>(euro thousands)</i>		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Equity	45	45	-
Equity - Listed	45	45	-
Equity - Unlisted	-	-	-
Bonds	431,683	431,616	67
Government bonds	431,683	431,616	67
Corporate bonds	-	-	-
Structured note	-	-	-
Collateralised securities	-	-	-
Collective investments undertakings	-	-	-
Derivatives	-	-	-
Investments	431,728	431,661	67

Total investments account for 43% of total assets on the balance sheet, allocated almost entirely to government bonds and for a residual part to equity securities.

Also for this company, the difference between the values in the balance sheet of the annual Financial Statements prepared in accordance with Italian accounting standards and those of the Solvency Report is due to the same reason as that indicated for Intesa Sanpaolo Vita.

Amounts recoverable from reinsurance

	<i>(euro thousands)</i>		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Health similar to Non-Life	17,565	19,563	- 1,998
Non-Life excluding Health	3	-	3
Reinsurance recoverables	17,568	19,563	- 1,995

In the Solvency Report, the technical provisions pertaining to the reinsurers are estimated on the basis of the cash flows connected to recoveries relating to direct business obligations, discounted on the basis of the risk free rate curve.

This different valuation compared to the annual Financial Statements prepared in accordance with [national accounting standards](#) results in a difference of -1,995 thousand euro.

Loans and Receivables

The valuation does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

	<i>(euro thousands)</i>		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Loans and mortgages	-	-	-
Insurance and intermediaries receivables	117,749	117,749	-
Reinsurance receivables	-	-	-
Receivables (trade, not insurance)	72,708	72,708	-

Other items

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Cash and cash equivalents	212,390	212,390	-
Any other assets, not elsewhere shown	22,695	22,695	-

D.2 TECHNICAL PROVISIONS

D.2.1 Valuation of technical provisions by Solvency II Business Line

Intesa Sanpaolo Vita Insurance Group

The technical provisions as of 31 December 2022 were calculated in accordance with the Solvency II framework and the national enacting laws.

In particular, the value of the technical provisions of the individual companies of the Insurance Group corresponds to the amount that the company would pay to transfer its insurance and reinsurance obligations to another insurer or reinsurer. The value of the Group's technical provisions is calculated using the arithmetical sum of the technical provisions of individual companies.

In terms of methodology, the value of the technical provisions is equal to the sum of the following components:

- discounted sum of the cash flows the Company expects to pay net of those it expects to collect over the next 50 years. This amount is called "Best Estimate";
- the risk margin, which is an additional component calculated to cover potential inaccuracy in the estimate of the component referred to above.

For the Insurance Group, the following table shows the amount of the technical provisions at 31 December 2022 for the substantial areas of activity, divided between the Best Estimate and Risk Margin. The value of amounts recoverable from the reinsurer after counterparty default adjustment is also indicated.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non Life	968.7	89.7	1,058.4	60.4	1,118.8
Non- Life (excluding Health)	482.2	55.1	537.3	33.4	570.7
Health (similar to Non-Life)	486.4	34.6	521.0	27.0	548.1
Life (excluding Health, Index-linked and unit-linked)	81,725.3	-	81,725.3	1,320.0	83,045.2
Health (similar to Life)	-	-	-	-	-
Life (excluding Health, Index-linked and unit-linked)	81,725.3	0.0	81,725.3	1,320.0	83,045.2
Index linked and unit linked	83,528.8	-	83,528.8	494.3	84,023.1
Total amount	166,222.7	89.7	166,312.4	1,874.7	168,187.1

The amount of the technical provisions, of 168.187,1 million euro, is mainly composed of the provisions for the Life business which represent 99% of the total. They can be broken down among technical provisions relating to conventional policies, at 83,045.2 million euro, and technical provisions for Linked policies, of 84,023.1 million euro. The Linked policies category also includes Pension Funds and the Linked components of multi-line products.

Below is the value of the technical provisions with a distinction between the Best Estimate and risk margin (amounts in million euro) of the Group divided by area of business.

Intesa Sanpaolo Vita S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non- Life (excluding Health)	-	-	-	-	-
Health (similar to Non-Life)	1.2	-	1.2	-	1.2
Health (similar to Life)	-	-	-	-	-
Life (excluding Health, Index-linked and unit-Index linked and unit linked)	76,367.1	-	76,367.1	1,240.1	77,607.2
Total amount	97,803.1	-	97,803.1	1,434.3	99,237.4

With regard to the valuation methods, see the notes given with regard to Group level.

Intesa Sanpaolo Assicura S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non- Life (excluding Health)	482.2	55.1	537.3	33.4	570.7
Health (similar to Non-Life)	291.8	17.1	308.9	18.9	327.8
Total amount	774.0	72.2	846.2	52.3	898.5

With regard to the valuation methods, see the notes given with regard to Group level.

Fideuram Vita S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Life (excluding Health, Index-linked and unit-Index linked and unit linked)	5,358.1	-	5,358.1	79.9	5,438.0
Total amount	34,125.9	-	34,125.9	211.6	34,337.6

With regard to the valuation methods, see the notes given with regard to Group level.

Intesa Sanpaolo Life D.A.C.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Index linked and unit linked	33,326.2	-	33,326.2	168.3	33,494.6

With regard to the valuation methods, see the notes given with regard to Group level.

Intesa Sanpaolo RBM Salute S.p.A.

(euro millions)

Solvency Line of Business	BEL Net of Reinsurance	Reinsurance Recoverable	BEL Gross of Reinsurance	Risk Margin	Technical Provisions Gross of Reinsurance
Non- Life (excluding Health)	-	-	0.1	-	0.1
Health (similar to Non-Life)	193.4	17.6	211.0	8.1	219.1
Total amount	193.5	17.6	211.0	8.1	219.2

With regard to the valuation methods, see the notes given with regard to Group level.

D.2.2 Calculation methods and assumptions

Intesa Sanpaolo Vita Insurance Group

Best Estimate

The methods used to calculate the Best Estimate as applied by the Insurance Group are described in the sections below, relating to the individual companies.

Risk Margin

The risk margin is one of two components, together with the Best Estimate, of the technical provisions. It corresponds to the amount that guarantees that the value of the technical provisions is equivalent to the amount that the insurance and reinsurance companies would need in order to accept and honour their obligations.

The risk margin was calculated using the "cost of capital" approach, which consists of determining the current value of the cost paid by the company as a result of the capitalisation of own funds to cover the "non-hedgeable" risks throughout the duration of the contracts. The cost-of-capital rate is 6% as specified in Article 39 of the Delegated Act.

The risk margin was valued in accordance with the Solvency II Directive, without using the volatility adjustment for the purposes of the calculation.

At 31 December 2022 the risk margin of the Insurance Group was 1,875 million euro.

Operating assumptions

One of the inputs needed for the calculation of technical provisions is the operational assumptions which include the non-economic factors that influence the calculation of the Best Estimate.

The operational hypotheses were valued in accordance with the contractual limits, where present, in the various portfolios; they mainly have an impact on:

- the insured's exercise of contractual options that modify the policy terms and the resulting cash flows (for example the option to convert into an annuity);
- the frequency and amount of the insured events (for example the operational factor relating to surrenders and mortality);
- technical scenarios relating to the non-life business (such as the definition of the loss ratio).

The Life companies have also expressly defined an inflation scenario for the calculation of the Best Estimate, in reference to key market data.

Financial assumptions

For the valuation at 31 December 2022, the Group companies used the risk-free rate curve published by EIOPA. Intesa Sanpaolo Vita and Fideuram Vita used a volatility adjustment of 19 bps, coinciding with the EIOPA adjustment at 31 December 2022. This adjustment was not used in the case of non-life companies. For more information see section "D.2.5 Transitional measures and long-term guarantee measures".

Main methodological changes in the calculation of technical provisions since the last report

Compared to the previous valuation, with reference to Intesa Sanpaolo Vita, there was a change in the approach to defining operating assumptions on surrenders and additional payments. The new approach is developed through the theory of regression and multivariate predictive models, the so-called GLMs (Generalised Linear Models) and is applied to the entire portfolio with the exception of the former UBI portfolio, for which the methodology in force at Q422 was used. In addition, the projection time horizon was increased from 30 to 50 years for the entire portfolio.

As regards Fideuram Vita, for the valuation at 31 December 2022, certain operational and cost assumptions were modified based on the updating of the historic events considered relevant for the purposes of calculating the BEL and due to some methodological refinements. In particular, the homogeneous risk groups (HRGs) for the surrender, additional payments and mortality events were revised and index processing methodologies for surrender (separately for total and partial surrender), additional payments and annuity propensity assumptions were updated. The grouping criteria included in the model points for group policies were also further refined to improve the representativeness of the relevant model points. Finally, the methodology for calculating the Life SCR was changed, whereby, for 'bi-directional' Life risks, the capital requirement was quantified by assuming - at the individual model point - the higher of the technical provisions obtained with the shock run and the technical provisions determined in the base case, both measured without risk margin.

For Intesa Sanpaolo Assicura, the main methodological changes applied for the valuation of technical provisions as at 31.12.2022, compared to the previous valuation, concern the application of inflation for BE Claims for LoB 4, 7 and 8.

For Intesa Sanpaolo RBM Salute, the main methodological changes applied for the valuation of technical provisions as at 31.12.2022, compared to the previous valuation, are as follows:

Best Estimate Premium Reserve:

- the Company, in the context of the operating assumptions as at 31.12.2022, carried out the valuation of the Loss Ratio according to a best estimate logic (in line with that carried out for the corresponding valuation of the Best Estimate of the Claims Reserve);
- in addition, the methodology for calibrating the prospective Loss Ratios was changed compared to previous quarters;
- in addition, the Company, starting with the valuation at 31.12.2022, for both the Best Estimate Premium Reserve and the Claims Reserve, performed a methodical revision of the payment pattern calibration;
- finally, starting with the valuation as at 31.12.2022, the Company has further refined the methodology for calculating the OGI. In particular, only flows related to investment management expenses were taken into account (previously, value adjustments to investments were also taken into account).

Best Estimate Claims Reserve:

- the Company, in the context of the Best Estimate Claims reserve valuation, made a dedicated estimate of the reserve using the WTW's ResQ actuarial valuation software, considering a granularity of 4 HRG macro-categories. This is a substantial difference from previous valuations in which the Best Estimate reserve was based on the corresponding statutory valuation, appropriately discounted;
- in addition, the Company, starting with the valuation at 31.12.2022, for both the Best Estimate Premium Reserve and the Claims Reserve, performed a methodical revision of the unwinding pattern calibration;
- finally, starting with the valuation as at 31.12.2022, the Company has further refined the methodology for calculating the OGI. In particular, only flows related to investment management expenses were taken into account (previously, value adjustments to investments were also taken into account).

For Intesa Sanpaolo Life D.A.C., the following is noted:

- the exclusion of recurring premiums in the estimated future profits (PVFP) of the product Prospettiva Sostenibile (product code EP104), due to the small amount and optional nature of these premiums;
- The adoption of generalised linear models (GLM) for the calculation of the operational surrender assumptions.

Comparison between IAS/IFRS Consolidated Financial Statement provisions and Solvency II provisions

Comparison between the technical provisions in the IAS/IFRS consolidated financial statements and Solvency II provisions referred to the Intesa Sanpaolo Vita Group.

<i>(euro millions)</i>				
Solvency Line of Business	Solvency II value	Statutory accounts value	Difference	Risk Margin
Non- Life	1,118.8	1,639.9	-521.1	60.4
Non- Life (excluding Health)	570.7	846.1	-275.4	33.4
Health (similar to Non-Life)	548.1	793.8	-245.7	27.0
Life (excluding Index- linked and unit- linked)	83,045.2	83,558.1	-512.8	1,320.0
Health (similar to Life)	-	-	-	-
Life (excluding Health, Index- linked and unit-linked)	83,045.2	83,558.1	-512.8	1,320.0
Index linked and unit linked	84,023.1	86,387.8	-2,364.6	494.3
Other Provisions	-	-	-	-
Total amount	168,187.1	171,585.7	-3,398.5	1,874.7

Expected profits included in future premiums

The value of the EPIFP was estimated as the difference between the Best Estimate calculated by zeroing the recurring premiums and additional future premium payments, where applicable, and the stochastic Best Estimate, calculated in the Best Estimate scenarios. As provided for in Article 260 section 3 of the Delegated Acts, the valuation is carried out for each homogeneous risk group, according to the following formula:

$$EPIFP = \sum_i \max\{0; \Delta BEL_i\}$$

For the Life business, the following table shows the value of the EPIFP for Intesa Sanpaolo Vita Group companies. For Intesa Sanpaolo Life, the business is mainly characterised by single premium policies: the residual part relating to recurring premiums is not considered for the purposes of calculating the EPIFP as it goes beyond the scope of the contractual limits and is not modelled in the best estimate calculation.

For the non-life business, the expected profits for future premiums have been valued, in the context of the valuation of the premiums best estimate, by considering the future premiums and instalments due, which the Company will collect from the policies in force on the valuation date. These profits have been estimated by considering the 1's complement of the Combined Ratio estimated for future years and considering the discounting effect.

<i>(euro millions)</i>	
Company	EPIFP
Intesa Sanpaolo Vita	945.2
Fideuram Vita	170.1
Intesa Sanpaolo Life	43.3
Intesa Sanpaolo Assicura	55.4
Intesa Sanpaolo RBM Salute	2.6
Totale	1,216.5

Future management actions

The calculation of best estimate and, more generally, of expected future cash flows requires specific assumptions regarding Future Management Actions.

These are any action by the insurer which is currently planned or could reasonably be implemented in the future deriving from a contract, statutory, commercial or other option.

Scenarios pertaining to future management actions are formalised by the company taking these actions, in a document approved annually by the management board (FMA Plan) and form the basis of the calculation of the best estimate.

The main measures relate to the management of with-profits portfolios and relate to:

- realisation strategies that are the result of a predefined sequence of checks in terms of cash flow mismatches, asset allocation, potential yield objectives and sale priorities for assets in the portfolio;
- reinvestment policies;
- potential management of the level of over-coverage of assets compared to related liabilities.

Dynamic policyholder behaviour

Below are details of the methods used by the Parent Company Intesa Sanpaolo Vita to govern the estimate of the possible dynamic behaviours of policyholders in relation to the exercise of the option to surrender on the with-profits portfolios of the Company.

At each time step in the projection the Parent Company includes a change in the percentage of surrenders if the difference between the measurement of the payout revaluation and the appropriate rate of return, accepted as the market benchmark, is significant. If this happens, the change translates into an increase or reduction in the basic surrender frequency (best estimate) depending on whether the above-mentioned difference is negative or positive.

Following this analysis, the company Fideuram Vita found that the correlation between the trends in the surrenders of its portfolio compared to the market trends, was not at a level that would affect the basic scenario (Best Estimate).

For the other Group companies the dynamic behaviour of insured is not significant.

Intesa Sanpaolo Vita S.p.A.

Best Estimate

The calculation of the best estimate as defined in section "D.2.1 Valuation of technical provisions by Solvency II business line" may be done using a deterministic or stochastic approach depending on the characteristics of the liabilities portfolio.

The stochastic approach refers to the fact that the cash flows are defined as the average flow is calculated according to an adequate number of different market scenarios, which give the most probable representation of future commitments in a risk-neutral market scenario, while incorporating the expected volatility. This approach is particularly used where there are financial guarantees and contractual options that depend on the financial situation in question.

The deterministic approach is based on valuations made according to the risk-neutral market scenario considered to be most probable.

More specifically, it should be noted that: - for policies or business lines where the cash flows do not directly depend on market volatility, the best estimate is calculated according to the deterministic approach; Some examples may concern the Protection LoB, Saving products without profit participation and without guarantees, and unit-linked products without guarantees.

-
- for products or LoB where the cash flows contain financial guarantees and contractual options (which do not move symmetrically with market movements), the best estimate should be calculated using a stochastic approach; - examples include conventional policies with guarantees or profit sharing mechanisms.

The projections include all the potential inflows and outflows necessary to value the company's commitments for their entire duration, in line with the contractual limits pertaining to the contracts to which those amounts refer.

A non-exhaustive list of cashflows considered in the calculation of the Best Estimate includes:

- payments of life benefits and, in case of death, payments in case of surrender, payments of annuities;
- The costs of administration, management of investments and claims payouts;
- Future premiums and other cash flows deriving from those premiums;
- commission paid to the retail networks;
- the costs paid to investment firms in relation to asset management or the protection schemes underlying certain types of contract.

Operating assumptions

The main operating assumptions considered by Intesa Sanpaolo Vita in calculating the Best Estimate relates to the propensity to surrender (which also includes cases of partial surrenders), additional payments, cases of premium payments being interrupted for annual premium policies and single recurring premiums, the case of mortality, cost, automatic deferment of maturity, conversion into annuity and subrogation on "Personal Protection Insurance", or "PPI").

Difference between provisions of the annual Financial Statements and Solvency II provisions

The company's Actuarial function has conducted an analysis to reconcile these two amounts. The starting point is the Solvency II technical provisions at 31 December 2022 and the endpoint is the statutory technical provisions at 31 December 2022.

This approach gives a reconciliation aimed at identifying and isolating the main factors that caused the difference. Overall there were no critical issues with the portfolio analysis, and the technical provisions on the financial statements and the best estimate in the Solvency II report were consistent. The residual variation from the reconciliation was limited.

Intesa Sanpaolo Assicura S.p.A.

Best Estimate

The Best Estimate calculation methodology includes:

- the Premium Provision Best Estimate calculation;
- the Claims Provision Best Estimate calculation.

The Premium Provision Best Estimate before the reinsurance calculation is obtained by adding the present value of the difference between future incoming and outgoing cash-flows with respect to future years.

Future cash outflows consist of:

- expected claims, with reference to both the unearned premium reserve and future premiums;
- expected operating costs, with reference to both the unearned premium reserve and future premiums;
- expected premium refunds, with reference to the unearned premium reserve.

Incoming future cash flows consist of future premiums and instalments due, adjusted for any anticipated terminations.

The Claims Provision Best Estimate gross of reinsurance is made on the basis of an analysis of historical data for settled and reserved claims (gross of any recovery by reinsurers, net of indirect costs and of any recoveries from policyholders and third parties), aggregated by LoB. This data is needed to estimate the ultimate cost of claims through the method that best fits each homogeneous risk group.

The Claim Provision Best Estimate before reinsurance is calculated as the sum, over future years, of the discounted cash flows described above.

The Premium Reserve Best Estimate net of reinsurance is the difference between the Premium Reserve Best Estimate before reinsurance and the Best Estimate of recoveries from reinsurers, inclusive of the adjustment for counterparty default risk.

Operating assumptions

The main operational scenarios considered for the purposes of calculating the Best Estimate by the Company Intesa Sanpaolo Assicura, include the "Loss Ratio" prospect, the "Expense Ratio", of the early surrender rates (either with the reimbursement of the unused premium or without) and the rates of unwinding claims.

Difference between provisions of the annual Financial Statements and Solvency II provisions

Premiums provision

The differences between the local premiums provision and the best estimate of the premiums provision at 31 December 2022, essentially relate to the different methodological approach followed to determine the liabilities, for which the Solvency II valuation also takes into consideration the current value of future profits.

Claims provision

Moving from the annual Financial statements prepared for Local purposes to the Solvency II accounts, the main differences relate to the discounting, the effect of estimated recoveries and the decisions taken with regard to the application of the statistical actuarial methodologies.

Fideuram S.p.A.

Best Estimate

For Fideuram Vita, see above, in relation to Intesa Sanpaolo Vita.

Operating assumptions

The main operational scenarios considered in the calculation of the best estimate by the company Fideuram Vita relate to the propensity to surrender (also including partial surrenders), additional payments, cases of mortality/longevity, cost, conversion into annuities, penalties in the event of surrender at the end of deferment and the pensionable age for the open pension fund.

Difference between provisions of the annual Financial Statements and Solvency II provisions

For Fideuram Vita, see above, in relation to the company Intesa Sanpaolo Vita.

Intesa Sanpaolo Life D.A.C.

Best Estimate

For Intesa Sanpaolo Life, see above, in relation to Intesa Sanpaolo Vita.

Operating assumptions

The main operational scenarios considered in the Best Estimate calculation by the company Intesa Sanpaolo Life relate to the propensity to surrender (total or partial), cost assumptions, recurring premium rate and mortality assumptions.

Difference between provisions of the annual Financial Statements and Solvency II provisions

With regard to the cohesion between the provisions on the annual Financial Statements and the best estimate net of the risk margin, the difference between these two items can be fully explained by the current value of the future profits. The portfolio of Intesa Sanpaolo Life mainly consists of unit-linked policies whose technical provisions are calculated on the annual accounts as the countervalue of the units on the valuation date. The Solvency II valuation however is based on the projected flows and therefore takes into consideration future profits as well.

Intesa Sanpaolo RBM Salute S.p.A.

Best Estimate

The Best Estimate calculation methodology includes:

- the Premium Provision Best Estimate calculation;
- the Claims Provision Best Estimate calculation.

The Premium Provision Best Estimate before the reinsurance calculation is obtained by adding the present value of the difference between future incoming and outgoing cash-flows with respect to future years.

Future cash outflows consist of:

- expected claims, with reference to both the unearned premium reserve and future premiums;
- expected operating costs, with reference to both the unearned premium reserve and future premiums;

Incoming future cash flows consist of future premiums and instalments due, adjusted for any anticipated terminations.

The Claims Provision Best Estimate gross of reinsurance is made on the basis of an analysis of historical data for settled and reserved claims (gross of any recovery by reinsurers, net of indirect costs and of any recoveries from policyholders and third parties), aggregated by LoB. This data is needed to calculate the Best Estimate of the ultimate cost of claims through the method that best fits each homogeneous risk group.

The Claim Provision Best Estimate before reinsurance is calculated as the sum, over future years, of the discounted cash flows described above.

For the purpose of calculating the Best Estimate ceded for reinsurance, the value obtained as the difference between the Best Estimate gross of reinsurance and the Best Estimate net of reinsurance is lowered to take account of reinsurers' default.

Operating assumptions

The differences between the local GAAP premiums provision and the best estimate at 31 December 2022, essentially relate to the different methodological approach followed to determine the liabilities, and, therefore, to the different assumptions used to estimate future cash flows, and to a lesser extent, to the effect of discounting the expected cash flows.

Difference between provisions of the annual Financial Statements and Solvency II provisions

Premiums provision

The differences between the local GAAP premiums provision and the best estimate at 31 December 2022, essentially relate to the different methodological approach followed to determine the liabilities, and, therefore, to the different assumptions used to estimate future cash flows, and to a lesser extent, to the effect of discounting the expected cash flows.

Claims provision

The differences between the Local GAAP Claims Reserve and the Best Estimate, as at 31 December 2022, are mainly due to the following factors:

- discounted cash flow effect obtained by applying the EIOPA rate curve;
- use of a pattern that considers the speed of claims settlement;

- consideration of investment management costs.

D.2.3 Simplifications used in calculating technical provisions

Intesa Sanpaolo Vita Insurance Group

As regards the company Intesa Sanpaolo Vita:

- given the non-materiality of the Non-Life portfolio, Technical Provisions were valued as a whole and considered as equal to statutory reserves net of the reserve component for reinsurers, without therefore considering the risk margin component.

As regards the company Fideuram Vita:

- The Undertaking reinsures only a portion of its portfolio with proportional treaties for excess risk premium. As at 31 December 2022, the portfolio potentially exposed to reinsurance amounted to approximately 1.06% of the contracts in the portfolio, of which only a portion was actually ceded to reinsurers. For this reason, in complying with the principle of materiality and proportionality a simplified methodology was defined to evaluate the amounts recoverable from reinsurance arrangements (RR);
- based on this approach, the amount of the RR measured at 31.12.2022 was not material and equal to -747 thousand euro;
- as regards the Fideuram Pension Fund, the business was modelled entirely according to a deterministic approach, also including the guaranteed component, considering that the related amount is of limited materiality;

(euro millions)

Pension Fund	Mathematical Reserves
Fideuram Sicurezza	86,218
Fideuram Equilibrio	655,939
Fideuram Valore	555,651
Fideuram Crescita	915,428
Fideuram Garanzia	83,535
Fideuram Millenials	99,090
Totale	2,395,861

- unit-linked products with a capital guarantee on maturity were processed according to a deterministic approach, as the difference of the BEL between a stochastic approach and deterministic approach was found to be negligible, and consequently, there was no asymmetry in market movements.
- The policies with a reversible and certain return were considered in the projections as annuities, despite considering the correct benefits. Since the unmodelled calculation takes into account the difference between the balance sheet reserve and the reserve recalculated by the model at the initial point in time (the projection model calculates a lower reserve than the balance sheet reserve) and thus the BELs are increased due to this deviation, it is considered proportionate to the implementation effort to treat these contracts as life annuities;

-
- future recurring premiums are not projected for weekly NAV non-guaranteed unit-linked policies classified as "insurance" under IFRS 4, as the guarantee of the annuity conversion factor is deemed immaterial in light of the low propensity for annuity conversion found on this portfolio;
 - Multi-line products, given their characteristics, were fully unbundled for processing purposes. This simplification is substantial only for the Fideuram Progetto Pensione, a product that provides for a life cycle mechanism towards the Line I component as of eight years before the contract's maturity; in 2018, an analysis was carried out which demonstrated the sustainability of this simplification;
 - dynamic surrenders are not considered by the actuarial model, as they are not relevant for the Company's portfolio.

For the purpose of calculating the Risk Margin, given the potential complexity inherent in this calculation, the Directive allows companies to use simplified methods. As stated in Article 60 of Regulation no. 18, the valuation may be made by using simplifications and approximations of the individual risks or certain risks used to calculate the future SCR, within the various modules or submodules.

For the valuation at 31 December 2022, all the Group companies (apart from Intesa Sanpaolo Life and Intesa Sanpaolo RBM Salute) calculated the risk margin according to the method 2 simplification as indicated in Annex 4 of Regulation no. 18 and the EIOPA guidelines on the calculation of technical provisions, based on the assumption that the Solvency Capital Requirement for each future year would be proportionate to the Best Estimate. Intesa Sanpaolo Life and Intesa Sanpaolo RBM Salute have relied on the method 1 simplification which estimates the individual risks or subrisks within all or some of the modules and submodules to be used in calculating the future solvency capital requirements.

D.2.4 Level of uncertainty associated with the value of technical provisions

Intesa Sanpaolo Vita Insurance Group

The technical provisions are calculated on the basis of the projection of the current portfolio volumes on the valuation date, which is done on the basis of appropriate financial-economic and technical-operational scenarios that may be accurate but may differ from the real situation in the future and therefore generate a degree of uncertainty in the calculation.

It is standard practice to carry out sensitivity tests to verify the uncertainty associated to the calculation of provisions by measuring the impact of these changes whenever there are changes in the individual scenarios, on the final results in order to understand how sensitive the valuation is, to any deviations that could occur in each scenario. With reference to the assumptions formulated within Solvency II, the BEL may be affected by changes in external factors such as volatility of rates, or macroeconomic factors, and internal factors such as surrenders, mortality and costs.

At methodological level, a minimum sensitivity set has been identified to explain the main factors of uncertainty at Group level, found in the BEL calculation. Each Company is able to carry out additional sensitivity tests depending on the specific nature of individual portfolios and, if

considered appropriate, they also analyse the results of the stress tests used in the Standard Formula to calculate the solvency capital requirement.

Below is the set of sensitivity tests for the Group. For the company Intesa Sanpaolo Assicura, at Group level only the sensitivity tests relating to the increase or decrease in the interest rate curve are valid. The operational sensitivity tests indicated below are relevant to the Life segment as this business line is the most important one at Group level.

For the valuations relating to Intesa Sanpaolo Vita, this analysis was not done on the non-life component of the portfolio as it is not material.

Economic sensitivities:

- an increase in the interest rate curve of 100 bps;
- a decrease of 100 bps in the interest rate curve (with no floor on the negative rates);
- a decrease in the value of the shares of 10%;
- zeroing of the volatility adjustment.

Operational sensitivities:

- a 10% increase in the surrender rates;
- a 10% decrease in the surrender rates;
- a 10% increase in the amount of costs and an increase of 1% in the rate of inflation (as per the Standard Formula);
- an increase of 15% in the mortality rates (as per the Standard Formula);
- annulment of the additional payments scenario.

The sensitivities indicated that the group's best estimate was more sensitive to a change in the interest rates than to the other market factors; with regard to the operational sensitivities the impacts were less significant: in general, the operational factors have no significant impact, because at sensitivity level, compensatory effects are also permitted.

Finally, where appropriate each company also carried out additional sensitivity tests, to reflect the specific nature of their own portfolios.

D.2.5 Transitional measures and long-term guarantee measures

Intesa Sanpaolo Vita Insurance Group

For the valuation at 31 December 2022, Intesa Sanpaolo Vita and Fideuram Vita used a volatility adjustment of 19 bps, coinciding with the EIOPA adjustment at 31 December 2022.

(euro millions)

	BEL	Risk Margin	Technical Provisions	Eligible Own Funds*	Solvency Capital Requirement	Minimum Capital Requirement	Solvency Ratio
No Volatility Adjustment	166,683.5	1,874.7	168,558.2	8,889.8	4,734.4	2,370.0	187.8%

* Eligible to meet the Solvency Capital Requirement

If the volatility adjustment is zeroed, the Solvency Ratio would fall by 6 percentage points to 187.8%, which is still far above the 100% threshold.

Intesa Sanpaolo Vita S.p.A.

The volatility adjustment is applied to the maturity structure of the interest rates with reference to the pure-risk portfolios and the separate management portfolios including the Line III component relating to multi-line pension products (PIP).

The table below shows the impact in terms of BEL, Risk Margin, Technical Provisions, Eligible Own Funds, SCR, MCR and Solvency Ratio, calculated without taking account of the volatility adjustment:

(euro millions)

	BEL	Risk Margin	Technical Provisions	Eligible Own Funds*	Solvency Capital Requirement	Minimum Capital Requirement	Solvency Ratio
No Volatility Adjustment	98,232.0	1,434.3	99,666.3	7,554.0	3,805.8	1,712.6	198.5%

* Eligible to meet the Solvency Capital Requirement

If the volatility adjustment is zeroed, the Solvency Ratio would fall by 22 percentage points to 198.5%, which is still far above the 100% threshold.

The numbers in the table refer to the company's entire portfolio however impact is mainly attributable to the segregated funds, as the adjustment for volatility is not applied to the pension fund portfolio or to the unit-linked policies portfolios.

Intesa Sanpaolo Assicura S.p.A.

The company does not apply long-term guarantee measures.

Fideuram Vita S.p.A.

The volatility adjustment is applied to the interest rates maturity structure but only for the valuation of with-profits policies.

The table below shows the impact in terms of Best Estimate, Risk Margin, Technical Provisions, Eligible Own Funds, Minimum Capital Requirement and Solvency Ratio, calculated without taking account of the volatility adjustment:

(euro millions)

	BEL	Risk Margin	Technical Provisions	Eligible Own Funds*	Solvency Capital Requirement	Minimum Capital Requirement	Solvency Ratio
No Volatility Adjustment	34,156.6	211.6	34,368.2	1,190.7	552.3	248.6	215.6%

* Eligible to meet the Solvency Capital Requirement

If the volatility adjustment is zeroed, the Solvency Ratio would fall by 9 percentage points to 215.6%, which is still far above the 100% threshold.

Intesa Sanpaolo Life D.A.C.

The company does not apply long-term guarantee measures.

Intesa Sanpaolo RBM Salute S.p.A.

The company does not apply long-term guarantee measures.

D.2.6 Amounts recoverable from reinsurance and SPV contracts

Intesa Sanpaolo Vita Insurance Group

The provisions assigned to reinsurance are commented on in the sections below, about the individual companies.

Intesa Sanpaolo Vita S.p.A.

For Intesa Sanpaolo Vita, the provision transferred to reinsurance has been left out of the calculation of the technical provisions as it is not material; therefore the Best Estimate net of reinsurance has been included, and it is equal to the Best Estimate inclusive of reinsurance.

Intesa Sanpaolo Assicura S.p.A.

In calculating the Best Estimate, the recoverable amounts from reinsurance are determined as follows:

- in calculating the Best Estimate of the premiums provision, the amounts recoverable from the reinsurer are the difference between:
 - the claims generated from the provision for portions of premiums, future premiums and the reimbursements transferred to reinsurance;
 - the premiums transferred to the reinsurer;
 - in addition to:
 - fees received from the reinsurer;
- in measuring the Best Estimate of claims, the amounts recoverable from the reinsurer are the difference between:
 - claims transferred for non-proportional arrangements;
 - claims transferred for the share quota arrangement;
 - claims ceded on an optional basis.

Fideuram Vita S.p.A.

Fideuram Vita, in complying with the principle of materiality and proportionality evaluated amounts recoverable from reinsurance arrangements (RR), defining a simplified methodology; based on this approach, the amount of the RR was not material.

Intesa Sanpaolo Life D.A.C.

For Intesa Sanpaolo Life, see above, in relation to Intesa Sanpaolo Vita.

Intesa Sanpaolo RBM Salute S.p.A.

In the Best Estimate valuation, the calculation net of reinsurance is carried out, for each homogeneous risk group, by taking into account the volume figures (and the relative ratios for Best Estimate Premiums) net of reinsurance. For the purpose of calculating the Best Estimate ceded for reinsurance, the value obtained as the difference between the Best Estimate gross of reinsurance and the Best Estimate net of reinsurance is lowered to take account of reinsurers' default. The reinsurer's cash flow is determined based on the total cash flow of the ceded Best Estimate and by applying an estimated rate as the weight of the statutory reserve ceded to the reinsurer relative to the total ceded reserve.

D.3 OTHER LIABILITIES

The purpose of this section is to specify additional liabilities on the solvency report which together with the best estimate of technical provisions, contribute to the total liabilities item.

Intesa Sanpaolo Vita Insurance Group

Provisions other than technical provisions

This item refers to the provisions for risks and charges, and the provision for taxes.

There are no differences between the valuations in the consolidated IFRS accounts and the Solvency II value, as the valuation models are fully aligned. Any differences should be recognised exclusively where:

- a company has a current obligation deriving from past events;
- it is probable that funds will need to be used to liquidate the obligation;
- it is possible to make a reliable estimate of the amount of the obligation.

The data for the Insurance Group is given below:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	42,680	139,715	-97,035

(euro thousands)

The amount of 139,715 thousand euro of the IAS/IFRS financial statements includes a provision for risks and charges referring to likely risks inherent in a non-life insurance contract which, under Solvency, was considered in the BELs prospective valuation and therefore not included in the item "Provisions other than technical provisions".

Pension obligations

This item includes the liabilities for post-employment benefits, length of service bonuses and medical care benefits paid to directors and their families after the termination of a contract of employment.

In the context of Solvency II, considering the complexity deriving from the use of valuation rules based on actuarial scenarios in order to estimate the discounted value of the benefits accruing to the employee for services rendered, IAS 19 is applied but without the corridor approach, to prevent companies from obtaining results that differ depending on the rules chosen for the recognition of actuarial gains and losses. The International accounting standard was applied to the post-employment benefits, length of service bonuses and medical care for directors.

The data for the Insurance Group is given below:

	<i>(euro thousands)</i>		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	14,800	14,516	284

Deferred tax liabilities

In relation to the numerical and methodological findings concerning deferred tax liabilities, refer to the contents of section D.1 (Deferred tax assets) for each company.

Deposits from reinsurers

The valuation, which recognises the nominal value, does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

	<i>(euro thousands)</i>		
	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Deposits from reinsurers	11,747	11,747	-

Financial liabilities

This category consists of:

- Derivatives
- Payables to banks.

Financial derivatives are only used in order to reduce the investment risk and to achieve an efficient management of the securities portfolio, with the exclusion of purely speculative aims. Hedging derivatives contracts are valued in line with the hedged assets and liabilities.

According to the Solvency II regulations, derivatives have to be valued at market value according to the valuation methods contained in section D.1 of this Report. With regard to the item "Payables

to credit institutions”, the Solvency II framework prescribes that they are valued in line with IFRS/IAS, on condition that these standards include valuation methods that are consistent with the valuation approach contained in Article 75 of European Directive 138/2009.

As can be seen from the table below, for these items the application of the Solvency Report valuation methods does not create any differences compared to the valuation done according to the IFRS.

The data for the Insurance Group is given below:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Derivatives	170,449	170,449	-
Debts owed to credit institutions	21,070	21,070	-

(euro thousands)

Other liabilities

This category consists of the following items:

- Amounts payable to insurers and intermediaries;
- Reinsurance payables;
- Payables (trade, non-insurance);
- All the other liabilities not indicated elsewhere.

The valuation criteria used for the items in question on the consolidated accounts prepared according to IAS are consistent with the Solvency II framework for the group and for the individual companies.

The item “Insurance payables and payables to intermediaries” consists of payables to policyholders, insurance brokers, from relations with the sales network represented by the banks that retail the insurance policies, and to insurance companies, referring to the amounts due on the coinsurance accounts. The difference relating to this item, of 231 million euro is due to the cancellation of the “Deferred Income Liabilities” of Intesa Sanpaolo Life, which is valued at zero in the Solvency Report as its measurement is included in the estimate of the technical provisions of the related contracts.

The “Reinsurance liabilities” are composed of the balance of technical accounts of transfers to the reinsurers.

The item “Trade payables, non-insurance” includes amounts payable to employees, suppliers, public bodies and other counterparties which do not relate to the insurance business.

The item “Other liabilities not reported elsewhere” includes all liabilities not included in other balance sheet items detailed below. It should be noted that, compared to the consolidated financial statements, the deferred profit liability (DIR) for investment contracts in the amount of 320 million euro was written off in the solvency balance sheet.

(euro thousands)

	Solvency II value
Insurance & intermediaries payables	1,523,247
Reinsurance payables	74,770
Payables (trade, not insurance)	499,582
Any other liabilities, not elsewhere shown	393,833

Subordinate liabilities

This category consists of the subordinated liabilities issued by Intesa Sanpaolo Vita and by Fideuram Vita, the amount of which is partially recognised under own funds.

When valuing the subordinated liabilities the individual and group companies use methods of determining the value of which those liabilities can be transferred or settled between informed, consenting parties in an operation carried out at normal market conditions without considering any adjustments that will take into account changes in the credit rating of the company after initial recognition.

On the other hand, with regard to valuation for the consolidated financial accounts, subordinated liabilities are recognised at amortised cost.

Due to the different valuation approach in the two systems, the Insurance Group has recorded a difference of -252,678 thousand euro.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Subordinated liabilities	1,968,825	2,221,503	-252,678

Intesa Sanpaolo Vita S.p.A.

Provisions other than technical provisions

In the statutory context, provisions for risks and charges are intended to cover year-end losses or liabilities whose nature is known, certain or probable, and whose amount or date is indeterminate. Provisions for risks and charges may not be used to correct the values of the asset items. When valuing these items, the company takes into consideration the general principles of financial reporting with particular regard to the principles of matching and conservatism.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	26,081	26,081	-

Pension obligations

According to the statutory rules on financial reporting, the length of service bonuses contained in the item "Severance pay" are determined in accordance with Article 2120 of the Civil Code and the current national and supplementary contracts in force on the reporting date applicable to each case and considering all forms of ongoing remuneration.

The Solvency valuation from the application of IAS 19, has generated a revaluation of liabilities of 3,817 thousand euro.

(euro thousands)

	Solvency II value	Statutory accounts value		Impact on Reconciliation reserve
Pension benefit obligations	6,755	2,938		3,817

Deposits from reinsurers

The valuation, which recognises the nominal value, does not result in any differences between the value recognised in the annual financial statements and the value for solvency purposes.

(euro thousands)

	Solvency II value	Statutory accounts value		Impact on Reconciliation reserve
Deposits from reinsurers	11,021	11,021		-

Financial liabilities

Regarding the derivatives, the revaluation according to fair value results in a difference of approximately -7,896 thousand euro compared to the statutory figure.

No differences in the valuation of payables to banks were recorded.

(euro thousands)

	Solvency II value	Statutory accounts value		Impact on Reconciliation reserve
Derivatives	170,417	178,313	-	7,896
Debts owed to credit institutions	21,070	21,070		-

Other liabilities

Other liabilities recognised in the solvency accounts are set out below by nature:

(euro thousands)

	Solvency II value	Statutory accounts value		Impact on Reconciliation reserve
Insurance & intermediaries payables	1,004,345	1,004,345		-
Reinsurance payables	134	134		-
Payables (trade, not insurance)	353,079	353,227	-	148
Any other liabilities, not elsewhere shown	110,782	110,782		-

In particular, the item All other liabilities not reported elsewhere, amounting to 110,782 thousand euro, consists mainly of the balance of insurance suspense accounts.

Subordinate liabilities

The subordinated liabilities of 1,839 million euro according to the solvency valuation refer to a series of subordinated loans issued by the Company in various batches from 1999 onwards, through to the final batch which was issued in December 2020, with a nominal value of 600 million and a duration of 10 years. In the classification of own funds this loan is classified as Tier 2.

(euro thousands)

	Solvency II value	Statutory accounts value		Impact on Reconciliation reserve
Subordinated liabilities	1,839,396	2,083,458	-	244,062

Below is a summary of the company's main subordinated loans:

- Non-convertible subordinated bond with indeterminate maturity, to be called in on expiry of the 10th year, issued on 17/12/2014 with a nominal value of 750 million euro (ISIN: XS1156024116);
- Non-convertible subordinated bond of a 10-year duration issued on 21/7/2017 for 600 million euro, entered into with Intesa Sanpaolo and transferred to Mediobanca.
- A non-convertible subordinated bond of 10-year duration issued on 17/12/2020 for 600 million euro (ISIN: XS2262806933)

Intesa Sanpaolo Assicura S.p.A.

Provisions other than technical provisions

This item amounted to 5,986 thousand euro and refers to a provision for extraordinary personnel expenses.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	5,986	5,986	-

(euro thousands)

Pension obligations

The Solvency valuation from the application of IAS 19, has generated a revaluation of liabilities of 2,933 thousand euro.

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	4,444	1,510	2,933

(euro thousands)

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Subordinate liabilities

The company has not issued subordinated liabilities.

Other liabilities

Other liabilities are detailed in the following table:

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	39,700	39,700	-
Reinsurance payables	71,950	70,172	1,778
Payables (trade, not insurance)	124,133	125,931	1,798
Any other liabilities, not elsewhere shown	93,210	93,210	-

(euro thousands)

Fideuram Vita S.p.A.

Provisions other than technical provisions

The changes are due to the reversal of the residual value of a provision for risks entered in the financial statements prepared according to the National accounting standards, as the conditions of IAS 37 did not exist.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	4,089	4,586	-497

Pension obligations

The Solvency Report valuation from the application of IAS 19, has generated a revaluation of liabilities of 2,871 thousand euro.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	2,871	1,421	1,450

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Other liabilities

For Fideuram Vita S.p.A. the only difference relates to the fair value adjustment of a debt pertaining to a bonus scheme for risk-takers, with a marginal value.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	247,963	247,984	-
Reinsurance payables	2,589	2,589	-
Payables (trade, not insurance)	22,226	22,226	-
Any other liabilities, not elsewhere shown	83,256	83,265	-10

Subordinated liabilities

The subordinated liabilities of 129.4 million relate to a subordinated loan granted on 18 December 2017 by Intesa Sanpaolo, expiring on 18 December 2027, with a fixed annual nominal rate of 2.8%. The loan provides for the company, after authorisation from the Supervisory Board, to make an early repayment of all or part of it, starting from the end of the fifth year, or after each interest payment date. Based on the subordination conditions alone, the loan refers to the provisions of Article 44 and 45 of Legislative Decree 209/2005. Therefore, if the Company is liquidated, that loan would have a lower ranking compared to the claims of all the other creditors and would only be reimbursed after all the other debts in existence on the liquidation date have been paid, but with a preference ahead of the Company's shareholders. The subordinated loan was considered appropriate for the purposes of inclusion in the own funds to cover the solvency requirement (Article 45A of the Code, and the minimum capital requirement, Article 47A of the Code).

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Subordinated liabilities	129,429	145,133	-15,705

Intesa Sanpaolo Life D.A.C.

Provisions other than technical provisions

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Provisions other than technical provisions	1,754	1,754	-

This item consists of provisions made for ongoing litigation.

Pension obligations

The company has not recorded any liability in relation to this item in its Financial Statements.

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Other liabilities

The difference relating to the item "Amounts payable to insurers and intermediaries", of approximately 232 million euro is due to the cancellation of the "Deferred Income Liabilities", which is valued at zero in the Solvency Report as its measurement is included in the estimate of the technical provisions of the related contracts.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	209,964	441,957	-231,993
Reinsurance payables	77	77	-
Payables (trade, not insurance)	16,900	16,900	-
Any other liabilities, not elsewhere shown	103,695	53,004	50,690

Subordinate liabilities

There are no subordinated liabilities for Intesa Sanpaolo Life.

Intesa Sanpaolo RBM Salute S.p.A.

Provisions other than technical provisions

The company has not recorded any liability in relation to this item in its Financial Statements.

Pension obligations

This item includes the liabilities for post-employment benefits.

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Pension benefit obligations	730	353	377

Financial liabilities

The company has not recorded any liability in relation to this item in its Financial Statements.

Other liabilities

(euro thousands)

	Solvency II value	Statutory accounts value	Impact on Reconciliation reserve
Insurance & intermediaries payables	21,275	21,275	-
Reinsurance payables	21	21	-
Payables (trade, not insurance)	20,037	17,883	2,154
Any other liabilities, not elsewhere shown	2,890	2,890	-

Subordinate liabilities

The company has not issued subordinated liabilities.

D.4 ALTERNATIVE VALUATION METHODS

Intesa Sanpaolo Vita Insurance Group

The Intesa Sanpaolo Group regulates and formalises the measurement of the fair value of the financial instruments through the "Group Fair Value Policy" which is prepared by the Financial and Market Risks Division and which applies to the parent company and all the subsidiaries in the consolidation perimeter.

The Insurance Group companies have outsourced the pricing of the bonds to the parent company Intesa Sanpaolo, which carries out its valuations in accordance with the Fair Value Policy.

The existence of official prices on an active market is the best evidence of their value. These quotes therefore represent the prices to use on a priority basis to measure the financial assets and liabilities in the trading portfolio. If there is no active market, fair value is calculated by using measurement techniques that establish, as a final analysis, what price the product would have at the measurement date, in open trading driven by normal commercial considerations. These techniques include:

- the reference to market values indirectly linked to the instrument to be valued, deduced from products with a similar risk profile;

-
- valuations made by using, entirely or partially, input not taken from market-observable parameters, for which recourse is made to estimates and assumptions made by the valuer.

The choice between the above-mentioned methods is not optional since they have to be applied on a hierarchical basis: if a price expressed on an active market is available, no other measurement approaches can be used.

The use of a valuation technique is intended to estimate the price at which an asset would be sold or a liability would be transferred between market operators on the valuation date under current market conditions. Three widely-used valuation techniques are the market valuation method, the cost method and the income method. Valuation techniques that reflect one or more of these methods are used to obtain the fair value. Although multiple valuation techniques are used to value the fair value, the results have to be assessed by considering the reasonableness of the range of values. A fair value valuation is the most representative value in the range, in those specific circumstances.

If the price of the operation is the fair value at the time of initial recognition, and if a valuation technique based on non-observable input is used to value the fair value subsequently, the input must be calibrated so that at the time of initial recognition, the result of the valuation technique equates to the price of the operation. Calibration ensures that the valuation technique reflects the current market conditions and helps the entity to determine whether the valuation technique needs to be rectified (for example, there may be a characteristic of the asset or liability that is not considered in the valuation technique). After initial recognition, when the fair value is valued using one or more techniques based on non-observable input, the entity needs to ensure that the valuation techniques reflect observable market data (for example the price of a similar asset or liability) on the valuation date.

Without a price from an active market, or if the market is not functioning regularly, i.e. if the market does not have a sufficient number of continuous transactions, bid-ask spread and volatility that is not low enough, the determination of the fair value of the financial instruments is mainly achieved by using valuation techniques designed to establish the price at which, in an ordinary transaction, the asset would be sold or the liability would be transferred among market operators, on the valuation date, under current market conditions. These techniques include:

- The use of market values indirectly linked to the valued instrument, derived from policies with a similar risk profile (Level 2);
- Valuations based even partially on input not derived from market-observable parameters for which estimates and assumptions from the valuer are used (Level 3).

For Level 2 input, the valuation is not based on prices of the valued instrument, but on prices or spreads taken from the official prices of instruments that are essentially similar in terms of risk factors, using a given calculation method (pricing model). The use of this approach requires a search for transactions on active markets, relating to instruments which in terms of risk factors are comparable with the valued instrument. The Level 2 calculation methods reproduce the prices of financial instruments listed on active markets (calibration of the model) without including discretionary parameters - i.e. parameters whose value cannot be deduced from the prices of financial instruments on active markets or cannot be set at levels that replicate prices on active markets - which have a decisive influence on the final valuation.

They are valued using models based on Level 2 input:

- Bonds with no official prices on an active market whose fair value is determined by using an appropriate credit spread, identified on the basis of liquid financial instruments with a similar profile;

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- Derivatives, if they are valued using appropriate pricing models derived from market-observable input parameters such as rate, currency and volatility curves;
 - ABS for which there are no significant prices and whose fair value is determined by using valuation techniques that take into account parameters that can be deduced from the market;
 - Equities valued by recourse to direct transactions, or significant transactions on the stock during a period of time considered sufficiently brief compared to the time of valuation, and under constant market conditions, for which "relative" multiplier-based valuation models are used.

To determine the fair value of certain types of financial instrument, valuation models that require the use of parameters not observable on the market need to be used, thus requiring estimates and assumptions by the valuer (Level 3). The financial instrument is valued by using a calculation methodology based on specific assumptions regarding:

- The trend in future cash flows which may be influenced by future events, to which probability can be attributed on the basis of past experience or behavioural assumptions;
- the level of certain parameters in input not available from active markets, for which the information acquired from market-observed prices and spreads is generally preferred. If this information is not available, historic data for the underlying risk factor will be used, or alternatively specialised research such as reports by rating agencies or leading market players).

The following items are valued with a mark-to-model approach:

- debt securities and complex derivatives within the perimeter of structured credit instruments and tranche-linked derivatives;
- hedge funds not considered in Level 1;
- ownership interests and other capital securities valued using models based on discounted cash flows.

In relation to bonds, the pricing of non-contributed securities (those with no official prices on an active market which are classified at fair value level 2 or 3) whose fair value is determined by using an appropriate credit spread, identified on the basis of liquid financial instruments with a similar profile. This measurement is drawn from the following sources:

- contributed liquid securities from the same issuer;
- credit default swaps on the same reference entity;
- contributed liquid securities from an issuer with the same rating belonging to the same sector.

In any case, attention is paid to the different seniority of the security to be priced in relation to the issuer's debt structure.

For Italian public issuers, a rating/duration grid is drawn up, based on the spread levels of the government issues. Differentials are then applied, between the various rating/duration classes compared to public issues (regional, provincial and municipal authorities, and government bodies).

Similarly, for financial liabilities valued at fair value, in order to determine and measure the credit spread of the Intesa Sanpaolo Group, reference is made to bonds issued by the Parent Company with regular coupons, maturity beyond 1 year and listed on an active market in accordance with IAS/IFRS. The market prices are used to obtain the implied credit rating which is then perfected

using interpolation models. These generate credit spread curves that are differentiated according to the type of coupon, maturity and subordination level.

In the case of bonds not listed on active markets, in order to take into account the higher premium required from the market in respect of a similar bond, an additional component is added to the fair credit spread, estimated on the basis of the market bid/ask spread.

If there is an embedded option, there is a further adjustment to the spread by adding a component intended to include the structure's hedging costs and the illiquidity of the underlying assets. This component is determined on the basis of the type of option and the maturity.

Intesa Sanpaolo Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Assicura S.p.A.

See above, in relation to the Insurance Group.

Fideuram Vita S.p.A.

See above, in relation to the Insurance Group.

Intesa Sanpaolo Life D.A.C.

See above, in relation to the Insurance Group.

Intesa Sanpaolo RBM Salute S.p.A.

See above, in relation to the Insurance Group.

D.5 OTHER INFORMATION

Intesa Sanpaolo Vita Insurance Group

The Group considers that it has covered all the information relevant for the purposes of this document, in sections D.1 to D.4.



E. CAPITAL MANAGEMENT

With reference to the QRT S.23.01 annexed to this Report, a list is given of the items in the own funds, and the solvency value and minimum solvency value required by regulations, with an emphasis on the main characteristics of each item.

E.1 OWN FUNDS

This section focuses on a representation of the insurance group's solvency position, and that of individual Companies. The solvency position is represented by the ratio between the own funds and SCR of the Group or companies.

Specifically, in relation to own funds, issues relating to the various components of the solvency position are explored and analysed. In particular:

- Items within the capital availability and related tiering;
- The reconciliation between own funds and shareholders' equity in the financial statements;
- An analysis of the changes in own funds.

The issue of Solvency Capital Requirement and Minimum Capital Requirement is also dealt with, investigating issues relating to the various types of risk that make up this amount, and the main features of the standard formula used by the group companies.

Intesa Sanpaolo Vita Insurance Group

E.1.1 Structure, amount and quality of own funds

The own funds, in the context of the Solvency II framework, are important asset items that can be used to absorb the losses resulting from the occurrence of risks facing the Insurance Group. They are equal to the sum of the basic own funds and the ancillary own funds as defined in Articles 88 and 89 of the Directive.

The capital requirement is valued by taking into consideration the risk tolerance threshold identified with a forward-looking valuation of risks and solvency (RAF- Risk appetite framework) and by following the ORSA (Own Risk and Solvency Assessment) principles, as well as a strategic planning of the Insurance Group defined for each Company.

The capital management policy, in compliance with the regulatory restraints and compatibly with maintaining the solvency of the Insurance Group, aims at supporting the growth of the Group and the companies and meeting the shareholders' yield expectations, while maintaining a balanced composition of the own funds.

Through the capital management process, it is possible:

- to monitor the capital position, periodically ensuring compliance with the RAF limits and consistency with the business strategy suggesting changes to the own risk profile;
- to provide the bases for the activities relating to strategic planning through the assessment of capital adequacy;

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- to determine the amount of dividends to shareholders;
 - to guide the capital-raising activities and select the most adequate instrument;
 - to ensure the availability of capital in qualitative terms, the relevant tier and ability to cover losses;
 - to optimise the risk/yield balance of the business, maintaining the regulatory capital levels in compliance with regulatory provisions and the Risk Appetite of the Company, and the target capital levels in line with management limits;
 - to contribute to determining the commercial strategies considering a new capital absorption and value creation strategy;
 - to assess the impacts of new products in terms of current and forward-looking capital.

At individual Company and Insurance Group level, the Eligible Own Funds are determined following the regulatory provisions of Solvency II through a process consisting of several phases:

- determining the Excess of Assets Over Liabilities in a consistent market context;
- including any subordinated loans;
- tiering and quantitative limits for the eligibility of Funds.

As regards the potential limitations in the Own Funds' use, the appropriate assessments are carried out on the basis of the nature of the fund, the capital components and the legal and regulatory operational context.

At 31 December 2022 the total basic "eligible" own funds amounted to 9,209 million euro, down by 951 million euro compared to the previous year.

The main components of the own funds are:

- share capital of 678 million euro;
- share premium reserve of 1,328 million euro;
- reconciliation reserve of 5,304 million euro;
- subordinated loans of 1,969 million euro;
- minority interest of -70 million euro.

Certain securities known as "Encumbrances" that are subject to restrictions are excluded from the calculation of own funds, amounting to 68,961 thousand euro, in accordance with the provisions of Article 71(1)(o) of the Delegated Regulation.

The solvency indicators relating to the value of the group SCR and the group MSR for 2022 were 203% and 374%, respectively.

With regard to the quality of the own funds, indicated by the tiering of each item, 79% of the eligible own funds are classified in the highest most reliable level (Tiering 1 unrestricted) while 8% is classified in the medium level (Tiering 1 restricted), which relates to a particular category of subordinated loans with no maturity. The remaining 13% is classified in Tier 2 as the result of another portion of subordinated loans with maturity. The share capital, share premium reserve and the reconciliation reserves are fully available to absorb potential losses (Tiering 1 unrestricted).

In relation to the subordinated loans we can conclude that the following items were recognised in the Solvency Reports of the individual Companies at 31 December 2022:

- **10 loans with indeterminate maturity** granted by the Parent Company Intesa Sanpaolo and Cassa di Risparmio di Firenze to the value of 24,029 thousand euro (Individual accounts prepared according to Italian accounting standards and Solvency II);
- **1 subordinated bond** on the Luxembourg market, the nominal value of which is 750,000 thousand euro, while the Solvency II value is 715,882 thousand euro;
- **1 loan with fixed maturity** granted by the Parent Company Intesa Sanpaolo and transferred to Mediobanca to the value of 600,000 thousand euro for a total of 551,542 thousand euro (Separate Financial Statements prepared according to Italian accounting standards and Solvency II).
- **1 non-convertible subordinated loan issued** in December 2020 for a nominal amount of 600 million euro, and whose value is equal to 465,300 thousand euro;
- **6 loan agreements with an indefinite maturity date**, arising from the acquisition of Compagnia Assicurazioni Vita S.p.A. and granted by the former Ubi Banca, with a nominal value of 38,494 thousand euro, while the Solvency II value was 38,822 thousand euro;
- **2 loan agreements** arising from the acquisition of Compagnia Assicurazioni Vita S.p.A., with nominal value of 50,000 thousand euro - of which one of 10,000 thousand euro granted by the former Ubi Banca and the remaining 40,000 thousand euro granted by Aviva Italia Holding S.p.A. - whose total Solvency II value amounted to 43,822 thousand euro;
- **1 bond** relating to the Company Fideuram Vita granted by Intesa Sanpaolo on 18 December 2017 maturing in 2027 for a nominal value of 145 million euro with an option for full or partial reimbursement from 18 December 2022 after authorisation by the Supervisory Board under Legislative Decree 231, while the Solvency value is equal to 129,429 thousand euro.

Basic own funds

Below there are the components of the basic own funds that make up the own funds of the Insurance Group:

- The ordinary share capital and share premium reserves;
- Surplus of assets over liabilities;
- The subordinated liabilities valued in accordance with the Solvency II framework to the extent that they meet all the requirements for eligibility.
- The minority interest referred to the company RBM Salute.

(euro thousands)

Basic Own Funds	2022	Tiering 2022				2021	Tiering 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	677,869	677,869	-	-	-	677,869	677,869	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	5,303,806	5,303,806	-	-	-	5,945,821	5,945,821	-	-	-
Subordinated liabilities	1,968,825	-	739,910	1,228,915	-	2,242,006	-	792,845	1,449,162	-
Non-available minority interests at group level	-69,682	-69,682	-	-	-	-34,218	-34,218	-	-	-
Total amount	9,208,916	7,240,091	739,910	1,228,915	-	10,159,575	7,917,569	792,845	1,449,162	-

At year end 2022, there was a decrease in Own Funds of 950,660 thousand euro, or -9% from the previous year; Of this, -642 million euro was attributable to the decrease in the reconciliation reserve, the decrease in subordinated liabilities of -273 million euro as well as the decrease in the unavailable minority interest in RBM Salute at group level of -35 million euro.

79% of the own funds are classified as Tier 1 unrestricted.

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

(euro thousands)

Eligible Own Funds	Tiering 2022					Tiering 2021				
	2022	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3	2021	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	677,869	677,869	-	-	-	677,869	677,869	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	5,303,806	5,303,806	-	-	-	5,945,821	5,945,821	-	-	-
Subordinated liabilities	1,191,084	-	739,910	451,174	-	1,212,325	0	792,845	419,480	-
Non-available minority interests at group level	-69,682	-69,682	-	-	-	-34,218	-34,218	-	-	-
Total amount	8,431,175	7,240,091	739,910	451,174	-	9,129,895	7,917,570	792,845	419,480	-

There is a reduction of -7% in total eligible own funds compared to 2021, with 86% of the funds classified as Tier 1 unrestricted.

The item of subordinated liabilities eligible for the Minimum Capital Requirement is lower than the item included in available subordinated liabilities because in the calculation the amounts classified as *Tier 2* are included for up to 20% of the Minimum Capital Requirement as required by Solvency regulations. The amount increases from 419 million euro in 2021 to 451 million euro in 2022.

The following table shows the reconciliation of shareholders' equity as at 31.12.2022:

(in migliaia di euro)

Adjustment	Amount
Patrimonio Netto IAS/IFRS	6,142,342
Assets	
Deferred acquisition costs	-394,594
Intangible assets & Goodwill	-1,222,737
Investments	-6,428
Reinsurance recoverables	-73,490
Deferred tax assets	1,694,994
Other	-211,755
Total Adj Assets	-214,011
Liabilities	
Technical provisions	-3,398,528
Deferred tax liabilities	2,372,635
Subordinated liabilities	-252,678
Other	-677,903
Total Adj Liabilities	-1,956,473
Reconciliation Reserve base	1,742,462
Excess of assets over liabilities	7,884,805

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

Please refer to Chapter D for details of the most significant items contributing to the group own fund reconciliation reserve, as differences between the amounts recognised in the consolidated financial statements and those recognised in the group balance sheet. On the other hand, reference is made to the following paragraphs, relating to the individual Group companies,

containing a reconciliation between the Shareholders' Equity of each of them, prepared according to the provisions of ISVAP Regulation no. 22/2008 (as amended) and the surplus of assets over liabilities calculated according to Article 75 and section 2 of chapter IV of the Directive, as well as the total own funds as defined in section 3 of chapter IV of the Directive.

E.1.3 Transitional provisions

Within the Group, Intesa Sanpaolo Vita and Fideuram Vita, adopting the "grandfathering" principle (as indicated in the Delegated Regulation of 2015, no. 35), divided subordinated loans between Tier 1–restricted (the loans described above in a. and b.), and Tier 2.

E.1.4 Ancillary own funds

No Group Company has requested authorisation for the use of ancillary own funds.

Intesa Sanpaolo Vita S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The Company Intesa Sanpaolo Vita holds 85.3% of the share capital of the items in the own funds of the Insurance Group, 100% of the share premium reserve. The Company also holds 93% of subordinated liabilities in relation to the Insurance Group.

Below is an illustration of the Company's own funds:

(euro thousands)

Basic Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	320,423	320,423	-	-	-	320,423	320,423	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	4,363,705	4,363,705	-	-	-	4,929,745	4,929,745	-	-	-
Subordinated liabilities	1,839,396	-	739,910	1,099,486	-	2,091,190	-	792,845	1,298,345	-
Total amount	7,851,622	6,012,225	739,910	1,099,486	-	8,669,455	6,578,265	792,845	1,298,345	-

According to Own Funds Regulations, the ordinary shares of the Company have the following characteristics:

- They are issued directly by the company with a resolution of its shareholders or by the management board (as permitted by national regulations);
- They give the bearer the right to draw on the residual assets after the company has been liquidated, in proportion to the securities held, without fixed amounts or caps.

Based on these considerations, they are considered to be Tier 1 Unrestricted together with the issue premium.

The reconciliation reserve was also fully considered in Tier 1 Unrestricted in accordance with the provisions of Delegated Regulation No. 35/2015.

The subordinated loans were classified in accordance with the contents of section E.1.3.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

The reconciliation reserve consists of the net equity reserves not included in the items relating to share capital and share premium reserves and includes also the sum of the valuation differences emerging from the valuation principles adopted for the statutory financial statements and those applied for the purposes of the solvency report. The result corresponds to the total surplus assets compared to liabilities net of the asset items already contained in the financial statements valued using the national accounting standards, less the value of shares, dividends in distribution and the basic own funds with the exclusion of the subordinated liabilities.

In essence the reconciliation reserve represents the difference between the NAV (net asset value = value of assets – value of liabilities) of the Solvency Report, based on the market value of assets and liabilities (market values for assets and best estimate for liabilities) and the NAV of the statutory accounts, which is characterised by the “at cost” valuation of the various items (more specifically, the lower of the “cost” and “market” with regard to the assets).

The reconciliation reserve is the most volatile component of the available own funds, as its value depends directly on the dynamics on the financial markets and the impact that those dynamics have on the Company's assets portfolio which are not offset by similar effects on the liabilities side both because of the different discount curve used and also because of the guarantees and options available to policyholders, which lead to an imbalance in behaviour, with regard to the former.

The Company's Asset Allocation strategy is therefore important. This is the degree of diversification of portfolios among the various classes of the investable universe, and the market risks to which each portfolio is subject, based on the various guarantees of return on capital offered to the policyholders and their behaviour in terms of exercising their options (early surrender and/or additional payments).

The reconciliation reserve calculated according to the Solvency II principles amounts to 4,363,705 thousand euro and comprises:

- Loss for the period of -319,055 thousand euro;
- Legal reserves: 64,085 thousand euro;
- Other Statutory reserves: 891,548 thousand euro;
- Other reserves: 492,232 thousand euro;
- Differences in valuation between the principles of the statutory accounts and those of Solvency II: 3,234,896 thousand euro.

With regard to the subordinated loans, below are details of the main loans in the solvency report of Intesa Sanpaolo Vita:

- a non-convertible subordinated bond with indeterminate maturity, to be called in on expiry of the 10th year, issued on 17/12/2014 with a nominal value of 750 million euro: a solvency value at 31/12/2022 equal to 716 million euro;
- a non-convertible subordinated bond of 10-year duration issued on 21/7/2017 for 600 million euro: a solvency value at 31/12/2022 equal to 552 million euro;
- A subordinated loan issued in December 2020 for a nominal amount of 600 million euro, and whose value is equal to 465 million euro.

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Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

(euro thousands)

Eligible Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	320,423	320,423	-	-	-	320,423	320,423	-	-	-
Share premium related to ordinary share capital	1,328,097	1,328,097	-	-	-	1,328,097	1,328,097	-	-	-
Reconciliation reserve	4,363,705	4,363,705	-	-	-	4,929,745	4,929,745	-	-	-
Subordinated liabilities	1,060,683	-	739,910	320,773	-	1,064,828	-	792,845	271,983	-
Total amount	7,072,908	6,012,225	739,910	320,773	-	7,643,093	6,578,265	792,845	271,983	-

The item of subordinated liabilities eligible for the Minimum Capital Requirement is lower than the item included in available subordinated liabilities because in the calculation the amounts classified as *Tier 2* are included for up to 20% of the Minimum Capital Requirement as required by Solvency regulations. The amount increases from 1,065 million euro in 2021 to 1,061 million euro in 2022.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2021 it can be seen there is a decrease of 9% in total own funds. Encumbrances decreased by 38 million euro, and the dividend coupon for the parent company was 504 thousand euro.

(euro thousands)

	2022	2021	Change	%
Equity- Statutory	2,777,329	3,999,297	-1,221,968	-30.6%
Adjustment on assets	-2,842,790	12,729,848	-15,528,914	>100%
Goodwill and other intangible assets	-45,115	-26,229	-18,886	72.0%
Properties and plants	3,950	5120	1,170	-
Holdings in financial and credit institutions	-	-	-	-
Holdings in other entities	1,533,489	1,618,088	-84,598	-5.2%
Financial instruments	-6,155,002	8,932,062	-15,087,064	<100%
Deferred tax assets	1,954,769	2,200,807	-246,039	-11.2%
Reinsurance receivables	-134881	0	-91,157	>100%
Adjustment on technical provisions	9,376,336	-6,007,687	15,384,024	<100%
Life technical provisions	8,337,950	-7,056,227	15,394,177	<100%
Life technical provisions - Index linked and unit- linked	1,038,378	1,048,531	-10,153	-1.0%
Other technical provisions	8	9	-1	-6.3%
Adjustment on other liabilities	-2,725,991	-3,132,447	362,732	-11.7%
Deferred tax liabilities	-2,970,414	-3,108,932	138,518	-4.5%
Financial liabilities	7,896	38,662	-30,766	-79.6%
Pension benefit obligations	-3,817	-5,147	1,330	-25.8%
Other adjustments	240,344	-57,030	253,650	<100%
Reconciliation reserve	3,807,555	3,589,714	217,842	6.1%
Subordinated liabilities includes in Basic Own Funds	1,839,396	2,091,190	-251,794	-12.0%
Dividend	-68,187	-904,117	38,442	-36.1%
Encumbrances	-504,471	-106,628	399,646	-44.2%
Total Own Funds	7,851,621	8,669,455	-817,834	-9.4%

E.1.3 Transitional provisions

Subordinate liabilities

According to Delegated Regulation no. 35/2015 the subordinated loans entered in the Financial Statements of Intesa Sanpaolo Vita at 31 December 2022 considered for Solvency II purposes are as follows:

- **10 loans with indeterminate maturity** granted by the Parent Company Intesa Sanpaolo and Cassa di Risparmio di Firenze to the value of 24,029 thousand euro (Individual accounts prepared according to Italian accounting standards and Solvency II);
- 1 subordinated bond on the Luxembourg market, the nominal value of which is 750,000 thousand euro, while the Solvency II value is 715,882 thousand euro;
- **1 loan with fixed maturity** granted by the Parent Company Intesa Sanpaolo and transferred to Mediobanca to the value of 600,000 thousand euro for a total of 551,542 thousand euro (Separate Financial Statements prepared according to Italian accounting standards and Solvency II).
- **1 non-convertible subordinated loan issued** in December 2020 for a nominal amount of 600 million euro, and whose value is equal to 465,300 thousand euro;
- **6 loan agreements with an indefinite maturity date**, arising from the acquisition of Compagnia Assicurazioni Vita S.p.A. and granted by the former Ubi Banca, with a nominal value of 38,494 thousand euro, while the Solvency II value was 38,822 thousand euro;
- **2 loan agreements** arising from the acquisition of Compagnia Assicurazioni Vita S.p.A., with nominal value of 50,000 thousand euro - of which one of 10,000 thousand euro granted by the former Ubi Banca and the remaining 40,000 thousand euro granted by Aviva Italia Holding S.p.A. - whose total Solvency II value amounted to 43,822 thousand euro;

Intesa Sanpaolo Vita and Fideuram Vita, adopting the "grandfathering" principle (as indicated in the Delegated Regulation of 2015, no. 35), divided subordinated loans between Tier 1–restricted (the loans described above in a. and b.), and Tier 2.

Intesa Sanpaolo Assicura S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The basic own funds of Intesa Sanpaolo Assicura include:

- the paid-up ordinary shares;
- the reconciliation reserve.

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2022 the value was equal to 27,912 thousand euro, divided into 27,912,258 ordinary shares each with a nominal value of 1 euro;
- reconciliation reserve: this item is calculated by taking into account the surplus assets over liabilities (of 574,998 thousand euro) net of the share capital.

All the components of own funds are considered in Tier 1.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

(euro thousands)

Basic Own Funds	2022	Tiering al 2022				2021	Tiering al 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	27,912	27,912	-	-	-	27,912	27,912	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	574,998	574,998	-	-	-	727,705	727,705	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	602,910	602,910	-	-	-	755,617	755,617	-	-	-

The reconciliation reserve amounts to 574,998 thousand euro and comprises:

- Annual profits equal to 119,691 thousand euro, and profits carried forward of 63,478 thousand euro;
- Legal reserves: 6,849 thousand euro;
- Other Statutory reserves: 230,112 thousand euro;
- Other reserves: 97,477 thousand euro;
- Differences in valuation between the principles of the statutory accounts and those of Solvency II: 57,391 thousand euro.

(euro thousands)

Eligible Own Funds	2022	Tiering al 2022				2021	Tiering al 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	27,912	27,912	-	-	-	27,912	27,912	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	574,998	574,998	-	-	-	727,705	727,705	-	-	-
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	602,910	602,910	-	-	-	755,617	755,617	-	-	-

There is a decrease of 20% of the total eligible own funds compared to 2021.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2021 it can be seen there is a decrease of -20% in total own funds and a considerable decrease in Encumbrances of 12.0%. An element of capital strengthening is the 47.8% increase in the reconciliation reserve and the payment of a dividend to the parent company in the amount of 307 million euro.

(euro thousands)

	2022	2021	Change	%
Equity- Statutory	545,520	509,199	36,321	7.1%
Adjustment on assets	-37,100	-11,971	-25,128	>100%
Goodwill and other intangible assets	-13,777	-10,789	-2,988	28%
Financial instruments	-8,181	7,920	-16,101	>100%
Deferred tax assets	20,178	10,935	9,243	85%
Other adjustments	-35,319	-20,037	-15,282	76%
Adjustment on technical provisions	588,999	382,739	206,260	53.9%
Non- Life technical provisions	310,709	201,861	108,848	53.9%
Riserve tecniche riassicurazione	266,853	170,880	95,973	56.2%
Other technical provisions	11,438	9,999	1,439	14.4%
Adjustment on other liabilities	-187,213	-124,053	-63,160	50.9%
Deferred tax liabilities	-182,647	-120,997	-61,650	51.0%
Pension benefit obligations	-2,933	-1,089	-1,845	>100%
Other adjustments	-1,632	-1,967	335	-17%
Reconciliation reserve	364,687	246,715	117,972	47.8%
Encumbrances	-261	-297	35	-11.9%
Dividend	-307,035	-	n.d	n.d
Total Own Funds	602,910	755,617	-152,707	-20.2%

Fideuram Vita S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

Also for Fideuram Vita, the components of the basic own funds are made up of the surplus of assets over liabilities, the subordinated liabilities and the own shares.

The basic own funds of Fideuram Vita include:

- the paid-up ordinary shares;
- the reconciliation reserves;
- the subordinated liabilities paid and valued according to the Solvency II framework.

As part of a capital reinforcement plan the Company may resort to a subordinated loan of 145 million euro expiring in 2027, in compliance with IVASS Regulation no. 25/2016 which implements the provisions of Delegated Regulation 35/2015 and the Private Insurance Code (CAP), in order to control risks in line with the risk-based approach of European Directive 138 of 2009.

The Company has tiered the various levels of own funds in accordance with Article 44-i CAP.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2022 the value was 357,447 thousand euro, attributable entirely to the Life business;
- reconciliation reserve: this item is equal to 725,057 thousand euro and was calculated by taking into account the excess of assets over liabilities (equal to 1,082,504 thousand euro) net of share capital (equal to 357,447 thousand euro) and encumbrances (equal to 467 thousand euro);
- subordinated loans: the total is 129,429 thousand euro, classified entirely in Tier 2.

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

(euro thousands)

Basic Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	357,447	357,447	-	-	-	357,447	357,447	-	-	-
Reconciliation reserve	725,057	725,057	-	-	-	852,878	852,878	-	-	-
Subordinated liabilities	129,429	-	-	129,429	-	150,816	-	-	150,816	-
Total amount	1,211,933	1,082,504	-	129,429	-	1,361,141	1,210,324	-	150,816	-

The reconciliation reserve at 31 December 2022 totalled 725,057 thousand euro and is formed of the following elements:

- Profits reserve of 46,153 thousand euro;
- Statutory reserves of 40,726 thousand euro;
- Other reserves of 329,545 thousand euro;
- Differences in valuation between the principles used for the statutory accounts and those for the Solvency Report, equal to 309,099 thousand euro;
- Encumbrance, equal to 467 thousand euro.

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

(euro thousands)

Eligible Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	357,447	357,447	-	-	-	357,447	357,447	-	-	-
Reconciliation reserve	725,057	725,057	-	-	-	852,878	852,878	-	-	-
Subordinated liabilities	48,642	-	-	48,642	-	44,537	-	-	44,537	-
Total amount	1,131,146	1,082,504	-	48,642	-	1,254,862	1,210,324	-	44,537	-

The item of subordinated liabilities eligible for the Minimum Capital Requirement is lower than the item included in available subordinated liabilities because in the calculation the amounts classified as Tier 2 are included for up to 20% of the Minimum Capital Requirement as required by Solvency regulations. The amount increases from 150.8 in 2021 to 129.4 million euro in 2022.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2021 it can be seen there is a decrease of 10.96% on the total own eligible funds.

(euro thousands)

	2022	2021	Change	%
Equity- Statutory	773,872	930,891	-157,019	-16.9%
Adjustment on assets	-446,259	516,601	-962,860	-186.4%
Goodwill and other intangible assets	-58,854	-72,959	14,105	-19.3%
Properties and plants	9,896	9,762	134	1.4%
Holdings in financial and credit institutions	-	-	-	0.0%
Financial instruments	-574,785	537,154	-1,111,939	-207.0%
Deferred tax assets	208,125	43,137	164,988	382.5%
Other assets	-30,641	-493	-30,149	6119.9%
Adjustment on technical provisions	1,094,602	-50,758	1,145,360	-2256.5%
Life technical provisions	441,768	-701,112	1,142,880	-163.0%
Life technical provisions - Index linked and unit- linked	652,834	650,355	2,479	0.4%
Adjustment on other liabilities	-339,244	-186,021	-153,222	82.4%
Deferred tax liabilities	-344,281	-168,646	-175,635	104.1%
Financial liabilities	344	-5,683	6,026	-106.0%
Pension benefit obligations	-1,450	-2,277	826	-36.3%
Other adjustments	6,145	-9,415	15,560	-165.3%
Reconciliation reserve	1,082,971	279,822	803,149	287.0%
Subordinated liabilities includes in Basic Own Funds	129,429	150,816	-21,387	-14.2%
Total Basic Own Funds	1,212,400	1,361,529	-149,129	-11.0%
Encumbrances	-467	-389	-78	20.1%
Total Own Funds	1,211,933	1,361,140	-149,207	-11.0%

Intesa Sanpaolo Life D.A.C.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The components of the basic own funds of Intesa Sanpaolo Life are made up of the surplus of assets over liabilities and by equity reserves. The Company has not issued subordinated liabilities.

The basic own funds of Intesa Sanpaolo Life are all classified as Tier 1, are all eligible for the required solvency capital ratio and include:

- the paid-up ordinary shares;
- the reconciliation reserves;
- the capital contribution.

(euro thousands)

Basic Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	625	625	-	-	-	625	625	-	-	-
Share premium related to ordinary share capital	10	10	-	-	-	10	10	-	-	-
Reconciliation reserve	1,425,770	1,425,770	-	-	-	1,561,728	1,561,728	-	-	-
Capital contribution	104,444	104,444	-	-	-	104,444	104,444	-	-	-
Total amount	1,530,849	1,530,849	-	-	-	1,666,807	1,666,807	-	-	-

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2022 the value was 625 thousand euro;
- the share premium reserve, with a value of approximately 10 thousand euro;
- the capital reserve of 104,444 thousand euro;

- - reconciliation reserve: this item was calculated taking into account the Excess of Assets over Liabilities (amounting to 1,425,770 thousand euro).

The reconciliation reserve is made up as follows:

(in migliaia di euro)

Riserva di Riconciliazione	2022	2021
Riconciliazione ad inizio anno	1,561,729	1,448,513
Utile d'esercizio IFRS	160,697	193,078
Modifiche sulla riserva AFS	-44,220	-2,416
Svalutazioni per attività fiscali relative ai sinistri	-42,175	-
Modifica di alcune voci di stato patrimoniale	5,302	-8,485
Modifiche derivanti dal risk margin dal costo economico dei sinistri	-165,862	31,578
Dividendo	-50,000	-100,000
Varie	294	-542
Riconciliazione delle Riserve a fine anno	1,425,770	1,561,729

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels. The funds eligible to cover the minimum requirement are all classified as Tier 1 Unrestricted and correspond to the amounts available to cover the solvency requirement.

(euro thousands)

Eligible Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	625	625	-	-	-	625	625	-	-	-
Share premium related to ordinary share capital	10	10	-	-	-	10	10	-	-	-
Reconciliation reserve	1,425,770	1,425,770	-	-	-	1,561,728	1,561,728	-	-	-
Capital contribution	104,444	104,444	-	-	-	104,444	104,444	-	-	-
Total amount	1,530,849	1,530,849	-	-	-	1,666,807	1,666,807	-	-	-

There is a decrease of 8.2% of the total eligible own funds compared to 2021. The Company Intesa Sanpaolo Life has all of its funds classified as Tier 1 unrestricted.

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2021 it can be seen there is a decrease of 8.2% in total own funds.

	(euro thousands)			
	2022	2021	Change	%
Equity- Statutory	1,013,661	989,358	24,303	2.5%
Adjustment on assets	-277,290	-351,020	73,730	-21.0%
Goodwill and other intangible assets	-277,290	-351,020	73,730	-21.0%
Properties and plants	-	-	-	-
Holdings in financial and credit institutions	-	-	-	-
Financial instruments	-	-	-	-
Deferred tax assets	-	-	-	-
Other assets	-	-	-	-
Adjustment on technical provisions	687,059	840,531	-153,471	-18.3%
Life technical provisions	-	-	-	-
Life technical provisions - Index linked and unit- linked	677,697	831,200	-153,503	-18.5%
Other technical provisions	9,363	9,331	31	0.3%
Adjustment on other liabilities	107,418	187,939	-80,520	-42.8%
Deferred tax liabilities	-73,884	-96,779	22,895	-23.7%
Financial liabilities	-	-	-	-
Pension benefit obligations	-	-	-	-
Insurance and intermediaries payables	231,993	299,354	-67,362	-22.5%
Other adjustments	-50,690	-14,637	-36,053	246.3%
Reconciliation reserve	517,188	677,450	-160,262	-23.7%
Subordinated liabilities includes in Basic Own Funds	-	-	-	-
Total Own Funds	1,530,849	1,666,807	-135,959	-8.2%

Intesa Sanpaolo RBM Salute S.p.A.

E.1.1 Structure, amount and quality of own funds

Basic own funds

The criteria that the Company has observed to identify aspects of own basic funds, with reference to ordinary level 1 shares and the reconciliation reserve are defined below.

In particular, the Company, in compliance with regulations, considered share capital as own level 1 funds which may be referred to, to absorb losses with a view to the business being a going concern.

In the asset management plan, the Company has not used subordinated loans, at present.

The Company has not included in its own funds any element that requires prior approval by the national regulator.

The essential conditions of the main elements of the company's own funds can be summarised as follows:

- Share capital: at 31 December 2022 the value was equal to 305 million euro, divided into 305,208,000 ordinary shares each with a nominal value of 1 euro;
- reconciliation reserve: this item is calculated by taking into account the surplus assets over liabilities (of 231 million euro) net of the share capital.

(euro thousands)

Basic Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	305,208	305,208	-	-	-	269,000	269,000	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	231,493	164,509	-	-	66,984	218,217	109,837	-	-	108,380
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	536,701	469,717	-	-	66,984	487,217	378,837	-	-	108,380

Compared to the year 2021, own funds increase by 49.5 million euro including the capital increase in February 2022 of 150 million euro. There was an increase in the reconciliation reserve equal to 13.3 million euro (6%), including the statutory profit for the year of 81.8 million euro, due mainly to:

- the increase in the value of assets equal to 27.7 million euro;
- the increase in DTA of 141.6 million euro;
- the decrease in cash and cash equivalents of 114.8 million euro;
- the decrease in DTA of 34.4 million euro;
- the decrease in liabilities related to Technical Provisions for 135.5 million euro;
- increase in DTL for an amount of 7 million euro.
- the increase in the net value of assets and liabilities equal to 6.5 million euro;

Below is the amount of own funds eligible to cover the SCR and MCR, classified by levels.

(euro thousands)

Eligible Own Funds	2022	Tiering at 2022				2021	Tiering at 2021			
		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3		Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Ordinary share capital (gross of own shares)	305,208	305,208	-	-	-	269,000	269,000	-	-	-
Share premium related to ordinary share capital	-	-	-	-	-	-	-	-	-	-
Reconciliation reserve	231,493	164,509	-	-	66,984	218,217	109,837	-	-	108,380
Subordinated liabilities	-	-	-	-	-	-	-	-	-	-
Total amount	536,701	469,717	-	-	66,984	487,217	378,837	-	-	108,380

E.1.2 Differences between the own capital stated in the company's financial statements and the excess assets compared to liabilities calculated for solvency purposes

From a comparison with 2021 it can be seen there is an increase of 10.2% on the total own funds.

(euro thousands)

	2022	2021	Change	%
Equity- Statutory	724,071	494,162	229,909	46.5%
Adjustment on assets	-1,544	4,033	-5,577	<-100%
Goodwill and other intangible assets	-4,552	-1,230	-3,322	>100%
Financial instruments	68	74	-6	-8%
Deferred tax assets	-	1801	-1,801	-100%
Other adjustments	2,940	3,388	-448	-13%
Adjustment on technical provisions	26,786	-4,527	31,313	<-100%
Non- Life technical provisions	-	-	-	n.a
Health non-STL technical provisions	26,786	-4,527	31,313	<-100%
Other technical provisions	-	-	-	n.a
Adjustment on other liabilities	-9,530	-3,251	-6,279	>100%
Deferred tax liabilities	-7000	0	-7,000	-100.0%
Pension benefit obligations	-376	-594	218	-36.7%
Other adjustments	-2,154	-2657	503	-18.9%
Reconciliation reserve	15,712	-3,745	19,457	<-100%
Total Own Funds	739,783	490,417	249,366	50.8%
Encumbrances	-45	-	-45	na
Foreseeable dividends, distribution and charges	-303,037	-1,600	-301,437	>100%
Total eligible Own Funds	536,701	487,217	49,484	10.2%

E.2 SOLVENCY CAPITAL REQUIREMENT AND MINIMUM CAPITAL REQUIREMENT

With reference to the contents of the QRT S.25.01 annexed to this report, the SCR should be mentioned, highlighting the individual risks it comprises.

Intesa Sanpaolo Vita Insurance Group

The companies belonging to the Intesa Sanpaolo Vita Insurance Group, under Article 1(r)-bis of the Private Insurance Code, adopt the standard formula for the calculation of the Solvency Capital Requirement (Article 45-quinquies to 45-undecies).

The solvency capital requirement of the Insurance Group at 31 December 2022 was 4,537 million euro.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

(thousands euro)

	2022	2021	Delta	
Solvency Capital Requirement	4,536,557.4	3,916,527.9	620,029.4	15.8%
Add On	84,082.2	176,175.2	-92,093.1	-52.3%
Deferred Tax Adjustment	-967,041.4	-831,232.8	-135,808.5	16.3%
Solvency Capital Requirement ante adj	5,419,516.6	4,571,585.5	847,931.1	18.5%
Operational Risk	526,607.6	598,600.1	-71,992.5	-12.0%
Basic Solvency Capital Requirement	4,892,908.9	3,972,985.4	919,923.6	23.2%
Diversification	-1,668,886.2	-1,435,917.8	-232,968.3	16.2%
Market Risk	2,028,480.4	2,832,758.2	-804,277.8	-28.4%
Interest Rate Risk	230,139.1	87,465.3	142,673.8	>100%
Equity Risk	755,657.1	1,200,860.8	-445,203.8	-37.1%
Property Risk	128,574.6	99,606.0	28,968.6	29.1%
Spread Risk	1,032,622.8	1,365,551.4	-332,928.6	-24.4%
Concentration Risk	1,948.0	29,304.1	-27,356.0	-93.4%
Currency Risk	579,959.0	782,944.6	-202,985.6	-25.9%
Diversification	-700,420.2	-732,974.1	32,553.8	-4.4%
Underwriting Risk (Life)	3,692,181.2	1,821,778.3	1,870,403.0	>100%
Mortality Risk	254,606.6	169,748.3	84,858.3	50.0%
Longevity Risk	87,922.4	211,677.8	-123,755.4	-58.5%
Disability Risk	-	-	-	-
Expenses Risk	389,160.1	380,155.2	9,005.0	2.4%
Revision Risk	-	-	-	-
Lapse Risk	3,419,692.7	1,492,136.2	1,927,556.5	>100%
Cat Risk	83,810.7	85,461.7	-1,651.0	-1.9%
Diversification	-543,011.4	-517,400.9	-25,610.5	4.9%
Underwriting Risk (Non-Life)	205,678.9	210,317.7	-4,638.8	-2.2%
Premium & reserve Risk	173,989.6	189,999.9	-16,010.3	-8.4%
Lapse Risk	60,686.5	49,778.9	10,907.5	21.9%
Cat Risk	57,698.4	41,448.7	16,249.7	39.2%
Diversification	-86,695.6	-70,909.9	-15,785.7	22.3%
Underwriting Risk (Health)	170,777.3	233,241.6	-62,464.3	-26.8%
Cat Risk	15,942.1	26,920.9	-10,978.8	-40.8%
Mass Accident Risk	1,483.7	1,360.9	122.8	9.0%
Concentration Risk	848.2	2,398.3	-1,550.2	-64.6%
Pandemic Risk	15,850.3	26,779.3	-10,929.1	-40.8%
Diversification	-2,240.0	-3,617.7	1,377.6	-38.1%
Non- SLT Risk	166,092.7	225,050.3	-58,957.5	-26.2%
Reserve Risk	153,857.7	215,254.5	-61,396.8	-28.5%
Lapse Risk	62,566.9	65,674.4	-3,107.5	-4.7%
Diversification	-50,331.8	-55,878.7	5,546.8	-9.9%
Diversification	-11,257.6	-18,729.6	7,472.0	-39.9%
Default Risk	464,677.3	310,807.4	153,869.8	49.5%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 2,256 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

The value of the own funds eligible to cover the SCR at Group level is equal to 9,209 million euro. With reference to Article 230, the Group solvency value has been stated. It is calculated as the difference between the eligible own funds and the SCR at Group level, amounting to 4,672 million euro.

Intesa Sanpaolo Vita S.p.A.

The SCR of the Company on 31 December 2022 was 3,564 million euro. In calculating the SCR, the Company uses the Volatility Adjustment.

	(thousands euro)			
	2022	2021	Delta	
Solvency Capital Requirement	3,564,141.4	3,022,033.8	542,107.6	17.9%
Deferred Tax Adjustment	-807,970.1	-724,699.4	-83,270.7	11.5%
Solvency Capital Requirement ante adj	4,372,111.6	3,746,733.2	625,378.3	16.7%
Operational Risk	357,949.1	436,649.2	-78,700.1	-18.0%
Basic Solvency Capital Requirement	4,014,162.5	3,310,084.0	704,078.5	21.3%
Diversification	-1,194,266.6	-870,887.4	-323,379.2	37.1%
Market Risk	2,019,555.0	2,616,999.6	-597,444.6	-22.8%
Interest Rate Risk	149,317.2	84,951.0	64,366.2	75.8%
Equity Risk	1,010,057.7	1,310,068.4	-300,010.7	-22.9%
Property Risk	125,205.1	89,134.4	36,070.6	40.5%
Spread Risk	919,898.3	1,178,005.3	-258,107.1	-21.9%
Concentration Risk	0.0	25,768.9	-25,768.9	-100.0%
Currency Risk	331,680.5	499,720.6	-168,040.2	-33.6%
Diversification	-516,603.7	-570,649.1	54,045.4	-9.5%
Underwriting Risk	2,874,872.2	1,377,948.8	1,496,923.4	>100%
Mortality Risk	209,011.4	134,418.4	74,593.0	55.5%
Longevity Risk	45,854.4	151,168.5	-105,314.0	-69.7%
Disability Risk	-	-	-	-
Expenses Risk	225,239.1	199,665.6	25,573.5	12.8%
Revision Risk	-	-	-	-
Lapse Risk	2,710,069.5	1,186,343.8	1,523,725.7	>100%
Cat Risk	77,259.7	78,296.8	-1,037.2	-1.3%
Diversification	-392,561.9	-371,944.3	-20,617.6	5.5%
Default Risk	314,001.9	186,023.0	127,978.9	68.8%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 1,604 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

Intesa Sanpaolo Assicura S.p.A.

The SCR of the company at 31 December 2022 was 242.1 million euro. In calculating the SCR the company does not use the volatility adjustment.

The table below gives the SCR distributed according to the modules and sub-modules of risk, calculated with the Standard Formula, by applying company-specific parameters (USP) to calculate the capital requirement for pricing and reserving risk of the Non-Life and Health business.

(thousands euro)

	2022	2021	Delta	
Solvency Capital Requirement	242,120.3	202,873.3	39,247.0	19.3%
Deferred Tax Adjustment	-76,459.0	-64,065.2	-12,393.8	19.3%
Solvency Capital Requirement ante adj	318,579.3	266,938.5	51,640.8	19.3%
Operational Risk	28,305.1	22,248.0	6,057.1	27.2%
Basic Solvency Capital Requirement	290,274.2	244,690.5	45,583.7	18.6%
Diversification	-134,820.3	-121,601.6	-13,218.7	10.9%
Market Risk	61,190.3	44,792.3	16,398.1	36.6%
Interest Rate Risk	29,664.7	2,899.3	26,765.4	>100%
Equity Risk	32,378.0	17,810.0	14,568.0	81.8%
Property Risk	-	-	-	-
Spread Risk	16,137.9	18,619.8	-2,482.0	-13.3%
Concentration Risk	-	-	-	-
Currency Risk	14,421.7	20,717.6	-6,295.9	-30.4%
Diversification	-31,411.9	-15,254.4	-16,157.5	>100%
Underwriting Risk (Non-Life)	205,446.5	160,567.1	44,879.4	28.0%
Premium & reserve Risk	173,857.2	143,572.6	30,284.6	21.1%
Lapse Risk	60,686.5	48,477.5	12,208.9	25.2%
Cat Risk	57,472.5	28,192.3	29,280.2	>100%
Diversification	-86,569.7	-59,675.3	-26,894.3	45.1%
Underwriting Risk (Health)	109,090.8	126,938.4	-17,847.6	-14.1%
Cat Risk	1,950.0	2,932.0	-982.1	-33.5%
Mass Accident Risk	1,407.2	1,216.6	190.6	15.7%
Concentration Risk	475.3	2,398.3	-1,923.0	-80.2%
Pandemic Risk	1,263.4	1,168.2	95.2	8.1%
Diversification	-1,196.0	-1,851.1	655.1	-35.4%
Non- SLT Risk	108,586.9	126,173.7	-17,586.7	-13.9%
Reserve Risk	89,287.8	113,770.2	-24,482.5	-21.5%
Lapse Risk	61,796.6	54,553.9	7,242.7	13.3%
Diversification	-42,497.4	-42,150.5	-347.0	0.8%
Diversification	-1,446.1	-2,167.3	721.1	-33.3%
Default Risk	49,367.0	33,994.3	15,372.6	45.2%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 108.9 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

Fideuram Vita S.p.A.

At 31 December 2022, the SCR of Fideuram Vita amounted to 540.5 million euro. The requirement is calculated using the Standard Formula, on the basis of the provisions of Chapters V and VI of the Delegated Acts. In calculating the SCR the company uses the Volatility Adjustment.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

	(thousands euro)			
	2022	2021	Delta	
Solvency Capital Requirement	540,473.6	494,858.7	45,614.9	9.2%
Deferred Tax Adjustment	-133,709.9	-135,515.7	1,805.8	-1.3%
Solvency Capital Requirement ante adj	674,183.5	630,374.4	43,809.0	6.9%
Operational Risk	53,284.3	34,093.6	19,190.7	56.3%
Basic Solvency Capital Requirement	620,899.2	596,280.8	24,618.3	4.1%
Diversification	-170,843.0	-174,696.3	3,853.4	-2.2%
Market Risk	308,165.7	359,260.1	-51,094.4	-14.2%
Interest Rate Risk	26,126.1	14,667.7	11,458.4	78.1%
Equity Risk	174,763.5	215,550.5	-40,787.0	-18.9%
Property Risk	2,684.6	3,391.3	-706.7	-20.8%
Spread Risk	72,989.6	109,395.6	-36,406.0	-33.3%
Concentration Risk	-	-	-	-
Currency Risk	122,197.8	116,553.3	5,644.5	4.8%
Diversification	-90,595.8	-100,298.3	9,702.5	-9.7%
Underwriting Risk	457,635.4	382,081.7	75,553.7	19.8%
Mortality Risk	20,674.2	11,957.7	8,716.5	72.9%
Longevity Risk	42,068.0	60,509.4	-18,441.4	-30.5%
Disability Risk	-	-	-	-
Expenses Risk	82,463.8	78,479.6	3,984.1	5.1%
Revision Risk	-	-	-	-
Lapse Risk	395,669.0	314,038.4	81,630.6	26.0%
Cat Risk	3,072.9	3,759.0	-686.1	-18.3%
Diversification	-86,312.4	-86,662.3	349.9	-0.4%
Default Risk	25,941.1	29,635.4	-3,694.3	-12.5%

The expected developments in the Solvency Capital Requirement are reported in the Group ORSA report, which is prepared annually by USCI. This results will therefore be presented in the ORSA Report.

Intesa Sanpaolo Life D.A.C.

At 31 December 2022, the SCR of Intesa Sanpaolo Life amounted to 512 million euro (637 million euro at 31 December 2021). The requirement is calculated using the Standard Formula, on the basis of the provisions of Chapters V and VI of the Delegated Acts.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

	(thousands euro)			
	2022	2021	Delta	
Solvency Capital Requirement	511,924.6	637,067.4	-125,142.8	-19.6%
Deferred Tax Adjustment	-68,304.8	-91,009.6	22,704.8	-24.9%
Solvency Capital Requirement ante adj	580,229.4	728,077.0	-147,847.6	-20.3%
Operational Risk	82,066.5	87,560.2	-5,493.7	-6.3%
Basic Solvency Capital Requirement	498,162.9	640,516.8	-142,353.9	-22.2%
Diversification	-141,316.9	-181,237.2	39,920.3	-22.0%
Market Risk	246,204.1	354,740.4	-108,536.3	-30.6%
Interest Rate Risk	44,825.3	16,237.1	28,588.2	>100%
Equity Risk	163,765.8	248,479.7	-84,713.9	-34.1%
Property Risk	-	-	-	-
Spread Risk	23,597.1	47,650.6	-24,053.5	-50.5%
Concentration Risk	1,948.0	3,535.2	-1,587.2	-44.9%
Currency Risk	111,659.1	145,268.7	-33,609.6	-23.1%
Diversification	-99,591.2	-106,430.8	6,839.6	-6.4%
Underwriting Risk	364,904.9	442,110.4	-77,205.5	-17.5%
Mortality Risk	24,921.1	23,372.3	1,548.8	6.6%
Longevity Risk	-	-	-	-
Disability Risk	-	-	-	-
Expenses Risk	81,457.2	102,009.9	-20,552.7	-20.1%
Revision Risk	-	-	-	-
Lapse Risk	313,954.3	379,167.0	-65,212.7	-17.2%
Cat Risk	3,478.2	3,405.8	72.4	2.1%
Diversification	-58,905.9	-65,844.6	6,938.7	-10.5%
Default Risk	28,370.8	24,903.2	3,467.6	13.9%

No simplifications have been used to calculate the SCR.

At 31 December 2022, the MCR amounted to 230 million euro.

Intesa Sanpaolo RBM Salute S.p.A.

The SCR of the company at 31 December 2022 was 278 million euro, including a conservative margin of 134 million euro (add-on). In calculating the SCR the company does not use the volatility adjustment.

The table below gives the SCR distributed according to the modules and submodules of risk, calculated with the Standard Formula.

	2022	2021	(thousands euro)	
			Delta	
Solvency Capital Requirement	277,902	400,017	-122,115	-30.5%
Add On	134,331	244,967	-110,637	-45.2%
Deferred Tax Adjustment	-	-	-	-
Solvency Capital Requirement ante adj	143,571	155,050	-11,478	-7.4%
Operational Risk	15,100	14,637	464	3.2%
Basic Solvency Capital Requirement	128,471	140,413	-11,942	-8.5%
Diversification	-38,621	-31,585	-7,036	22.3%
Market Risk	10,345	4,149	6,196	>100%
Interest Rate Risk	10,322	4,089	6,234	>100%
Equity Risk	-	23	-23	-100.0%
Property Risk	685	685	-	-
Spread Risk	-	-	-	-
Concentration Risk	-	-	-	-
Currency Risk	-	-	-	-
Diversification	-662	-648	-14	2.2%
Underwriting Risk (Non-Life)	893	33	860	>100%
Premium & reserve Risk	572	20	552	>100%
Lapse Risk	-	-	-	-
Cat Risk	557	21	536	>100%
Diversification	-236	-9	-228	>100%
Underwriting Risk (Health)	93,173	117,987	-24,813	-21.0%
Cat Risk	14,611	25,575	-10,963	-42.9%
Mass Accident Risk	77	116	-40	-34.1%
Concentration Risk	848	-	848	-
Pandemic Risk	14,587	25,574	-10,988	-43.0%
Diversification	-900	-116	-784	>100%
Non- SLT Risk	88,440	108,965	-20,525	-18.8%
Reserve Risk	88,437	108,768	-20,331	-18.7%
Lapse Risk	770	6,551	-5,780	-88.2%
Diversification	-767	-6,354	5,587	-87.9%
Diversification	-9,878	-16,553	6,675	-40.3%
Default Risk	62,681	49,864	12,817	25.7%

The MCR is calculated on the basis of the provisions of Chapter VII of the Delegated Acts, and amounts to 69 million euro.

On the valuation date, no simplifications had been used to calculate the SCR.

Information of LAC DT

The Intesa Sanpaolo Vita Group companies, except for Intesa Sanpaolo Life D.A.C, prepare a recoverability plan that allows, in the presence of sufficient future profits, to calculate the adjustment to the SCR ("LAC DT") according to the deferred notional tax assets generated by a loss equal to the SCR.

The Companies have calculated the potential LAC DT adjustment ("nDTA") referred to in Article 207 of the Delegated Acts, allocating to each MVBS item, the loss deriving from each risk sub-module of the BSCR and from the Operational Risk, taking into account proportional to the diversification effect. The potential LAC DT adjustment was calculated by assessing only the temporary differences that give rise to prepaid IRES taxes in that, any IRAP tax losses would not be reportable in future years as governed by national tax legislation.

The nominal reference tax rate used in the calculation is therefore 24%, considering permanent valuation differences on specific income components that are partially or totally non-deductible (for example, the PEX regime).

To identify the admissibility of the nDTAs, the Companies determine future taxable annual incomes post-stress related to new production in order to recover tax receivables, generated by a loss determined pursuant to Article 207 of the delegated acts. In order to ensure the double counting prohibition in compliance with Article 16 of IVASS Regulation No 35 of 7 February 2017 concerning LAC DT, future income relating to new production is determined using a marginal approach, i.e., as the difference between portfolio profits including new production and those of the existing portfolio. In addition, in accordance with paragraph 2 quarter included into Article 207 by the amendments introduced by Commission Delegated Regulation (EU) 2019/981, future income relating to new business has been determined by assuming that the rates of return on the Company's investments are equal to the implied forward rate returns derived from the relevant risk-free interest rate term structure.

The Companies determine the potential impact of financial and technical stresses on the profit from new business in proportion to the change in Excess of Assets over Liabilities generated by the allocation of the loss arising from each sub-module of Market, Non-Life, Health e Life Underwriting on the MVBS. The stress factor thus applied is gradually reduced in the projection years following the first, to take into account the exit of contracts and securities that generated the loss and the inclusion of new contracts and securities acquired in future periods in which a gradual recovery of losses and market normalisation are expected.

Further considerations are made with regard to the future recoverability of financial markets. The occurrence of market stress led to the occurrence of losses directly impacting on future profits generated by the companies' business. Future market developments make it possible to foresee a recovery, albeit gradual and limited, of the value of the Company's investments with consequent recovery of the financial losses incurred (e.g. recovery over time of the value of equity investments or reduction of bond spreads). Since these profits are not already taken into account in the MVBS, they are directly attributable to new production.

For the definition of new production volumes, the Companies agreed to use the hypotheses of premium volume as a reference, consistent with the ORSA projections but with a longer projection

period, replicating for each missing year to the completion of the recovery plan (which is assumed to be 7 years), the same assumptions as in the last year available of the ORSA plan. In accordance with paragraph 2 quarter (d) inserted in Article 207 through the amendments introduced by the Commission Delegated Regulation (EU) 2019/981, the Companies shall apply appropriate and time-increasing haircuts to the profits arising from the new business outside the ORSA plan, set equal to those provided for in Article 13 paragraph 4 of IVASS Regulation 35/2017:

- 20 per cent for probable future taxable income of the 4th projection year;
- 40 per cent for probable future taxable income of the 5th projection year;
- 60 per cent for probable future taxable income of the 6th projection year;
- 80 per cent for probable future taxable income of the 7th projection year.

E.3 USE OF THE SHARE PRICE RISK SUBMODULE BASED ON THE DURATION IN THE SCR CALCULATION

All the Group companies don't use this method.

E.4 DIFFERENCES BETWEEN THE STANDARD FORMULA AND THE INTERNAL MODEL

All the Insurance Group companies use standard formula.

E.5 FAILURE TO MEET THE MCR AND SCR

None of the Group companies consider that there is a reasonably predictable risk of not meeting the MCR or SCR.

E.6 OTHER INFORMATION

The Insurance Group has not valued any part of its portfolio as Ring Fenced Funds, pending the publication of the level II regulations.

We consider that we have provided all the information relevant for the purposes of this document.



GLOSSARY AND ACRONYMS

Certain sections of this document contain acronyms. In some cases, English terminology has been used to minimise any doubts as to interpretation, in the use of international definitions or methods. To facilitate the understanding of certain concepts, the Italian translations have been given below.

English term	Acronym	Italian term
As a whole		Elemento unico
Best Estimate	BE/BEL	Best Estimate
Cash Flow		Flussi di cassa
Certainty equivalent	CE	Certo equivalente
Combined Ratio		Indicator relating the cost of claims, commission and general expenses to net premiums collected Contractual limits
Contract boundaries		
Cost of Capital	CoC	Costo del Capitale
Credit protection insurance	CPI	Credit insurance cover
Deferred Tax Assets	DTA	Deferred Tax Assets
Deferred Tax Liabilities	DTL	Deferred Tax Liabilities
Dread disease		Insurance cover for serious illnesses
Excess of loss	XL	Type of reinsurance arrangement for excess of loss Certainty equivalent approach
Certainty Equivalent		
Dynamic Policyholder Behaviour		Dynamic policyholder behaviour
Standard formula		Formula used to calculate the Group SCR
Excess of Assets Over Liabilities		Eccesso delle attività sulle passività
Expected Profits Included in Future Premiums	EPIFP	Method to calculate Expected Profits Included in Future Premiums
Expert Judgement		Giudizio esperto
Expense Ratio		Indicator that refers general expenses to net premiums collected
Future Discretionary Benefits	FDB	Future discretionary benefits
Homogeneous Risk Groups	HRG	Gruppi di rischio omogenei
Lines of Business	LoB	Linee di Business
Long Term Guarantees Measures	LGT	Misure di garanzie a lungo termine
Loss Ratio		Indicator that refers the cost relative to claims to net collected premiums
Management Actions	FMG	Future Management Actions
Market Consistent		Market valuation
Market Value Balance Sheet	MVBS	Financial Statements prepared according to Solvency II
Minimum Capital Requirement	MCR	Minimum capital requirement

Non-Similar To Life Technique	Non-SLT	Health products with characteristics similar to the Non-Life business
Reference Curve		Curva di riferimento
Ring Fenced Funds	RFF	Separate funds
Risk Appetite Framework	RAF	Risk Appetite
Risk Free Curve		Curva priva di rischio
Risk Margin	RM	Risk Margin
Risk Neutral		Neutrali rispetto al rischio
Run Off		Existing portfolio
Non Hedgeable Risks		Rischi non immunizzabili
Similar To Life Technique	SLT	Health products with characteristics similar to the Life business
Solvency Capital Requirement	SCR	Solvency Capital Requirement
Solvency Ratio	SR	Margine di Solvibilità
Statutory Reserve		Riserva civilistica
Technical Provisions	TP	Riserve tecniche
Unbundling		Scomposizione del contratto
Underwriting Risks		Rischi di sottoscrizione
Volatility Adjustment	VA	Aggiustamento di volatilità

In order to guarantee consistency in the representation of data, the Solvency regulations have defined the insurance business lines as follows:

Solvency II Lines of Business		
A. Non-Life insurance obligations		
1	Medical expense insurance	Medical expense insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
2	Income protection insurance	Income protection insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
3	Workers' compensation insurance	Health insurance obligations which relate to accidents at work, industrial injury and occupational diseases and where the underlying business is not pursued on a similar technical basis to that of life insurance.
4	Motor vehicle liability insurance	Insurance obligations which cover all liabilities arising out of the use of motor vehicles operating on land (including carrier's liability).
5	Other motor insurance	Insurance obligations which cover all damage to or loss of land vehicles (including railway rolling stock).

6	Marine, aviation and transport insurance Marine, aviation and transport insurance	Insurance obligations which cover all damage or loss to sea, lake, river and canal vessels, aircraft, and damage to or loss of goods in transit or baggage irrespective of the form of transport. Insurance obligations which cover liabilities arising out of the use of aircraft, ships, vessels or boats on the sea, lakes, rivers or canals (including carrier's liability).
7	Fire and other damage to property insurance	Insurance obligations which cover all damage to or loss of property other than those included in the lines of business 5 and 6 due to fire, explosion, natural forces including storm, hail or frost, nuclear energy, land subsidence and any event such as theft.
8	General liability insurance	Insurance obligations which cover all liabilities other than those in the lines of business 4 and 6.
9	Credit and suretyship insurance	Insurance obligations which cover insolvency, export credit, instalment credit, mortgages, agricultural credit and direct and indirect suretyship.
10	Legal expenses insurance	Insurance obligations which cover legal expenses and cost of litigation.
11	Assistance	Insurance obligations which cover assistance for persons who get into difficulties while travelling, while away from home or while away from their habitual residence.
12	Miscellaneous financial loss	Insurance obligations which cover employment risk, insufficiency of income, bad weather, loss of benefit, continuing general expenses, unforeseen trading expenses, loss of market value, loss of rent or revenue, indirect trading losses other than those mentioned above, other financial loss (non-trading) as well as any other risk of Non-Life insurance not covered by the lines of business 1 to 11.

B. Proportional non-life reinsurance obligations

13-24 Proportional reinsurance obligations that relate to policies in the areas of activity from 1 to 12 respectively.

C. Non-proportional non-life reinsurance obligations

25	Non-proportional Health reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 1 to 3.
26	Non-proportional casualty reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 4 and 8.
27	Non-proportional marine, aviation and transport reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in line of business 6.
28	Non-proportional property reinsurance	Non-proportional reinsurance obligations relating to insurance obligations included in lines of business 5, 7 and 9 to 12.

D. Life insurance obligations

29	Health insurance	Health insurance obligations where the underlying business is pursued on a similar technical basis to that of life insurance, other than those included in line of business 33.
30	Insurance with profit participation	Insurance obligations with profit participation other than obligations included in line of business 33 and 34.
31	Index-linked and unit-linked insurance	Insurance obligations with Index-linked and unit-linked benefits other than those included in lines of business 33 and 34.
32	Other life insurance	Other life insurance obligations other than obligations included in lines of business 29 to 31, 33 and 34.
33	Annuities stemming from Non-Life insurance contracts and relating to Health insurance obligations	
34	Annuities stemming from Non-Life insurance contracts and relating to insurance obligations other than Health insurance obligations Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	
E.	Life reinsurance obligations	
35	Health reinsurance	Reinsurance obligations which relate to the obligations included in lines of business 29 and 33.
36	Life reinsurance	Reinsurance obligations which relate to the obligations included in lines of business 30 to 32 and 34

QRT INTESA SANPAOLO VITA GROUP

QRT Intesa Sanpaolo Vita Group: S.02.01.02

Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	-
Deferred tax assets	R0040	2.684.864
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	29.148
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	87.843.960
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	20.533
Equities	R0100	1.997.862
Equities - listed	R0110	1.899.111
Equities - unlisted	R0120	98.751
Bonds	R0130	72.862.294
Government Bonds	R0140	55.928.660
Corporate Bonds	R0150	13.976.563
Structured notes	R0160	2.928.978
Collateralised securities	R0170	28.093
Collective Investments Undertakings	R0180	12.865.360
Derivatives	R0190	97.910
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	86.372.838
Loans and mortgages	R0230	711
Loans on policies	R0240	596
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	115
Reinsurance recoverables from:	R0270	89.728
Non-life and health similar to non-life	R0280	89.728
Non-life excluding health	R0290	55.115
Health similar to non-life	R0300	34.614
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	375.501
Reinsurance receivables	R0370	104.466
Receivables (trade, not insurance)	R0380	3.389.827
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	3.093.196
Any other assets, not elsewhere shown	R0420	385.429
Total assets	R0500	184.369.667

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	1.118.810
Technical provisions – non-life (excluding health)	R0520	570.746
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	537.342
Risk margin	R0550	33.404
Technical provisions - health (similar to non-life)	R0560	548.064
Technical provisions calculated as a whole	R0570	1.195
Best Estimate	R0580	519.845
Risk margin	R0590	27.025
Technical provisions - life (excluding index-linked and unit-linked)	R0600	83.045.218
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	83.045.218
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	81.725.257
Risk margin	R0680	1.319.961
Technical provisions – index-linked and unit-linked	R0690	84.023.115
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	83.528.787
Risk margin	R0720	494.328
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	42.680
Pension benefit obligations	R0760	14.800
Deposits from reinsurers	R0770	11.747
Deferred tax liabilities	R0780	3.560.733
Derivatives	R0790	170.449
Debts owed to credit institutions	R0800	21.070
Financial liabilities other than debts owed to credit institutions	R0810	15.983
Insurance & intermediaries payables	R0820	1.523.247
Reinsurance payables	R0830	74.770
Payables (trade, not insurance)	R0840	499.582
Subordinated liabilities	R0850	1.968.825
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	1.968.825
Any other liabilities, not elsewhere shown	R0880	393.833
Total liabilities	R0900	176.484.862
Excess of assets over liabilities	R1000	7.884.805

QRT Intesa Sanpaolo Vita Group: S.05.01.02

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											Line of Business for: accepted non-proportional reinsurance				Totale		
	Medical expense insurance C0010	Income protection insurance C0020	Workers' compensation insurance C0030	Motor vehicle liability insurance C0040	Other motor insurance C0050	Marine, aviation and transport insurance C0060	Fire and other damage to property insurance C0070	General liability insurance C0080	Credit and suretyship insurance C0090	Legal expenses insurance C0100	Assistance C0110	Miscellaneous financial loss C0120	Health C0130	Casualty C0140	Marine, aviation, transport C0150		Property C0160	
Premiums written																		
Gross - Direct Business	487.704	362.728		74.423	17.602	126	240.736	128.359	330	21.129	14.600	58.056					1.435.877	
Gross - Proportional reinsurance accepted																		
Gross - Non-proportional reinsurance accepted																		
Reinsurers' share	51.261	31.217		5.278	1.843	10	17.007	33.644	56	15.943	2.952	13.002					172.010	
Net	436.444	331.511		69.147	15.759	116	223.729	94.715	337	5.186	11.609	45.054					1.263.867	
Premiums earned																		
Gross - Direct Business	475.076	414.149		84.497	19.704	140	203.454	119.864	927	20.903	15.779	82.747					1.437.960	
Gross - Proportional reinsurance accepted																		
Gross - Non-proportional reinsurance accepted																		
Reinsurers' share	46.212	31.192		5.020	1.643	22	15.415	29.180	142	15.055	2.601	12.304					161.326	
Net	427.464	382.957		79.477	18.061	117	188.039	90.684	785	5.329	13.178	70.443					1.276.634	
Claims incurred																		
Gross - Direct Business	338.694	157.027		54.278	11.740	344	42.404	13.630	-24	903	1.605	7.611					678.923	
Gross - Proportional reinsurance accepted																		
Gross - Non-proportional reinsurance accepted																		
Reinsurers' share	67.574	14.406		9.578	1.807	41	3.320	6.007	-325	1.100	1.497	5.244					95.247	
Net	330.091	142.621		44.702	9.933	303	39.084	7.623	301	-186	308	2.367					583.676	
Changes in other technical provisions																		
Gross - Direct Business	-3.447	474		-	219	27	11	-2	-	-	-	3					-1.718	
Gross - Proportional reinsurance accepted																		
Gross - Non-proportional reinsurance accepted																		
Reinsurers' share	-	-		-	-	-	-	-	-	-	-	-					-	
Net	-3.447	474		-	219	27	11	-2	-	-	-	3					-1.718	
Expenses incurred																		
Other expenses	57.509	130.371		28.023	5.096	65	88.070	33.155	123	-1.759	5.651	17.736					364.402	
Total expenses																		377.537

QRT Intesa Sanpaolo Vita Group: S.22.01.22

Annex I
S.22.01.22

Impact of long term guarantees and transitional measures

(in migliaia di euro)

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	168.187.143	-	-	460.840	-
Basic own funds	R0020	9.208.916	-	-	-319.162	-
Eligible own funds to meet Solvency Capital Requirement	R0050	9.208.916	-	-	-319.162	-
Solvency Capital Requirement	R0090	4.536.557	-	-	197.825	-

QRT Intesa Sanpaolo Vita Group: S.23.01.22

Annex I
S.23.01.22
Own funds

(in migliaia di euro)

		Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040	Tier 3 C0050
Basic own funds before deduction for participations in other financial sector						
Ordinary share capital (gross of own shares)	R0010	677.869	677.869			
Non-available called but not paid in ordinary share capital at group level	R0020					
Share premium account related to ordinary share capital	R0030	1.328.097	1.328.097			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Non-available subordinated mutual member accounts at group level	R0060					
Surplus funds	R0070					
Non-available surplus funds at group level	R0080					
Preference shares	R0090					
Non-available preference shares at group level	R0100					
Share premium account related to preference shares	R0110					
Non-available share premium account related to preference shares at group level	R0120					
Reconciliation reserve	R0130	5.303.806	5.303.806			
Subordinated liabilities	R0140	1.968.825		739.910	1.228.915	
Non-available subordinated liabilities at group level	R0150					
An amount equal to the value of net deferred tax assets	R0160					
The amount equal to the value of net deferred tax assets not available at the group level	R0170					
Other items approved by supervisory authority as basic own funds not specified above	R0180					
Non available own funds related to other own funds items approved by supervisory authority	R0190					
Minority interests (if not reported as part of a specific own fund item)	R0200					
Non-available minority interests at group level	R0210	- 69.682	- 69.682			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities	R0230					
whereof deducted according to art 228 of the Directive 2009/138/EC	R0240					
Deductions for participations where there is non-availability of information (Article 229)	R0250					
Deduction for participations included by using D&A when a combination of methods is used	R0260					
Total of non-available own fund items	R0270					
Total deductions	R0280					
Total basic own funds after deductions	R0290	9.348.280	7.379.455	739.910	1.228.915	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Non available ancillary own funds at group level	R0380					
Other ancillary own funds	R0390	-				
Total ancillary own funds	R0400	-				-
Own funds of other financial sectors						
Reconciliation reserve	R0410					
Institutions for occupational retirement provision	R0420					
Non regulated entities carrying out financial activities	R0430					
Total own funds of other financial sectors	R0440					
Own funds when using the D&A, exclusively or in combination of method 1						
Own funds aggregated when using the D&A and combination of method	R0450					
Own funds aggregated when using the D&A and a combination of method net of IGT	R0460					
Total available own funds to meet the consolidated group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	R0520	9.208.916	7.240.091	739.910	1.228.915	-
Total available own funds to meet the minimum consolidated group SCR	R0530	9.208.916	7.240.091	739.910	1.228.915	-
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	9.208.916	7.240.091	739.910	1.228.915	-
Total-eligible own funds to meet the minimum consolidated group SCR	R0570	8.431.175	7.240.091	739.910	451.174	
Minimum consolidated Group SCR	R0610	2.255.872				
Ratio of Eligible own funds to Minimum Consolidated Group SCR	R0650	37,4%				
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	9.208.916	7.240.091	739.910	1.228.915	
Group SCR	R0680	4.536.557				
Ratio of Eligible own funds to group SCR including other financial sectors and the undertakings included via D&A	R0690	203%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	7.884.805
Own shares (included as assets on the balance sheet)	R0710	68.961
Forseeable dividends, distributions and charges	R0720	506.071
Other basic own fund items	R0730	2.005.967
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	-
Other non available own funds	R0750	-
Reconciliation reserve before deduction for participations in other financial sector	R0760	5.303.806
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	1.158.543
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	57.996
Total EPIFP	R0790	1.216.539

QRT Intesa Sanpaolo Vita Group: S.25.01.22

Annex I

S.25.01.22

Solvency Capital Requirement - for groups on Standard Formula

(in migliaia di euro)

		Net solvency capital requirement	USP	Simplifications
		C0110	C0080	C0090
Market risk	R0010	2.028.480		
Counterparty default risk	R0020	464.677		
Life underwriting risk	R0030	3.692.181		
Health underwriting risk	R0040	170.777		
Non-life underwriting risk	R0050	205.679		
Diversification	R0060	-1.668.886		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	4.892.909		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	526.608
Loss-absorbing capacity of technical provisions	R0140	-5.361.085
Loss-absorbing capacity of deferred taxes	R0150	-967.041
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	4.452.475
Capital add-on already set	R0210	84.082
Solvency capital requirement	R0220	4.536.557
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Minimum consolidated group solvency capital requirement	R0470	2.255.872
Information on other entities		
Capital requirement for other financial sectors (Non-insurance capital requirements)	R0500	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies	R0510	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Institutions for occupational retirement provisions	R0520	
Capital requirement for other financial sectors (Non-insurance capital requirements) - Capital requirement for non - regulated entities carrying out financial activities	R0530	
Capital requirement for non-controlled participation requirements	R0540	
Capital requirement for residual undertakings	R0550	

Overall SCR

SCR for undertakings included via D and A	R0560	
Solvency capital requirement	R0570	4.536.557

QRT Intesa Sanpaolo Vita Group: S.32.01.22

Annex I

S.32.01.22

Undertakings in the scope of the group

Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/non mutual)	Supervisory Authority
C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080
IT	LEI/5493000YZPPFRVZPF37	LEI	Fideuram Vita	1	Societa Per Azioni	2	IVASS
IT	LEI/81560058D9F02B0FCD27	LEI	Intesa Sanpaolo Assicura	2	Societa Per Azioni	2	IVASS
IE	LEI/635400H9NIJ5SQ65LG47	LEI	Intesa Sanpaolo Life	1	Societa Per Azioni	2	CBI
IT	LEI/5493000UM31PJ24TTSR94	LEI	Intesa Sanpaolo Vita	4	Societa Per Azioni	2	IVASS
IT	LEI/815600F2CB73D0455054	LEI	Intesa Sanpaolo RBM	2	Societa Per Azioni	2	IVASS

Ranking criteria (in the group currency)								
Total Balance Sheet (for (re)insurance undertakings)	Total Balance Sheet (for other regulated undertakings)	Total Balance Sheet (non-regulated undertakings)	Written premiums net of reinsurance ceded under IFRS or local GAAP for (re)insurance undertakings	Turn over defined as the gross revenue under IFRS or local GAAP for other types of undertakings or insurance holding companies	Underwriting performance	Investment performance	Total performance	Accounting standard
C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170
36.268.780.837	-	-	3.269.427.086	-	15.269.000	557.524.749	46.153.451	2
2.333.108.352	-	-	800.689.625	-	815.373.036	83.121.815	119.690.548	2
35.432.078.129	-	-	2.849.510.575	-	222.896.550	5.344.271.000	160.697.465	1
112.343.841.122	-	-	10.099.520.176	-	4.047.594.829	3.694.245.948	319.055.358	2
1.015.666.972	-	-	462.752.225	-	28.284.000	21.434.000	81.832.551	2



QRT INTESA SANPAOLO VITA S.P.A.

QRT Intesa Sanpaolo Vita: S.02.01.02

Annex I
S.02.01.02
Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	2.339.191
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	9.235
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	82.819.966
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	3.007.548
Equities	R0100	1.905.696
Equities - listed	R0110	1.807.079
Equities - unlisted	R0120	98.617
Bonds	R0130	66.125.374
Government Bonds	R0140	50.460.075
Corporate Bonds	R0150	12.939.616
Structured notes	R0160	2.697.752
Collateralised securities	R0170	27.931
Collective Investments Undertakings	R0180	11.684.478
Derivatives	R0190	96.870
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	22.667.403
Loans and mortgages	R0230	185
Loans on policies	R0240	185
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	-
Non-life and health similar to non-life	R0280	-
Non-life excluding health	R0290	-
Health similar to non-life	R0300	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	19.157
Reinsurance receivables	R0370	6.252
Receivables (trade, not insurance)	R0380	2.086.813
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	2.288.389
Any other assets, not elsewhere shown	R0420	107.250
Total assets	R0500	112.343.841

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	1.195
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	1.195
Technical provisions calculated as a whole	R0570	1.195
Best Estimate	R0580	-
Risk margin	R0590	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	77.607.188
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	77.607.188
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	76.367.132
Risk margin	R0680	1.240.056
Technical provisions – index-linked and unit-linked	R0690	21.629.003
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	21.434.757
Risk margin	R0720	194.246
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	26.081
Pension benefit obligations	R0760	6.755
Deposits from reinsurers	R0770	11.021
Deferred tax liabilities	R0780	2.974.627
Derivatives	R0790	170.417
Debts owed to credit institutions	R0800	21.070
Debts owed to credit institutions resident domestically	ER0801	21.070
Financial liabilities other than debts owed to credit institutions	R0810	3.866
debts owed to non-credit institutions resident domestically	ER0812	3.866
Insurance & intermediaries payables	R0820	1.004.345
Reinsurance payables	R0830	134
Payables (trade, not insurance)	R0840	353.079
Subordinated liabilities	R0850	1.839.396
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	1.839.396
Any other liabilities, not elsewhere shown	R0880	110.782
Total liabilities	R0900	105.758.958
Excess of assets over liabilities	R1000	6.584.883

QRT Intesa Sanpaolo Vita: S.05.01.02

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

(in migliaia di euro)

	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)											Total
	Medical expense insurance C0710	Income protection insurance C0020	Workers' compensation insurance C0030	Motorvehicle liability insurance C0040	Other motor insurance C0050	Marine, aviation and transport insurance C0060	Fire and other damage to property insurance C0070	General liability insurance C0080	Credit and suretyship insurance C0090	Legal expenses insurance C0100	Assistance C0110	
Premiums written												
Gross - Direct Business	R0110	2	444	-	-	-	-	-	-	-	-	446
Gross - Proportional reinsurance accepted	R0130	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0130	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0140	-	21	-	-	-	-	-	-	-	-	21
Net	R0200	4	423	-	-	-	-	-	-	-	-	427
Premiums earned												
Gross - Direct Business	R0210	3	455	-	-	-	-	-	-	-	-	458
Gross - Proportional reinsurance accepted	R0230	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0230	-	22	-	-	-	-	-	-	-	-	22
Reinsurers' share	R0240	-	433	-	-	-	-	-	-	-	-	433
Net	R0300	3	433	-	-	-	-	-	-	-	-	435
Claims incurred												
Gross - Direct Business	R0310	-	218	-	-	-	-	-	-	-	-	218
Gross - Proportional reinsurance accepted	R0330	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0330	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0340	-	0	-	-	-	-	-	-	-	-	0
Net	R0400	-	218	-	-	-	-	-	-	-	-	218
Changes in other technical provisions												
Gross - Direct Business	R0410	-	0	-	-	-	-	-	-	-	-	0
Gross - Proportional reinsurance accepted	R0430	-	-	-	-	-	-	-	-	-	-	-
Gross - Non-proportional reinsurance accepted	R0430	-	-	-	-	-	-	-	-	-	-	-
Reinsurers' share	R0440	-	0	-	-	-	-	-	-	-	-	0
Net	R0500	-	0	-	-	-	-	-	-	-	-	0
Expenses incurred												
Other expenses	R1200	-	247	-	-	-	-	-	-	-	-	247
Total expenses	R1300	-	-	-	-	-	-	-	-	-	-	-

QRT Intesa Sanpaolo Vita: S.12.01.02

	Insurance with profit participation	Index-linked and unit-linked insurance		Other life insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)		
		Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees					
	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0150
Technical provisions calculated as a whole										
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole										
Technical Provisions calculated as a sum of BE and RM										
Gross Best Estimate										
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	75.954.647		20.596.538	838.219				412.485		97.801.889
Best estimate minus recoverables from reinsurance/SPV and Finite Re - Total										
Risk Margin										
Amount of the transitional on Technical Provisions	1.196.393	194.246			43.663					1.434.302
Technical Provisions calculated as a whole										
Best estimate	75.954.647		20.596.538	838.219				412.485		97.801.889
Risk margin										
Technical provisions - total	77.151.040	21.629.003			456.148					99.236.190

(in migliaia di euro)

QRT Intesa Sanpaolo Vita: S.19.01.21

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year /
Underwriting year 2020 1

Gross Claims Paid (non-cumulative) (absolute amount)

Year		Development year															In Current year	Sum of years (cumulative)	
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14			15 & +
Prior	R0100	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-13	R0120	-	-	-	103	-	-	-	-	-	-	-	-	-	-	-	-	-	103
N-12	R0130	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-11	R0140	-	55	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	55
N-10	R0150	55	251	55	79	-	-	-	55	-	-	-	-	-	-	-	-	-	495
N-9	R0160	55	110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	165
N-8	R0170	103	55	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	158
N-7	R0180	203	-	-	-	-	-	103	-	-	-	-	-	-	-	-	-	-	307
N-6	R0190	-	258	55	-	-	-	-	-	-	-	-	-	-	-	-	-	-	313
N-5	R0200	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-4	R0210	103	158	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	262
N-3	R0220	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-2	R0230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-1	R0240	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N	R0250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total																	R0260	-	

Gross undiscounted Best Estimate Claims Provisions (absolute amount)

Year		Development year															Year end (discounted data)	
		0	1	2	3	4	5	6	7	8	9	10	11	12	13	14		15 & +
Prior	R0100	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0110	C0120	C0130	C0140	C0150	C0160	C0360
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-13	R0120	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-12	R0130	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-11	R0140	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-10	R0150	-	-	-	-	-	-	-	-	-	-	52	-	-	-	-	-	-
N-9	R0160	-	-	-	-	-	-	-	-	-	104	-	-	-	-	-	-	-
N-8	R0170	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-7	R0180	-	-	-	-	-	-	-	104	-	-	-	-	-	-	-	-	-
N-6	R0190	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-5	R0200	-	-	-	-	-	307	-	-	-	-	-	-	-	-	-	-	-
N-4	R0210	-	-	-	-	98	150	-	-	-	-	-	-	-	-	-	-	-
N-3	R0220	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-2	R0230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N-1	R0240	-	104	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
N	R0250	98	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.102
Total																	R0260	1.102

QRT Intesa Sanpaolo Vita: S.22.01.21

Annex I
S.22.01.21

Impact of long term guarantees and transitional measures

(in migliaia di euro)

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	99.237.385	-	-	430.159	-
Basic own funds	R0020	7.851.621	-	-	-297.584	-
Eligible own funds to meet Solvency Capital Requirement	R0050	7.851.621	-	-	-297.584	-
Solvency Capital Requirement	R0090	3.564.141	-	-	241.684	-
Eligible own funds to meet Minimum Capital Requirement	R0100	7.072.908	-	-	-275.832	-
Minimum Capital Requirement	R0110	1.603.864	-	-	-275.832	-

QRT Intesa Sanpaolo Vita: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	320.423	320.423			
Share premium account related to ordinary share capital	R0030	1.328.097	1.328.097			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	4.363.705	4.363.705			
Subordinated liabilities	R0140	1.839.396		739.910	1.099.486	
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	7.851.621	6.012.225	739.910	1.099.486	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					-
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	7.851.621	6.012.225	739.910	1.099.486	-
Total available own funds to meet the MCR	R0510	7.851.621	6.012.225	739.910	1.099.486	-
Total eligible own funds to meet the SCR	R0540	7.851.621	6.012.225	739.910	1.099.486	-
Total eligible own funds to meet the MCR	R0550	7.072.908	6.012.225	739.910	320.773	
SCR	R0580	3.564.141				
MCR	R0600	1.603.864				
Ratio of Eligible own funds to SCR	R0620	220%				
Ratio of Eligible own funds to MCR	R0640	441%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	6.584.883
Own shares (held directly and indirectly)	R0710	68.187
Foreseeable dividends, distributions and charges	R0720	504.471
Other basic own fund items	R0730	1.648.520
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	4.363.705
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	945.204
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	
Total Expected profits included in future premiums (EPIFP)	R0790	945.204

QRT Intesa Sanpaolo Vita: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Net solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	2.019.555		
Counterparty default risk	R0020	314.002		
Life underwriting risk	R0030	2.874.872		
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-1.194.267		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	4.014.162		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	357.949
Loss-absorbing capacity of technical provisions	R0140	-5.040.502
Loss-absorbing capacity of deferred taxes	R0150	-807.970
Capital requirement for business operated in accordance with Art. 4	R0160	
Solvency capital requirement excluding capital add-on	R0200	3.564.141
Capital add-on already set	R0210	
Solvency capital requirement	R0220	3.564.141

Other information on SCR

Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for	R0410	
Total amount of Notional Solvency Capital Requirements for ring	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo Vita: S.28.02.01

Annex I
S.28.02.01

Minimum Capital Requirement - Both life and non-life insurance activity

(in migliaia di euro)

	Non-life activities		Life activities	
	MCR _(NL,NL)		MCR _(NL,L)	
	Result		Result	
	C0010		C0020	
Linear formula component for non-life insurance and reinsurance obligations	R0010	193	-	

(in migliaia di euro)

	Non-life activities		Life activities	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
	C0030	C0040	C0050	C0060
Medical expense insurance and proportional reinsurance	R0020	1	3	-
Income protection insurance and proportional reinsurance	R0030	1.194	429	-
Workers' compensation insurance and proportional reinsurance	R0040			
Motor vehicle liability insurance and proportional reinsurance	R0050			
Other motor insurance and proportional reinsurance	R0060			
Marine, aviation and transport insurance and proportional reinsurance	R0070			
Fire and other damage to property insurance and proportional reinsurance	R0080			
General liability insurance and proportional reinsurance	R0090			
Credit and suretyship insurance and proportional reinsurance	R0100			
Legal expenses insurance and proportional reinsurance	R0110			
Assistance and proportional reinsurance	R0120			
Miscellaneous financial loss insurance and proportional reinsurance	R0130			
Non-proportional health reinsurance	R0140			
Non-proportional casualty reinsurance	R0150			
Non-proportional marine, aviation and transport reinsurance	R0160			
Non-proportional property reinsurance	R0170			

(in migliaia di euro)

	Non-life activities		Life activities	
	MCR _(L,NL)		MCR _(L,L)	
	Result		Result	
	C0070		C0080	
Linear formula component for life insurance and reinsurance obligations	R0200	-	2.388.879	

(in migliaia di euro)

	Non-life activities		Life activities	
	Net (of reinsurance/SPV) best estimate and TP	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP	Net (of reinsurance/SPV) total capital at risk
	C0090	C0100	C0110	C0120
Obligations with profit participation - guaranteed benefits	R0210		68.976.554	
Obligations with profit participation - future discretionary benefits	R0220		6.978.093	
Index-linked and unit-linked insurance obligations	R0230		21.434.757	
Other life (re)insurance and health (re)insurance obligations	R0240		412.485	
Total capital at risk for all life (re)insurance obligations	R0250			58.430.985

Overall MCR calculation

		C0130
Linear MCR	R0300	2.389.072
SCR	R0310	3.564.141
MCR cap	R0320	1.603.864
MCR floor	R0330	891.035
Combined MCR	R0340	1.603.864
Absolute floor of the MCR	R0350	3.700
		C0130
Minimum Capital Requirement	R0400	1.603.864

Notional non-life and life MCR calculation

		Non-life activities	Life activities
		C0140	C0150
Notional linear MCR	R0500	193	2.388.879
Notional SCR excluding add-on (annual or latest calculation)	R0510	288	3.563.853
Notional MCR cap	R0520	130	1.603.734
Notional MCR floor	R0530	72	890.963
Notional Combined MCR	R0540	130	1.603.734
Absolute floor of the notional MCR	R0550	2.500	3.700
Notional MCR	R0560	2.500	1.603.734

QRT INTESA SANPAOLO ASSICURA S.P.A.

QRT Intesa Sanpaolo Assicura: S.02.01.02

Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	39.804
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	3.132
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	1.695.249
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	261
Equities - listed	R0110	261
Equities - unlisted	R0120	-
Bonds	R0130	1.259.031
Government Bonds	R0140	1.133.984
Corporate Bonds	R0150	111.116
Structured notes	R0160	13.930
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	435.957
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	115
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	115
Reinsurance recoverables from:	R0270	72.160
Non-life and health similar to non-life	R0280	72.160
Non-life excluding health	R0290	55.112
Health similar to non-life	R0300	17.048
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	237.673
Reinsurance receivables	R0370	36.306
Receivables (trade, not insurance)	R0380	136.094
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	92.086
Any other assets, not elsewhere shown	R0420	20.488
Total assets	R0500	2.333.108

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	898.453
Technical provisions – non-life (excluding health)	R0520	570.696
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	537.294
Risk margin	R0550	33.402
Technical provisions - health (similar to non-life)	R0560	327.757
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	308.857
Risk margin	R0590	18.900
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	5.986
Pension benefit obligations	R0760	4.444
Deposits from reinsurers	R0770	727
Deferred tax liabilities	R0780	182.647
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	1.652
debts owed to non-credit institutions resident domestically	ER0812	1.652
Insurance & intermediaries payables	R0820	39.700
Reinsurance payables	R0830	71.950
Payables (trade, not insurance)	R0840	124.133
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	93.210
Total liabilities	R0900	1.422.902
Excess of assets over liabilities	R1000	910.207

QRT Intesa Sanpaolo Assicura: S.17.01.02

Annex I
S.17.01.02
Non-life Technical Provisions

(in millions of euro)

	Direct business and accepted proportional reinsurance											Accepted non-proportional reinsurance				Total Non-Life obligation	
	Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional reinsurance (health)	Non-proportional reinsurance (casualty)	Non-proportional reinsurance (marine, aviation and transport)		Non-proportional reinsurance (property)
	R0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180
Technical provisions calculated as a whole																	
Total recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0010																
Technical provisions calculated as a sum of BE and RM																	
Best estimate	R0050																
Premium provisions																	
Gross	R0060	-9,894	143,838		28,496	5,270	2	147,253	16,291	199	464	1,377					394,810
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140	456	-447		831	-7	-1	1,535	4,436	63	180	1,018					13,343
Net Best Estimate of Premium Provisions	R0150	-10,349	144,345		25,665	5,277	3	145,719	11,855	136	283	359					371,467
Claims provisions																	
Gross	R0160	7,290	167,583		141,863	4,313	348	52,712	60,695	1,359	5,762	606					461,341
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240	1,441	15,599		12,840	896	40	7,573	11,696	595	2,704	410					58,817
Net Best Estimate of Claims Provisions	R0250	5,849	151,984		129,022	3,417	307	45,139	48,999	765	3,058	196					402,524
Total Best estimate - gross	R0260	-2,603	311,461		168,359	9,583	350	190,966	76,986	1,559	6,226	1,982					846,151
Total Best estimate - net	R0270	-4,500	296,309		154,688	8,694	310	190,898	60,854	901	3,542	955					773,991
Risk margin	R0280	1,265	17,115		3,138	284	19	14,075	4,260	77	217	116					52,302
Amount of line transitional on Technical Provisions																	
Best estimate	R0290	-	-		-	-	-	-	-	-	-	-					-
Best estimate	R0300	-	-		-	-	-	-	-	-	-	-					-
Risk margin	R0310	-	-		-	-	-	-	-	-	-	-					-
Technical provisions - total																	
Technical provisions - total	R0320	-818	328,575		171,497	9,867	369	214,041	81,245	1,636	6,443	2,098					898,453
Recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330	1,897	15,151		13,671	889	40	9,108	16,132	657	2,885	1,427					72,180
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total	R0340	-2,715	313,424		157,826	8,978	329	204,933	65,114	978	3,558	671					826,292

QRT Intesa Sanpaolo Assicura: S.19.01.21

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	2020	1
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Gross Claims Paid (non-cumulative)
(absolute amount)

Year	Development year															In Current year	Sum of years (cumulative)		
	(in migliaia di euro)																	(in migliaia di euro)	(in migliaia di euro)
	0	1	2	3	4	5	6	7	8	9	10 & +	11	12	13	14			15 & +	C0170
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160			
Prior																			
N-14	R0110	54.319	47.980	22.606	8.603	5.127	2.086	2.643	1.616	2.983	1.560	2.260	1.331	296	51	1.302	R0100	2.501	
N-13	R0120	44.128	52.028	17.435	8.102	3.527	1.956	2.360	1.823	1.660	927	1.011	590	71	155	R0110	1.302		
N-12	R0130	53.017	44.669	22.432	5.908	2.808	2.116	1.349	1.326	515	878	351	466	766	R0120	155			
N-11	R0140	49.583	55.088	20.659	9.287	6.197	4.880	1.813	1.594	1.086	399	379	418	R0130	766				
N-10	R0150	52.178	57.960	23.213	9.689	4.720	3.385	1.927	1.042	562	728	245	R0140	418					
N-9	R0160	62.147	65.060	29.719	6.910	3.011	1.783	2.789	739	733	1.019	R0150	245						
N-8	R0170	66.061	63.689	21.242	5.651	1.870	1.838	2.573	745	1.265	R0160	1.019							
N-7	R0180	70.455	58.361	21.918	5.596	3.507	3.184	761	677	R0170	1.265								
N-6	R0190	75.727	58.804	22.569	8.530	2.046	1.628	784	R0180	677									
N-5	R0200	82.724	68.070	29.389	7.865	3.638	1.715	R0190	784										
N-4	R0210	79.088	74.423	28.355	7.825	5.019	R0200	1.715											
N-3	R0220	98.823	90.692	28.237	9.118	R0210	5.019												
N-2	R0230	91.889	85.259	27.343	R0220	9.118													
N-1	R0240	97.816	110.498	R0230	27.343														
N	R0250	93.191	R0240	93.191															
			R0250	256.019															
			Total	R0260	2.531.728														

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Year	Development year															Year end (discounted data)		
	(in migliaia di euro)																(in migliaia di euro)	
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14		15 & +	C0360
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350		
Prior	R0100																R0100	-
N-14	R0110	-	-	-	-	-	-	-	16.468	12.715	7.880	4.302	2.623	2.486	7.814	R0110	-	
N-13	R0120	-	-	-	-	-	-	14.046	10.417	9.140	5.957	3.790	3.582	2.737	R0120	-		
N-12	R0130	-	-	-	-	-	-	15.351	11.139	9.018	6.343	3.779	2.179	1.145	R0130	-		
N-11	R0140	-	-	-	-	-	25.030	18.225	12.789	8.326	5.759	3.709	3.000	R0140	-			
N-10	R0150	-	-	-	-	32.855	23.268	16.785	11.650	7.872	5.093	4.457	R0150	-				
N-9	R0160	-	-	-	36.525	29.207	19.867	11.933	7.280	4.400	3.247	R0160	-					
N-8	R0170	-	-	44.204	31.731	24.481	15.825	9.748	6.438	5.022	R0170	-						
N-7	R0180	-	60.008	34.299	24.019	14.503	9.979	7.011	4.892	R0180	-							
N-6	R0190	145.294	70.212	39.036	25.015	16.563	11.647	9.863	R0190	-								
N-5	R0200	157.835	72.696	38.499	26.463	18.958	15.162	R0200	-									
N-4	R0210	152.534	74.907	43.432	31.821	21.776	R0210	-										
N-3	R0220	205.828	81.704	48.749	30.487	R0220	-											
N-2	R0230	204.001	79.807	40.959	R0230	-												
N-1	R0240	223.721	94.285	R0240	-													
N	R0250	210.720	R0250	-														
			Total	R0260	-													

QRT Intesa Sanpaolo Assicura: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	27.912	27.912			
Share premium account related to ordinary share capital	R0030	-	-			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-			
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	574.998	574.998			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	602.910	602.910	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	602.910	602.910		-	-
Total available own funds to meet the MCR	R0510	602.910	602.910		-	-
Total eligible own funds to meet the SCR	R0540	602.910	602.910		-	-
Total eligible own funds to meet the MCR	R0550	602.910	602.910		-	-
SCR	R0580	242.120				
MCR	R0600	108.954				
Ratio of Eligible own funds to SCR	R0620	249%				
Ratio of Eligible own funds to MCR	R0640	553%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	910.207
Own shares (held directly and indirectly)	R0710	261
Foreseeable dividends, distributions and charges	R0720	307.035
Other basic own fund items	R0730	27.912
Adjustment for restricted own fund items in respect of matching adjustment	R0740	-
Reconciliation reserve	R0760	574.998
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	55.373
Total Expected profits included in future premiums (EPIFP)	R0790	55.373

QRT Intesa Sanpaolo Assicura: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Net solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	61.190		
Counterparty default risk	R0020	49.367		
Life underwriting risk	R0030			
Health underwriting risk	R0040	109.091		
Non-life underwriting risk	R0050	205.446		
Diversification	R0060	-134.820		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	290.274		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	28.305
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-76.459
Capital requirement for business operated in accordance with Art. 4	R0160	
Solvency capital requirement excluding capital add-on	R0200	242.120
Capital add-on already set	R0210	
Solvency capital requirement	R0220	242.120
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for	R0410	
Total amount of Notional Solvency Capital Requirements for ring	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo Assicura: S.28.01.01

Annex I

S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for non-life insurance and reinsurance obligations

(in migliaia di euro)

MCRNL Result	R0010	C0010	160.655
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(in migliaia di euro)

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
Medical expense insurance and proportional reinsurance	R0020	0	15.197
Income protection insurance and proportional reinsurance	R0030	296.309	320.135
Workers' compensation insurance and proportional reinsurance	R0040	-	-
Motor vehicle liability insurance and proportional reinsurance	R0050	154.688	69.147
Other motor insurance and proportional reinsurance	R0060	8.694	15.919
Marine, aviation and transport insurance and proportional reinsurance	R0070	310	116
Fire and other damage to property insurance and proportional reinsurance	R0080	190.858	223.791
General liability insurance and proportional reinsurance	R0090	60.854	94.715
Credit and suretyship insurance and proportional reinsurance	R0100	901	337
Legal expenses insurance and proportional reinsurance	R0110	3.342	5.186
Assistance and proportional reinsurance	R0120	555	11.609
Miscellaneous financial loss insurance and proportional reinsurance	R0130	61.981	44.537
Non-proportional health reinsurance	R0140	-	-
Non-proportional casualty reinsurance	R0150	-	-
Non-proportional marine, aviation and transport reinsurance	R0160	-	-
Non-proportional property reinsurance	R0170	-	-

Linear formula component for life insurance and reinsurance obligations

MCR _L Result	R0200	C0040	
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(in migliaia di euro)

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210		
Obligations with profit participation - future discretionary benefits	R0220		
Index-linked and unit-linked insurance obligations	R0230		
Other life (re)insurance and health (re)insurance obligations	R0240		
Total capital at risk for all life (re)insurance obligations	R0250		

Overall MCR calculation

(in migliaia di euro)

		C0070	
Linear MCR	R0300	160.655	
SCR	R0310	242.120	
MCR cap	R0320	108.954	
MCR floor	R0330	60.530	
Combined MCR	R0340	108.954	
Absolute floor of the MCR	R0350	2.500	
		C0070	
Minimum Capital Requirement	R0400	108.954	



QRT FIDEURAM VITA S.P.A.

QRT Fideuram Vita: S.02.01.02

Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	-
Deferred tax assets	R0040	226.305
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	9.896
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	5.469.118
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	91.656
Equities - listed	R0110	91.522
Equities - unlisted	R0120	134
Bonds	R0130	4.693.805
Government Bonds	R0140	3.635.329
Corporate Bonds	R0150	841.019
Structured notes	R0160	217.295
Collateralised securities	R0170	162
Collective Investments Undertakings	R0180	682.617
Derivatives	R0190	1.040
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	29.530.941
Loans and mortgages	R0230	410
Loans on policies	R0240	410
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	-
Non-life and health similar to non-life	R0280	-
Non-life excluding health	R0290	-
Health similar to non-life	R0300	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	923
Reinsurance receivables	R0370	1.410
Receivables (trade, not insurance)	R0380	471.708
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	356.834
Any other assets, not elsewhere shown	R0420	201.236
Total assets	R0500	36.268.781

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	-
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	-
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	-
Risk margin	R0590	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	5.438.031
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	5.438.031
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	5.358.126
Risk margin	R0680	79.905
Technical provisions – index-linked and unit-linked	R0690	28.899.537
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	28.767.793
Risk margin	R0720	131.744
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	4.089
Pension benefit obligations	R0760	2.871
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	345.701
Derivatives	R0790	32
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	10.087
debts owed to non-credit institutions resident domestically	ER0812	10.087
Insurance & intermediaries payables	R0820	247.963
Reinsurance payables	R0830	2.589
Payables (trade, not insurance)	R0840	22.226
Subordinated liabilities	R0850	129.429
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	129.429
Any other liabilities, not elsewhere shown	R0880	83.256
Total liabilities	R0900	35.185.810
Excess of assets over liabilities	R1000	1.082.971

(in migliaia di euro)

	Line of Business for: life insurance obligations							Life reinsurance obligations		Total
	Health insurance C0210	Insurance with profit participation C0220	Index-linked and unit-linked insurance C0230	Other life insurance C0240	Annuities stemming from non-life insurance contracts and relating to health insurance obligations C0250	Annuities stemming from non-life insurance contracts and relating to health insurance obligations C0260	Health reinsurance C0270	Life-reinsurance C0280	C0300	
Premiums written										
Gross	-	633.630	2.632.373	6.250	-	-	-	-	-	3.272.253
Reinsurers' share	-	893	-	1.933	-	-	-	-	-	2.826
Net	-	632.737	2.632.373	4.317	-	-	-	-	-	3.269.427
Premiums earned										
Gross	-	633.630	2.632.373	6.250	-	-	-	-	-	3.272.253
Reinsurers' share	-	893	-	1.933	-	-	-	-	-	2.826
Net	-	632.737	2.632.373	4.317	-	-	-	-	-	3.269.427
Claims incurred										
Gross	-	501.394	1.973.725	2.082	-	-	-	-	-	2.477.202
Reinsurers' share	-	414	-	896	-	-	-	-	-	1.310
Net	-	500.980	1.973.725	1.186	-	-	-	-	-	2.475.892
Changes in other technical provisions										
Gross	-	(242.555)	4.555.190	(282)	-	-	-	-	-	4.312.354
Reinsurers' share	-	-	-	-	-	-	-	-	-	-
Net	-	(242.555)	4.555.190	(282)	-	-	-	-	-	4.312.354
Expenses incurred										
R1900	-	8.788	28.850	257	-	-	-	-	-	37.895
Other expenses										
R2500	-	-	-	-	-	-	-	-	-	2.773
Total expenses										
R2600	-	-	-	-	-	-	-	-	-	40.668

QRT Fideuram Vita: S.12.01.02

Annex I
S.12.01.02
Life and Health SLT Technical Provisions

(in millions of euro)

	Insurance with profit participation		Index-linked and unit-linked insurance		Other life insurance		Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)	
	C0020	C0030	C0040	C0050	C0060	C0070				C0080
Technical provisions calculated as a whole										
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default as associated to TP as a whole		-								
Technical provisions calculated as a sum of BE and RM										
Best Estimate										
Gross Best Estimate										
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	5.361.015		28.477.773	290.020						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	-		-	-						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	5.361.015		28.477.773	290.020						
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	79.308	131.744			597					
Amount of the transitional on Technical Provisions										
Technical Provisions calculated as a whole										
Best estimate										
Risk margin										
Technical provisions - total	5.440.323	28.609.537			-2.292					34.337.567

QRT Fideuram Vita: S.22.01.21

Annex I

S.22.01.21

Impact of long term guarantees and transitional measures

(in migliaia di euro)

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	34.337.567	-	-	30.682	-
Basic own funds	R0020	1.211.932	-	-	-21.225	-
Eligible own funds to meet Solvency Capital Requirement	R0050	1.211.932	-	-	-20.758	-
Solvency Capital Requirement	R0090	540.474	-	-	11.874	-
Eligible own funds to meet Minimum Capital Requirement	R0100	1.131.146	-	-	-20.157	-
Minimum Capital Requirement	R0110	243.213	-	-	5.343	-

QRT Fideuram Vita: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 48 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	357.447	357.447			
Share premium account related to ordinary share capital	R0030					
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	725.057	725.057			
Subordinated liabilities	R0140	129.429			129.429	
An amount equal to the value of net deferred tax assets	R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	1.211.932	1.082.503		129.429	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	1.211.932	1.082.503		129.429	-
Total available own funds to meet the MCR	R0510	1.211.932	1.082.503		129.429	-
Total eligible own funds to meet the SCR	R0540	1.211.932	1.082.503		129.429	-
Total eligible own funds to meet the MCR	R0550	1.131.146	1.082.503		48.643	
SCR	R0580	540.474				
MCR	R0600	243.213				
Ratio of Eligible own funds to SCR	R0620	224%				
Ratio of Eligible own funds to MCR	R0640	465%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	1.082.971
Own shares (held directly and indirectly)	R0710	467
Foreseeable dividends, distributions and charges	R0720	
Other basic own fund items	R0730	357.447
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	725.057
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	170.079
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	-
Total Expected profits included in future premiums (EPIFP)	R0790	170.079

QRT Fideuram Vita: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Net solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	308.166		
Counterparty default risk	R0020	25.941		
Life underwriting risk	R0030	457.635		
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-170.843		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	620.899		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	53.284
Loss-absorbing capacity of technical provisions	R0140	-343.191
Loss-absorbing capacity of deferred taxes	R0150	-133.710
Capital requirement for business operated in accordance with Art. 4	R0160	
Solvency capital requirement excluding capital add-on	R0200	540.474
Capital add-on already set	R0210	-
Solvency capital requirement	R0220	540.474
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for	R0410	
Total amount of Notional Solvency Capital Requirements for ring	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Fideuram Vita: S.28.01.01

Annex I
S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for life insurance and reinsurance obligations

(in migliaia di euro)

		C0040
MCR _L Result	R0200	378.211

(in migliaia di euro)

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	5.361.015	
Obligations with profit participation - future discretionary benefits	R0220	418.164	
Index-linked and unit-linked insurance obligations	R0230	28.767.793	
Other life (re)insurance and health (re)insurance obligations	R0240	-	
Total capital at risk for all life (re)insurance obligations	R0250		319.652

Overall MCR calculation

(in migliaia di euro)

		C0070
Linear MCR	R0300	378.211
SCR	R0310	540.474
MCR cap	R0320	243.213
MCR floor	R0330	135.118
Combined MCR	R0340	243.213
Absolute floor of the MCR	R0350	3.700
		C0070
Minimum Capital Requirement	R0400	243.213



QRT INTESA SANPAOLO LIFE D.A.C.

QRT Intesa Sanpaolo Life: S.02.01.02

Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	5.580
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	538
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	414.913
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	203
Equities - listed	R0110	203
Equities - unlisted	R0120	-
Bonds	R0130	352.401
Government Bonds	R0140	267.588
Corporate Bonds	R0150	84.813
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	62.309
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	34.174.494
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	-
Non-life and health similar to non-life	R0280	-
Non-life excluding health	R0290	-
Health similar to non-life	R0300	-
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	-
Reinsurance receivables	R0370	-
Receivables (trade, not insurance)	R0380	659.297
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	143.496
Any other assets, not elsewhere shown	R0420	33.760
Total assets	R0500	35.432.078

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	-
Technical provisions – non-life (excluding health)	R0520	-
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	-
Risk margin	R0550	-
Technical provisions - health (similar to non-life)	R0560	-
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	-
Risk margin	R0590	-
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	33.494.576
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	33.326.237
Risk margin	R0720	168.339
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	1.754
Pension benefit obligations	R0760	-
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	73.885
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	379
debts owed to non-credit institutions resident domestically	ER0812	21
debts owed to non-credit institutions resident in the euro area other than domestically	ER0813	358
Insurance & intermediaries payables	R0820	209.964
Reinsurance payables	R0830	77
Payables (trade, not insurance)	R0840	16.900
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	103.695
Total liabilities	R0900	33.901.230
Excess of assets over liabilities	R1000	1.530.849

QRT Intesa Sanpaolo Life: S.05.02.01

Annex I

S.05.02.01

Premiums, claims and expenses by country

(in migliaia di euro)

		Home country	Top 5 countries (by amount of gross premiums written) - life obligations		Total Top 5 and home country
				IT	ES
	R1400				C0280
Premiums written					
Gross	R1410		2.821.087	28.480	2.849.567
Reinsurers' share	R1420		56	-	56
Net	R1500		2.821.030	28.480	2.849.511
Premiums earned					
Gross	R1510		2.821.087	28.480	2.849.567
Reinsurers' share	R1520		56	-	56
Net	R1600		2.821.030	28.480	2.849.511
Claims incurred					
Gross	R1610		4.425.968	9.012	4.434.980
Reinsurers' share	R1620		2	-	2
Net	R1700		4.425.966	9.012	4.434.979
Changes in other technical provisions					
Gross	R1710		6.878.155	-	6.878.155
Reinsurers' share	R1720		-	-	-
Net	R1800		6.878.155	-	6.878.155
Expenses incurred	R1900		479.113	2.905	482.018
Other expenses	R2500				
Total expenses	R2600		-	-	482.018

(in migliaia di euro)

	R0010	R0020	Index-linked and unlinked insurance		Other life insurance		Total (Life other than health insurance, incl. Unit-Linked)
			C0030	C0040	C0050	C0060	
		Insurance with profit participation		Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees
Technical provisions calculated as a whole							
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole							
Technical provisions calculated as a sum of BE and RM							
Gross Best Estimate							
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default				33.326.237	-	-	33.326.237
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total				-	-	-	-
Risk Margin							
Amount of the transitional on Technical Provisions			166.339				166.339
Best estimate							
Risk margin							
Technical provisions - total			33.494.576				33.494.576

QRT Intesa Sanpaolo Life: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	625	625			
Share premium account related to ordinary share capital	R0030	10	10			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	1.425.770	1.425.770			
Subordinated liabilities	R0140	-		-	-	
An amount equal to the value of net deferred tax assets	R0160	-				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180	104.444	104.444			
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	1.530.849	1.530.849	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	1.530.849	1.530.849	-	-	-
Total available own funds to meet the MCR	R0510	1.530.849	1.530.849	-	-	-
Total eligible own funds to meet the SCR	R0540	1.530.849	1.530.849	-	-	-
Total eligible own funds to meet the MCR	R0550	1.530.849	1.530.849	-	-	-
SCR	R0580	511.925				
MCR	R0600	230.366				
Ratio of Eligible own funds to SCR	R0620	299%				
Ratio of Eligible own funds to MCR	R0640	665%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	1.530.849
Own shares (held directly and indirectly)	R0710	-
Foreseeable dividends, distributions and charges	R0720	-
Other basic own fund items	R0730	105.079
Adjustment for restricted own fund items in respect of matching adjustment portfolios and	R0740	-
Reconciliation reserve	R0760	1.425.770
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	43.260
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	-
Total Expected profits included in future premiums (EPIFP)	R0790	43.260

QRT Intesa Sanpaolo Life: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Net solvency capital	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	246.204		
Counterparty default risk	R0020	28.371		
Life underwriting risk	R0030	364.905		
Health underwriting risk	R0040			
Non-life underwriting risk	R0050			
Diversification	R0060	-141.317		
Intangible asset risk	R0070			
Basic Solvency Capital Requirement	R0100	498.163		

Calculation of Solvency Capital Requirement

		C0100
Operational risk	R0130	82.067
Loss-absorbing capacity of technical provisions	R0140	
Loss-absorbing capacity of deferred taxes	R0150	-68.305
Capital requirement for business operated in accordance with Art. 4	R0160	
Solvency capital requirement excluding capital add-on	R0200	511.925
Capital add-on already set	R0210	
Solvency capital requirement	R0220	511.925

Other information on SCR

Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for	R0410	
Total amount of Notional Solvency Capital Requirements for ring	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo Life: S.28.01.01

Annex I

S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for life insurance and reinsurance obligations

(in migliaia di euro)

MCR _L Result	R0200	C0040 233.883
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(in migliaia di euro)

		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
		C0050	C0060
Obligations with profit participation - guaranteed benefits	R0210	-	-
Obligations with profit participation - future discretionary benefits	R0220	-	-
Index-linked and unit-linked insurance obligations	R0230	33.326.237	-
Other life (re)insurance and health (re)insurance obligations	R0240	-	-
Total capital at risk for all life (re)insurance obligations	R0250	-	855.969

Overall MCR calculation

(in migliaia di euro)

		C0070
Linear MCR	R0300	233.883
SCR	R0310	511.925
MCR cap	R0320	230.366
MCR floor	R0330	127.981
Combined MCR	R0340	230.366
Absolute floor of the MCR	R0350	4.000
		C0070
Minimum Capital Requirement	R0400	230.366



INTESA SANPAOLO RBM SALUTE S.P.A.

QRT Intesa Sanpaolo RBM SALUTE: S.02.01.02

Annex I

S.02.01.02

Balance sheet

(in migliaia di euro)

Assets		Solvency II value
		C0010
Goodwill	R0010	-
Deferred acquisition costs	R0020	-
Intangible assets	R0030	-
Deferred tax assets	R0040	73.984
Pension benefit surplus	R0050	-
Property, plant & equipment held for own use	R0060	6.346
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	431.729
Property (other than for own use)	R0080	-
Holdings in related undertakings, including participations	R0090	-
Equities	R0100	45
Equities - listed	R0110	45
Equities - unlisted	R0120	-
Bonds	R0130	431.683
Government Bonds	R0140	431.683
Corporate Bonds	R0150	-
Structured notes	R0160	-
Collateralised securities	R0170	-
Collective Investments Undertakings	R0180	-
Derivatives	R0190	-
Deposits other than cash equivalents	R0200	-
Other investments	R0210	-
Assets held for index-linked and unit-linked contracts	R0220	-
Loans and mortgages	R0230	-
Loans on policies	R0240	-
Loans and mortgages to individuals	R0250	-
Other loans and mortgages	R0260	-
Reinsurance recoverables from:	R0270	17.568
Non-life and health similar to non-life	R0280	17.568
Non-life excluding health	R0290	3
Health similar to non-life	R0300	17.565
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-
Health similar to life	R0320	-
Life excluding health and index-linked and unit-linked	R0330	-
Life index-linked and unit-linked	R0340	-
Deposits to cedants	R0350	-
Insurance and intermediaries receivables	R0360	117.749
Reinsurance receivables	R0370	60.498
Receivables (trade, not insurance)	R0380	72.708
Own shares (held directly)	R0390	-
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	-
Cash and cash equivalents	R0410	212.390
Any other assets, not elsewhere shown	R0420	22.695
Total assets	R0500	1.015.667

(in migliaia di euro)

Liabilities		Solvency II value
		C0010
Technical provisions – non-life	R0510	219.163
Technical provisions – non-life (excluding health)	R0520	50
Technical provisions calculated as a whole	R0530	-
Best Estimate	R0540	48
Risk margin	R0550	2
Technical provisions - health (similar to non-life)	R0560	219.112
Technical provisions calculated as a whole	R0570	-
Best Estimate	R0580	210.987
Risk margin	R0590	8.125
Technical provisions - life (excluding index-linked and unit-linked)	R0600	-
Technical provisions - health (similar to life)	R0610	-
Technical provisions calculated as a whole	R0620	-
Best Estimate	R0630	-
Risk margin	R0640	-
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	-
Technical provisions calculated as a whole	R0660	-
Best Estimate	R0670	-
Risk margin	R0680	-
Technical provisions – index-linked and unit-linked	R0690	-
Technical provisions calculated as a whole	R0700	-
Best Estimate	R0710	-
Risk margin	R0720	-
Other technical provisions	R0730	-
Contingent liabilities	R0740	-
Provisions other than technical provisions	R0750	4.769
Pension benefit obligations	R0760	730
Deposits from reinsurers	R0770	-
Deferred tax liabilities	R0780	7.000
Derivatives	R0790	-
Debts owed to credit institutions	R0800	-
Financial liabilities other than debts owed to credit institutions	R0810	-
Insurance & intermediaries payables	R0820	21.275
Reinsurance payables	R0830	21
Payables (trade, not insurance)	R0840	20.037
Subordinated liabilities	R0850	-
Subordinated liabilities not in Basic Own Funds	R0860	-
Subordinated liabilities in Basic Own Funds	R0870	-
Any other liabilities, not elsewhere shown	R0880	2.890
Total liabilities	R0900	275.884
Excess of assets over liabilities	R1000	739.783

QRT Intesa Sanpaolo RBM SALUTE: S.05.01.02

Annex I
S.05.01.02
Premiums, claims and expenses by line of business

(in millions of euro)

	Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)										Line of Business for: accepted non-proportional reinsurance				Total		
	Medical expense insurance C0010	Income protection insurance C0020	Workers' compensation insurance C0030	Motor vehicle liability insurance C0040	Other motor insurance C0050	Marine, aviation and transport insurance C0060	Fire and other damage to property insurance C0070	General liability insurance C0080	Credit and suretyship insurance C0090	Legal expenses insurance C0100	Assistance C0110	Miscellaneous financial loss C0120	Health C0130	Casualty C0140		Marine, aviation, transport C0150	Property C0160
Premiums written																	
Gross - Direct Business	R0110	471.536	48.644								576						520.756
Gross - Proportional reinsurance accept	R0120	-	-														-
Gross - Non-proportional reinsurance ac	R0130	-	-														-
Reinsurers' share	R0140	50.292	7.692														58.004
Net	R0200	421.244	40.952								556						462.752
Premiums earned																	
Gross - Direct Business	R0210	457.866	45.130								345						503.341
Gross - Proportional reinsurance accept	R0220	-	-														-
Gross - Non-proportional reinsurance ac	R0230	-	-														-
Reinsurers' share	R0240	47.271	7.230														54.520
Net	R0300	410.595	37.901								325						448.821
Claims incurred																	
Gross - Direct Business	R0310	381.097	44.279														425.378
Gross - Proportional reinsurance accept	R0320	-	-														-
Gross - Non-proportional reinsurance ac	R0330	-	-														-
Reinsurers' share	R0340	51.982	2.401														54.383
Net	R0400	329.115	41.879														370.995
Changes in other technical provisions																	
Gross - Direct Business	R0410	-2.910	-														-2.910
Gross - Proportional reinsurance accept	R0420	-	-														-
Gross - Non-proportional reinsurance ac	R0430	-	-														-
Reinsurers' share	R0440	-	-														-
Net	R0500	-2.910	-														-2.910
Expenses incurred	R0550	52.950	8.408								150						61.508
Other expenses	R1200																6.484
Total expenses	R1300																67.992

QRT Intesa Sanpaolo RBM SALUTE: S.19.01.21

Annex I
S.19.01.21
Non-life Insurance Claims Information

Total Non-Life Business

Accident year / Underwriting year	2020	1
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Gross Claims Paid (non-cumulative)
(absolute amount)

Year	Development year															In Current year	Sum of years (cumulative)				
	(in migliaia di euro)																	(in migliaia di euro)	(in migliaia di euro)		
	0	1	2	3	4	5	6	7	8	9	10 & +	11	12	13	14					15 & +	
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0170	C0180			
Prior	R0100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0100	-
N-14	R0110	7.006	4.444	179	18	4	106	-	-	-	-	-	-	-	-	-	-	-	-	R0110	-
N-13	R0120	12.687	10.621	271	58	5	10	-	2	-	-	-	-	-	-	-	-	-	-	R0120	-
N-12	R0130	18.917	14.661	758	99	30	5	1	-	-	-	-	-	-	-	-	-	-	-	R0130	-
N-11	R0140	28.073	27.122	1.885	283	59	18	8	-	50	-	-	-	-	-	-	-	-	-	R0140	-
N-10	R0150	88.536	12.962	2.111	302	131	46	1	33	7	1	-	-	-	-	-	-	-	-	R0150	-
N-9	R0160	126.341	29.284	1.997	830	(214)	(2)	74	42	1	-	-	-	-	-	-	-	-	-	R0160	-
N-8	R0170	173.017	36.309	4.067	884	223	63	68	13	14	-	-	-	-	-	-	-	-	-	R0170	14
N-7	R0180	210.851	47.099	7.231	639	48	104	24	-	-	-	-	-	-	-	-	-	-	-	R0180	3
N-6	R0190	189.147	94.823	5.112	309	279	157	12	-	-	-	-	-	-	-	-	-	-	-	R0190	12
N-5	R0200	189.814	129.873	4.199	589	445	81	-	-	-	-	-	-	-	-	-	-	-	-	R0200	81
N-4	R0210	269.084	123.609	4.190	1.044	207	-	-	-	-	-	-	-	-	-	-	-	-	-	R0210	207
N-3	R0220	371.574	80.153	6.377	949	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0220	949
N-2	R0230	235.504	116.213	6.739	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0230	6.739
N-1	R0240	463.144	199.205	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0240	199.205
N	R0250	320.326	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0250	320.326
	Total																			Total	527.536
																					3.683.699

Gross undiscounted Best Estimate Claims Provisions
(absolute amount)

Year	Development year															Year end (discounted data)				
	(in migliaia di euro)																(in migliaia di euro)			
	0	1	2	3	4	5	6	7	8	9	10	11	12	13	14			15 & +		
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	C0310	C0320	C0330	C0340	C0350	C0360			
Prior	R0100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0100	-
N-14	R0110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0110	-
N-13	R0120	10.154	1.409	30	3	7	2	-	-	-	-	-	-	-	-	-	-	-	R0120	-
N-12	R0130	18.653	1.672	26	8	7	-	-	-	-	-	-	-	-	-	-	-	-	R0130	-
N-11	R0140	26.215	233	114	32	0	79	32	81	35	-	-	-	-	-	-	-	-	R0140	-
N-10	R0150	11.588	1.225	107	2	43	10	104	82	36	-	-	-	-	-	-	-	-	R0150	-
N-9	R0160	22.912	1.231	8	76	1	2	20	4	1	-	-	-	-	-	-	-	-	R0160	-
N-8	R0170	36.974	505	71	35	9	77	14	11	-	-	-	-	-	-	-	-	-	R0170	-
N-7	R0180	42.165	829	175	134	69	48	15	-	-	-	-	-	-	-	-	-	-	R0180	-
N-6	R0190	83.961	1.931	234	374	268	76	65	-	-	-	-	-	-	-	-	-	-	R0190	63
N-5	R0200	142.800	4.965	647	359	181	119	-	-	-	-	-	-	-	-	-	-	-	R0200	115
N-4	R0210	143.699	6.090	980	350	279	-	-	-	-	-	-	-	-	-	-	-	-	R0210	270
N-3	R0220	92.194	5.604	1.166	460	-	-	-	-	-	-	-	-	-	-	-	-	-	R0220	444
N-2	R0230	124.505	5.734	729	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0230	704
N-1	R0240	230.660	12.726	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0240	12.303
N	R0250	130.230	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	R0250	125.882
	Total																		Total	139.779

QRT Intesa Sanpaolo RBM SALUTE: S.23.01.01

Annex I
S.23.01.01
Own funds

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	305.208	305.208			
Share premium account related to ordinary share capital	R0030	-	-			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040	-	-			
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	164.508	164.508			
Subordinated liabilities	R0140					
An amount equal to the value of net deferred tax assets	R0160	66.984				
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	536.700	469.716	-	-	-
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					

(in migliaia di euro)

		Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	536.700	469.716	-	-	-
Total available own funds to meet the MCR	R0510	469.716	469.716	-	-	-
Total eligible own funds to meet the SCR	R0540	511.401	469.716	-	-	-
Total eligible own funds to meet the MCR	R0550	469.716	469.716	-	-	-
SCR	R0580	277.902				
MCR	R0600	69.476				
Ratio of Eligible own funds to SCR	R0620	184%				
Ratio of Eligible own funds to MCR	R0640	676%				

		C0060
Reconciliation reserve		
Excess of assets over liabilities	R0700	739.783
Own shares (held directly and indirectly)	R0710	45.40
Foreseeable dividends, distributions and charges	R0720	203.037
Other basic own fund items	R0730	372.192
Adjustment for restricted own fund items in respect of matching adjustment	R0740	-
Reconciliation reserve	R0760	164.508
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	-
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	2.623
Total Expected profits included in future premiums (EPIFP)	R0790	2.623

QRT Intesa Sanpaolo RBM SALUTE: S.25.01.21

Annex I

S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

(in migliaia di euro)

		Net solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
Market risk	R0010	10.345		
Counterparty default risk	R0020	62.681		
Life underwriting risk	R0030	-		
Health underwriting risk	R0040	93.173		
Non-life underwriting risk	R0050	-		
Diversification	R0060	-38.621		
Intangible asset risk	R0070	-		
Basic Solvency Capital Requirement	R0100	128.471		

Calculation of Solvency Capital Requirement		C0100
Operational risk	R0130	15.100
Loss-absorbing capacity of technical provisions	R0140	-
Loss-absorbing capacity of deferred taxes	R0150	-
Capital requirement for business operated in accordance with Art. 4	R0160	-
Solvency capital requirement excluding capital add-on	R0200	143.571
Capital add-on already set	R0210	134.331
Solvency capital requirement	R0220	277.902
Other information on SCR		
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirement for	R0410	
Total amount of Notional Solvency Capital Requirements for ring	R0420	
Total amount of Notional Solvency Capital Requirement for matching	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

QRT Intesa Sanpaolo RBM SALUTE: S.28.01.01

Annex I

S.28.01.01

Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

Linear formula component for non-life insurance and reinsurance obligations

(in migliaia di euro)

MCR _{NL} Result	R0010	C0010	35.272
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(in migliaia di euro)

		Net (of reinsurance/SPV best estimate and TP calculated as a whole)		Net (of reinsurance) written premiums in the last 12 months	
		C0020		C0030	
Medical expense insurance and proportional reinsurance	R0020	159.780		421.244	
Income protection insurance and proportional reinsurance	R0030	33.642		40.953	
Workers' compensation insurance and proportional reinsurance	R0040	-		-	
Motor vehicle liability insurance and proportional reinsurance	R0050	-		-	
Other motor insurance and proportional reinsurance	R0060	-		-	
Marine, aviation and transport insurance and proportional reinsurance	R0070	-		-	
Fire and other damage to property insurance and proportional reinsurance	R0080	-		-	
General liability insurance and proportional reinsurance	R0090	-		-	
Credit and suretyship insurance and proportional reinsurance	R0100	-		-	
Legal expenses insurance and proportional reinsurance	R0110	-		-	
Assistance and proportional reinsurance	R0120	-		-	
Miscellaneous financial loss insurance and proportional reinsurance	R0130	45		556	
Non-proportional health reinsurance	R0140	-		-	
Non-proportional casualty reinsurance	R0150	-		-	
Non-proportional marine, aviation and transport reinsurance	R0160	-		-	
Non-proportional property reinsurance	R0170	-		-	

Linear formula component for life insurance and reinsurance obligations

MCR _L Result	R0200	C0040	
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(in migliaia di euro)

		Net (of reinsurance/SPV best estimate and TP calculated as a whole)		Net (of reinsurance/SPV) total capital at risk	
		C0050		C0060	
Obligations with profit participation - guaranteed benefits	R0210				
Obligations with profit participation - future discretionary benefits	R0220				
Index-linked and unit-linked insurance obligations	R0230				
Other life (re)insurance and health (re)insurance obligations	R0240				
Total capital at risk for all life (re)insurance obligations	R0250				

Overall MCR calculation

(in migliaia di euro)

		C0070
Linear MCR	R0300	35.272
SCR	R0310	277.902
MCR cap	R0320	125.056
MCR floor	R0330	69.476
Combined MCR	R0340	69.476
Absolute floor of the MCR	R0350	2.500
		C0070
Minimum Capital Requirement	R0400	69.476



INDEPENDENT AUDITORS REPORT

The following pages contain the Reports of the auditing firm EY S.p.A., which was engaged by Intesa Sanpaolo Vita S.p.A. and the Italian subsidiaries. The reports include the findings of the audits of the Intesa Sanpaolo Vita Insurance Group and the Italian Group companies for Section D "Information on valuation for solvency purposes" and sub-section E.1 "Own Funds" and E.2 "Solvency capital requirement and minimum capital requirement", according to the provisions of Article 47-septies(7) of the Italian Private Insurance Code, and in accordance with IVASS Regulation no. 42/2018.

The Insurance Parent Company INTESA SANPAOLO VITA S.p.A.

Registered office: Corso Inghilterra, 3 – 10138 Turin

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

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

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

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

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