

SFCR
ASR Levens-
verzekering
N.V.
2022



a.s.r.
de nederlandse
verzekering
maatschappij
voor alle
verzekeringen

SFCR

ASR Levens-
verzekering

N.V.

2022



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Introduction

The structure of the Solvency and Financial Condition Report (SFCR) has been prepared as described in annex XX of the Solvency II Directive Delegated Regulation. The subjects addressed are based on article 51 to 56 of the Solvency II Directive and act 292 up to and including 298 and act 359 of the Delegated Regulation. Furthermore, the figures presented in this report are in line with the supervisor's reported Quantitative Reporting Templates (QRT).

All amounts in this report, including the amounts quoted in the tables, are presented in millions of euros (€ million), being the functional currency of ASR Levensverzekering N.V. (hereafter referred to as a.s.r. life), unless otherwise stated.



Summary

The 2022 SFCR provides a.s.r. life stakeholders insight in:

A Business and performance

The Solvency II ratio stood at 168% as at 31 December 2022, based on the standard formula as a result of € 4,015 million Eligible Own Funds (EOF) and € 2,383 million Solvency Capital Requirement (SCR). Note that the ratio of 168% is presented after deduction of a planned dividend upstream to a.s.r. group. Excluding the deduction of the planned dividend upstream the ratio stood at 186%.

a.s.r. life generated € 1,952 million in Gross Written Premiums (GWP) in 2022 (2021: € 1,893 million). This increase was mostly the result of strong growth in Pension DC.

The result before tax from continuing operations increased by € 318 million to € 1,013 million (2021: € 695 million), mainly due to strengthening of technical provisions in previous year as a result of the outcome of the Liability Adequacy Test (LAT) which had a negative result impact of € 289 million on the figures of 2021.

Operating expenses increased by € 5 million to € 170 million, mainly driven by extraordinary compensation to employees for higher energy costs and expenses for realising a new IT landscape to administer the pension portfolio.

Full details on the a.s.r. life's business and performance are described in chapter A Business and performance (page 9).

B System of governance

This paragraph contains a description of group policy, which is applicable for the solo entity.

General

ASR Nederland N.V. (hereafter referred to as a.s.r.) is a public limited company which is listed on Euronext Amsterdam and governed by Dutch corporate law. It has a two-tier board governance structure consisting of an Executive Board (EB) and a Supervisory Board (SB). The EB is responsible for the realisation of corporate objectives, the strategy with its associated risks and the delivery of the results.

The SB is responsible for advising the EB, supervising its policies and the general state of affairs relating to a.s.r. and its group entities. Next to the EB, there is also a Business Executive Committee (BEC). The task of the BEC is to support the EB in implementing and realising a.s.r.'s objectives and executing the (business) strategy with the associated risk profile.

Risk management

It is of great importance to a.s.r. that risks within all business lines are timely and adequately controlled. In order to do so, a.s.r. has implemented a Risk Management framework based on internationally recognized and accepted standards. With the aid of this framework, material risks that a.s.r. is, or can be, exposed to are identified, measured, managed, monitored and evaluated. The framework is both applicable to a.s.r. group and the underlying business entities.

Control environment

In addition to risk management, a.s.r.'s Solvency II control environment consist of an internal control system, an actuarial function, a compliance function, a risk management function and an internal audit function. The system of internal control includes the management of risks at different levels in the organisation, both operational and strategic. Internal control at an operational level centres around identifying and managing risks within the critical processes that pose a threat to the achievement of the business line's objectives. The Actuarial Function is responsible for expressing an opinion on the adequacy and reliability of reported technical provisions, reinsurance and underwriting. The mission of the Compliance department is to enhance and ensure a controlled and sound business operation. The Audit Department evaluates the effectiveness of governance, risk management and internal control processes, and gives practical advice on process optimisation.

Full details on the a.s.r.'s system of governance are described in chapter B System of governance (page 17).

C Risk profile

a.s.r. life applies an integrated approach in managing risks, ensuring that our strategic goals (customer interests, financial solidity and efficiency of processes) are maintained. This integrated approach ensures that value will be created by identifying the right balance between risk and return, while ensuring that obligations towards our stakeholders are met. Risk management supports a.s.r. life in the identification,

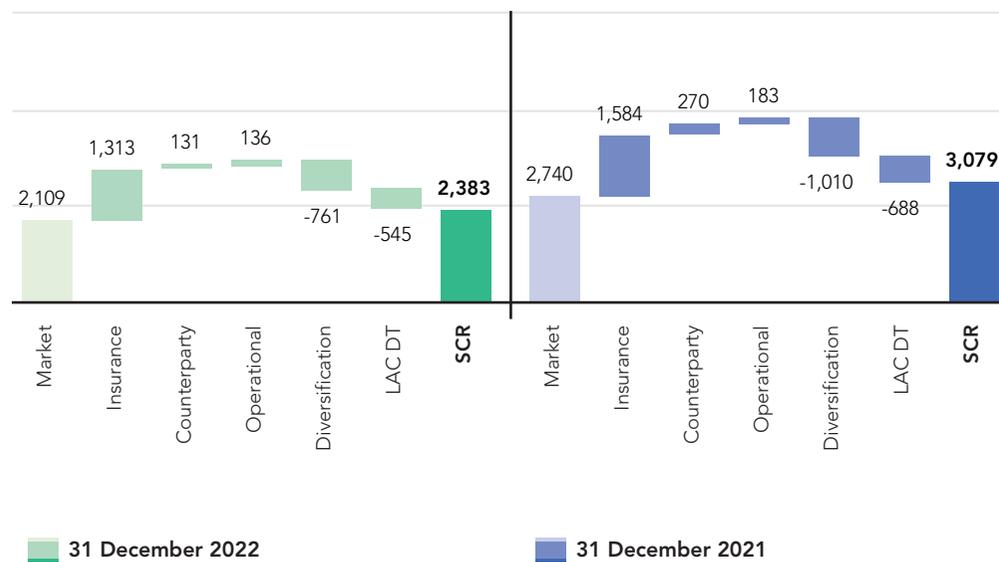


measurement and management of risks and monitors to ensure adequate and immediate actions are taken in the event of changes in a.s.r. life's risk profile.

a.s.r. life is exposed to the following types of risks: insurance risk, market risk, counterparty default risk, liquidity risk, operational risk and strategic risk. The risk appetite is formulated at both group and legal entity level and establishes a framework that supports an effective selection of risks.

The SCR is build up as follows:

SCR



Full details on the a.s.r.'s risk profile are described in chapter C Risk profile (page 34).



D Valuation for Solvency purposes

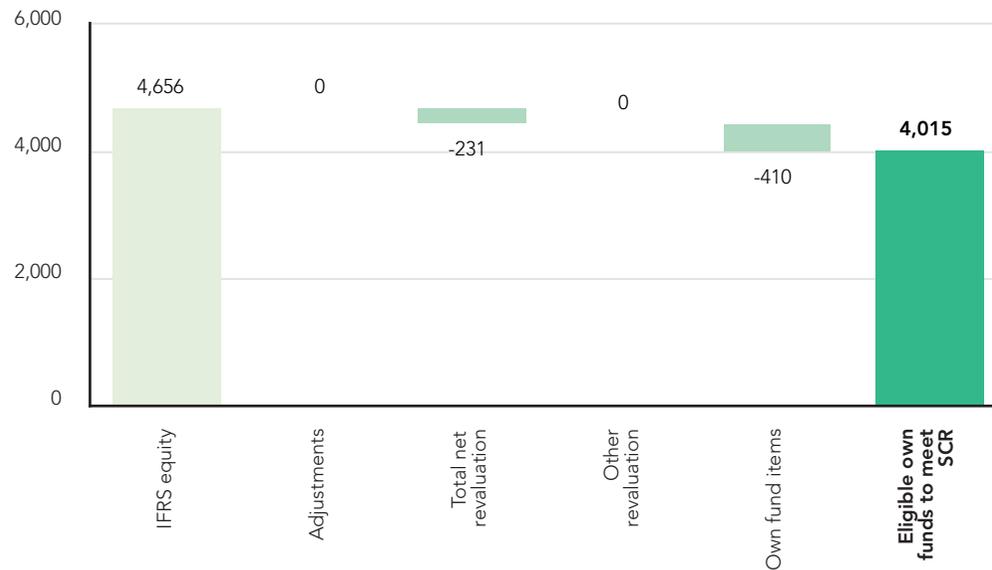
a.s.r. life values its Solvency II balance sheet items on a basis that reflects their economic value. Where the IFRS fair value is consistent with Solvency II requirements, a.s.r. life follows IFRS for valuing assets and liabilities other than technical provisions.

The reconciliation of IFRS equity and Excess Assets over Liabilities (Solvency II basis) can be summarised as follows:

- derecognition of items on the Solvency II economic balance sheet which are admissible on the IFRS balance sheet, for instance goodwill, and other intangible assets;
- revaluation differences on mainly insurance liabilities and other assets which are valued other than fair value in the IFRS balance sheet.

A graphical representation of the reconciliation from Solvency II equity to EOF is presented below:

Reconciliation from Solvency II to EOF



Full details on the reconciliation between a.s.r. life's economic balance sheet based on Solvency II and consolidated financial statements based on IFRS are described in chapter D Valuation for solvency purposes (page 57).



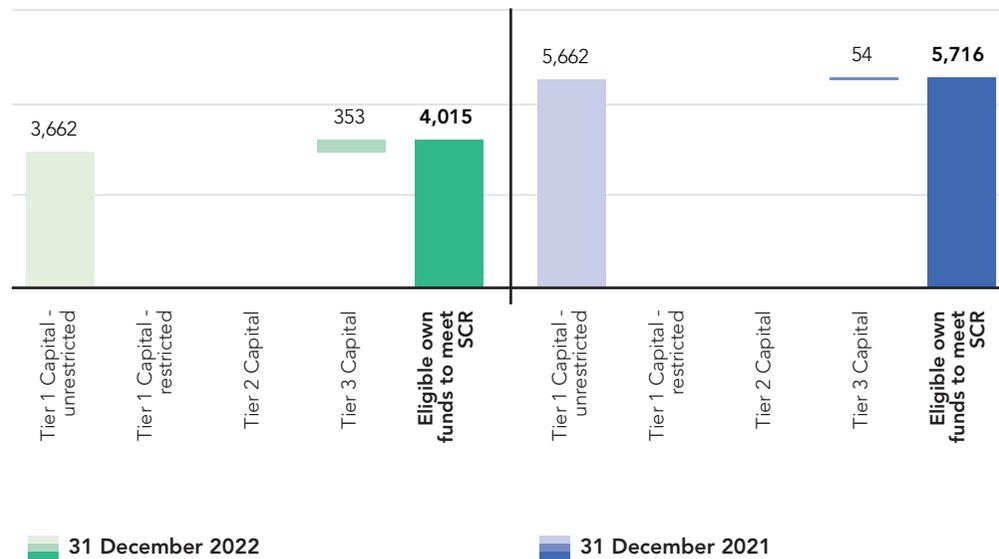
E Capital management

Overall capital management is administered at group level. Capital generated by operating units and future capital releases will be allocated to profitable growth of new business or repatriated to shareholders, beyond the capital that is needed to achieve management's targets.

a.s.r. life has no internal model and follows the default method for the determination of the group solvency. a.s.r. life maintains an internal minimum and management target for the Solvency II ratio. The internal minimum Solvency II ratio for a.s.r. life as formulated in the risk appetite statement is 120%. The management threshold level for the Solvency II ratio is above 160%. a.s.r. only distributes cash dividends if the interest of the policyholders has been ensured (i.e. a Solvency II ratio above 140%). The Solvency II ratio was 168% at 31 December 2022 presented after deduction of a planned dividend upstream to a.s.r. group.

The EOF is build up as follows:

Eligible Own Funds



The EOF decreased to € 4,015 million at year-end 2022 (2021: € 5,716 million). The contribution of the organic capital creation and higher VA were offset by the impact of higher interest rates and widening of credit spreads, the UFR reduction, and dividend upstreams to a.s.r. group.

Full details on the capital management of a.s.r. life can be found in chapter E Capital Management (page 66).



A Business and performance

A.1 Business

A.1.1 Profile

Object of the company

ASR Levensverzekering N.V. ('a.s.r. life') is a subsidiary of ASR Nederland N.V. (a.s.r. or group). a.s.r. life intends to enable people to be insured against risks they are unable or unwilling to bear themselves. a.s.r. life is convinced that its main strategic principle is justified by thinking in terms of customer interests and perception. The products and services of a.s.r. life must be in line with this.

Understandability and simplicity combined with efficient business processes and a solid financial position are essential. Customers can count on their risk coverage being held by an insurer that works sustainably, listens to them, thinks along with them and is accessible through various channels.

Customers need transparent products, clear communication and personal service. a.s.r. life has made it its top priority to meet these needs. For example, activities and objectives of a.s.r. life are tested against the interests of the customer and products are presented to customer panels. Customer journeys and the wishes expressed by customers are included in product development. Ultimately, this is reflected in the valuation of customers as measured by the Net Promoter Score (NPS). The NPS measures the extent to which customers would recommend a.s.r. life to their surroundings.

Also a lot of attention is paid to our social role and sustainability. a.s.r. was again rated as the most sustainable insurance company worldwide by Sustainalytics on their Environmental, Social and Governance (ESG) Risk Rating in September 2022. According to Sustainalytics, a.s.r. has a negligible risk for several ESG criteria relevant to insurers, for example integration of ESG in insurance products. a.s.r. joined the Net-Zero Insurance Alliance (NZIA) to reduce CO₂ emissions in its insurance portfolio. Target of the partnership is to make the insurance portfolio climate neutral by 2050. Furthermore, a.s.r. life is starting dialogues with corporate customers to make them aware of the potential negative impact on the climate of their activities.

Core activities

a.s.r. life comprises Pensions, Individual life and Funeral. a.s.r. life offers insurance policies that involve asset building, immediate (pension) annuities, asset protection, term life insurance and funeral expenses insurance for consumers and business owners. The insurances are offered via the brands a.s.r. and Ardanta. The market share (measured in gross written premiums) of a.s.r. life in 2021 was 15.5% (2020: 14.8%).¹

Legal structure of the company

a.s.r. life is a wholly-owned subsidiary of a.s.r. a.s.r. is a public limited company under Dutch law having its registered office located at Archimedeslaan 10, 3584 BA in Utrecht, the Netherlands. a.s.r. is registered with the Dutch Chamber of Commerce under number 30070695. a.s.r. has chosen the Netherlands as 'country of origin' (land van herkomst) for the issued share capital and corporate bonds which are listed on Euronext Amsterdam and Euronext Dublin (Ticker: ASRNL).

Internal organisational structure and staffing

As of 1 March 2022, a.s.r. life consists of two product lines: i) Pensions and ii) Life, Funeral and a.s.r. Pensioenfondsen Services (APFS) activities. The Life and APFS activities were managed as service books in conjunction with the Funeral activities.

Various services are purchased internally from a.s.r. (a.o. Payment Centre, HR, Finance & Risk, Group Balance Sheet Management (GBSM), Asset Management and Information Technology & Communication (IT&C)).

Headcount

The total internal work force of a.s.r. life increased to 448 FTEs (2021: 440).

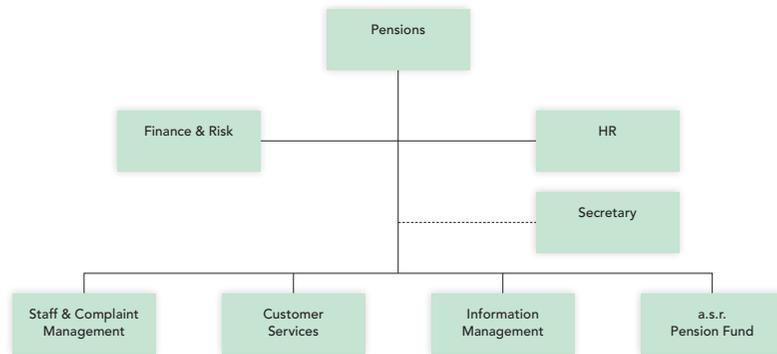
Organisational charts

Below, the organisational charts of the two product lines within a.s.r. life are presented:

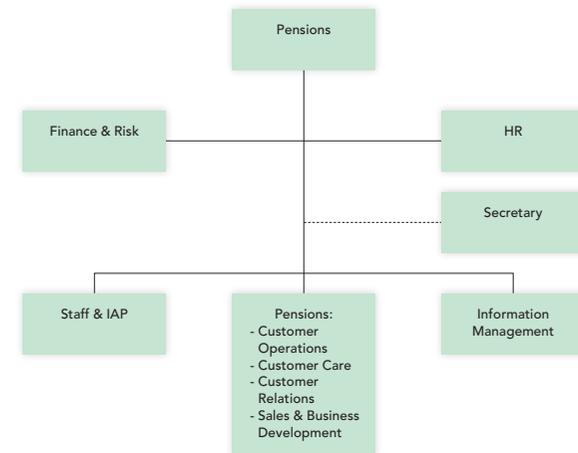
¹ Source: Market shares DNB 2021, market shares 2022 not available yet.



Life

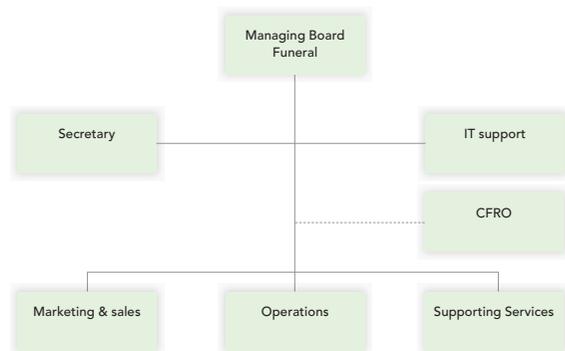


Pensions





Funeral



Key elements of policy pursued

a.s.r. life has split its Life and Pensions activities on 1 March 2022. As a result, the management of the (customer service of) Life, the ASR Pensioenfondsen Services (APFS) activities and Funeral are combined. Pensions can now focus entirely on (organic) growth and on the migration to a new IT landscape.

Pensions

a.s.r. life provides Defined Contribution (DC) pension products with recurring premiums, in which benefits are based on investment returns on selected funds, in some cases with guarantees. a.s.r. life also offered Defined Benefit (DB) products but these are no longer (actively) sold since 1 January 2022.

In 2022, a.s.r. successfully completed the integration of Brand New Day IORP and renamed the entity a.s.r. PPI. The selling product is Doenpensioen. a.s.r. PPI is a separate legal entity and therefore not included in the figures.

Products

a.s.r. life's DC proposition concerns the employee pension product Werknemers Pensioen (WnP). In 2022, the WnP had almost 151,000 active participants (2021: 130,000) and € 3.3 billion (2021: € 3.0 billion) in AuM, all invested in Socially Responsible Investments (SRI) funds.

In addition to the fixed annuity product, a.s.r. life also has a variable pension product. This offers customers a product for the payout phase of their pension, with an appropriate balance between risk and return.

Strategy and achievements

a.s.r. life's competitive position is being strengthened through the creation of further economies of scale and a focus on digital transformation and consolidation opportunities.

With the launch of the Ik denk vooruit ("I think ahead") platform, customers have been able to gain more insight into their financial situation so that they can take the right financial decisions. Through the platform, customers can register for the targeted investment product, which allows them to choose between three sustainable ASR Vooruit mixed funds.

The a.s.r. life's strategy in pensions consists of five focus points:

- Serving the needs of clients and partners. Helping customers increase their financial health, providing more insight into their financial situation and helping them to make the right financial decisions. Excellent operational performance with a high level of client satisfaction.
- Realising a new IT landscape to administer the pension portfolio. This new target IT landscape will contribute to the efficient implementation of changes in laws and regulations (among them the new pension legislation) and the further reduction of costs.
- Building a future-proof company by investing in the development of its employees and developing a data-driven organisation with healthy financial performance.
- Realising growth by having the right product propositions in place and looking for opportunities through ongoing market consolidation to acquire portfolios or companies in order to achieve cost reductions.
- Maintaining control by keeping service levels on-track, complying with legislation and continuously monitoring the risk appetite. If necessary, a.s.r. life can enact measures and make adjustments.

The average NPS-c rating for Pensions was 57 (2021: 52).



Funeral and Individual life

In 2022, the Funeral (Ardanta) and Individual life product lines were combined in the new business unit Life, because of the many similarities in their partially closed book portfolios.

In recent years, both Funeral and Individual life have proved to have excellent skills in the satisfactory integration of portfolios, efficiently and with an eye for customer interests. These skills are cherished, with potential future acquisitions in mind.



Products

Following product rationalisation in 2021, Funeral still has one active product: a capital funeral insurance policy with maximum options for the customer (free choice of undertaker and various options for the premium payment term and for retaining the value of the insurance). Distribution takes place via independent intermediaries and direct channels.

Individual life is still active in the market with term life insurance. Fierce competition, including from new providers, has led to a fall in a.s.r. life's share of this market in recent years.

Strategy and achievements

The focal point for Funeral and Individual life is the provisional innovative service to customers, driven by digitalisation. In 2022, Funeral introduced an upgraded portal for its customers, at which they can now make virtually all changes to their insurance policies themselves in a simple manner, at any time they choose.

This portal complies with the industry standard for digital access (Web Content Accessibility Guidelines (WCAG)- compliant). The share of output sent digitally rose in 2022 to 68% (2021: 56%) and 44% of all customer requests received by the customer contact departments are processed automatically ('straight through processing') (2021:31.5%). New customers contract funeral insurance entirely digitally. At Individual life, 90% of benefit claims are now processed digitally.

The bundling of expertise enables Funeral and Individual life to work together more effectively to realise the ambitions of efficient operations and 'best in class' customer service. The results of this approach are shown in the outcomes of the customer satisfaction surveys:

NPS-c Individual life 2022 is 49 (2021: 38).



NPC-c Funeral 2022 is 50 (2021: 47).



Both Funeral and Individual life make efforts to contribute towards a.s.r. life's sustainability ambitions. In 2022, a.s.r. life became the first funeral insurer to join GreenLeave, an alliance of organisations in the funeral undertaking sector which aims for 100% sustainable funerals in the Netherlands. With this membership, a.s.r. life aims to make an active contribution to research into and implementation of initiatives that promote sustainable funerals and communicate actively on this with customers.

Market developments

Pensions market

With the pension reform in the Netherlands, a.s.r. life expects the pension market to continue to move from DB to DC solutions over the coming years. With the acquisition of a.s.r. PPI, a.s.r. has further expanded its product range in DC solutions. One fifth of the Dutch pension market is still DB. Following the pension reform in the Netherlands the DB market provides strategic growth opportunities for a.s.r. life.

The switch from DB to DC results in a shift in risk from employer to employee/participant. This switch also leads to a declining cost coverage in the market. a.s.r. life is taking further steps to enable digital self-service, given that customers expect to be able to arrange their own financial affairs online.

A second result from the pension reform is that part of the company pension funds will transfer to the new Wet Toekomst Pensioenen (Future Pensions Act; WTP). Activating and guiding pension participants is an important element of the WTP. a.s.r. has extensive experience with this and is well-positioned to benefit from this development.

Funeral and Individual life market

In the Dutch market, a.s.r. life ranks third in Funeral and second in Individual life, measured by GWP. The market concentration that has taken place in recent years has further diminished the number of active providers.

The market share in new production of funeral insurance policies was 15.4% in 2022 (2021: 17%). The ambition is regain our market share in the coming years. Higher interest rates in 2022 led to lower premiums, helping to realise these ambitions.



Movements in the consumer price index in 2022 led to an unprecedentedly high index percentage of 14.3% for funeral. Close attention was paid to explaining this to customers. The lapse in the portfolio as a result of the price increases rose slightly in comparison with earlier years.

Internal control of processes and procedures

Risk management is an integral part of a.s.r.'s daily business operations. a.s.r. applies an integrated approach to managing risks ensuring that strategic objectives are met. The Risk Management Function (RMF) supports and advises a.s.r. life in identifying, measuring and managing risks, and monitors that adequate and immediate action is taken in the event of developments in the risk profile. a.s.r. life is exposed to the following types of risk: insurance risk, market risk, counterparty default risk, liquidity risk, strategic risk and operational risk. The risk management approach is described in more detail in chapter B.

The quality of internal control within a.s.r. life is assured by means of a Risk and Control Matrix (RCM) as part of a.s.r.'s Operational Risk Management (ORM) policy. This framework has been developed from an integral risk management perspective and, based on the framework and the a.s.r. ORM policy, the effectiveness of key controls in the core processes is periodically tested and management is informed of the results.

The results are reported to the Business Risk Committee of a.s.r. life as well as to the Non-financial Risk Committee of a.s.r. on a quarterly basis. The report also focuses on the management of strategic and compliance risks. New products and services with the corresponding customer brochures are subjected to an internal 'Product Approval and Review Process (PARP)'. Submitting products and services to customer and intermediary panels is often part of this before the PARP board gives its approval. It is assessed to what extent the wishes and ideas of customers can be included in the product development.

Existing products and services are regularly tested against the changing customer needs based on PARP. In addition, work processes at customers are tested on the basis of a customer journey. In this context, a process from the first to the last step is presented to customers and their comments are taken into account in order to improve the process so that it better meets the needs and expectations of the customer. Ultimately this can be seen in the customer's valuation as measured by the NPS.

The risks due to outsourcing are mitigated by periodically monitoring Service Level Agreements and controls based on ISAE3402 reports.

a.s.r. life aims to create a solid risk culture in which ethical values, desired behaviour and understanding of risk in the entity are fully embedded. Integrity is of the utmost importance at a.s.r. life: this is translated into a code of conduct and strict application policies for new and existing personnel, such as taking an oath or making a solemn affirmation when entering the company, and the 'fit and proper' aspect of the Solvency II regulation, ensuring that a.s.r. life is overseen and managed in a professional manner.

Quality control

The quality management of a.s.r. life contains policies, procedures and principles about how to serve its customers. The quality management is aimed at achieving optimal customer satisfaction and is taken into account in all contacts with customers. Internal standards have been set and are used to actively comply with a.s.r. life's quality standards and in the continuous improvement of a.s.r. life's services.

For the operational departments, including the client contact offices (front office) and the back office, the objectives in terms of customer focus and the internal standards of a.s.r. life have been translated into operational KPIs. These contribute to the management of communication with customers in terms of being error-free, transparency and speed of processing. Handling complaints is also central in this context. The KPIs are managed on a daily basis by the relevant management and staff. The results of the KPIs are periodically shared and discussed at all levels within a.s.r. life. Collaboration in risk governance contributes to ensuring customer satisfaction and putting the client's interests first.

Training of employees

a.s.r. life believes it is important to continuously educate its employees in knowledge and skills. Various training initiatives have been set up for this purpose. The initiatives receive continuous attention at both a general level and an individual level.

Continuous training takes place through:

- Twice a year the compulsory Permanent Training sessions for all employees;
- At individual level, the training tool of a.s.r. is used and appropriate education is provided at job level. The aim is to ensure that every employee is and remains permanently trained and up-to-date;
- A training plan is drawn up for new employees and updated after each evaluation session based on experience;
- The Gamification tool is available to all employees, which helps them interactively to refresh and deepen their knowledge of, among other things, integrity issues on a daily basis;
- Awareness programme on various themes as for instance information (cyber) security risk and the General Data Protection Regulatory.

Finance

Overall capital management is administered at group level. a.s.r. currently intends to consider investing capital above the management target Solvency II ratio (calculated based on the standard formula) of 160% (management threshold level) with the objective of creating value for its shareholders. If and when a.s.r. operates at a level (which may change over time) that is considerably above the management threshold level and it believes that it cannot invest this capital in value-creating opportunities for a prolonged period of time, it may decide, but is not obliged, to return (part of this) capital to shareholders. If a.s.r. chooses to return capital, it plans to do so in a form that is efficient for shareholders at that time.



a.s.r. actively manages its in-force business, which is expected to result in free capital generation over time. Additionally, business improvement and balance sheet restructuring should optimise the capital generation capacity while advancing the risk profile of the company. a.s.r. life is capitalised separately, and excess capital over management's targets are intended to be up-streamed to the holding company to the extent local regulations allow and within the internal risk appetite statement. In 2022, a.s.r. life made a dividend distribution of € 490 million (2021: € 501 million) to the holding company.

A.1.2 General information

The SFCR has been prepared by and is the sole responsibility of the Company's management. Selected Own Funds and SCR information are also reported in a.s.r. financial statements. KPMG has examined the 2022 financial statements and issued an unqualified audit report thereon. The SFCR is not in scope of the KPMG audit.

Name and contact details of the supervisory authority

| | |
|-----------------------------------|---------------------------------|
| Name: | De Nederlandsche Bank |
| Visiting address: | Spaklerweg 4, 1096 BA Amsterdam |
| Phone number (general): | +31 800 020 1068 |
| Phone number (business purposes): | +31 20 524 9111 |
| Email: | info@dnb.nl |

Name and contact details of the external auditor

| | |
|-------------------|--|
| Name: | KPMG Accountants N.V. |
| Visiting address: | Laan van Langerhuize 1, 1186 DS Amstelveen |
| Phone number: | +31 20 656 7890 |

A.2 Key figures

- The result before tax increased to € 1,013 million (2021: € 695 million)
- Gross written premiums increased by 3.1% to € 1,952 million (2021: € 1,893 million)
- Operating expenses increased to € 170 million (2021: € 165 million)

Key figures a.s.r. life

| (in €) | 2022 | 2021 |
|--|-------|-------|
| Gross written premiums | 1,952 | 1,893 |
| Operating expenses | -170 | -165 |
| Result before tax from continuing operations | 1,013 | 695 |
| Income tax (expense) / gain | -218 | -155 |
| Result for the year | 796 | 541 |
| New business (APE) | 127 | 151 |

Gross written premiums

At € 1,952 million, the gross written premiums increased by 3.1% (€ 59 million). This increase was mainly driven by a growth in DC pension products, which more than compensated for the decrease in the 'service book' portfolio comprising the existing DB Pension portfolio and Individual life. The gross written premiums of Funeral increased slightly.

Recurring premiums of the employee Pension DC product 'Werknemers Pensioen' rose by € 134 million (or 21%) to € 768 million, which includes the own pension scheme for a.s.r. employees. The number of active participants further increased to almost 151,000 (2021: almost 130,000). Assets under Management (AuM) of WnP further increased to € 3.3 billion (2021: € 3.0 billion). The growth in WnP offsets the decrease in the 'closed book' portfolio comprising of the existing DB/DC Pension portfolio. GWP of Individual life decreased partly as a result of surrenders of nominal policies by 0.7% (2021: 1.2%), mainly related to savings linked mortgages. The redemption rate decreased mainly due to increased market interest rates in 2022.

Operating expenses

Operating expenses increased by € 5 million to € 170 million, mainly driven by extraordinary compensation to employees for higher energy costs and expenses for realising a new IT landscape to administer the pension portfolio.

Life operating expenses, expressed in basis points of the basic life provision, increased slightly to 48 bps (2021: 45 bps), reflecting higher operating expenses and a lower average basic Life provision. This is in line with the target range of 40-50 bps for 2022-2024.

Result before tax

The result before tax from continuing operations increased by € 318 million to € 1,013 million (2021: € 695 million), mainly due to strengthening of technical provisions in previous year as a result of the outcome of the Liability Adequacy Test (LAT) which had a negative result impact of € 289 million on the figures of 2021.



The remaining increase of € 29 million mainly relates to a higher technical result, partly offset by a slightly lower investment margin. The higher technical result is mainly driven by higher mortality and disability result and was partly offset by strengthening of unit-linked provisions as a result of lower equity markets and higher interest rates. Despite a higher contribution from renewables and asset optimisation, investment margin decreased slightly due to additional provisioning in Funeral to reflect the Consumer Prices Indexation (CPI) of the portfolio and lower amortised realised gains.

New business (APE)

New business in APE decreased by € 24 million to € 127 million (2021: € 151 million). This is mainly due to renewals of ANW Hiaat ('ANW-gap') insurance contracts in previous year. Furthermore, switching from the pension DB-book to WnP decreased.

A.3 Investment performance

a.s.r.'s investment policy is aimed at striking a balance between generating returns and preventing risks. Protecting the solvency position is an important factor in this context.

A.3.1 Financial assets and derivatives

| Investments | 31 December 2022 | 31 December 2021 |
|--------------------------------------|------------------|------------------|
| Available for sale | 13,967 | 23,364 |
| At fair value through profit or loss | 5,077 | 4,567 |
| | 19,044 | 27,931 |

Breakdown of investments

| | 31 December 2022 | | | 31 December 2021 | | |
|---|--------------------|-----------------------------------|---------------|--------------------|-----------------------------------|---------------|
| | Available for sale | Fair value through profit or loss | Total | Available for sale | Fair value through profit or loss | Total |
| Fixed income investments | | | | | | |
| Government bonds | 4,979 | - | 4,979 | 10,345 | - | 10,345 |
| Corporate bonds | 5,593 | - | 5,593 | 9,083 | - | 9,083 |
| Asset-backed securities | 368 | - | 368 | 438 | - | 438 |
| Preference shares | 228 | - | 228 | 249 | - | 249 |
| Equities and similar investments | | | | | | |
| Equities | 2,798 | 80 | 2,878 | 3,129 | 16 | 3,145 |
| Real estate equity funds | - | 3,283 | 3,283 | - | 1,784 | 1,784 |
| Mortgage equity funds | - | 129 | 129 | 120 | 55 | 175 |
| Subsidiaries | - | 1,585 | 1,585 | - | 2,712 | 2,712 |
| Total investments | 13,967 | 5,077 | 19,044 | 23,364 | 4,567 | 27,931 |

The equities consist primarily of listed equities and investment in investment funds. Equities decreased mainly as a result of negative revaluations.

The increase in real estate equity funds and the decrease in subsidiaries is mainly related to DFLF. a.s.r. life lost control when external participants invested in DFLF.

Cash collateral received on derivatives were reinvested in government bonds. Derivatives decreased due to increasing interest rates, therefore cash collateral decreased and government bonds were sold. Government bonds also decreased due to negative revaluation due to increasing interest rates. Corporate bonds decreased also due to disposals and negative revaluations due to increasing interest rates.

For the real estate equity funds, the mortgage equity fund and a.s.r. PPI funds for which a.s.r. life has significant influence, being DMOF, DPRF, DCRF, DFLF, ASR Mortgage Fund, ASR Duurzaam Wereldwijd Aandelen Fonds and ASR Paraplufonds, the exemption of IAS 28 was used, thereby measuring the



investments at fair value through profit or loss and presenting them as a separate category within the investments at fair value through profit or loss.

All investments at fair value through profit or loss are designated as such by a.s.r. life upon initial recognition.

Based on their contractual maturity, an amount of € 10,559 million (2021: € 17,423 million) of fixed income investments is expected to be recovered after more than one year after the balance sheet date. For assets without a contractual maturity date, it is expected that they will be recovered after more than one year after the balance sheet date.

Investment income

Breakdown of investment income per category

| | 2022 | 2021 |
|---|--------------|--------------|
| Interest income from receivables due from credit institutions | 97 | 109 |
| Interest income from investments | 282 | 273 |
| Interest income from amounts due from customers | 266 | 239 |
| Interest income from derivatives | 638 | 556 |
| Other interest income | 37 | 54 |
| Interest income | 1,321 | 1,231 |
| Dividend on equities | 58 | 58 |
| Dividend on subsidiaries | 45 | 32 |
| Dividend on real estate equity funds | 58 | 46 |
| Dividend on mortgage equity funds | 4 | 4 |
| Rentals from investment property | 24 | 29 |
| Dividend and other investment income | 189 | 168 |
| Total Investment income | 1,510 | 1,399 |

The effective interest method has been applied to an amount of € 645 million (2021: € 620 million) of the interest income from financial assets not classified at fair value through profit or loss. Interest income includes € 2 million (2021: € 3 million) of interest received on impaired fixed-income securities.

A.3.2 Consolidated statement of comprehensive income

Consolidated statement of comprehensive income for the year ended 31 December

| (in € millions) | Note | 2022 | 2021 |
|---|------|---------------|------------|
| Net result | | 796 | 541 |
| Unrealised change in value of property for own use | | -8 | -9 |
| Income tax on items that will not be reclassified to profit or loss | | 2 | 2 |
| Total items that will not be reclassified to profit or loss | | -6 | -7 |
| Unrealised change in value of available for sale assets | | -3,376 | -418 |
| Realised gains/(losses) on available for sale assets reclassified to profit or loss | | -579 | -411 |
| Shadow accounting | | 2,324 | 1,150 |
| Segregated investment pools | | 97 | -89 |
| Income tax on items that may be reclassified subsequently to profit or loss | | 349 | -41 |
| Total items that may be reclassified subsequently to profit or loss | | -1,185 | 190 |
| Total other comprehensive income, after tax | | -1,191 | 184 |
| Total comprehensive income | | -396 | 724 |

Shadow accounting allows a recognised but unrealised gain or loss on an asset to be transferred to liabilities arising from insurance contracts.

A.3.3 Information about investments in securities

As a.s.r. life has no investments in securitisation, no further information is included here.

A.4 Performance of other activities

No other activities are material.



A.5 Any other information

As of 1 March 2022, Individual life and Pensions activities have been split. The split allows Pensions to fully focus on (commercial) growth and the migration and investments to a new target landscape. The management of the customer service of Individual life and Funeral are brought under one control. With the cooperation of the portfolios of Ardanta, Individual life and APFS, there is a joint focus to achieve a more efficient operation and a joint 'best in class customer service'. Commercially, there are also opportunities for synergy where cost efficiency and digitalisation can be further improved.

In October 2022 a.s.r. announced the business combination of a.s.r. with Aegon Nederland. The closing is expected for 1 July 2023 at the earliest and will have impact on the business.



B System of governance

B.1 General information on the system of governance

This paragraph contains a description of group policy, which is also applicable for a.s.r. life.

B.1.1 Corporate governance

Executive Board

The composition of the Executive Board (EB) of a.s.r. life is the same as that of a.s.r. The EB is collectively responsible for the day-to-day conduct of business of a.s.r. as a whole and for its strategy, structure and performance. In performing its duties, the EB is guided by a.s.r.'s interests, which include the interests of the businesses connected with a.s.r., which, in turn, include the interests of customers, shareholders, employees and society in general. For the performance of its duties, the EB is accountable to the Supervisory Board (SB) and to the General Meeting of Shareholders.

The EB currently consists of three members. The General Meeting of Shareholders appoints the members of the EB and may suspend or dismiss any member of the EB at any time. The SB may also suspend any member of the EB. A suspension by the SB may be raised by the General Meeting of Shareholders at any time.

Apart from the EB, each division of a.s.r. life has its own management team (MT).

Supervisory Board

The composition of the SB of a.s.r. life is the same as that of a.s.r. The SB performs its duties on the basis of three roles; the supervisory role, the advisory role and the employer's role. The SB supervises the policy pursued by the EB and the general course of affairs at a.s.r. and its group entities. Specific powers are vested in the SB, including the approval of certain decisions taken by the EB.

The SB currently consists of five members. The General Meeting of Shareholders appoints the members of the SB and may suspend or dismiss any member of the SB at any time.

B.1.1.1 Supervisory Board Committees

The SB of a.s.r. has three committees that discuss specific issues and prepare items on which the full SB takes decisions. The chairperson of each committee reports on the main points of discussion and the

resulting recommendations are discussed at the subsequent SB meeting. The minutes of the committee meetings are available to the members of the SB.

The three committees are:

- the Audit & Risk Committee (A&RC)
- the Remuneration Committee (RC)
- the Nomination & ESG Committee (N&ESGC)

B.1.1.2 Corporate Governance

a.s.r. is the group's holding company. a.s.r. Life is one of the supervised entities (OTSOs) within the group. a.s.r. is a public limited company which is listed on the Euronext Amsterdam Exchange and governed by Dutch corporate law. It has a two-tier board governance structure consisting of an Executive Board (EB) and a Supervisory Board (SB). The EB is responsible for the realisation of the company's corporate objectives, the strategy with its associated risks and the delivery of the results. The SB is responsible for advising the EB, supervising its policies and for the general state of affairs relating to a.s.r. and its group entities.

The EB members and SB members of a.s.r. life are the same as those of a.s.r.

B.1.1.3 Executive Board

The Executive Board (EB) is collectively responsible for the day-to-day conduct of business at a.s.r. and for its strategy, structure and performance. In carrying out its duties, the EB is guided by a.s.r.'s interests, which include the interests of the businesses connected with it, which in turn include the interests of customers, shareholders, employees and society at large. The EB is accountable to the Supervisory Board (SB) and the General Meeting of Shareholders with regard to the performance of its duties.

Certain resolutions made by the EB require the approval of the SB and/or the General Meeting of Shareholders. These resolutions are outlined in the a.s.r. articles of association and the Rules of Procedure of the EB. Both can be viewed at www.asrnl.com.

Composition of the Executive Board

The articles of association of a.s.r. specify that the EB must consist of a minimum of two members, including at least a CEO and CFO. Only candidates found to meet the fit and proper test under the Dutch



Financial Supervision Act are eligible for appointment. The EB currently consists of the following three members: the CEO, Jos Baeten, the CFO, Ewout Hollegien and the COO/CTO, Ingrid de Swart.

Permanent education and evaluation

The 2022 self-evaluation session of the EB was conducted on the basis of a questionnaire and discussed with the members of the EB and the company secretary.

The EB looks back positively on an exciting and intense year with many internal and external developments. These included remaining COVID-19 restrictions, geopolitical tensions and resulting economic uncertainty at the beginning of the year, the Aegon Transaction in the second half of the year, and CLA negotiations at the end of the year. Cooperation within the EB, in the first full year of its current composition, was evaluated as positive, constructive and open. Issues and dilemmas were discussed freely, focusing on content without impacting personal relationships. Within the organisation the EB is seen as a natural, cohesive, and confident team, with complementary skillsets that ensure stakeholder interests are addressed in a balanced way. Communication with the SB is assessed as transparent and positive, whereby the intensified collaboration during the Aegon Transaction process further strengthened the relationship between the EB and the SB. The EB looks forward to maintaining these constructive dynamics with the new composition of the SB after closing of the Aegon Transaction.

Focus areas for 2023 include the closing of the Aegon Transaction and the subsequent integration process, as well as realisation of the ambitious medium term targets. Sustainability and long-term value creation are increasingly and naturally integrated into the business, but in the coming years further developments in these areas will also remain important focus points for the new combination.

The performance of the EB was also assessed by the SB as part of the scope of the annual assessment process. In this context, interviews are held twice a year with the individual EB members (by two SB members on each occasion) in which the results of the aforementioned self-evaluation are included.

In 2022, specific sessions were also organised jointly with the SB for the benefit of further education. The first session, led by Asset Management, provided an overview and update on the interest rate and inflation sensitivity of the a.s.r. balance sheet, as well as recent inflation developments and drivers of inflation in the short and long term. The second session focused on the implementation of a partial internal model for the envisaged business combination of a.s.r. and Aegon Nederland. During this session, led by Group Balance Sheet Management and Group Risk Management, the SB and EB were given an overview of internal models in the Dutch insurance sector as a whole, the internal model used at Aegon Nederland, the advantages of implementing an internal model for the new business combination and the steps required to do so. The session was the first in a series, to be continued in 2023.

The individual EB members attended (leadership) sessions on various topics in their capacity as board members and supervisory directors at other organisations.

B.1.1.4 Supervisory Board

The SB has three roles: the supervisory role, the advisory role and the employer's role for the EB. The SB supervises the policy pursued by the EB and the general course of affairs at a.s.r. and its group entities. Specific powers are vested in the SB, including approving certain EB decisions.

Composition of the Supervisory Board

In line with a.s.r.'s articles of association, the SB should consist of at least three members.

The SB currently consists of five members: Joop Wijn (chair), Herman Hintzen, Sonja Barendregt, Gerard van Olphen and Gisella van Vollenhoven. The composition of the SB of ASR Levensverzekering N.V. and ASR Schadeverzekering N.V. is the same as that of ASR Nederland N.V.

Furthermore, in accordance with the rotation schedule the first term of office of Gisella van Vollenhoven and Gerard van Olphen will expire at the close of the 2023 AGM. Both Gisella van Vollenhoven and Gerard van Olphen were nominated by the SB for a reappointment for a further four-year term. The proposal to reappoint Gisella van Vollenhoven and Gerard van Olphen will be submitted to the AGM in 2023.

Diverse representation

The SB has drawn up a projected profile for its size and composition, taking into account the nature of a.s.r.'s business, its activities and the desired expertise and background of its members. The SB profile can be viewed on www.asrnl.com.

One of the objectives of a.s.r.'s DGI policy is to achieve a SB consisting of at least one-third female and at least one-third male members. In 2022, the composition of the SB met this gender ratio, with 40% female and 60% male members.

The composition of the SB is such that each member has the skills to assess the main aspects of overall policy and the SB as a whole matches the desired profile due to a combination of experience, expertise and independence of the individual members. The diversity of its members ensures the complementary profile of the SB. a.s.r. will continue to strive for an adequate and balanced composition of the SB in any future appointments by taking into account the DGI policy and all relevant selection criteria such as executive experience, experience in finance and experience in the political and social environment.

Independence and conflicts of interest

In line with the Dutch Corporate Governance Code, SB members of a.s.r. are appointed by the AGM for a four-year term. They can be reappointed for a single additional four-year term and subsequently reappointed for a period of two years, which appointment may be extended by two years at most. Reappointments following an eight-year period must be justified in the SB report. SB members retire no later than by the AGM immediately following the end of their term of appointment.



All the SB members passed the fit and proper test required under the Dutch Financial Supervision Act. In 2022, there were no reports of potential conflicts of interest relating to members of the SB. The SB was also able to carry out its tasks independently pursuant to principles 2.1.7 to 2.1.9 of the Dutch Corporate Governance Code, in accordance with article 39 (1) Directive 2014/56/EU. The maximum number of other mandates for a member of the SB is set at 5.

Permanent education and evaluation

The SB is responsible for assessing the quality of its own performance. It therefore performs an annual self-assessment and discussion of its own performance and that of its committees and members. A self-assessment with external supervision is carried out every three years.

The self-assessment for 2022 was based on a questionnaire and interviews with members of the SB and the EB. The following aspects were assessed:

- Role and composition of the SB;
- Effectiveness of processes (information-gathering and decision-making);
- Role as an employer;
- Advisory role and strategy.

The outcome of the assessment was discussed by the members of the SB and the Company Secretary, and at a later stage with the members of the EB.

The current composition of the SB is assessed as good and diversified; dynamics within the SB are transparent and positive. The SB has an open, constructive and professional relationship with the EB. Dilemmas, in general or in specific files, are openly discussed both during meetings and during informal (and one-on-one) contact. In 2022 the Aegon Transaction demanded significant extra flexibility and commitment from the SB. The SB was an important sparring partner and advisor for the EB during this process, which strengthened the relationship between the members. The evaluation of the remuneration policy was another extra focus area in 2022.

The Aegon Transaction will bring new challenges for a.s.r., including in terms of governance. The SB looks forward to the appointment of Daniëlle Jansen Heijtmajer and Lard Friese (conditional upon closing of the Aegon Transaction), whose specific knowledge and expertise will be valuable in achieving a successful integration. Attention will be given to smoothly onboarding the new members and to maintaining the currently existing open and constructive dynamics within the SB.

The SB is also satisfied with the division of roles between and within the SB committees. The SB looks forward to welcoming Daniëlle Jansen Heijtmajer to the Nomination and ESG Committee and Lard Friese to the Audit & Risk Committee after closing of the Aegon Transaction.

In 2022, specific sessions were also organised jointly with the SB for the benefit of further education. The first session, led by Asset Management, provided an overview and update on the interest rate and inflation sensitivity of the a.s.r. balance sheet, as well as recent inflation developments and drivers of inflation in the short and long term. The second session focused on the implementation of a partial internal model for the envisaged business combination of a.s.r. and Aegon Nederland. During this session, led by Group Balance Sheet Management and Group Risk Management, the SB and EB were given an overview of internal models in the Dutch insurance sector as a whole, the internal model used at Aegon Nederland, the advantages of implementing an internal model for the new business combination and the steps required to do so. The session was the first in a series, to be continued in 2023.

The individual SB members attended (leadership) sessions on various topics in their capacity as supervisory members at other organisations.

B.1.1.5 Governance codes

The current articles of association (dated 3 August 2021) of a.s.r. are published on www.asrnl.com. The SB and EB rules of a.s.r. are also available on the corporate website. These rules were most recently amended and adopted in 2022 respectively 2021.

Dutch Corporate Governance Code

Since being listed on Euronext Amsterdam, a.s.r. has been required to abide by the Dutch Corporate Governance Code. a.s.r. complies with all the principles and best practices of the Dutch Corporate Governance Code, with the exception of those that are not applicable. In the Corporate Governance section of its website, a.s.r. also publishes a detailed comply or explain list indicating which principles and best practices of the Dutch Corporate Governance Code (2016) do not apply to it.

Professional oath

On 1 January 2013, the Dutch financial sector introduced a mandatory oath for EB and SB members of financial institutions licensed in the Netherlands. With regard to insurance companies, in addition to the EB and SB members, individuals holding a management position immediately below the EB who are responsible for staff who could have a significant influence on the risk profile of the insurance company are also required to take the oath, as are certain other employees. This includes individuals who may (independently) significantly influence the risk profile of the undertaking as well as those who are or may be involved in the provision of financial services.

Notwithstanding the above, a.s.r. has decided that all employees and other individuals carrying out activities under its responsibility must also take the oath. New employees must take the oath within three months of joining the company.



Decision concerning disclosure of non-financial information and Decision concerning disclosure of diversity policy

a.s.r. also wishes to be transparent concerning the non-financial information in its Management Report. Since the 2017 reporting year, the relevant legal requirements have been extended for large companies of public interest. Such organisations, which include a.s.r., are expected to clarify how they deal with environmental, social and personnel issues, respect for human rights and the fight against corruption and bribery in their business operations and value chain. Large listed companies must also provide insight into their policy on diversity in relation to the EB and SB. In addition, as from 1 January 2022, large companies of public interest must publish information about how and to what extent their activities are associated with economic activities (eligibility) that qualify as environmentally sustainable as defined in Regulation (EU) 2020/852 (EU Taxonomy Regulation).

B.1.2 Related-party transactions

A related party is a person or entity that has significant influence over another entity, or has the ability to affect the financial and operating policies of the other party. Parties related to a.s.r. life include a.s.r. and its subsidiaries, associates, joint ventures, key management personnel, close family members of any person referred to above, entities controlled or significantly influenced by any person referred to above and any other affiliated entity.

a.s.r. life regularly enters into transactions with related parties during the conduct of its business. These transactions mainly involve loans and receivables, allocated costs and premiums received, and are conducted on terms equivalent to those that prevail in arm's length transactions.

- The remuneration of the key management personnel of a.s.r. life is described in chapter B.1.2 of the 2022 SFCR of a.s.r.;
- The operating expenses are predominantly intercompany, consisting of allocated expenses from head office, support functions and expenses related to personnel;
- Transactions with a.s.r. concern the payment of taxes as a.s.r. heads the fiscal unity;
- The post-employment benefit plan of a.s.r. has been insured by a.s.r. life. The premium income in the following table concerns the premiums related to this post-employment benefit plan.

Positions and transactions between a.s.r. life, associates and other related parties

The table below shows the financial scope of the related party transactions of a.s.r. life:

- Associates;
- Other related parties (including a.s.r. and its subsidiaries).

Financial scope of a.s.r. life related party transactions

| | Associates | Other related parties | Total |
|--|------------|-----------------------|-------|
| 2022 | | | |
| Balance sheet items with related parties as at 31 December | | | |
| Loans and receivables | 17 | 596 | 613 |
| Other assets | - | 76 | 76 |
| Insurance liabilities | - | 2,632 | 2,632 |
| Due to customers | - | 372 | 372 |
| Other liabilities | 176 | 266 | 442 |
| Transactions in the income statement for the financial year | | | |
| Net insurance premiums | - | 185 | 185 |
| Investment income | - | 7 | 7 |
| Interest income | - | 8 | 8 |
| Insurance claims and benefits | - | 194 | 194 |
| Commission expenses | - | 12 | 12 |
| Operating expenses | - | 36 | 36 |

| | Associates | Other related parties | Total |
|--|------------|-----------------------|-------|
| 2021 | | | |
| Balance sheet items with related parties as at 31 December | | | |
| Loans and receivables | 10 | 441 | 451 |
| Other assets | - | 4 | 4 |
| Insurance liabilities | - | 2,863 | 2,863 |
| Due to customers | - | 192 | 192 |
| Other liabilities | 177 | 375 | 552 |
| Transactions in the income statement for the financial year | | | |
| Net insurance premiums | - | 155 | 155 |
| Investment income | - | 12 | 12 |
| Interest income | - | 8 | 8 |
| Insurance claims and benefits | - | 213 | 213 |
| Commission expenses | - | 15 | 15 |
| Operating expenses | - | 34 | 34 |



In 2022, a.s.r. life sold mortgages to a.s.r. non-life at a market value of € 523 million. The realised loss on these transactions (€ 57 million) has been added to the liabilities arising from insurance contracts due to the application of shadow accounting.

In 2022, a.s.r. life entered into two funds of a.s.r. PPI. Transactions and balance sheet items with a.s.r. PPI are included under associates in the table above.

An amount of € 7 million rental income from a.s.r. is included in the investment income (2021: € 8 million).

No provisions for impairments have been recognised on the loans and receivables for the years 2022 and 2021.

During 2022, a.s.r. life paid a dividend to a.s.r. in the amount of € 490 million (2021: € 501 million).

B.1.3 Remuneration of Supervisory Board and Executive Board

The members of the EB and SB of a.s.r. life are the same members in the EB and SB of a.s.r. The amount of compensation paid for the services provided by the EB and the SB of a.s.r. was not charged to a.s.r. life, and is subsequently not accounted for in the result of a.s.r. life.

The remuneration policy of the EB and SB Board members is determined in accordance with the current Articles of Association of a.s.r. An overview of these remunerations is described in the consolidated financial statements of a.s.r. group.

B.2 Fit and Proper requirements

a.s.r. has a policy that sets out principles and criteria to ensure that persons who effectively run the undertaking and other key functions are fit and proper. The fit and proper policy provides guidance on the assessment process and contributes to controlled and sound business operations and promotes the stability and integrity of a.s.r. as well as customer confidence.

a.s.r. assesses all employees (internal and external FTEs) for their reliability and integrity prior to their appointment and periodically during the course of employment. This includes persons who effectively run the undertaking and other key functions.

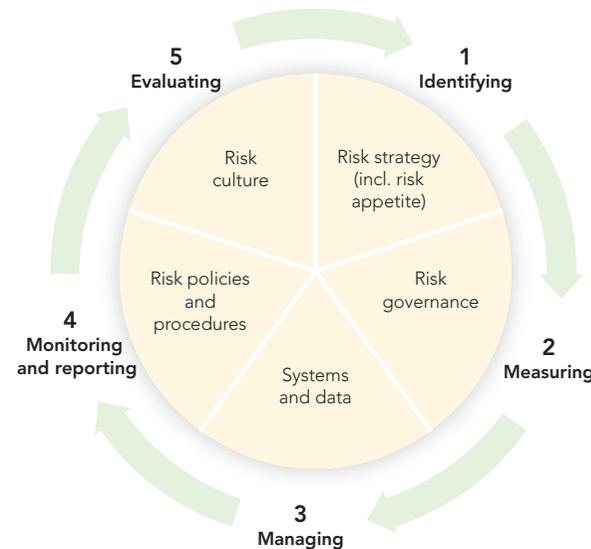
The fit and proper requirements that are imposed on persons who effectively run the undertaking and other key functions are included in the job profile, which is used as a basis for recruitment. Each year, an assessment is made of the extent to which an employee may require additional training. In addition, a.s.r. has a program for the continuing education of persons who effectively run the undertaking and other key functions.

B.3 Risk management system including the Own Risk and Solvency Assessment Risk Management System

This paragraph contains a description of group policy, which is applicable for the solo entity. It is of great importance to a.s.r. that risks within all business lines are timely and adequately controlled. In order to do so, a.s.r. implemented a Risk Management (RM) framework based on internationally recognised and accepted standards (such as COSO ERM and ISO 31000 RM principles and guidelines). Using this framework, material risks that a.s.r. is, or can be, exposed to, are identified, measured, managed, monitored, reported and evaluated. The RM framework is both applicable to a.s.r. group and the underlying (legal) business entities.

B.3.1 Risk Management Framework

The figure below is the RM framework as applied by a.s.r.



Risk Management framework

The RM framework consists of risk strategy (including risk appetite), risk governance, systems and data, risk policies and procedures, risk culture, and RM process. The RM framework contributes to achieving the strategic, tactical and operational objectives as set out by a.s.r. The overall effectiveness of the RM framework is evaluated as part of the regular internal review of the system of governance.



Risk strategy (incl. risk appetite)

Risk strategy is defined to contain at least the following elements:

- Strategic, tactical and operational objectives that are pursued;
- The risk appetite in pursuit of those strategic, tactical and operational objectives.

a.s.r.'s risk strategy aims to ensure that decisions are made within the boundaries of the risk appetite, as stipulated annually by the Executive Board (EB) and the Supervisory Board (SB) (see chapter B.3.1.1 Risk strategy and risk appetite).

Risk governance

Risk governance can be seen as the way in which risks are managed, through a sound risk governance structure and clear tasks and responsibilities, including risk ownership. a.s.r. employs a risk governance framework that entails the tasks and responsibilities of the RM organisation and the structure of the Risk committees (see chapter B.3.1.2 Risk governance).

Systems and data

Systems and data support the RM process and provide management information to the risk committees and other relevant bodies. a.s.r. finds it very important to have qualitatively adequate data, models and systems in place, in order to be able to report and steer correct figures and to apply risk-mitigating measures timely. To ensure this, a.s.r. has designed a policy for data quality and model validation in line with Solvency II. Tools, models and systems are implemented to support the RM process by giving guidance to and insights into the key risk indicators, risk tolerance levels, boundaries and actions, and remediation plans to mitigate risks (see chapter B.3.1.3 Systems and data).

Risk policies and procedures:

Risk policies and procedures at least:

- Define the risk categories and the methods to measure the risks;
- Outline how each relevant category, risk area and any potential aggregation of risk is managed;
- Describe the connection with the overall solvency needs assessment as identified in the Own Risk & Solvency Assessment (ORSA), the regulatory capital requirements and the risk tolerances;
- Provide specific risk tolerances and limits within all relevant risk categories in line with the risk appetite statements;
- Describe the frequency and content of regular stress tests and the circumstances that would warrant ad-hoc stress tests.

The classification of risks within a.s.r. is performed in line with, but is not limited to, the Solvency II risks. Each risk category consists of one or more policies or procedures that explicates how risks are identified, measured and controlled within a.s.r. (see chapter B.3.1.4 Risk policies and procedures).

Risk culture

An effective risk culture is one that enables and rewards individuals and groups for taking risks in an informed manner. It is a term describing the values, beliefs, knowledge, attitudes and understanding about risk. All the elements of the RM framework combined make an effective risk culture.

Within a.s.r. risk culture is an important element that emphasizes the human side of RM. The EB has a distinguished role in expressing the appropriate norms and values (tone at the top). a.s.r. employs several measures to increase the risk awareness and, in doing so, the risk culture (see chapter B.3.1.5 Risk culture).

Risk Management process

The RM process contains all activities within the RM processes to structurally 1) identify risks; 2) measure risks; 3) manage risks; 4) monitor and report on risks; and 5) evaluate the risk profile and RM framework. At a.s.r., the RM process is used to implement the risk strategy in the steps mentioned. These five steps are applicable to the risks within the company to be managed effectively (see chapter B.3.1.6 Risk Management process).

B.3.1.1 Risk strategy and risk appetite

a.s.r.'s risk strategy aims to ensure that decisions are made within the boundaries of the risk appetite, as stipulated annually by the EB and the SB.

Risk appetite is defined as the level and type of risk a.s.r. is willing to bear in order to meet its strategic, tactical and operational objectives. The risk appetite is formulated to give direction to the management of the (strategic) risks. The risk appetite contains a number of qualitative and quantitative risk appetite statements and is defined for both financial (FR) and non-financial risks (NFR). The statements highlight the risk preferences and limits of the organisation and are viewed as key elements for the realisation of the strategy. The statements and limits are defined at both group level and at legal entity level and are determined by the a.s.r. risk committee and approved by the SB.

Risk strategy aims to ensure that management decisions lead to a risk profile that remains within the risk limits. The risk strategy entails all processes to identifying, measuring and managing risks and opportunities. Through a combined top-down and bottom-up Strategic Risk Analysis (SRA) approach, the most important strategic risks are identified. The main strategic risks are translated into 'risk priorities' and 'emerging risks' at group level and are monitored throughout the year. Important changes in risk priorities and emerging risks are reported to the a.s.r. risk committee and the Audit & Risk Committee. Output from the SRA, combined with the risk appetite statements, provides insight into the strategic risk profile of a.s.r. and underlying legal entities. The entire risk profile is monitored in the relevant risk committees.

B.3.1.2 Risk governance

a.s.r.'s risk governance can be described by:

- risk ownership;



- the implemented three lines of defence model and associated (clear delimitation of) tasks and responsibilities of key function holders; and
- the risk committee structure to ensure adequate decision making.

Risk ownership

The EB has the final responsibility for risk exposures and management within the organisation. Part of the responsibilities have been delegated to persons that manage the divisions where the actual risk-taking takes place. Risk owners are accountable for one or more risk exposures that are inextricably linked to the department or product line they are responsible for. Through the risk committee structure, risk owners provide accountability for the risk exposures.

Three lines of defence

The risk governance structure is based on the ‘three lines of defence’ model. The ‘three lines of defence’ model consists of three defence lines with different responsibilities with respect to the ownership of controlling risks. The model below provides insight in the organisation of the three lines of defence within a.s.r.

| Three lines of defence | | |
|--|--|--|
| First line of defence | Second line of defence | Third line of defence |
| <ul style="list-style-type: none"> • Executive Board • Management teams of the business lines and their employees • Finance & risk decentral | <ul style="list-style-type: none"> • Group Risk Management department <ul style="list-style-type: none"> - Risk management function - Actuarial function • Integrity department <ul style="list-style-type: none"> - Compliance function | <ul style="list-style-type: none"> • Audit department <ul style="list-style-type: none"> - Internal audit function |
| Ownership and implementation | Policies and monitoring implementation by 1st line | Independent assessment of 1st and 2nd lines |
| <ul style="list-style-type: none"> • Responsible for the identification and the risks in the daily business • Has the day-to-day responsibility for operations (sales, pricing, underwriting, claims handling, etc.) and is responsible for implementing risk frameworks and policies. | <ul style="list-style-type: none"> • Challenges the 1st line and supports the 1st line to achieve their business objectives in accordance with the risk appetite • Has sufficient countervailing power to prevent risk concentrations and other forms of excessive risk taking • Responsible for developing risk policies and monitoring the compliance with these policies | <ul style="list-style-type: none"> • Responsible for providing dedicated assurance services and oversees and assesses the functioning and the effectiveness of the first two lines of defence |

Positioning of key functions

Within the risk governance, the key functions (compliance, risk, actuarial and audit) are organised in accordance with Solvency II regulation. They play an important role as countervailing power of management in the decision-making process. The four key functions are independently positioned within a.s.r. In all the risk committees one or more key functions participate. None of the functions has voting rights in the committees, in order to remain fully independent as countervailing power. All functions have direct communication lines with the EB and can escalate to the chairman of the Audit & Risk Committee of the SB. Furthermore, the key functions have regular meetings with the supervisors of the Dutch Central Bank (DNB) and / or The Dutch Authority for the Financial Markets (AFM).

Group Risk Management

GRM is responsible for the execution of the RM function (RMF) and the Actuarial Function (AF). The department is led by the CRO, which is also the RMF holder. GRM consists of the following sub-departments:

- Enterprise Risk Management;
- Financial Risk Management;
- Model Validation.

As of 1 January 2023, Business Risk Management (BRM) will be hierarchically part of GRM. An important goal for this change is to realise a future proof and efficient RM organisation (regarding the organisation, processes and the execution of non financial risk management) taking into account the impact of the intended acquisition of Aegon Nederland. For the implementation a maximum period of 2-3 years is expected.

Enterprise Risk Management

Enterprise Risk Management (ERM) is responsible for second-line strategic and operational (including IT) RM and the enhancement of the risk awareness for a.s.r. and its subsidiaries. The responsibilities of ERM include the development of risk policies and procedures, the annual review and update of the risk strategy (risk appetite), the coordination of the SRA process leading to the risk priorities and emerging risks and ORSA scenarios and the monitoring of the non-financial risk profile. For the management of operational risks, a.s.r. has a solid Risk-Control framework in place that contributes to its long-term solidity. The quality of the framework is continuously enhanced by the analysis of operational incidents, periodic risk assessments and monitoring by the RMF. ERM actively promotes risk awareness at all levels to contribute to the vision of staying a socially relevant insurer.

Financial Risk Management

Financial Risk Management (FRM) is responsible for the second line financial RM and supports both the AF and RMF. An important task of FRM is to be the countervailing power to the EB and management in managing financial risks for a.s.r. and its subsidiaries. FRM assesses the accuracy and reliability of the market risk, counterparty risk, insurance risk and liquidity risk, risk margin and best estimate liability. As part of the AF, FRM reviews the technical provisions, monitors methodologies, assumptions and models



used in these calculations, and assesses the adequacy and quality of data used in the calculations. Furthermore, the AF expresses an opinion on the underwriting policy and determines if risks related to the profitability of new products are sufficiently addressed in the product development process. The AF also expresses an opinion on the adequacy of reinsurance arrangements. Other responsibilities of financial RM are e.g. monitoring Solvency II compliancy (e.g. changes in Solvency II regulation), updating policies on valuation and risk, activities related to the DNB (National Supervisor), assessment of the ORSA (financial parts), assessment of strategic initiatives.

Model Validation

Model Validation (MV) is responsible for performing validation activities or having them carried out in accordance with the drawn up annual model validation plan. MV is responsible for supervising compliance with the model validation policy, discussing and challenging the (draft) validation reports and advising the Model Committee. The MV is a separate sub-department within GRM. The MV is part of the RMF and operates independent of the AF.

Compliance

Compliance is responsible for the execution of the compliance function. An important task of Compliance is to be the countervailing power to the EB and other management in managing compliance risks for a.s.r. and its subsidiaries. The mission of the compliance function is to enhance and ensure a controlled and sound business operation.

As second line of defence, Compliance encourages the organisation to comply with relevant rules and regulations, ethical standards and the internal standards derived from them ('rules') by providing advice and formulating policies. Compliance supports the first line in the identification of compliance risks and assesses the effectiveness of RM on which Compliance reports to the relevant risk committees. In doing so, Compliance uses a compliance risk and monitoring framework. In line with RM, Compliance also creates further awareness to comply with the rules and desired ethical behavior. Compliance coordinates interaction with regulators in order to maintain effective and transparent relationships with those authorities.

Audit

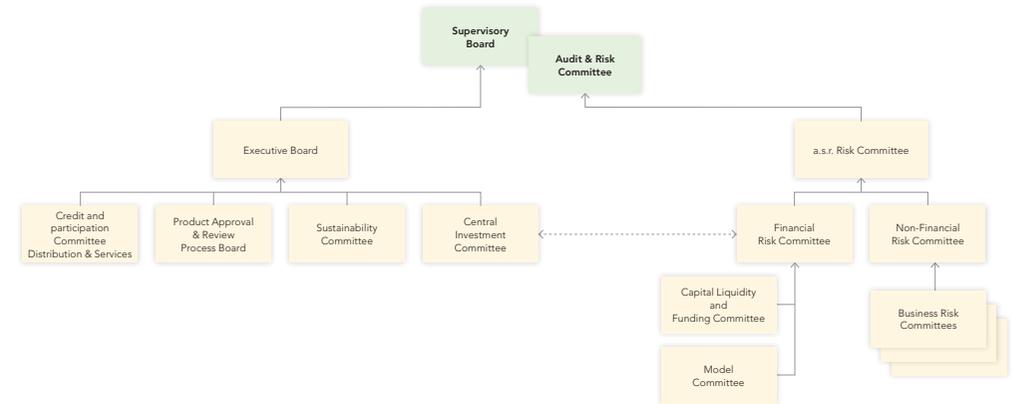
The Audit department, the third line of defence, provides an independent opinion on governance, risk and management processes, with the goal of supporting the EB and other management of a.s.r. in achieving the corporate objectives. To that end, Audit evaluates the effectiveness of governance, risk and management processes, and provides pragmatic advice that can be implemented to further optimise these processes. In addition, senior management can engage Audit for specific advisory projects.

Risk committee structure

a.s.r. has established a structure of risk committees with the objective to monitor the risk profile for a.s.r. group, its legal entities and its business lines in order to ensure that it remains within the risk appetite and the underlying risk tolerances and risk limits. When triggers are hit or likely to be hit, risk committees

make decisions regarding measures to be taken, being risk-mitigating measures or measures regarding governance, such as the frequency of their meetings. For each of the risk committees a statute is drawn up in which the tasks, composition and responsibilities of the committee are defined.

Risk committee structure



Audit & Risk Committee

The Audit & Risk Committee was established by the Supervisory Board to gain support, among other things, in the following matters:

- Assessment of the risk appetite proposal and quarterly monitoring of the risk profile;
- Assessment of the annual report, including the financial statements of a.s.r.;
- The relationship with the independent external auditor, including the assessment of the quality and independence of the independent external auditor and the proposal by the SB to the AGM to appoint the independent external auditor;
- The performance of the audit function, compliance function, the AF and the RMF;
- Compliance with rules and regulations; and
- The financial position.

The Audit & Risk Committee has three members of the SB, one of whom acts as the chairman.

a.s.r. risk committee

The a.s.r. risk committee monitors a.s.r.'s overall risk profile on a quarterly basis. At least annually, the a.s.r. risk committee determines the risk appetite statements, limits and targets for a.s.r. This relates to the overall a.s.r. risk appetite and the subdivision of risk appetite by financial and non-financial risks. The risk appetite is then submitted to the a.s.r. Audit & Risk Committee, which advises the SB on the approval of



the risk appetite. The a.s.r. risk committee also monitors the progress made in managing risks included in the risk priorities and emerging risks of the EB.

All members of the EB participate in the a.s.r. risk committee, which is chaired by the CEO. The involvement of the EB ensures that risk decisions are being addressed at the appropriate level within the organisation. In addition to the EB, the Key Functions (Risk management, Compliance, Internal audit, Actuarial function) are members of the Committee.

Non-Financial Risk Committee

The Non-Financial Risk Committee (NFRC) discusses, advises and decides upon non-financial risk policies. The most relevant non-financial risk policies are approved by the a.s.r. risk committee. The NFRC monitors that non-financial risks are managed adequately and monitors that the risk profile stays within the agreed risk limits. If the risk profile exceeds the limits, the NFRC takes mitigating actions. The NFRC reports to the a.s.r. risk committee. The NFRC is chaired by a member of the EB.

Financial Risk Committee

The Financial Risk Committee (FRC) discusses, advises and decides upon financial risk policies. The most relevant financial risk policies are approved by the a.s.r. risk committee. The FRC monitors that financial risks are managed adequately and monitors that the risk profile stays within the agreed risk limits. If the risk profile exceeds the limits, the NFR takes mitigating actions. The FRC reports to the a.s.r. risk committee. The Chairman of the FRC is the CFO.

Capital, Liquidity and Funding Committee

The Capital, Liquidity and Funding Committee (CLFC) is a subcommittee of the FRC. As such, the CLFC prepares and assesses the technical analysis of capital, liquidity and funding positions, rating policy, rating model reporting, and treasury activities. The Chairman of the CLFC is the Director of Group Asset Management.

Model Committee

The model committee (MC) is a subcommittee of the FRC and is responsible for the execution and update of the model validation policy and the approval of validation of existing or newly developed models. The MC receives all required information for the validation of models (e.g. model documentation and validation reports) prepared by Model Validation (MV) that assures the quality of the validation process. The chairman of the MC is the Director of Finance, Risk and Performance Management (FRPM).

Business Risk Committees

The business lines manage and control their risk profile through the Business Risk Committees (BRC). The BRC's monitor that the risk profile of the business lines stays within the risk appetite, limits and targets, as formulated by the EB. The BRC reports to the FRC and the NFRC. The Chairman of the BRC is the Managing Director of the business line.

Central Investment Committee

In addition to the risk committee structure, the Central Investment Committee (CIC) monitors tactical decisions and the execution of the investment policy. It takes investment decisions within the boundaries of the strategic asset allocation as agreed upon in the FRC. The CIC bears particular responsibility for investment decisions exceeding the mandate of the investment department. The CIC is chaired by the Director of Group Balance Sheet Management (GBSM).

Product Approval and Review Process Board

The Product Approval & Review Process Board (PARP Board) is responsible for the final decision-making process around the introduction of new products and adjustments in existing products. The committee evaluates if potential risks in newly developed products are sufficiently addressed. New products need to be developed in such a way that they are cost efficient, reliable, useful and secure for our clients. New products also need to have a strategic fit with a.s.r.'s mission to be a solid and trustful insurer. In addition, the risks of existing products are evaluated, as requested by the PARP as a result of product reviews. The PARP Board is chaired by the managing Director of the business line Health.

B.3.1.3 Systems and data

GRC tooling is implemented to support the RM process by giving guidance and insight into the key risk indicators, risk tolerance levels, boundaries and actions and remediation plans to mitigate risks. The availability, adequacy and quality of data and IT systems is important in order to ensure that correct figures are reported and risk mitigating measures can be taken in time. It is important to establish under which conditions the management information that is submitted to the risk committees has been prepared and which quality safeguards were applied in the process of creating this information. This allows the risk committees to ascertain whether the information is sufficient to base further decisions upon.

a.s.r. has a Data Governance and Quality policy in place to support the availability of correct management information. This policy is evaluated on an annual basis and revised at least every three years to keep the standards in line with the latest developments on information management. The quality of the information is reviewed based on the following aspects, based on Solvency II:

- completeness (including documentation of accuracy of results)
- adequacy
- reliability
- timeliness

Adherence to this policy is ensured by the three lines of defence risk governance model. With a new Central Data Office and a Data Quality Improvement Programme, additional measures are taken to increase maturity in data management practices.



The preparatory body or department checks the assumptions made and the plausibility of the results and ensures coordination with relevant parties. When a preparatory body has established that the information is reliable and complete, it approves and formally submits the document(s) to a risk committee.

The information involved tends to be sensitive. To prevent unauthorised persons from accessing it, it is disseminated using a secure channel or protected files. a.s.r.'s information security policy contains guidelines in this respect.

a.s.r.'s information security policy is based on market standards, like ISO 2700x, COBIT 2019, NIST Cybersecurity framework, SOC2 principles, PCI DSS, COSO, BS 25999, ISO 31000, ITIL. These standards describes best practices for the implementation of information security.

There are technical solutions for accomplishing this, by enforcing a layered approach (defence-in-depth) of technical measures to avoid unauthorised persons to compromise a.s.r. data and systems. In this perspective, one may think of methods of logical access management, intrusion detection techniques, in combination with firewalls are aimed at preventing hackers and other unauthorised persons from accessing information stored on a.s.r. systems.

Nevertheless, confidential information can also have been committed to paper. On top of technical measures a.s.r. implemented physical measures and measures that help create the desired level of awareness of personnel as part of the information security environment. The resilience of these measures is actively tested.

When user defined models (e.g. spreadsheets) are used for supporting the RM framework, the 'a.s.r. Standard for End user computing'- in addition to the general information security policy - defines and describes best practices in order to guard the reliability and confidentiality of these tools and models. a.s.r. recognises the importance of sound data quality and information management systems. The management of IT and data risks of the implemented tools, models and systems (including data) is part of the Operational IT RM.

B.3.1.4 Risk policies and procedures

a.s.r. has established guidelines, including policies that cover all main risk categories (market, counterparty default, liquidity, underwriting, strategic and operational). These policies address the accountabilities and responsibilities regarding management of the different risk types. Furthermore, the methodology for risk measurement is included in the policies. The content of the policies is aligned to create a consistent and complete set. The risk policy landscape is maintained by GRM and Compliance. These departments also monitor the proper implementation of the policies in the business. New risk policies or updates of existing risk policies are approved by the risk committees as mentioned previously. a.s.r. has drawn up an integrated policy calendar which includes all risk related documents.

This guarantees that policies are drawn up and reassessed in a timely manner and that tasks and responsibilities are clear.

B.3.1.5 Risk culture

Risk awareness is a vital component of building a sound risk culture within a.s.r. that emphasises the human aspect in the management of risks. In addition to gaining sufficient knowledge, skills, capabilities and experience in RM, it is essential that an organisation enables objective and transparent risk reporting in order to manage them more effectively.

The EB clearly recognises the importance of RM and is therefore represented in all of the major group level risk committees. Risk Management is involved in the strategic decision-making process, where the company's risk appetite is always considered. The awareness of risks during decision-making is continually addressed when making business decisions, for example by discussing and reviewing risk scenarios and the positive and / or negative impact of risks before finalising decisions.

It is very important that this risk awareness trickles down to all parts of the organisation, and therefore management actively encourages personnel to be aware of risks during their tasks and projects, in order to avoid risks or mitigate them when required. The execution of risk analyses is embedded in daily business in, for example, projects, product design and outsourcing.

In doing so, a.s.r. aims to create a solid risk culture in which ethical values, desired behaviours and understanding of risk in the entity are fully embedded. Integrity is of the utmost importance at a.s.r.: this is translated into a code of conduct and strict application policies for new and existing personnel, such as taking an oath or solemn affirmation when entering the company, and the 'fit and proper' aspect of the Solvency II regulation, ensuring that a.s.r. is overseen and managed in a professional manner.

Furthermore, a.s.r. believes it is important that a culture is created in which risks can be discussed openly and where risks are not merely perceived to be negative and highlight that risks can also present a.s.r. with opportunities. Risk Management (both centralised and decentralised) and Compliance are positioned as such, that they can communicate and report on risks independently and transparently, which also contributes to creating a proper risk culture.

B.3.1.6 Risk management process

The RM process typically comprises of five important steps: 1) identifying; 2) measuring; 3) managing; 4) monitoring and reporting; and 5) evaluating¹. a.s.r. has defined a procedure for performing risk analyses and standards for specific assessments. The five different steps are explained in this chapter.

¹ Based on COSO ERM en ISO 31000.



Identifying

Management should endeavour to identify all possible risks that may impact the strategic, tactical and operational objectives of a.s.r., ranging from the larger and / or more significant risks posed on the overall business, down to the smaller risks associated with individual projects or smaller business lines. Risk identification comprises of the process of identifying and describing risk sources, events, and the causes and effects of those events.

Measuring

After risks have been identified, quantitative or qualitative assessments of these risks take place to estimate the likelihood and impact associated with them. Methods applicable to the assessment of risks are:

- Sensitivity analysis
- Stress testing
- Scenario analysis
- Expert judgments (regarding likelihood and impact)
- Portfolio analysis

Managing

Typically, there are four strategies to managing risk:

- *Accept*: risk acceptance means accepting that a risk might have consequences, without taking any further mitigating measures.
- *Avoid*: risk avoidance is the elimination of activities that cause the risk.
- *Transfer*: risk transference is transferring the impact of the risk to a third party.
- *Mitigate*: risk mitigation involves the mitigation of the risk likelihood and / or impact.

RM strategies are chosen in a way that ensures that a.s.r. remains within the risk appetite tolerance levels and limits.

Monitoring and reporting

The risk identification process is not a continuous exercise. Therefore, risk monitoring and reporting are required to capture changes in environments and conditions. This also means that RM strategies could, or perhaps should, be adapted in accordance with risk appetite tolerance levels and limits.

Evaluating

The evaluation step is twofold. On the one hand, evaluation means risk exposures are evaluated against risk appetite tolerance levels and limits, taking (the effectiveness of) existing mitigation measures into account. The outcome of the evaluation could lead to a decision regarding further mitigating measures or changes in RM strategies. On the other hand, the RM framework (including the risk management processes) is evaluated by the RM function, in order to continuously improve the effectiveness of the RM framework as a whole.

B.3.2 a.s.r.'s risk categories

a.s.r. is exposed to a variety of risks. There are six main risk categories that a.s.r. recognises, as described below. In addition, a.s.r. recognises sustainability risks arising from environmental, social or governance (ESG) events or conditions. These risks can be financial and non-financial and can be both strategic and operational. This means that all six main risk categories that a.s.r. recognises can be affected by sustainability risks. In chapter 4.9.2 Climate change a.s.r. briefly describes how a.s.r. identifies, measures and manages climate risks and opportunities for its business.

Insurance risk

Insurance risk is the risk that premium and / or investment income or outstanding reserves will not be sufficient to cover current or future payment obligations, due to the application of inaccurate technical or other assumptions and principles when developing and pricing products. a.s.r. recognises the following insurance risks:

- Life insurance risk
- Health insurance risk
- Non-life insurance risk

Market risk

The risk of changes in values caused by market prices or volatility of market prices differing from their expected values. The following types of market risk are distinguished:

- Interest rate risk
- Equity risk
- Property risk
- Spread risk
- Currency risk
- Concentration risk / market concentration risk

Counterparty default risk

Counterparty default risk is the risk of losses due to the unexpected failure to pay or credit rating downgrade of counterparties and debtors. Counterparty default risk exists in respect of the following counterparties:

- Reinsurers
- Consumers
- Intermediaries
- Counterparties that offer cash facilities
- Counterparties with which derivatives contracts have been concluded
- Healthcare providers
- Zorginstituut Nederland



Liquidity risk

Liquidity risk is the risk that a.s.r. is not able to meet its financial obligations to policyholders and other creditors when they become due and payable, at a reasonable cost and in a timely manner.

Operational risk

Operational risk is the risk of losses caused by weak or failing internal procedures, weaknesses in the action taken by personnel, weaknesses in systems or because of external events. The following subcategories of operational risk are used:

- Sustainability
- Business process
- Financial reporting
- Outsourcing
- Information technology
- Project risks

Strategic risk

Strategic risk is the risk of a.s.r. or its business lines failing to achieve the objectives due to incorrect decision-making, incorrect implementation and / or an inadequate response to changes in the environment. Such changes may arise in the following areas:

- Macro-economic
- Climate change and energy transition
- Cyber security
- Pandemics
- Regulation
- Biodiversity
- Social tensions
- Geopolitical instability

Strategic risk may arise due to a mismatch between two or more of the following components: the objectives (resulting from the strategy), the resources used to achieve the objectives, the quality of implementation, the economic climate and / or the market in which a.s.r. and / or its business lines operate.

B.4 Internal control system

Within a.s.r., internal control is defined as the processes, affected by the board of directors, senior management, and other personnel within the organisation, implemented to obtain a reasonable level of certainty with regard to achieving the following objectives:

- High-level goals, aligned with and supporting the organisation's mission
- Effective and efficient use of resources

- Reliability of operational and financial reporting
- Compliance with applicable laws regulations and ethical standards
- Safeguarding of company assets

B.4.1 Strategic and operational risk management

The system of internal control includes the management of risks at different levels in the organisation, both operational and strategic.

B.4.1.1 Strategic Risk Management

Strategic risk management aims to identify and manage the most significant risks that may impact a.s.r.'s strategic objectives. Subsequently, the aim is to identify and analyse the risk profile as a whole, including risk interdependencies. The process of strategic risk analysis (SRA) is designed to identify, measure, manage, monitor, report and evaluate those risks that are of strategic importance to a.s.r.:

Identifying

Through the SRA process, identification of risks is structurally organised through the combined top-down and bottom-up SRA approach. The SRA outcomes are jointly translated into 'risk priorities' and 'emerging risks', in which the most significant risks for a.s.r. are represented.

Measuring

Through the SRA process, the likelihood and impact of the identified risks are assessed, taking into account (the effectiveness of) risk mitigating measures and planned improvement actions. Information from other processes is used to gain additional insights into the likelihood and impact. One single risk priority can take multiple risks into account. In this manner, the risk priorities provide (further) insights into risk interdependencies.

Managing

As part of the SRA processes, the effectiveness of risk mitigating measures and planned measures of improvement is assessed. This means risk management strategies are discussed, resulting in refined risk management strategies.

Monitoring and reporting

The output of the SRA process is translated into day-to-day risk management and monitoring and reporting, both at group level and product line levels. At group level, the risk priorities are discussed in the a.s.r. risk committee and the Audit & Risk Committee. At the level of the product lines, risks are discussed in the BRC's.

Evaluating

Insights regarding likelihood and impact are evaluated against solvency targets in the SRA process. Based on this evaluation, conclusions are formulated regarding the adequacy of solvency objectives at group and individual legal entity level.



Climate change

One of the areas within Strategic Risk Management concerns climate change. For a.s.r., climate change is a direct and indirect risk, both to its assets and liabilities. In chapter 4.7.3 Identified risks of the Annual report of a.s.r. and 4.9.2 Climate change of the Annual report of a.s.r., the relevant climate related risks for a.s.r. are discussed including how these risks are managed. Climate change related risks have had no direct impact on the valuation in the current accounting and disclosures of a.s.r.'s assets and liabilities.

B.4.1.2 Operational Risk Management

Operational Risk Management (ORM) involves the management of all possible risks that may influence the achievement of the business goals and that can cause financial or reputational damage. ORM includes the identification, analysis, prioritization and management of these risks in line with the risk appetite.

The policy on ORM is drafted and periodically evaluated under the coordination of ERM. The policy is implemented in the decentralised business entities under the responsibility of the management boards. A variety of risks is covered by ORM policy: IT, outsourcing, project, reporting etc.

Identifying

With the operational targets as a starting point, each business entity performs risk assessments to identify events that could influence these targets. In each business entity the business risk manager facilitates the periodic identification of the key operational risks. All business processes are taken into account to identify the risks. All identified risks are prioritised and recorded in a risk-control framework.

The risk policies prescribe specific risk analyses to be performed to identify and analyse the risks. For IT systems, Information Security Analyses (DIVA – Dienstverlening en Informatie Veiligheids Analyse) have to be performed and for large outsourcing projects a specific risk analysis is required.

Measuring

All risks in the risk-control frameworks are assessed on likelihood of defaults and impact. Where applicable, the variables are quantified, but often judgments of subject matter experts are required. Based on the estimation of the variables, each risk is labelled with a specific level of concern (1 to 4). Gross risks with a level of concern 3 or 4 are considered 'key'.

Managing

For each risk, identified controls are implemented into the processes to keep the level of risk within the agreed risk appetite (level of concern 1 or 2). In general, risks can be accepted, mitigated, avoided or transferred. A large range of options is available to mitigate operational risks, depending on the type. An estimation is made of the net risk, after implementing the control(s). A more effective and efficient approach to managing risks is required driven by increased complexity of processes, data processing and the need for a timely and accurate view on the risk profile. a.s.r. is therefore in the process of shifting towards a more automated approach to manage risks, for example automated controls and data analysis.

Monitoring and reporting

The effectiveness of operational risk management is periodically monitored by the business risk manager at each business line or legal entity. For each key control in the risk-control framework a testing calendar is established, based on auditing standards. Each control is tested regularly and the outcomes of the effectiveness of the management of key risks are reported to the management board. Outcomes are also reported to the NFRC and a.s.r. risk committee.

Evaluating

Periodically, yet at least annually, the risk-control frameworks and ORM policies are evaluated to see if revisions are necessary. The risk management function also challenges the business lines and legal entities regarding their risk-control frameworks.

Operational incidents

Operational incidents are reported to GRM, in accordance with the operational risk policy. The causes of losses are evaluated in order to learn from these experiences. An overview of the largest operational incidents and the level of operational losses is reported to the NFRC. Actions are defined and implemented to avoid repetition of operational losses.

ICT

Through IT risk management, a.s.r. devotes attention to the confidentiality, integrity and availability of ICT, including End User Computations. The logical access control for key systems used in the financial reporting process remains a high priority in order to enhance the integrity of applications and data. The logical access control procedures also prevents fraud by improving segregation of duties and by offsetting current and desired access levels within the systems and applications. Proper understanding of information, security and cyber risks is essential and the reason for which continuous actions are carried out to create awareness among employees. All of a.s.r.'s security measures are tested periodically. To increase cyberresilience, a.s.r. is participating in de DNB Threat Intel Based Ethical Red Teaming exercise.

Business Continuity Management

Operational management can be disrupted significantly by unforeseen circumstances or calamities which could ultimately disrupt the execution of critical and operational processes. Business Continuity Management enables a.s.r. to resume its daily business with limited interruptions and to react quickly and effectively during such situations.

Critical processes and activities and the tools necessary to use for these processes are identified during the Business Impact Analysis. The factors that can threaten the availability of those tools necessary for the critical processes are identified in the Threat Analysis.

a.s.r. defines a crisis as: one or more business lines are (in danger of being) disrupted in their operations, due to a calamity, or when there is a reputational threat. In order to manage the crisis, and to be able to react timely, efficiently and effectively, a.s.r. has set up a crisis organisation.



There is a central crisis team led by a member of the board. Each business line has their own crisis team led by the director of the business line. The continuity of activities and the systems supporting critical activities are regularly tested and crisis teams are trained annually. The objective of the training is to give the teams insights in how they function during emergencies and to help them perform their duties more effectively during such situations. Some important training scenarios used are scenarios that include cyber threats.

Preparatory Crisis Plan

On 1 January 2019 Dutch legislation entered into force that addresses the recovery and settlement of insurance companies ('Wet herstel en afwikkeling van verzekeraars' in Dutch). The objective is that insurance companies and supervisors are better prepared against a crisis and that insurance companies can recover from a crisis without government aid. a.s.r. is obliged to have a Preparatory Crisis Plan ('Voorbereidend Crisisplan' in Dutch) in place that has been approved by DNB. In 2021 a.s.r. established its Preparatory Crisis Plan. a.s.r.'s Preparatory Crisis Plan helps to be prepared and supports the organisation in various scenarios of extreme financial stress. The Preparatory Crisis Plan describes and quantifies the measures that can be applied to handle a crisis situation and to resume business. These measures are tested in the scenario analysis, in which the effects of each recovery measure on a.s.r.'s financial position (solvency and liquidity) are quantified. The required preparations for implementing the measures, their implementation time and effectiveness, potential obstacles, impact on clients and operational effects are also assessed. The main purpose of the Preparatory Crisis Plan is to increase the chances of early intervention in the event of a financial crisis situation and to further guarantee that the interest of clients and other stakeholders are protected.

Reasonable assurance and model validation

a.s.r. aims to obtain reasonable assurance regarding the adequacy and accuracy of the outcomes of models that are used to provide best estimate values and solvency capital requirements. To this end, multiple instruments are applied, including model validation. Two times a year a model inventory is performed by the productlines to determine if and when a model (re)validation is required. Triggers for model (re)validation are diverse, e.g. regulation, conversions, analysis of change. Materiality is determined by means of an assessment of impact and complexity. Impact and complexity is expressed in terms of High (H), Medium (M), or Low (L). The model inventories are discussed in the Model Committee.

In the pursuit of reasonable assurance, model risk is mitigated and unacceptable deviations are avoided, against acceptable costs.

B.4.2 Compliance function

The Compliance department (Compliance) is a centralised function within a.s.r., headed by the compliance manager for both a.s.r. and the supervised entities. Being part of the second line of defence, Compliance is considered a key function in line with the Solvency II regulation. The CEO bears ultimate responsibility and the compliance manager has a direct reporting line and access to the CEO.

To enhance and ensure a controlled and sound business operation, Compliance is responsible for:

- Encouraging compliance with relevant legislation and regulations, self-regulation, ethical standards and the internal standards derived from them (the rules), by providing advice and stipulating policies;
- Monitoring compliance with the rules;
- Monitoring management of compliance risks by further developing adequate compliance risk management, including, where necessary, advising on business measures and actions;
- Creating awareness of the need to comply with the rules and desired ethical behaviour;
- Coordinating interaction with regulators in order to maintain effective and transparent relationships.

The compliance manager also has an escalation line to the chair of the A&RC and/or the chair of the SB in order to safeguard the independent position of the compliance function and to allow it to operate autonomously.

The compliance manager issues quarterly reports on compliance matters and on the progress made regarding advised business measures and actions at the Group level, supervised entity (OTSO) level and business line level. The quarterly report at the divisional level is discussed with the management responsible, with the relevant Business Risk committees and where applicable with the (A&RC of the) SB. The quarterly report at the Group and OTSO levels is presented to and discussed with the individual members of the Executive Board, with the Non-Financial Risk Committee, with the Risk Committee and with the A&RC of the SB. The report is shared and discussed with Dutch Central Bank (De Nederlandsche Bank; DNB), the Dutch Authority for the Financial Markets (Autoriteit Financiële Markten; AFM), and the internal and external auditors.

Compliance risks

Developments in rules and in the management of (identified) compliance risks and action plans provide the basis for the annual compliance plan and compliance monitoring activities. a.s.r. continuously monitors changing legislation and regulations and assesses their impact on a.s.r. and the corresponding measures to be taken.

In 2022 a.s.r. paid specific attention to:

- Customer Due Diligence (CDD);
- Privacy laws and regulations, including the GDPR. a.s.r. considers it important that personal data are handled with care. More information on this topic can be found in chapter 4.8.2 of the Annual report of a.s.r.;
- Sustainability regulation, such as the SFDR, the EU Taxonomy Regulation and the CSRD. Increasing attention has been given to sustainability and the implementation of regulations as part of the EU Green Deal. Detailed information can be found in chapter 4.9.1 of the Annual report of a.s.r.



Customer Due Diligence (CDD)-related risks (including anti-money laundering) are relevant to a.s.r. Commissioned by the Business Executive Committee (BEC), the Central CDD Review project was launched in 2020 with the following objectives:

- Making the review results of all business units transparent through central recording;
- Strengthened continuous demonstrable compliance with the a.s.r. CDD policy;
- Implementing central management of assessment failures, monitoring and reporting, and establishing (decentralised) knowledge rules regarding the assessments to be performed;
- Establishing the processes required for this, and for governance and its implementation.

Within the investigation department, a central CDD- Ultimate Beneficial Owner (UBO) desk has been set up for the central handling of business customers (e.g. if the UBO cannot be determined automatically and in the case of hits on Politically Exposed Person (PEP) and/or sanction lists). In 2023, a.s.r. will complete the central process handling to identify UBO's. The centralised review of private relationships is also in progress. This process will be completed in 2023.

In addition, a.s.r. has set up a CDD Center that centrally manages compliance with CDD policy and reports centrally on this. The CDD Center has drawn up an action plan to further shape compliance with the relevant laws and regulations. The CDD Center uses the advice of the central desk consisting of Compliance, Investigations, Legal and representatives of the business segments.

a.s.r. monitors sound and controlled business operations, including reputational risks. The framework for monitoring and reviewing is based on the rules, regulations and standards of a.s.r. itself, including the a.s.r. code of conduct. In 2022, a.s.r. monitored compliance with e.g. the rules, regulations and policies on CDD, privacy, remuneration, the digital agenda, sustainability, the product approval and review process, handling of client requests, intra-group outsourcing, and the registration and reporting of data breaches, and the quality of information provided to customers.

In addition, a.s.r. focused in 2022 on further improving ongoing monitoring activities by reviewing the compliance risk and monitoring framework and its translation into the business units' Risk Control Matrix (RCM). Also in 2022, Compliance launched a behaviour and culture pilot on the subject of professional competence. It is the ambition of a.s.r. to increasingly integrate behaviour and culture into its monitoring surveys. Good insight into behaviour and culture, together with the analysis of process design and monitoring, provides an integral picture of the control environment. In addition, behaviour and culture influence the ethical and controlled business operations and are a deciding factor in decision-making. Thus, they become an important part of the compliance monitoring activities. Behaviour and culture studies will be part of the compliance monitoring activities and the monitoring cycle in 2023.

B.5 Internal audit function

The Audit Department evaluates the effectiveness of governance, risk management and internal control processes, and gives practical advice on process optimisation. This statement of duties has been set down in the Audit Charter for ASR Nederland N.V. and its subsidiaries. The Audit Department reports its findings to the EB of a.s.r., to the managing boards of the legal entities and, by means of the quarterly audit management report, to the a.s.r. risk committee and to the Audit and Risk Committee.

The Audit Department has an independent position within a.s.r., as set down in the Audit Charter. The SB guarantees Audit and its employees an independent, impartial and autonomous position in order to execute the mission of Audit. The head of the Audit Department reports to the chairman of the EB and has a direct reporting line to the chairman of the Audit and Risk Committee. The Chief Audit Executive is appointed by the SB. In order to maintain the independence and impartiality of the internal audit function, the audit function is not influenced by the EB and managing boards of the legal entities in the execution of an audit and the evaluation of and reporting on audit outcomes. The audit function is not subjected to any inappropriate influence from any other function, including the key functions.

The persons carrying out the internal audit function do not assume any responsibility for any other (key) function. The Audit Department has periodic consultations with the supervisors (DNB and AFM) to discuss the risk assessment, findings and audit plan. The Audit Department's risk assessment is performed in close consultation with the independent external auditor. The department also takes the initiative to organise a 'tripartite consultation' with DNB and the independent external auditor at least once a year. In 2021, no tripartite consultation was held. The tripartite consultation was postponed to January 2022.

The Audit Department sets up a multi-year audit plan based upon an extensive risk assessment. The audit plan is approved by the Audit and Risk Committee. At least once a year, the audit plan is evaluated and any changes to the plan must be approved by the Audit and Risk Committee.

All auditors took the oath for the financial sector and are subject to disciplinary proceedings. All auditors have committed themselves to the applicable code of conduct of a.s.r., follow the Code of Ethics of the Institute of Internal Auditors (IIA) and comply with the specific professional rules of the Netherlands Institute of Chartered Accountants (NBA) and the professional association for IT-auditors in the Netherlands (NOREA).

Audit applies the standards of the IIA, NBA and NOREA for the profession of internal auditing. Each year, Audit performs a self-assessment and an internal quality review and reports the results to the chairman of the board and to the members of the Audit and Risk Committee. In accordance with the standards of the IIA, an external quality review is performed every five years. During the last review in 2016, Audit was approved by the IIA and received the Institute's quality certificate. The next external quality review is planned to be performed in 2022.



B.6 Actuarial function

The Actuarial Function (AF) is one of four key functions in a.s.r.'s system of governance.

The main tasks and responsibilities of the AF are to:

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

The AF is part of the second line of defense and operates independently of both the first line (responsible for determining the technical provisions, reinsurance and underwriting), as well as the other three key functions (internal audit, risk management and compliance).

The AF for both a.s.r. and the insurance legal entities is operationally part of a.s.r. GRM. The AF is performed by persons who have profound knowledge of actuarial and financial mathematics, proportionate to the nature, scale and complexity of the risks present in a.s.r.'s businesses.

There are two function holders. One is responsible for the legal entities in the Life segment (Individual Life & Pensions and Funeral business lines) as well as for the overall Life segment of a.s.r. The other for the entities in the Non-life segment (Property & Casualty, Disability and Health business lines) as well as for the overall Non-life segment of a.s.r.

The AF function is represented in several risk committees. At least annually the AF drafts a formal report, which is discussed with the a.s.r. Risk Committee (or EB) and the a.s.r. Audit & Risk Committee.

Independence of the AF is secured through several measures:

- The AF holders are appointed and dismissed by the Board. Both the appointment and the dismissal of the holders is, together with an advice from the Audit and Risk Committee, submitted to the SB for approval;
- The AF holders have unrestricted access to all relevant information necessary for the exercise of their function;
- The AF holders have a direct reporting line to the a.s.r. Risk Committee or EB and the Audit and Risk Committee of a.s.r. The AF is free to report to one of the management or risk committees when considered necessary;

- The AF is free to report all relevant issues;
- In case of a conflict of interest with the CRO, the function holders may escalate directly to the CEO and to the Chairperson of the Audit & Risk Committee of a.s.r.;
- If the AF is asked to perform tasks that are outside the formal scope described in a charter, the function holder(s) assess if there is a conflict of interest. If so, the AF will not execute the task unless there are sufficient additional measures to mitigate conflicts of interest;
- The Internal Audit Department evaluates periodically the governance of a.s.r. including the (independent) operation of the AF;
- Target setting and assessment of the function holders is done by the CEO taking into account the opinion of the Audit & Risk Committee.

B.7 Outsourcing

a.s.r. has outsourced some of its (operational) activities and/or processes to external service providers, including certain critical and/or important activities that are part of material (operational) processes. Part of the outsourced activities is related to front-, mid- or back office activities of supervised entities within the group. In addition, the management and service of some supporting systems is outsourced.

When activities are outsourced, a.s.r. remains fully accountable for these activities and the processed data and a.s.r. retains full control ('volledige zeggenschap' in Dutch) over the outsourced activities. To manage the risks related to outsourcing, a.s.r. has implemented an outsourcing policy to safeguard controlled and sound business operations which ensures compliance with laws and regulatory requirements. Solid risk management, governance, monitoring and a complete overview of outsourced activities are essential to manage those risks. The outsourcing policy outlines the relevant procedures and is applicable to a.s.r. and its supervised entities. The policy is also applicable to intragroup outsourcing.

To define the respective rights and obligations, a.s.r. drafts and agrees a written outsourcing contract with the service provider. The contract includes amongst others the obligations for all parties involved, commitment to comply with applicable laws and regulatory requirements, right to audit and information security requirements.

Confidentiality, quality of service, and continuity are key for a.s.r. in carrying out its activities. To safeguard the quality of outsourced activities, service providers are carefully examined prior to selection and during the period of service provision. a.s.r. monitors compliance with the terms of the contract and performance of the outsourced activities. The findings of the monitoring activities serve as input for the regular consultation on operational, tactical and strategic level with the service provider and in case of non-compliance immediate action is taken.



B.8 **Any other information**

Other material information about the system of governance does not apply.



C Risk profile

This paragraph contains a description of group policy, which is applicable for the solo entity. Risk management is an integral part of a.s.r.'s day-to-day business operations. a.s.r. applies an integrated approach to managing risks and ensuring that business targets are met. Value is created by striking the right balance between risk, return and capital whilst ensuring that obligations to stakeholders are met. a.s.r. life's approach to manage risks is described below.

Risk governance

The risks identified are clustered into:

- Strategic risks (including emerging risks);
- Financial risks;
- Non-financial risks.

Management of strategic risks

a.s.r. life's risk priorities and emerging risks are defined annually by the Executive Board (EB), based on strategic risk analyses. a.s.r. life's risk priorities and emerging risks are defined as the main strategic risks which could materially affect its strategic, financial and non-financial targets. To gauge the degree of risk, a.s.r. life's uses a risk scale (see image) based on likelihood and impact (Level of Concern). For each risk priority, the degree of risk is determined for the gross and net risks. Gross risk is the degree of risk when no (control) measures are in place. Net risk is the degree of risk with mitigating (control) measures in place. Each of a.s.r. life's risk priorities has a gross and net risk Level of Concern 3 or 4, outside risk appetite boundaries. The a.s.r. life's risk priorities and emerging risks are described in Strategic risks and in Emerging risks.

Risk scale

| | | Impact | | | | |
|------------|---|--------|--------|--------|--------|--------|
| | | 1 | 2 | 3 | 4 | 5 |
| Likelihood | 5 | Yellow | Orange | Red | Red | Red |
| | 4 | Yellow | Orange | Orange | Red | Red |
| | 3 | Yellow | Yellow | Orange | Orange | Red |
| | 2 | Green | Yellow | Yellow | Orange | Orange |
| | 1 | Green | Green | Yellow | Yellow | Orange |

Level of Concern (LoC)

| | | | |
|-------|-------|-------|-------|
| LoC 4 | LoC 3 | LoC 2 | LoC 1 |
|-------|-------|-------|-------|

Management of financial risks

Financial risk appetite statements (RAS) are in place to manage a.s.r. life's financial risk profile within the limits. a.s.r. life aims for an optimum trade-off between risk, return and capital. Steering on risk, return and capital is done by decision-making throughout the entire product cycle from the Product Approval & Review Process (PARP) to the payment of benefits and claims. At a more strategic level, decision-making takes place through balance sheet management. A robust solvency position takes precedence over profit, premium income and direct investment income. Risk tolerance levels and limits are disclosed in the financial RAS and are monitored by the Financial Risk Committee (FRC). The FRC evaluates financial



risk (FR) positions against the RAS on a monthly basis. Where appropriate, a.s.r. life applies additional mitigating measures.

In 2022, the Actuarial Function (AF) performed its regulatory tasks by assessing the adequacy of the Solvency II technical provisions, giving an opinion on reinsurance and underwriting, and contributing to the Risk Management Framework and supporting the Risk Management Function (RMF). The AF report on these topics was discussed by the EB, FRC and A&RC.

Management of non-financial risks

Non-financial risk appetite statements (RAS) are in place to manage a.s.r.'s non financial risk profile within the limits. The non financial risk profile and internal control performance of each business line is discussed with senior management in the business risk committees each quarter. The Non-Financial Risk Committee (NFRC) monitors and discusses on a quarterly basis whether non-financial risks (NFR) are adequately managed. Should the risk profile exceed the risk appetite, the NFRC will decide on the steps to be taken.

a.s.r. life employees gain risk management knowledge and skills through the implementation of risk management policies, procedures and practices and the execution and testing of controls within business processes for sound and controlled business operations. Training courses that cover the main risk-related topics, presentations, workshops, gamification and the use of governance, risk & compliance tooling also contribute to this. Courses include, for example sustainability risk and more specifically Environmental, Social, and Governance (ESG) factors to better understand and identify material risks was and still is an important topic. In addition, risk management employees keep their knowledge and skills up to date through training courses - including in the context of permanent education - that cover specific risk-related topics.

Risk appetite

Risk appetite is defined as the level and type of risk a.s.r. life is willing to bear in order to meet its targets while maintaining the right balance between risk, return and capital. a.s.r. life's risk appetite contains a number of qualitative and quantitative RAS and gives direction to the management of both FR and NFR. The statements highlight the organisation's risk preferences and limits and are viewed as key elements for the realisation of a.s.r.'s strategy.

According to the annual risk management cycle in 2022, to ensure alignment with a.s.r.'s (risk) strategy, the RAS and RAS limits were evaluated and updated by the EB and approved by the SB.

Identified risks

The risks identified are clustered into:

- Strategic risks (including emerging risks);
- Financial risks;
- Non-financial risks.

Strategic risks

In 2022, a.s.r. life's main strategic risks (risk priorities) were:

- Interest rates and inflation;
- Biometric;
- Climate change and energy transition;
- Cyber- and information security;
- COVID-19/pandemics;
- Impact of supervision, legislation and regulations and juridification of society;
- Insufficient reduction and scalability of indirect costs;
- Premium income growth.

In the texts given below the strategic risks are described in more detail.

Interest rates and inflation

The past decade was characterised by many years of stable inflation and low interest rates, well below long-term equilibrium levels. Following very high inflation, we saw a significant rise in interest rates in 2022. Looking ahead, the current situation may continue (stagflation). But neither can the possibility of the economy going into recession and interest rates falling be ruled out.

According to economic theory, high inflation is linked to high interest rates - at least in the medium term. Also depending on the positioning of the interest rate hedge and inflation hedge, the adverse effect of high inflation (higher indexation of benefits and increase in wage costs) is offset by higher interest rates (lower UFR drag). A rise in interest rates also leads to increasing liquidity needs. If the interest rate development lags behind expected inflation, this may have a negative effect on balance. A fall in interest rates can also be detrimental to the solvency.

a.s.r. life monitors and assesses relevant developments for possible risks and to this end implements appropriate control measures.

In the annual SAA study, a.s.r. life examines several possible economic scenarios, including stagflation. In the interim, follow-up analyses can be carried out. If necessary, this results in the investment policy being adjusted, in order to reduce solvency risks. a.s.r. has an exclusion policy for government bonds of countries that are non-democratic or corrupt.

Depending on economic developments, interest rate and inflation hedges will be adjusted, taking into account the indirect effects from other asset classes.

Depending on the level and duration of inflation - and thus the impact on a.s.r. due to, among other things, higher claims costs - possible premium increases will be implemented to offset inflation.



Biometric

If the life expectancy of a.s.r. life's policyholders improves significantly compared to current (expected) mortality due to relatively sudden (medical and/or technological) developments in health care there is a chance that a.s.r. life's policyholders will live significantly longer compared to the current mortality assumptions, this will have an impact on a.s.r. life. Some improvements and unexpected breakthroughs could even ultimately result in a lower solvency for a.s.r. life. a.s.r. life monitors the longevity developments of its own portfolio, and mitigating measures such as longevity reinsurance are continuously analysed from a risk management perspective. Based on the analysis, it was concluded that the longevity risk could if necessary be reinsured and therefore it could be considered as a lower emerging risk.

Climate change and energy transition

Climate change and energy transition affect insurable risks and investments. a.s.r. life wants to minimise its negative impact on the climate and, where possible, make a positive contribution to climate mitigation and adaptation through its investments, products and services.

Climate-related risks are divided into physical, transition and reputational risks. Physical risks can be acute, such as extreme weather events, or chronic when they stem from gradual changes such as water shortages, rising temperatures or rising sea levels. Chronic climate change could lead to biodiversity loss. The Netherlands is also experiencing greater variations in weather patterns and climatic changes. The transition to a climate-neutral society involves changes in legislation and regulations, adapted supervision, technological developments, market changes and changes in consumer preferences/needs.

a.s.r. life monitors and assesses relevant developments for possible risks, and implements appropriate control measures.

Developments from climate change are taken into account in the products and services that a.s.r. develops and offers. Examples include offering flood cover, the sustainability mortgage and offering sustainable damage repair. To mitigate transition risks, a.s.r. cooperates with several research institutes, reinsurers and other insurers, and knowledge holders to gain as much knowledge as possible about the new technologies. These cooperations enable a.s.r. to determine the right price and conditions to insure these risks in a responsible manner.

a.s.r. expresses a clear ambition in the field of sustainability, partly to comply with the Paris Agreement (to which a.s.r. committed in 2015). a.s.r. also supports the energy transition through impact investments in, for example, wind and solar farms and a strict Socially Responsible Investment (SRI) policy to reduce CO₂-eq emissions in the investment portfolio. In addition, a.s.r. has joined the Net Zero Insurance Alliance (NZIA), committing to a climate-neutral insurance portfolio by 2050. In 2023, a.s.r. will develop shorter-term targets (2030) in this context. In terms of investments, a.s.r. has also committed to net-zero by 2050.

Finally, a.s.r. also encourages its (potential) customers to take preventive measures to avoid climate damage and/or save energy. Business customers can obtain advice through a risk inspection. For

individuals, a.s.r. has the digital Sustainable Living platform. For this a.s.r. works with PorteRenee.nl to get (potential) customers to make their homes more sustainable and save energy.

To adequately address mitigation and adaptation of climate risks, a.s.r. will continuously strengthen its policies and measures.

Cyber and information security

Technological development results in opportunities and threats through ongoing digitisation and automation at both a.s.r., its IT suppliers, and its customers. IT risks related to cyber, information security, IT outsourcing and data are persistently high, due to a constant threat from cyber criminals and the visible growth of ransomware attacks. In addition, the use of IT outsourcing (including the use of cloud services), the growing volume of (sensitive) data, the increased use of new applications for digitisation (including the use of data) and automation, increases the importance of proper IT risk management. Geopolitical tensions are not yet leading to visibly increased criminal activity but are a reason to remain highly vigilant. Cyber risks increase when IT systems are not secured adequately or because of the human factor.

a.s.r. life monitors and assesses relevant developments of these risks, and implements appropriate control measures both internally and at its suppliers.

a.s.r. has implemented a system of measures based on international standards. a.s.r. actively monitors the threat landscape and invests in prevention, detection and response skills and technology to strengthen its cyber resilience so that customers can continue to rely on a.s.r.'s secure digital services. If a.s.r. is hit by a serious comprehensive ransomware attack, only an 'offline backup' can restore business continuity. Due to the time required even in that situation to investigate the cause of the cyber attack and the recovery time required for recovery, the impact is still very high. a.s.r. is taking several other measures, including an information security awareness programme, to improve employee awareness and behaviour towards information security. Specific tooling is used in this context to increase the necessary mindset and skillset, such as Gamification and phishing campaigns.

a.s.r. is actively involved in partnerships with financial institutions and public governing bodies, such as the National Cyber Security Centre, Digital Trust Center, Insurance-ISAC, Insurance-CERT, and the DNB Threat Intel Based Ethical Red-team programme (TIBER-NL). The aim is to share information to improve the financial sector's resilience to cyber risks. Being cyber resilient is important for a.s.r. as it contributes to its customer-oriented strategy. Customer trust is a great asset in this regard, and cyber resilience contributes to this.

a.s.r. informs those affected in case of high risks and/or possible consequences and when those affected are required to take measures to mitigate risks.



COVID-19/repeated pandemics

The impact of the corona pandemic on a.s.r.'s strategic objectives, operational processes and financial performance has proved limited. The course of a pandemic and the (long-term) consequences on society, the economy and a.s.r. are inherently uncertain and potentially large.

There is a risk that society will face new impactful global infectious diseases in the future. Possible causes include population growth, changes in food systems, environmental degradation and increasingly frequent contact between humans and disease-carrying animals. Illness and government measures can affect a.s.r.'s strategic objectives and operational processes. The potential impact on financial markets could affect a.s.r.'s financial performance.

a.s.r. monitors and assesses relevant developments for possible risks and to this end implements appropriate control measures.

Key management measures in place at a.s.r. to mitigate risks are:

- a.s.r. has developed policies, provisions, measures and steering information to manage the impact of the corona crisis and is closely monitoring the development of the current pandemic. These resources and the lessons learned from the corona crisis at a.s.r. provide input for managing the impact of any new pandemic. A crisis organisation has been set up within a.s.r. which is activated when necessary.
- a.s.r. contributes to the government's approach by following basic measures to prevent any crisis spreading. In a broader sense, strategic developments such as continuously strengthening the physical and mental fitness of employees and encouraging exercise and a healthy lifestyle among customers/employees (a.s.r. Vitality) contribute to increasing the resilience of a.s.r. and its environment.

Impact of supervision, legislation and regulations and juridification of society

Legislation and regulations, including Solvency II, IFRS, sustainability (ESG), Customer Due Diligence (CDD), General Data Protection Regulation (GDPR) and sanctions legislation and regulations, are increasing, as well as their complexity and amendments to them. A large amount of new regulations, as announced under the EU Sustainable Financial Regulations (SFR), need to be interpreted and implemented within a short period of time. The field of cyber/information security has seen an increase in legislation and regulations, such as the European AI Regulation, the Digital Markets Act and the Data Act, Cyber Resilience Act and requirements from the new Corporate Governance Code regarding the role of directors in cybersecurity measures. At the same time, not all regulations are final at this point. Related developments, such as the Solvency II review and the UFR, affect a.s.r.'s capital requirement and solvency. The implementation and continuous tightening of (additional) control measures to comply with legislation and regulations leads to an increase in required capital.

Another dimension is the impact of possible political choices such as government intervention in the social insurance and pension system. This may have an impact on a.s.r.'s strategic direction and products as an insurer. Among other things, these developments lead to more personal responsibility and choices

for citizens. This places heavier demands on providers to support and guide their customers in this respect (digitally).

There is also an ongoing focus by regulators, government and society on privacy, the use of data and the gate keeper function of the financial sector in the battle against money laundering, terrorist financing and tax evasion, among others. This is characterised by more data-driven and rule-based supervision and stricter requirements for demonstrable (non-)financial risk management. Another aspect of this risk is the juridification of society. One example is the introduction of legislation in the field of settlement of large-scale losses in class actions and uncertainty about the outcome of legal disputes at a.s.r. and other market participants.

a.s.r. monitors and assesses relevant developments for possible risks, and implements appropriate control measures.

On key themes, programmes and/or projects are set up to ensure sound implementation, such as the implementation of sustainability (ESG) legislation and regulations. Depending on the consequences of legislation and regulations, supervisory climate and juridification of society - and thus the impact on a.s.r. through, among other things, higher internal costs - possible premium increases will be implemented to offset these consequences.

CDD

CDD risk (including anti-money laundering) remains relevant for a.s.r. in order to guarantee sound and controlled business operations. To mitigate the risks of non-compliance relating to CDD, a.s.r. centralised a major part of its CDD screening and tooling. a.s.r. has set up a CDD Center that centrally manages compliance with CDD policy and reports centrally on this. The CDD Center has drawn up an action plan to further shape compliance with the relevant laws and regulations. The CDD Center uses the advice of the central CDD desk consisting of Compliance, Investigations, Legal and representatives of the business segments.

In response to Russia's invasion of Ukraine, a large number of natural persons, legal entities and institutions have been placed on EU sanctions lists since 23 February 2022 through various sanctions packages. The business units are immediately notified of new additions to the sanctions lists, which require immediate additional screening. In addition to continuous screening, all business units have been asked to carry out additional checks on client portfolios, including those that are clients of a.s.r. through intermediaries or agents. Agents have been reminded to be extra vigilant.

As a result, Compliance notified supervisory authorities of 10 business relations (companies) in which (sometimes several) UBOs produced a hit on the sanctions lists (total of 26). In all cases it concerns hits on regulations dating after 23 February 2022. Immediately after the discovery of a (possible) hit, the business relations were frozen. In the case of several 'hits', it was decided to part company relations (implementation of exit policy). In some cases, in collaboration with a legal advisor, it was



assessed whether sufficient guarantees could be received from the business relations in question that the relationship could be continued. The aim is to establish that no funds flow from a.s.r.'s business client to a sanctioned UBO(s) and that adequate organisational measures are in place to prevent the sanctioned UBO(s) from having or exercising control.

IFRS 17/9

In June 2020, the International Accounting Standards Board (IASB) published the revised International Financial Reporting Standard 17 (IFRS 17) which was endorsed by the EU and will be effective from 1 January 2023. IFRS 17 is designed to facilitate comparability between insurers and to increase transparency in relation to risks, contingencies, losses and embedded options in insurance contracts. IFRS 9 Financial Instruments was published in July 2014 and will have a major impact on accounting for financial instruments (investments). In order to maintain cohesion between the two standards, a.s.r. applies the option in IFRS 4 which allows for the deferral of the implementation of IFRS 9 until the implementation of IFRS 17 in 2023. Since 2017, a.s.r. has had an internal programme in place to prepare for the implementation of IFRS 17 and IFRS 9 throughout the Group. In 2022, the programme IFRS 17 and IFRS 9 entered its final implementation phase. Systems were brought into production or are being further improved. The opening balance sheet and comparative figures 2022 have been prepared and analysed and included in the audit process. a.s.r. expects all systems, processes and the control environment to be implemented before the end of 2023. The presented condensed opening balance sheet and related disclosures in these consolidated financial statements 2022 are provisional. Since implementation has not been finalized some uncertainties have been identified. IFRS 17 and IFRS 9 had a major impact on the Group's primary financial processing and reporting and had significant effect on financial statements and related KPIs. Finance, Risk, Audit and the business segments have all been given due attention in the programmes due to the need to develop an integrated vision.

Solvency II

The Solvency II Directive came into force on 1 January 2016 and provided for two review clauses in its texts, a review in 2018 and a review in 2020. As part of the 2020 review, the European Commission (EC), the European Council and the European Parliament all published draft amendments to the Directive. Changes to the Solvency II Delegated Regulations are also in scope. The proposed amendments consist of various changes to the Solvency II framework, affecting most notably the liability discount curve, the risk margin and the volatility adjustment (VA). The trilogue negotiations (EC, Council and Parliament) will start in 2023. The implementation date is not yet known, but will probably not be before 1 January 2025. Some measures could include a phase-in period.

Sustainability Regulation

The Group has become subject to increasing sustainability regulations, such as SFDR, and to the EU Taxonomy Regulation, which is intended to facilitate sustainable investment. The EU Taxonomy Regulation will enter into force in stages and will be further developed over time. These regulations require the Group to report certain, additional information at the entity and product level. The sustainability regulations also include the amendment of existing directives and regulations such as

Solvency II, the IDD, and the Markets in Financial Instruments Directive (MiFID II), Alternative Investment Fund Managers Directive (AIFMD), and Benchmarks Regulation (BMR). These amendments have an impact on product development and advice, CDD, risk management, solvency requirements and the disclosure of financial products. Other European sustainability legislation has been developed as well, such as the Corporate Sustainability Reporting Directive (CSRD) and draft Corporate Sustainability Due Diligence Directive (CSDDD). The CSRD will require the Group to disclose information on how it operates and manages social and environmental challenges. The main elements of the CSDDD are identifying, bringing to an end, preventing, mitigating and accounting for negative human rights and environmental impacts in the company's own operations, their subsidiaries and their value chains. The developments in sustainability regulations and the impact of these developments on a.s.r. are continuously monitored. See chapter 4.9 of the a.s.r. Annual report for more detailed information on climate-related risks and opportunities, and Emerging risks.

Unit linked insurance

Political, regulatory and public attention has focused on unit-linked life insurance policies for some time now. Elements of a.s.r.'s unit-linked life insurance policies are challenged on multiple legal grounds in current legal proceedings and may continue to be challenged in the future. There is a risk that one or more of the current and/or future claims and/or allegations will be upheld. To date, a number of rulings relating to unit-linked life insurance products have been issued by the Financial Services Complaints Board (FSCB) and (appeal) courts in the Netherlands against a.s.r. and other insurers in specific cases. In these proceedings, different (legal) approaches have been taken to arrive at a ruling. The outcomes of these rulings are varied. Since the record of (a.s.r.'s) policies dates back many years, it contains a wide variety of products with different features and conditions and, since rulings are so diverse, no reliable estimate can be made of the timings and outcomes of these current and future legal proceedings. Although the financial consequences of these developments could be substantial, a.s.r.'s exposure cannot be reliably estimated or quantified at this point.

If one or more of these legal proceedings succeed, there is a risk that a judgement, though only legally binding for the parties involved in the proceedings, could be applied to, or be relevant for, other unit-linked life insurance policies sold by a.s.r. Consequently, the consequences of any current and/or future legal proceedings instituted against a.s.r. could be substantial for a.s.r.'s life insurance business and have a potential materially adverse effect on a.s.r.'s financial position, business, reputation, revenues, operating results, solvency, financial condition and/or prospects.

Regarding the investment insurance dossier, we can report that in an ongoing class action between a claims organisation and another Dutch insurer, questions for a preliminary ruling were referred to the Supreme Court by the Court of Appeal of The Hague in Q1 2021. In its ruling of 1 February 2022, the Supreme Court answered these questions. The preliminary conclusion is that this ruling does not significantly advance the investment insurance dossier or parties involved for the time being.



Insufficient reduction and scalability of indirect costs

a.s.r. life continuously focuses on process improvement and lowering costs and there is focus on further variability of costs of indirect costs by staff departments.

Premium income growth / debtor risk

a.s.r. life monitors the premium income growth frequently. Regarding the debtor risk a.s.r. life offered payment arrangements to employers.

Emerging risks

Emerging risks are defined by a.s.r. as new or existing risks with a potentially major impact, in which the level of risk is hard to define. In 2022, a.s.r. life's emerging risk is longevity risk.

Longevity risk

If the life expectancy of a.s.r. life's policyholders improves significantly compared to current (expected) mortality due to relatively sudden (medical and/or technological) developments in health care there is a chance that a.s.r. life's policyholders will live significantly longer compared to the current mortality assumptions, this will have an impact on a.s.r. life. Some improvements and unexpected breakthroughs could even ultimately result in a lower solvency for a.s.r. life. a.s.r. life monitors the longevity developments of its own portfolio, and mitigating measures such as longevity reinsurance are continuously analysed from a risk management perspective. Based on the analysis, it was concluded that the longevity risk could if necessary be reinsured and therefore it could be considered as a lower emerging risk.

Financial risks

Currently, financial risks arise in particular from the war in Ukraine (see also the description under emerging risk 'Geopolitical instability'). There is high inflation that may persist for longer than initially expected. Central banks are raising interest rates to limit inflation. Lower consumer and investor confidence could hurt the real economy. Fears of a global stagflation scenario have increased.

Although the strategic risks also contain financial risks, a.s.r. life additionally describes other relevant financial risk aspects below. These topics are:

- Return on investment;
- Solvency II regulations.

Return on investment

When a.s.r. life receives low return on their investment portfolio, this could lead to pressure on its solvency position. a.s.r. has a clear governance structure with a strict investment framework and monitoring policy. a.s.r. maintains a study about its strategic asset allocation every year.

Solvency II regulations

As a result of changes in legislation and regulations (UFR, for example), there is a risk that a.s.r. life's solvency ratio will fall sharply. a.s.r. monitors changes in legislation and regulations closely. In addition a.s.r. has various reports on here interest rate risk.

Non-financial risks

In addition to strategic and financial risks, a.s.r. has recognized several non-financial risks. In 2022, the most relevant of these were:

- Outsourcing risk;
- Data quality;
- Agile methodologies.

Outsourcing risk

Outsourcing risk continues to be relevant for a.s.r. life, especially in view of cyber resilience and growing dependence on suppliers. The risks related to outsourcing are managed and reported as part of the overall operational risk profile. An outsourcing framework is in place to define responsibilities, processes, risk assessments and mandatory controls. In 2022, a.s.r. life started the implementation of a database which will increase the oversight of key suppliers. In 2023, a.s.r. life aims to expand the available information from this database, as well as the number of connected suppliers. The insight obtained from this database supports the implementation of regulatory developments on suppliers such as CSRD and DORA. Furthermore a.s.r. life has drawn up a code of conduct to provide clarity about key principles in the field of sustainable procurement. The code of conduct will be part of contractual agreements from 2023. a.s.r. life invites suppliers to work together on solutions that support sustainable business.

Data quality

Sound data quality is important for a.s.r. life in relation to financial (including regulatory) reporting (SII, IFRS) and the digital transformation and ambitions it pursues. In this regard, insufficient data quality could pose a threat to the degree to which:

- Processes can be digitised;
- Operations can be made efficient;
- The front-end of business can be transformed;
- Customer and advisory relationships / connections can be enhanced.

As such, a.s.r. life recognises the importance of sound data quality (both financial and non-financial). To uphold the reliability and confidentiality of its data, a.s.r. has an explicit data quality policy in place defining the data quality (including control) framework and data governance. Adherence to this policy is ensured by the three lines of defence risk governance model. With a dedicated Central Data Office and a Data Quality Improvement Programme, additional measures are taken to increase maturity in data management practices.



Agile methodologies

As mentioned earlier, digitisation is an important objective for a.s.r. life. Agility and risk management both drive the rate of change as they coincide in digitising the customer experience. Agility breaks down complexity and delivers focus while risk reduces uncertainty and insures value. a.s.r. life shifts from traditional to digital communication channels which changes risk exposure and this leads to policy realignment. On an operational level, digitisation is an enabler to reduce effort in monitoring business processes and to automate risk management controls. At a strategic level, digitisation enables data-driven insight by combining process and customer experience data. The continuous change that digitalisation brings about requires development risks to be integrated in automated pipelines in order to optimise risks without hindering the continuous delivery of business value.

Quantitative description of a.s.r.'s risk priorities

Solvency II sensitivities

The sensitivities of the solvency ratio as at 31 December 2022, expressed as the impact on the a.s.r. life Solvency II ratio (in percentage points) are as presented in the table below. The total impact is split between the impact on the Solvency II ratio related to movement in the available capital and the required capital. The sensitivities are based on the situation per 31 December 2022. The Solvency II ratios presented are not final until filed with the regulators.

Solvency II sensitivities - market risks

| Effect on: | Available capital | | Required capital | | Ratio | |
|--|-------------------|------------------|------------------|------------------|------------------|------------------|
| | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 |
| Scenario (%-point) | | | | | | |
| UFR 3.2% | -7 | -12 | -1 | -1 | -8 | -13 |
| Interest rate +1% (2022 incl. UFR 3.45% / 2021 incl. UFR 3.6%) | -8 | -12 | +2 | +20 | -6 | +7 |
| Interest rate -1% (2022 incl. UFR 3.45% / 2021 incl. UFR 3.6%) | +2 | +14 | -12 | -14 | -10 | -1 |
| Interest steepening +10 bps | -2 | -4 | -1 | -1 | -2 | -4 |
| Volatility Adjustment -10bp | -13 | -12 | -3 | -2 | -15 | -14 |
| Government spread + 50 bps / VA +10 bps (2021: VA: +11 bps) | -3 | - | - | +1 | -2 | +1 |
| Mortgage spread +50 bps | -11 | -8 | -1 | +1 | -12 | -7 |
| Equity prices -20% | -18 | -11 | +13 | +17 | -6 | +5 |
| Property values -10% | -16 | -10 | +4 | +4 | -13 | -6 |
| Spread +75bps/ VA +18bps (2021: VA +19bps) | +10 | +13 | +7 | +6 | +17 | +19 |
| Inflation +30 bps | -2 | -1 | - | -1 | -2 | -2 |



Solvency II sensitivities - explanation

| Risk | Scenario |
|---|--|
| Interest rate risk - UFR 3.2% | Measured as the impact of a lower UFR. For the valuation of liabilities, the extrapolation to the UFR of 3.2% after the last liquid point of 20 years remained unchanged. The impact on available capital, required capital and ratio relates to a comparison with a solvency ratio measured at a UFR of 3.45% for 2022 (3.6% for 2021). |
| Interest rate risk (incl. UFR 3.45%/3.6%) | Measured as the impact of a parallel 1% upward and downward movement of the interest rates. For the liabilities, the extrapolation to the UFR (3.45% for 2022 and 3.6% for 2021) after the last liquid point of 20 years remained unchanged. |
| Interest steepening | Measured as the impact of a linear steepening of the interest rate curve between 20Y and 30Y of 1 bps to 10 bps. |
| Volatility Adjustment | Measured as the impact of a 10 bps decrease in the Volatility Adjustment. |
| Government spread | Measured as the impact of an increase of spread on Government bonds of 50 bps. At the same it is assumed that the Volatility Adjustment will increase by 10 bps (2021: +11 bps). |
| Mortgage spread | Measured as the impact of a 50 bps increase of spreads on mortgages. |
| Equity risk | Measured as the impact of a 20% downward movement in equity prices. |
| Property risk | Measured as the impact of a 10% downward movement in the market value of real estate. |
| Spread risk (including impact of spread movement on VA) | Measured as the impact of an increase of spread on loans and corporate bonds of 75 bps. At the same time, it is assumed that the Volatility Adjustment will increase by 18 bps (2021: +19bps) based on reference portfolio. |
| Inflation risk | Measured as the impact of a 30 bps parallel increase of the inflation rates (EUSWI-curve). The extrapolation of the UFI remains unchanged. |

The interest rate sensitivity scenario "Interest rate +1%" decreased due to the increase in interest rates in 2022. As mass lapse risk within the SCR Life module becomes more sensitive to increase of interest rates due to higher interest rates (mass lapse risk increases when interest rates increase), this less to a reduction of the interest rate sensitivity of the required capital.

The impact of the sensitivity of equity risk decreased due to a decrease of the equity dampener in 2022 (from 7% as per 31-12-2021 to -3% as per 31-12-2022) due to declining share prices. As the equity dampener cannot be lower than -10%, the decrease in available capital will not be more than compensated by a decrease in required capital.

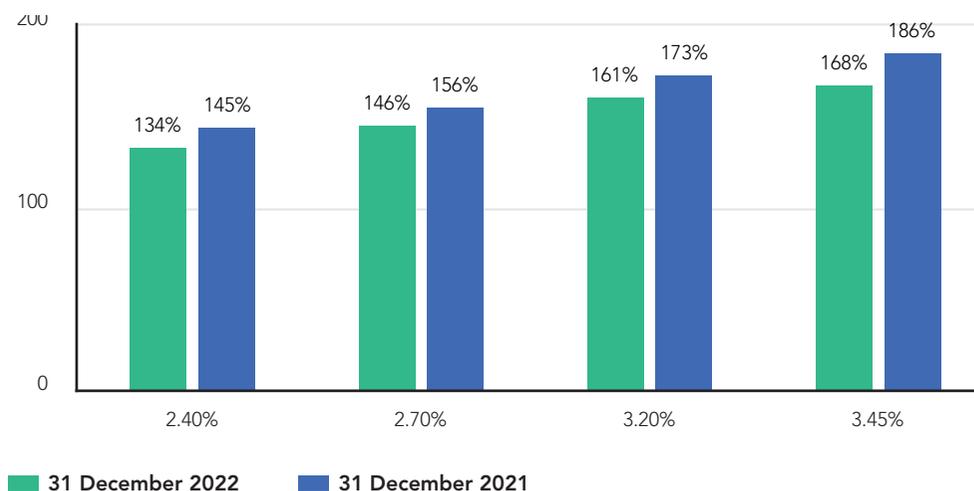
Expected development UFR

European Insurance and Occupational Pensions Authority (EIOPA) may reduce the ultimate forward rate used to extrapolate insurers' discount curves to better reflect expected inflation and real interest rates. There are various scenarios regarding lowering the Ultimate Forward Rate (UFR).

The UFR will decrease by 15 bps per year. In 2022 the UFR was 3.45% (2021: 3.6%). After the decline of the UFR by 15 bps the solvency ratio is still above internal solvency objectives.

Changes in the UFR have an almost linear effect on the solvency ratio. The impact on the solvency ratio of various UFR levels is stated below.

Sensitivities Solvency II ratio to UFR

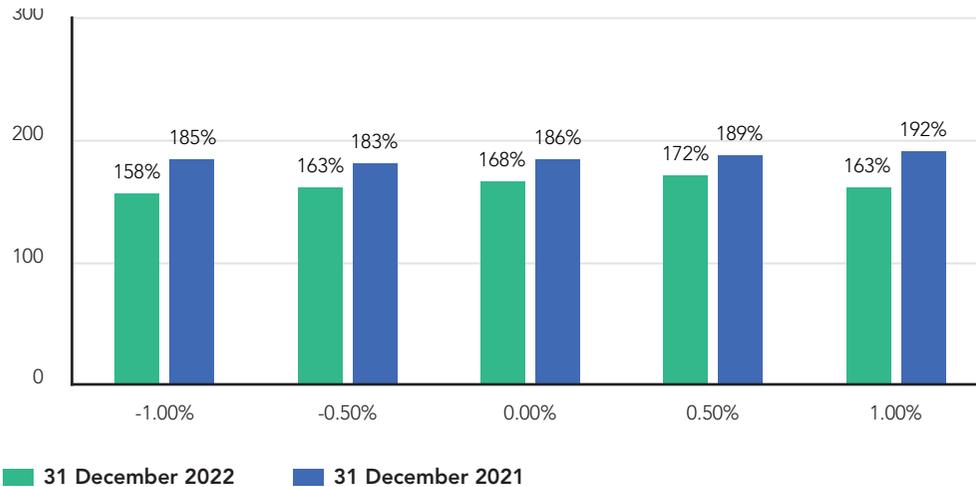


Interest rate sensitivity of Solvency II ratio

The impact of the interest rate on the Solvency II ratio, including the UFR effect, is stated below. The UFR methodology has been applied to the shocked interest rate curve. The figure shows that in 2021 a small sensitivity is recognised due to the hedge policy. In 2022 the interest rate sensitivity of the required capital changed due to a rise of interest rates. This resulted in an interest rate sensitivity in which the solvency ratio will decrease with both increasing interest rates and decreasing interest rates.



Sensitivity Solvency II to interest rate



Equity risk

In 2022 the equity risk decreased mainly due to declining share prices which leads to a lower equity risk, driven by an decreased exposure to equities and a lower risk charge as a result of the symmetric risk adjustment. This was partially offset by an increase of the SCR equity risk due to the run-off of the transitional measure of equity risk.

Spread risk

The SCR spread risk decreased in 2022. The SCR spread risk decreased due to the shortening duration of the credit portfolio and due a decrease of the market value of the credit portfolio as a result of an increase of interest rates and widening of the spread.

The sensitivity to spread risk is measured as the impact of an increase of spread on loans and corporate bonds of 75 bps.

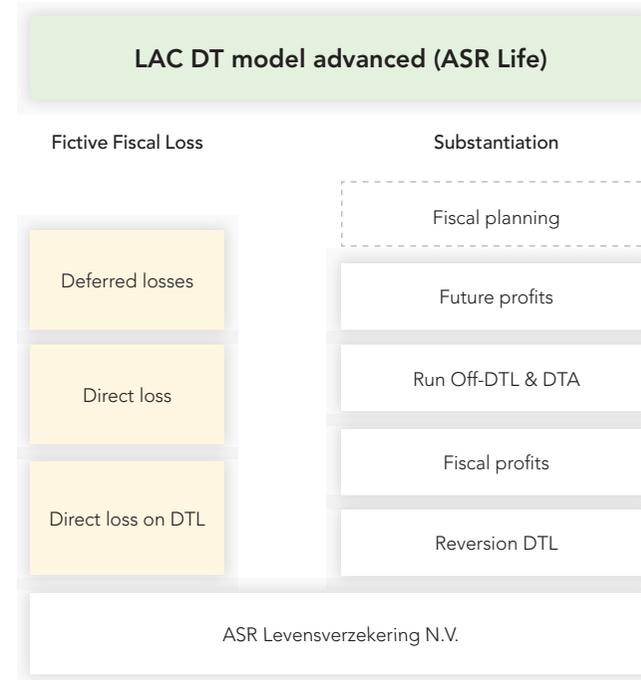
The volatility adjustment is based on a reference portfolio. An increase of 75 bps of the spreads on loans and corporate bonds within the reference portfolio leads to an increase of the VA with 18 bps in 2022 (2021: 19 bps).

Loss Absorbing Capacity of Deferred Tax

a.s.r. uses the following methodology for the calculation of the Loss Absorbing Capacity Deferred Tax (LAC DT) benefit in euros of a.s.r. life. Relevant regulation and current guidance (Delegated Regulation,

Level 3 guidelines, Dutch Central Bank Q&As and IAS12) are taken into account in the development of the LAC DT methodology.

LAC DT Components



The outcome is an unrounded LAC DT factor.

1. In the advanced model that a.s.r. life applies, the unrounded LAC DT factor is determined based on Fiscal profits in the current year and carry back year and the reversion on the DTL position to offset the direct losses. Furthermore, to substantiate the deferred losses, future profits and the run-off of the post DTL/DTA position is taken into account. Fiscal planning is currently not used.
2. Moreover, an outlook and sensitivities are made for the substantiation of the LAC DT factor, divided over the separate components. The outlook will take into account potential risks not yet included in the model, also called a code of conduct. This code of conduct ensures financial stability in the LAC DT benefit for a.s.r. life in euros, resulting in financial stability of the solvency position of a.s.r. life.
3. The LAC DT factors, sensitivities and the outlook are reviewed by Financial Risk Management.



4. A proposal with the advised LAC DT factors will be presented to the Financial Risk Committee (FRC). The LAC DT factors agreed with the FRC are to be applied.

To ensure a stable LAC DT factor, a code of conduct is taken into account. An increase is only possible in case it is sustainable and significant.

Loss Absorbing Capacity of Technical Provisions (LAC TP)

Loss Absorbing Capacity of Technical Provisions (LAC TP) is the part of the technical provisions that can be used to absorb some of the SCR shock losses, as the expected future profit sharing to policyholders will be reduced if actual losses would arise. LAC TP is applicable to insurance policies with discretionary profit sharing.

C.1 Insurance risk

Insurance risk is the risk that future insurance claims and benefits cannot be covered by premium and/or investment income, or that insurance liabilities are not sufficient, because future expenses, claims and benefits differ from the assumptions used in determining the best estimate liability.

Risk-mitigating measures are used to reduce and contain the volatility of results or to decrease the possible negative impact on value as an alternative for the capital requirement. Proper pricing, underwriting, reinsurance, claims management, and diversification are the main risk mitigating actions for insurance risks.

The solvency buffer is held by a.s.r. life to cover the risk that claims may exceed the available insurance provisions and to ensure its solidity. The solvency position of a.s.r. life is determined and continuously monitored in order to assess if a.s.r. life meets the regulatory requirements.

a.s.r. life measures its risks based on the standard model as prescribed by the Solvency II regime. The SCR for each insurance risk is determined as the change in own funds caused by a predetermined shock which is calibrated to a 1-in-200-year event. The basis for these calculations are the Solvency II technical provisions which are calculated as the sum of a best estimate and a risk margin.

The insurance risk arising from the insurance portfolios of a.s.r. life is as follows, after application of the Loss Absorbing Capacity of the Technical Provisions (LAC TP).

Life insurance risk - required capital

| | 31 December 2022 | 31 December 2021 |
|---------------------|---------------------|---------------------|
| Life insurance risk | 1,313 | 1,584 |

The life insurance risk decreased with € 271 million, mainly as a result of the increase of the interest rates and the natural outflow of the portfolio.

Solvency II sensitivities

a.s.r. life has assessed the impact of various sensitivities on the Solvency II ratio. The sensitivities as at 31 December 2022 expressed as impact on the a.s.r. life solvency ratio (in percentage points) are as follows:

Solvency II sensitivities - insurance risks

| Effect on: | Available capital | | Required capital | | Ratio | |
|-----------------------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 |
| Type of risk (%-points) | | | | | | |
| Expenses +10% | -7 | -5 | -1 | -1 | -9 | -7 |
| Mortality rates, all products -5% | -6 | -5 | -1 | - | -6 | -6 |
| Lapse rates -10% | - | - | - | - | - | - |

Solvency II sensitivities - explanation

| Risk | Scenario |
|----------------|---|
| Expense risk | Measured as the impact of a 10% increase in expense levels. |
| Mortality risk | Measured as the impact of a 5% decrease in all mortality rates. |
| Lapse risk | Measured as the risk of a 10% decrease in lapse rates. |

In accordance with a.s.r.'s accounting policy, the LAT is performed at the Segment Life level (for the consolidated financial statements of a.s.r.) and at that level the shadow accounting adjustments related to instruments with a revaluation reserve amount below cost are made to the level that the LAT will not get triggered (i.e. shows a positive margin). Further details are disclosed in paragraph 2.4.13 of the 2022 annual report of a.s.r. life.



C.1.1 Life insurance risk

The life portfolio can be divided into funeral, individual life and group pension. The insurance contracts are sold primarily to retail and wholesale clients through intermediaries.

The products are sold as insurance products in cash or unit-linked contracts. With respect to products in cash, the investment risk is fully borne by the insurer whereas, in the case of unit-linked products, the majority of the investment risk is for the policyholder's account.

The SCR for Life insurance risks is determined on the level of model points. A model point is a group of policies with equal characteristics and used as a subset of a homogeneous risk group. The model points are sufficiently homogeneous and therefore netting between positive and negative risks is not material.

The following life insurance risks are involved:

Mortality risk

Mortality risk is associated with (re)insurance obligations, such as endowment or term assurance policies, where a payment or payments are made in case of the policyholder's death during the contract term.

The increase in mortality rates is applied to (re)insurance obligations which are contingent on mortality risk. The required capital for this risk is calculated as the change in own funds of a permanent increase of mortality rates by 15% for all ages and each policy.

Longevity risk

Longevity risk is associated with (re)insurance obligations where payments are made until the death of the policyholder and where a decrease in mortality rates results in higher technical provisions. The decrease in mortality rates is applied to (re)insurance obligations portfolio's where payments are contingent on longevity risk. The required capital is calculated as the change in own funds of a permanent decrease of mortality rates by 20%.

Disability-morbidity risk

Morbidity or disability risk is associated with all types of insurance compensating or reimbursing losses (e.g. loss of income, adverse changes in the best estimate of the liabilities) caused by changes in the morbidity or disability rates. The scenario analysis consists of a 35% increase in disability rates for the first year, 25% for subsequent years, combined with a decrease in revalidation rates of 20%. However for the Life portfolio, disability and recovery rates are not modelled because of the limited impact and risk. Instead an experience percentage substitutes the role of these rates in the model. The disability-morbidity risk is calculated on policy level by increasing the experience percentage with 25%.

Lapse risk

Lapse risk is the risk of losses (or adverse changes in the best estimate of the liabilities) due to an unanticipated (higher or lower) rate of policy lapses, terminations, changes to paid-up status (cessation of premium payment) and surrenders. The effect of the lapse risk is equal to the highest result of a

permanent increase in lapse rates of 50%, a permanent decrease in lapse rates of 50% or a mass lapse event (70% of insurance policies in collective pension funds or 40% of the remaining insurance policies). The lapse shocks are only applied to portfolios where this leads to a higher best estimate.

Especially in the case of funeral policies the netting of positive and negative risks within model points can be considerable for policies that can be surrendered (completely ending the policy, with payment of surrender value) in the case of the mass lapse. In most cases, the shock scenario for determining the SCR for mass lapse for funeral policies consists of an immediate shock of 40% with respect to the continuation of premium payment (mass "pup"-scenario). This is mostly in line with policy conditions. The mass pup treatment in the funeral portfolio for mass lapse risk reduces the netting of positive and negative risks to a level that is not material.

Expense risk

A calculation is made of the effect on own funds of a permanent increase in costs used for determining the best estimate. For investment costs only an increase of 10% applies, since there is no inflation component in the method used to project investment costs in the best estimate liability. Both the internally and externally managed investment costs are involved in this scenario.

Life catastrophe risk

Catastrophe risk arises from extreme events which are not captured in the other life insurance risks, such as pandemics. The capital requirement for this risk is calculated as a 1.5 per mille increase in mortality rates in the first projected year for (re)insurance obligations where the increase in mortality rates leads to an increase in technical provisions.

Mortgage Loans

Within the individual life portfolio there is a group of policies directly linked to a mortgage loan ('Spaarhypotheek'). In case the mortgage loan is not provided by a.s.r. life, but by another party, which is the case for most of these policies, the interest that a.s.r. life reimburses to the policyholder is claimed from the party that has provided the mortgage loan. The cashflow of interests from the provider of the mortgage loan to a.s.r. life represents an asset. The cashflow and value of this asset depends on the cashflow of the linked savings policy. Therefore, the change in this asset value due to mortality or lapse is taken into account when determining the SCR for life insurance risks.

Employee benefits

a.s.r. has insured the post-employment defined benefit benefit plans for a.s.r.'s employees with a.s.r. life. Though the liability of this plan is classified as employee benefits on the balance sheet of a.s.r. and determined according to IFRS principles, for a.s.r. life the post-employment defined benefit plan for a.s.r.'s employees is a group pension contract and is treated that way both in IFRS-accounts and in Solvency II.



Other information

Within a.s.r. life, the longevity risk is dominant and arises from group pension business and individual annuities. The longevity risk is partly offset by mortality risk that arises from the funeral portfolio and individual policies with mortality risk. The other main risks a.s.r. life is exposed to are expense risk and lapse risk.

The table below summarises the required capital for abovementioned life insurance risks based on the standard model after application of LAC TP. The impact of LAC TP decreased in 2022 to € 49 million (2021: € 99 million).

Life insurance risk - required capital

| | 31 December 2022 | 31 December 2021 |
|-----------------------------|---------------------|---------------------|
| Mortality risk | 216 | 238 |
| Longevity risk | 784 | 1,166 |
| Disability-morbidity risk | 18 | 3 |
| Lapse risk | 406 | 260 |
| Expense risk | 506 | 612 |
| Revision risk | - | - |
| Catastrophe risk (subtotal) | 139 | 76 |
| Diversification (negative) | -756 | -770 |
| Life insurance risk | 1,313 | 1,584 |

The decrease of the required capital in 2022 was mainly the result of the increase of the interest rates. Due to an adjusted definition of the contract boundary of the WnP product the catastrophe risk increased in 2022.

For the life portfolio, the provision at year-end (provided figures are without reductions resulting from reinsurance contracts) can be broken down as follows under Solvency II:

Life portfolio - technical provision per segment

| | 31 December 2022 | 31 December 2021 |
|---|---------------------|---------------------|
| Insurance with profit participation | | |
| Best estimate | 13,051 | 18,623 |
| Risk margin | 589 | 880 |
| Technical provision | 13,640 | 19,503 |
| Other life insurance | | |
| Best estimate | 12,859 | 17,300 |
| Risk margin | 580 | 916 |
| Technical provision | 13,439 | 18,217 |
| Index-linked and unit-linked insurance | | |
| Best estimate | 10,173 | 11,846 |
| Risk margin | 62 | 89 |
| Technical provision | 10,235 | 11,935 |
| Total | | |
| Best estimate | 36,083 | 47,769 |
| Risk margin | 1,231 | 1,886 |
| Technical provision | 37,314 | 49,655 |

In 2022 the technical provisions decreased with € 12,341 million, this was mainly caused by increased interest rates, the run-off of the portfolio and the decrease of the unit linked fund values.

C.1.1.1 Managing life insurance risk

Life insurance risk is mitigated by pricing, underwriting policies and reinsurance.

Pricing is based on profit capacity calculations. A calculation is made of the price required to cover the risks. A calculation is made of the price required to cover the insurance liabilities, expenses and risks.

Underwriting policies describe the types of risks and the extent of risk a.s.r. life is willing to accept. Policyholders may be subjected to medical screening for individual life insurance.



Reinsurance

Reinsurance and other risk-mitigating measures are used to reduce the volatility of results or to decrease the possible negative impact on value as an alternative to the capital requirement. Reinsurance arrangements have been set up to mitigate the effects of catastrophes on earnings.

The level of retention in different reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios. This includes taking account of the cost of reinsurance on the one hand, and the risk that is retained on the other.

In order to optimise its balance sheet risks, a.s.r. life entered into a reinsurance agreement with Legal and General Re in 2015. The share of Legal and General Re is on behalf of a specific buy-out portfolio. The total share of the reinsurances for a.s.r. life amounts to € 125 million per 31 December 2022.

C.2 Market risk

Market risk is the risk of potential losses due to adverse movements in financial market variables. Exposure to market risk is measured by the impact of movements in financial variables such as equity prices, interest rates and property prices. The various types of market risk which are discussed in this section, are:

- interest rate risk
- equity risk
- property risk
- currency risk
- spread risk
- concentration risk

Market risk reports are submitted to the FRC at least once a month. Key reports on market risk include the Solvency II and economic capital report, the interest rate risk report and the report on risk budgets related to the strategic asset mix.

A summary of sensitivities to market risks for the regulatory solvency, total equity and profit for the year is presented in the tables below and summarises the required capital for market risks based on the standard model.

Market risk - required capital

| | 31 December 2022 | 31 December 2021 |
|----------------------------|---------------------|---------------------|
| Interest rate | 158 | 517 |
| Equity | 655 | 827 |
| Property | 882 | 921 |
| Currency | 116 | 92 |
| Spread | 714 | 961 |
| Concentration | - | - |
| Diversification (negative) | -416 | -580 |
| Total | 2,109 | 2,740 |

The main market risks of a.s.r. life are spread, property, equity and interest rate risk. This is in line with the risk budgets based on the strategic asset allocation study. Market risk decreased mainly driven by increased interest rates and decreased share prices during 2022.

The value of investment funds at year-end 2022 was € 5,006 million (2021: € 3,604 million). a.s.r. life applies the Look through approach for investment funds to assess the market risk.

The interest rate risk is the maximum loss of (i) an upward shock or (ii) a downward shock of the yield curve. For a.s.r. life the downward shock is dominant.

The diversification effect shows the effect of having a well-diversified investment portfolio.

C.2.1 Interest rate risk

Interest rate risk is the risk that the value of assets, liabilities or financial instruments will change due to fluctuations in interest rates. Many insurance products are exposed to interest rate risk; the value of the products is closely related to the applicable interest rate curve. The interest rate risk of insurance products depends on the term to maturity, interest rate guarantees and profit-sharing features. Life insurance contracts are particularly sensitive to interest rate risk. The required capital for interest rate risk is determined by calculating the impact on the available capital due to changes in the yield curve. Both assets and liabilities are taken into account. The interest rate risk is the maximum loss of (i) an upward shock or (ii) a downward shock of the yield curve according to the prescribed methodology. a.s.r. applies a look through approach for investment funds to assess the interest rate risk.

The interest rate risk is calculated by a relative shock up- and downward shock of the risk-free (basis) yield curve.



All adjustments (credit spread, volatility adjustment) on this yield curve are considered constant. The yield curve is extrapolated to the UFR. The yield curve after shock is not extrapolated again to the UFR.

The used shocks vary by maturity and the absolute shocks are higher for shorter maturities (descending: 75% to 20% and ascending: -70% to -20%):

- the yield curve up shock contains a minimum shock of 100 bps;
- the yield curve after the downward shock is limited to zero (no negative interest rates);
- the yield curves of all currencies are shocked simultaneously.

Solvency II sensitivities - market risks

| | 31 December 2022 | 31 December 2021 |
|-------------------------------|---------------------|---------------------|
| SCR interest rate risk up | -33 | -212 |
| SCR interest rate risk down | -158 | -517 |
| SCR interest rate risk | 158 | 517 |

a.s.r. life has assessed various scenarios to determine the sensitivity to interest rate risk. The impact on the solvency ratio is calculated by determining the difference in the change in available and required capital. The interest rate risk decreased as a result of an increase in the interest rates in 2022.

Solvency II sensitivities - interest rate

| Effect on: | Available capital | | Required capital | | Ratio | |
|--|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 |
| UFR 3.2% | -7 | -12 | -1 | -1 | -8 | -13 |
| Interest rate +1% (2022 incl. UFR 3.45% / 2021 incl. UFR 3.6%) | -8 | -12 | +2 | +20 | -6 | +7 |
| Interest rate -1% (2022 incl. UFR 3.45% / 2021 incl. UFR 3.6%) | +2 | +14 | -12 | -14 | -10 | -1 |
| Interest steepening +10 bps | - | - | - | - | - | - |
| Volatility Adjustment -10bp | -13 | -12 | -3 | -2 | -15 | -14 |

The interest rate sensitivity scenario "Interest rate +1%" decreased due to the increase in interest rates in 2022. As mass lapse risk within the SCR Life module becomes more sensitive to increase of interest rates due to higher interest rates (mass lapse risk increases when interest rates increase), this leads to a reduction of the interest rate sensitivity of the required capital.

Interest rate risk is managed by aligning fixed-income investments to the profile of the liabilities. Among other instruments, swaptions and interest rate swaps are used for hedging the specific interest rate risk arising from interest rate guarantees and profit sharing features in life insurance products.

An interest rate risk policy is in place for the Group as well as for the registered insurance companies. All interest rate-sensitive balance sheet items are in scope, including the employee benefit obligations of the Group. In principle, the sensitivity of the solvency ratio to interest rates is minimised. In addition, the exposure to interest rate risk or various term buckets is subject to maximum amounts.

C.2.2 Equity risk

Equity risk arises from the sensitivity of the value of assets and liabilities to changes in the level or in the volatility of market prices of equities. In order to maintain a good understanding of the actual equity risk, a.s.r. applies the look-through approach for investment funds to assess the equity risk. Besides the equity portfolio, a.s.r. holds put-options to mitigate part of the equity risk.

The required capital for equity risk is determined by calculating the impact on the available capital due to an immediate drop in share prices. Both assets and liabilities are taken into account. Stocks listed in regulated markets in countries in the EEA or OECD are shocked by 39% together with the symmetric adjustment of the equity capital charge (type I). Stocks in countries that are not members of the EEA or OECD, unlisted equities, alternative investments, or investment funds in which the look-through principle is not possible, are shocked by 49% together with the symmetric adjustment of the equity capital charge (type II). Investments of a strategic nature are shocked by 22%. Equity qualifying as an infrastructure investment (e.g. wind farm Wieringermeer) are shocked by 30% together with 77% of the symmetric adjustment of the equity capital charge.

a.s.r. applied the transitional measure for equity risk for shares, which came to an end at 31 December 2022.

Equity risk - required capital

| | 31 December 2022 | 31 December 2021 |
|------------------------------------|---------------------|---------------------|
| SCR equity risk - required capital | 655 | 827 |



The 2022 SCR equity risk decreased with € 172 million. This decrease is mainly the result of lower share prices which leads to a lower SCR equity risk, both due to an decreased exposure to equities and also due to a lower risk charge as a result of the symmetric adjustment. Besides the impact of decreased share prices, SCR equity risk slightly increased due to the run-off of the transitional measure of equity risk.

Solvency II sensitivities - equity prices

| Effect on: | Available capital | | Required capital | | Ratio | |
|--------------------|-------------------|------------------|------------------|------------------|------------------|------------------|
| | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 |
| Scenario (%-point) | | | | | | |
| Equity prices -20% | -18 | -11 | +13 | +17 | -6 | +5 |

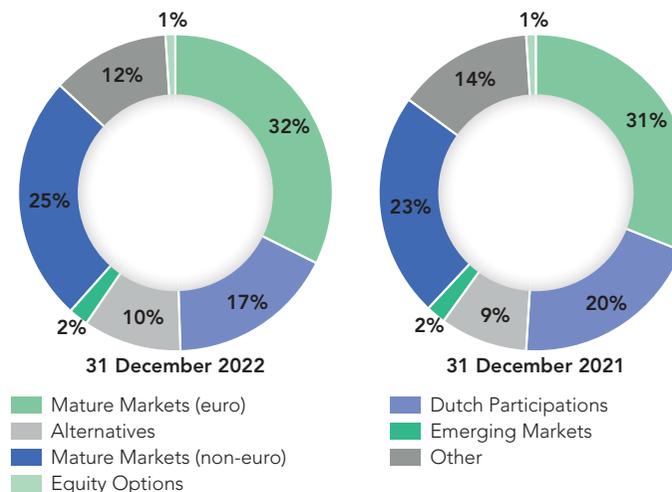
Composition of equity portfolio

The fair value of equities and similar investments at year-end 2022 was € 2,038 million (2021: € 2,397 million). The decrease in 2022 was mainly due to the negative returns on the equity markets.

The equities are diversified across the Netherlands (including participating interests), other European countries and the United States. A limited part of the portfolio consists of investments in emerging markets and alternatives. A portfolio of put options with a value of € 23 million is in place to mitigate the equity risk.

The table below shows the exposure of the equity portfolio to different categories. The total value is including the equities in externally managed funds. The categorie Other contains the investments of ASR Infrastructure Renewables (AIR) in windmill- and solar parks which are in scope of 'Qualifying infrastructure equities other than corporate' (€ 251 million). In 2022 increased the investments in renewables, however the exposure in 'Qualifying infrastructure equities other than corporate' decreased due to methodology change. In 2022 the net asset value of AIR is in scope of SCR equity risk instead of the underlying investments.

Composition of equity portfolio



C.2.3 Property risk

The property risk depends on the total exposure to real estate. In order to maintain a good understanding of the actual property risk, a.s.r. life applies the look through approach for investment funds to assess the property risk.

The required capital for property risk is determined by calculating the impact on the available capital due to an immediate drop in property prices by 25%. Both assets and liabilities are taken into account. The product Agrarische Impact Erfpacht (AIE) has effectively a lower charge (average of 10.8%) due to the underlying risk mitigating characteristics of this product.

Property risk - required capital

| | 31 December 2022 | 31 December 2021 |
|--------------------------------------|------------------|------------------|
| SCR property risk - required capital | 882 | 921 |

a.s.r. life applies the look through approach for participations which activities are primarily real estate investments.



The 2022 SCR real estate decreased with € 39 million. The real estate exposure per saldo decreased due to (i) transactions and improved lookthrough data of property funds and (ii) higher property prices. Besides this, the average SCR charge of AIE decreased from 10.8% to 6.5%. As a result of these effects, the required capital for property risk decreased with € 18 million. The increased impact of LAC TP caused a decrease of € 22 million.

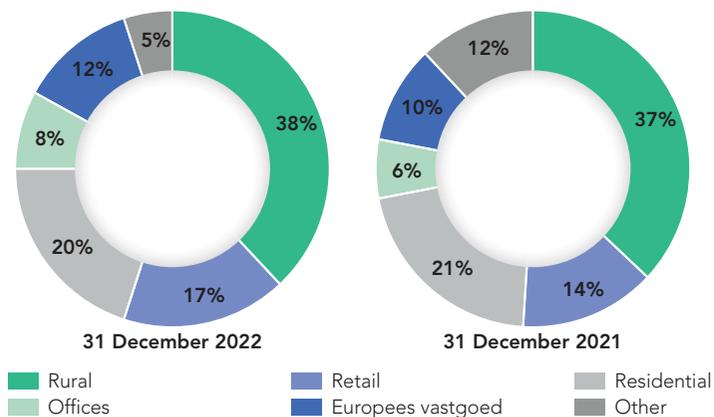
The sensitivity of the solvency ratio to changes in property value is monitored on a monthly basis. The sensitivity of the regulatory solvency (Solvency II) to changes in property prices is shown in the following table.

Solvency II sensitivities - property values

| Effect on: | Available capital | | Required capital | | Ratio | |
|----------------------|-------------------|------------------|------------------|------------------|------------------|------------------|
| | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 |
| Scenario (%-point) | | | | | | |
| Property values -10% | -16 | -10 | +4 | +4 | -13 | -6 |

The property risk depends on the total exposure to property, which includes both property investments and property held for own use. The fair value of property was € 4,182 million at year-end 2022 (2021: € 4,173 million). The decrease in 2022 (approximately € 9 million) was a result of transactions (approximately € 2 million) improved look through data of property funds (approximately € -98 million) and increases in property prices (approximately € 105 million).

Composition of property portfolio



C.2.4 Currency risk

Currency risk measures the impact of losses related to changes in currency exchange rates. The table below provides an overview of the currencies with the largest exposures. a.s.r. life has currency risk to insurance products in American dollars (USD), Australian dollars (AUD) and South African Rands (ZAR). In 2021 a.s.r. implemented a new hedge policy for currency risk. For different investment categories a.s.r. has defined a target hedge ratio.

The required capital for currency risk is determined by calculating the impact on the available capital due to a change in exchange rates. Both assets and liabilities are taken into account and a look-through approach is applied for investment funds. For each currency the maximum loss due to an upward and a downward shock of 25% is determined except for a small number of currencies where lower shocks are applied (i.e. Danish crown).

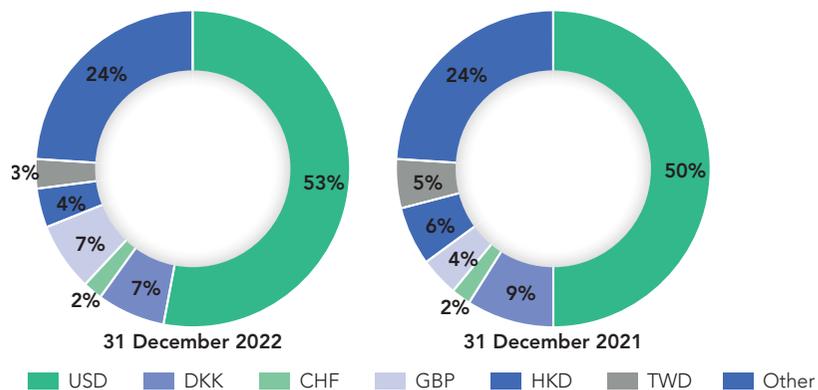
Currency risk - required capital

| | 31 December 2022 | 31 December 2021 |
|--------------------------------------|------------------|------------------|
| SCR currency risk - required capital | 116 | 92 |

In 2022 the SCR currency risk has increased with € 24 million, mainly due to the reduction of the target hedge ratio for USD credits and Emerging Market Debt.



Composition of currency portfolio



The total foreign exchange exposure at year-end 2022 was € 502 million (2021: € 385 million).

C.2.5 Spread risk

Spread risk arises from the sensitivity of the value of assets and liabilities to changes in the level of credit spreads on the relevant risk-free interest rates. a.s.r. has a policy of maintaining a well-diversified high-quality investment grade portfolio while avoiding large risk concentrations. Going forward, the volatility in spreads will continue to have possible short-term effects on the market value of the fixed income portfolio. In the long run, the credit spreads are expected to be realised and to contribute to the growth of the own funds. The required capital for spread risk is determined by calculating the impact on the available capital due to the volatility of credit spreads over the term structure of the risk-free rate.

The required capital for spread risk is equal to the sum of the capital requirements for bonds, structured products and credit derivatives. The capital requirement depends on (i) the market value, (ii) the modified duration and (iii) the credit quality category.

Spread risk - required capital

| | 31 December 2022 | 31 December 2021 |
|------------------------------------|------------------|------------------|
| SCR spread risk - required capital | 714 | 961 |

The SCR spread risk decreased in 2022 due to (i) the increased interest rates, which resulted lower bond values, (ii) the run off of the bond portfolio, which resulted in lower duration durations and therefore lower spread risk and (iii) the netto deinvestment in the portfolio.

The sensitivity to spread risk is measured as the impact of an increase of spread on loans and corporate bonds of 75 bps. The volatility adjustment is based on a reference portfolio. An increase of 75 bps of the spreads on loans and corporate bonds within the reference portfolio leads to an increase of the VA with 18 bps in 2022 (2021: 19 bps).

Solvency II sensitivities - spread risk

| Effect on: | Available capital | | Required capital | | Ratio | |
|---|-------------------|------------------|------------------|------------------|------------------|------------------|
| | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 |
| Scenario (%-point) | | | | | | |
| Spread +75bps/(2022: VA +18bps/2021: VA +19bps) | +10 | +13 | +7 | +6 | +17 | +19 |

Composition of fixed income portfolio

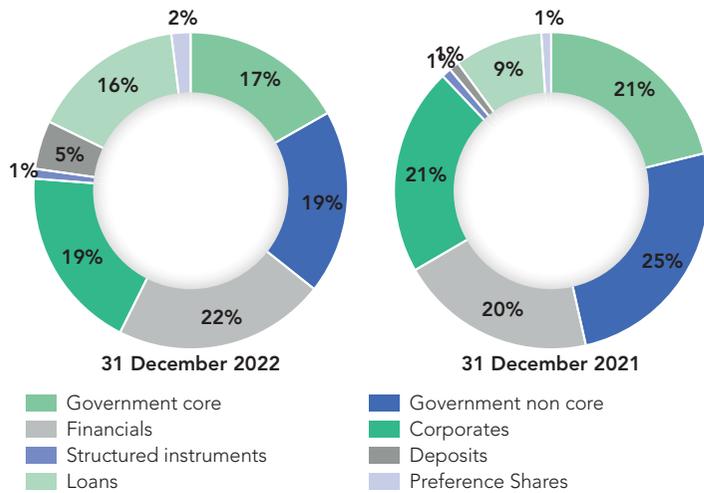
Spread risk is managed on a portfolio basis within limits and risk budgets established by the relevant risk committees.

Where relevant, credit ratings provided by the external rating agencies are used to determine risk budgets and monitor limits. A limited number of fixed-income investments do not have an external rating. These investments are generally assigned an internal rating. Internal ratings are based on methodologies and rating classifications similar to those used by external agencies. The following tables provide a detailed breakdown of the fixed-income exposure by (i) rating class and (ii) sector. Assets in scope of spread risk are, by definition, not in scope of counterparty default risk.

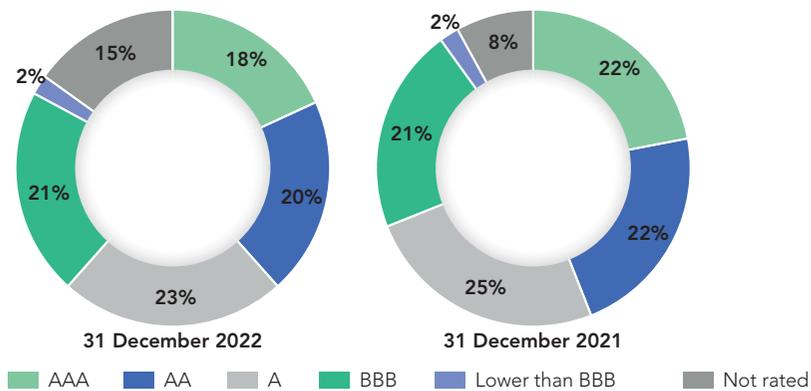
The total exposure of assets in scope of spread risk is € 14,416 million (2021: € 22,795 million). The portfolio composition is similar to 2021.



Fixed income portfolio by sector



Fixed income portfolio by rating



C.2.6 Market risk concentrations

Concentrations of market risk constitute an additional risk to an insurer. Concentration risk is the concentration of exposures to the same counterparty. Other possible concentrations (region, country, etc.) are not in scope. The capital requirement for concentration risk is determined in three steps:

1. determine the exposure above threshold. The threshold depends on the credit quality of the counterparty;
2. calculation of the capital requirement for each counterparty, based on a specified factor depending on the credit quality;
3. aggregation of individual capital requirements for the various counterparties.

According to the spread risk module, bonds and loans guaranteed by a certain government or international organisation are not in scope of concentration risk. Bank deposits can be excluded from concentration risk if they fulfill certain conditions.

a.s.r. continuously monitors exposures in order to avoid concentrations in a single obligor outside of the risk appetite and has an overall limit on the total level of the required capital for market risk concentrations. The calculation of the market risk concentrations applies to the total investment portfolio, where, in line with Solvency II, government bonds are not included.

The required capital for market risk concentrations is nil per year-end 2022.

C.3 Counterparty default risk

Counterparty default risk reflects possible losses due to unexpected default or deterioration in the credit standing of counterparties and debtors. Counterparty default risk affects several types of assets:

- mortgages
- savings-linked mortgage loans
- derivatives
- reinsurance
- receivables
- cash and deposits

Assets that are in scope of spread risk are, by definition, not in scope of counterparty default risk and vice versa. The Solvency II regime makes a distinction between two types of exposures:

- Type 1: These counterparties generally have a rating (reinsurance, derivatives, current account balances, deposits with ceding companies and issued guarantee (letter of credit). The exposures are not diversified.
- Type 2: These counterparties are normally unrated (receivables from intermediaries and policyholders, mortgages with private individuals or SMEs). The exposures are generally diversified.



The total capital requirement for counterparty risk is an aggregation of the capital requirement for type 1 exposure and the capital requirement for type 2 exposure by taking 75% correlation.

Counterparty default risk - required capital

| | 31 December 2022 | 31 December 2021 |
|----------------------------|------------------|------------------|
| Type 1 | 77 | 91 |
| Type 2 | 63 | 195 |
| Diversification (negative) | -9 | -16 |
| Total | 131 | 270 |

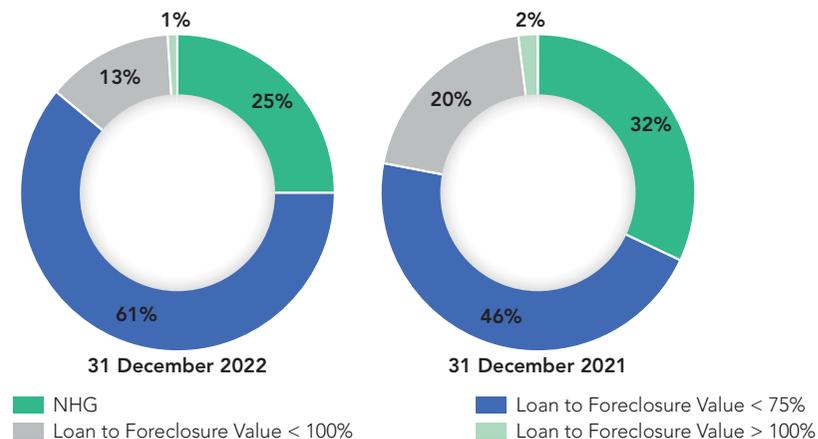
The counterparty default risk type 1 has netto decreased; it has i) decreased due to the decreased cash position, ii) decreased due to a decreased exposure to the derivatives portfolio and iii) increased due to the loan positions that are given a guarantee on all scheduled payments by a third party and this guarantee is satisfied the requirements of Articles 213(3-5) and 215 Solvency II Delegated Regulation.

The counterparty default risk type 2 has decreased due to the decrease of the exposure to the Mortgage portfolio. The latter is due to the lower market value of mortgage portfolio. The value of mortgage portfolio has decreased due to a considerable increase of the interest rates in 2021. The total counterparty risk has decreased by € 139 million.

C.3.1 Mortgages

Mortgages are granted for the account and risk of third parties and for a.s.r.'s own account. The a.s.r. life portfolio consists only of Dutch mortgages with a limited counterparty default risk. The fair value of a.s.r. life's mortgage portfolio was € 7,710 million at year-end 2022 (2021: € 9,390 million).

Composition mortgage portfolio



The Loan-to-Value ratio is based on the value of the mortgage according Solvency II principals with respect to the a.s.r. calculated collateral.

The percentage of mortgages which are in arrears for over three months has increased from 0.02% at 31 December 2021 to 0.03% at December 2022.

C.3.2 Savings-linked mortgage loans

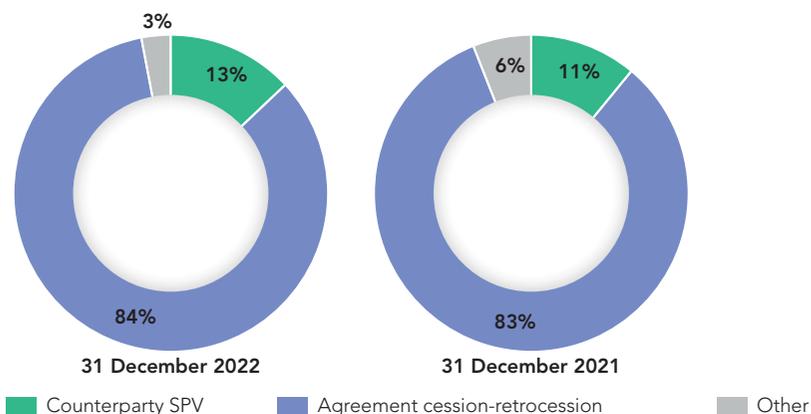
The counterparty default risk of the savings-linked mortgage loans ("Spaarlossen") depends on the collateral agreement with the counterparty. For 13% of the portfolio, the counterparties are Special Purpose Vehicles. The risk is limited due to the robust quality of the mortgages in the Special Purpose Vehicles in combination with the tranching. a.s.r. has a cession-retrocession agreement with the counterparty for 84% of the portfolio, for which the risk is limited. Effectively, a.s.r. receives the underlying mortgage loans as collateral, mitigating the counterparty default risk of the savings-linked mortgage loans. Finally 6% of the portfolio has no collateral agreement at all.

On September 1, 2021 DNB issued the Q&A and Good Practices document on the treatment of saving mortgages and in December, the Dutch Association of Insurers shared its additional guidance on this subject. These documents provide further requirements and guidelines on the valuation, risk calculations and balance sheet classification. Saving deposits without collateral agreement are considered in the SCR spread risk module. The saving deposits with collateral are treated in the counterparty risk module. Furthermore the collateralised deposits are split in two: a) the outstanding part and corresponding interest



are considered in the SCR counterparty risk type 2 (zero risk); b) the future premiums and corresponding interest are treated as the uncollateralised derivative contract of SCR counterparty risk type 1.

Composition savings-linked mortgage loans portfolio



Please note that due to a methodology change, the composition of the savings-linked mortgage loans portfolio for 2021 has been adjusted.

C.3.3 Derivatives

Over the Counter (OTC) derivatives are primarily used by a.s.r. life to manage the interest-rate risks incorporated into the insurance liabilities. Interest-rate derivatives are traded with a well-diversified and qualitative dealer panel with whom there is an established International Swaps and Derivatives Association (ISDA) contract and a Credit Support Annex (CSA) in place. These CSAs include specific agreements on the exchange of collateral limiting market and counterparty risk. The outstanding value of the interest rate derivative positions is matched by collateral received from eligible counterparties, minimising the net counterparty default risk.

C.3.4 Reinsurance

When entering into reinsurance contracts for fire and catastrophe, a.s.r. requires the counterparty to be rated at least single A. With respect to long-tail business and other sectors, the minimum permitted rating is single A.

Composition reinsurance counterparties by rating

| | 31 December 2022 | 31 December 2021 |
|--------------|------------------|------------------|
| AAA | 0% | 0% |
| AA | 97% | 100% |
| A | 3% | 0% |
| NR | 0% | 0% |
| Total | 100% | 100% |

The table above shows the exposure to reinsurers per rating. The total exposure to reinsurers at year-end 2022 was € 125 million (2021: € 156 million).

C.3.5 Receivables

The receivables decreased to € 205 million in 2022 (2021: € 363 million), mainly the result of lower other receivables. The composition of the receivables is presented in the table below.

Composition receivables

| | 31 December 2022 | 31 December 2021 |
|-------------------------|------------------|------------------|
| Policyholders | 62 | 23 |
| Intermediaries | 2 | 2 |
| Reinsurance receivables | - | - |
| Other receivables | 142 | 338 |
| Total | 205 | 363 |

C.3.6 Cash and cash equivalents

The current accounts amounted € 1,103 million in 2022 (2021: € 1,253 million).



Composition cash accounts by rating

| | 31 December 2022 | 31 December 2021 |
|--------------|---------------------|---------------------|
| AAA | 0 | 0 |
| AA | 0 | 0 |
| A | 1,092 | 1,228 |
| Lower than A | 11 | 25 |
| Total | 1,103 | 1,253 |

a.s.r. has no deposits in scope of counterparty default risk.

C.4 Liquidity risk

Liquidity risk is the risk that a.s.r. is not able to meet its financial obligations to policyholders and other creditors when they become due and payable, at a reasonable cost and in a timely manner. Liquidity risk is not quantified in the SCR of a.s.r. life and is therefore separately discussed.

a.s.r. life recognises different levels of liquidity management. First, short-term liquidity management which covers the day-to-day cash requirements and aims to meet short term liquidity risk targets. Second level covers the long-term liquidity management. This, among others, considers the strategic matching of liquidity & funding needs in different business conditions in which market liquidity risk could materialize. Finally stress liquidity management refers to the ability to respond to a potential crisis situation as a result of a market event and/or an a.s.r.-specific event.

Due to rising interest rates in 2022, a.s.r. experienced liquidity outflow as a result of cash variation margin outflow related to the ISDA/CSA- and Clearing agreements of derivatives. The cash outflow was financed by returning earlier received cash collateral to counterparties. As at 31 December 2022 a.s.r. remained a net receiver of cash collateral. Other sources of liquidity risk are (unexpected) lapses in the insurance portfolios and catastrophe risk. a.s.r. monitors its liquidity risk via different risk reporting and monitoring processes including cash management reports, cash flow forecasts and liquidity dashboards in which liquidity outflows are calculated for different stress scenarios. For long-term liquidity management purposes, liquidity is also taken into account in the asset allocation process.

a.s.r. life's liquidity management principle consists of three components. First, a well-diversified funding base in order to provide liquidity for cash management purposes. A portion of assets must be held in cash and invested in unencumbered marketable securities so it can be used for collateralised borrowing or asset sales. In order to cover liquidity needs in stress events a.s.r. has committed repo-facilities in place to ensure liquidity under all market circumstances. Second, the strategic asset allocation should reflect the expected and contingent liquidity needs of liabilities. Finally, an adequate and up-to-date liquidity

policy and contingency plan are in place to enable management to act effectively and efficiently in times of crisis.

In managing the liquidity risk from financial liabilities, a.s.r. relies on holding liquid assets comprising cash and cash equivalents and investment grade securities for which there is an active and liquid market. These assets can be readily sold to meet liquidity requirements. As at 31 December 2022, a.s.r. life had cash (€ 918 million), short-term deposits (€ 700 million) and liquid government bonds (€ 5,036 million).

The following table shows the contractual undiscounted cash flows of the insurance and financial liabilities. The insurance liabilities are including insurance contracts on behalf of policyholders and include the impact of expected lapses and mortality risk. Profit-sharing cash flows of insurance liabilities are not taken into account, nor are equities, property and swaptions.

Contractual cash flows

| | Payable on demand | < 1 years | 1-5 years | 5-10 years | > 10 years | Carrying value |
|-----------------------------|----------------------|--------------|---------------|---------------|---------------|----------------|
| 31 December 2022 | | | | | | |
| Insurance liabilities | - | 5,346 | 7,852 | 8,850 | 34,607 | 37,971 |
| Derivatives liabilities | - | 328 | 2,455 | 1,880 | 1,261 | 5,208 |
| Financial liabilities | 2,546 | 976 | 124 | 19 | 27 | 3,542 |
| Future interest payments | - | - | - | - | - | - |
| Total | 2,546 | 6,650 | 10,431 | 10,748 | 35,894 | 46,721 |

| | Payable on demand | < 1 years | 1-5 years | 5-10 years | > 10 years | Carrying value |
|-----------------------------|----------------------|--------------|--------------|--------------|---------------|----------------|
| 31 December 2021 | | | | | | |
| Insurance liabilities | - | 5,032 | 8,079 | 8,914 | 33,916 | 48,498 |
| Derivatives liabilities | - | 156 | 169 | 168 | 283 | 694 |
| Financial liabilities | 6,247 | 513 | 169 | 19 | 0 | 6,949 |
| Future interest payments | - | - | - | - | - | - |
| Total | 6,247 | 5,701 | 8,416 | 9,102 | 34,200 | 56,140 |

When the amount payable is not fixed the amount reported is determined by reference to the conditions existing at the reporting date.



Financial liabilities payable on demand include the liability recognised for cash collateral received under ISDAs, concluded with counterparties. The related cash collateral received is recognised as cash and cash equivalents, and not part of the liquidity risk exposure table.

EPIFP

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

| EPIFP | | |
|-------|---------------------|---------------------|
| | 31 December 2022 | 31 December 2021 |
| EPIFP | 719 | 571 |

The EPIFP increased in 2022 mainly as a result of increased interest rates and new business. There were also opposite effects due to the natural outflow of the portfolio and changes in the non-economic assumptions, but smaller.

C.5 Operational risk

Operational risk concerns the risk of direct and / or indirect losses which can occur within a.s.r. as a result of inadequate or failing (changing) internal processes, people, systems and/or as a result of external events. Operational risks occurred are most times being caused by the failure of processes, people, systems, external events or a combination of these factors.

| Operational risk - required capital | | |
|---|---------------------|---------------------|
| | 31 December 2022 | 31 December 2021 |
| SCR operational risk - required capital | 136 | 183 |

The SCR for operational risk amounts to € 136 million at the end of 2022 (2021: € 183 million) and is determined with the standard formula under Solvency II. The operational risk is based on the basic SCR, the volumes of premiums and technical provisions, and the amount of expenses.

Operational risk decreased mainly driven by lower best estimate liabilities due to the increased interest rates in 2022.

C.6 Other material risks

As part of the regular ORSA process, the overall risk profile and associated solvency capital needs are assessed against a.s.r.'s actual solvency capital position. The most important risks to which a.s.r. is exposed, including risks that are not incorporated into the standard formula, are identified through a combined top-down (strategic risk assessment) and bottom-up (control risk self-assessments) approach. After assessment of the effectiveness of the mitigating measures, the risks with the highest 'Level of Concern' (LoC) are translated to the a.s.r. risk priorities and relevant risk scenarios for the ORSA. The following risks, outside the scope of the standard formula, are recognised by a.s.r. as being potentially material:

- Inflation risk;
- Reputation risk;
- Liquidity risk;
- Contagion risk;
- Legal environment risk;
- Model risk;
- Risks arising from non-insurance activities (non-OTSOs);
- Strategic risk;
- Climate risk and sustainability risk;
- Emerging risk;
- Environmental, Social & Governance (ESG) risk.

As part of the appropriateness assessment of the standard formula mitigating measures regarding these risks are identified and evaluated.

C.7 Any other information

C.7.1 Description of off-balance sheet positions

a.s.r. life has no off-balance sheet positions per year-end 2022.

C.7.2 Reinsurance policy and risk budgeting

C.7.2.1 Reinsurance policy

When deemed effective in terms of capital relief versus costs incurred, a.s.r. enters into reinsurance agreements to mitigate Non-life insurance risks. Reinsurance can be taken out for each separate claim



(per risk), for the accumulation of claims due to natural disasters or to human actions (per event), or for both these risks.

The level of retention in the various reinsurance contracts is aligned with the size and the risk profile of the underlying portfolios, taking account of the cost of reinsurance on the one hand, and of the risk that is retained on the other. By determining the retention, the impact on the statement of financial position is taken into account as well.

To limit risk concentration, reinsurance contracts are placed with various reinsurance companies. a.s.r. requires the counterparties to be rated at least single A-. The reinsurance programme has remained largely the same as in previous years in terms of cover and limits.

C.7.2.2 Risk budgeting

The FRC assesses the solvency position and the financial risk profile on a monthly basis. Action is taken where appropriate to ensure the predefined levels in the risk appetite statement will not be violated.

C.7.3 Monitoring of new and existing products

Group Risk Management, Compliance, and Legal Affairs participate in the Product Approval and Review Process Board. All these departments evaluate whether risks in newly developed products are sufficiently addressed. New products need to be developed in a way that they are cost efficient, reliable, useful and secure for the client. New products must also be strategically aligned with a.s.r.'s mission to be a solid and trustworthy insurer. In addition, the risks of existing or modified products are evaluated, as requested by the PARP, as a result of product reviews.

C.7.4 Prudent Person Principle

a.s.r. complies with the prudent person principles as set out in Directive 2009/138/EC/article 132:

Prudent person principle. The prudent person principle ensures that assets are managed on behalf of its subsidiaries, policyholders or other stakeholders in a prudent manner, and covers aspects that relate to market, credit, liquidity and operational risk. a.s.r. has mandated ASR Vermogensbeheer N.V. as their asset manager.

a.s.r. ensures that assets of policyholders or other stakeholders are managed in a prudent manner. a.s.r. complies with the Prudent Person Principle by investing only in assets and instruments which a.s.r. can adequately assess, measure, monitor, control, maintain and report the risks. All assets will be assessed against solvency criteria according to article 45 (1a).

Derivatives are only used when these contribute to a lower risk or when it can be used to manage/hedge the portfolio more efficient. Mortgages, real estate and illiquid assets, which are not traded on regulated financial markets, are limited to a prudent level.

Governance of Investments

Within the Three Lines-of-Defence model, investments are managed in the first line by ASR Vermogensbeheer NV, reporting to the CFO of a.s.r.

ASR Vermogensbeheer NV manages its investments within the boundaries of a.s.r.'s Risk Appetite Framework, Strategic Asset Allocation and its Market-Risk Budget. The Market-Risk Budget is calculated on a monthly basis by Group Balance Sheet Management (GBSM), taking into account the Risk Appetite Framework. GRM, acting as the second line of defence, is responsible for the review. Internal Audit acts as the third-line of defence.

a.s.r. has established a structure of risk committees with the objective to monitor the risk profile for a.s.r. group, its legal entities and its business lines in order to ensure that it remains within the risk appetite and the underlying risk tolerances and risk limits. When triggers are hit or likely to be hit, risk committees make decisions regarding measures to be taken, being risk-mitigating measures or measures regarding governance, such as the frequency of their meetings.

All investment related activities are performed according to mandates as set by a.s.r., clients or policyholders. Mandates for investments for own account, clients and for account of policyholders are set out in internal guidelines, in order to ensure that prudent person principles are satisfied. This should always be in line with internal policies and internal constraints (such as a.s.r.'s ESG policy) and external constraints (such as regulatory limits).



D Valuation for Solvency purposes

This chapter contains information regarding the valuation of the balance sheet items. For each material asset class, the bases, methods and main assumptions used for valuation for solvency purposes are described. Separately for each material class of assets a quantitative and qualitative explanation of any material difference between the valuation for solvency purposes and valuation in the financial statements. When accounting principles are equal or when line items are not material, some line items are clustered together.

Valuation of assets is based on fair value measurement as described below. Each material asset class is described in paragraph D.1. Valuation of technical provisions is calculated as the sum of the best estimate and the risk margin. This is described in paragraph D.2. Other liabilities are described in paragraph D.3.

Information for each material line item is based on the balance sheet below. For each line item is described:

- Methods and assumptions for valuation
- Difference between solvency valuation and valuation in the financial statements.
- The numbering of the line items refers to the comments below.

Based on the differences in this template a reconciliation is made between IFRS equity and Solvency equity.

Reconciliation IFRS balance sheet and Solvency II balance sheet

| Balance sheet | 31 December 2022 IFRS | Revaluation | 31 December 2022 Solvency II |
|--|--------------------------|-------------|------------------------------------|
| 1. Deferred acquisition costs | - | - | - |
| 2. Intangible assets | - | - | - |
| 3. Deferred tax assets | 272 | 80 | 353 |
| 4. Property, plant, and equipment held for own use | 112 | - | 112 |
| 5. Investments - Property (other than for own use) | 364 | - | 364 |
| 6. Investments - Equity | 8,115 | 4 | 8,119 |
| 7. Investments - Bonds | 11,103 | 64 | 11,167 |
| 8. Investments - Derivatives | 5,247 | 6 | 5,253 |
| 9. Unit-linked investments | 9,905 | - | 9,905 |
| 10. Loans and mortgages | 12,588 | -1,012 | 11,576 |
| 11. Reinsurance | 145 | -20 | 125 |
| 12. Cash and cash equivalents | 1,519 | - | 1,519 |
| 13. Any other assets, not elsewhere shown | 1,765 | 9 | 1,775 |
| Total assets | 51,135 | -869 | 50,267 |
| 14. Technical provisions (best estimates) | 24,965 | 945 | 25,910 |
| 15. Technical provisions (risk margin) | - | 1,169 | 1,169 |
| 16. Unit-linked best estimate | 13,007 | -2,833 | 10,173 |
| 17. Unit-linked risk margin | - | 62 | 62 |
| 18. Pension benefit obligations | - | - | - |
| 19. Deferred tax liabilities | - | - | - |
| 20. Subordinated liabilities | - | - | - |
| 21. Other liabilities | 8,508 | 20 | 8,528 |
| Total liabilities | 46,479 | -637 | 45,842 |
| Excess of assets over liabilities | 4,656 | -231 | 4,425 |



This chapter contains also the reconciliation between the excess of assets over liabilities to EOF.

| | 31 December 2022 |
|--|---------------------|
| | Gross of tax |
| IFRS equity | 4,656 |
| Revaluation assets | |
| i. Intangible assets | - |
| ii. Loans and mortgages | -938 |
| iii. Reinsurance | -20 |
| iv. Cash and cash equivalents | - |
| v. Any other assets, not elsewhere shown | 9 |
| Subtotal | -949 |
| Revaluation liabilities | |
| i. Technical provisions (best estimates) | -945 |
| ii. Technical provisions (risk margin) | -1,169 |
| iii. Unit-linked best estimate | 2,833 |
| iv. Unit-linked risk margin | -62 |
| v. Subordinated liabilities | - |
| vi. Other liabilities | - |
| Subtotal | 657 |
| Total gross revaluations | -292 |
| Tax percentage | 25.8% |
| Total net revaluations | -217 |
| Other Revaluations | |
| i. Goodwill | - |
| ii. Participations | - |
| Subtotal | - |
| Solvency II equity | 4,425 |
| Own fund items | |
| i. Subordinated liabilities | - |
| ii. Foreseeable dividends | -410 |
| Eligible Own Funds Solvency II | 4,015 |



D.1 Assets

Valuation of most financial assets is based on fair value. In the paragraph below, this valuation methodology is described. For different line items will be referred to this method. In this paragraph line items 1 – 15 from the simplified balance sheet above are described.

D.1.1 Fair value measurement

In accordance with the Delegated Regulation, Solvency II figures are based on fair value. In line with the valuation methodology described in article 75 and further of the Solvency II directive and articles 9 and 10, the following three hierarchical levels are used to determine the fair value of financial instruments and non-financial instruments when accounting for assets and liabilities at fair value:

Level 1: Fair value based on quoted prices in an active market

Level 1 includes assets and liabilities whose value is determined by quoted (unadjusted) prices in the primary active market for identical assets or liabilities.

A financial instrument is quoted in an active market if:

- Quoted prices are readily and regularly available (from an exchange, dealer, broker, sector organisation, third party pricing service, or a regulatory body);
- These prices represent actual and regularly occurring transactions on an arm's length basis.

Level 2: Fair value based on observable market data

Determining fair value on the basis of Level 2 involves the use of valuation techniques that use inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is derived from prices of identical or similar assets and liabilities). These observable inputs are obtained from a broker or third party pricing service and include:

- Quoted prices in active markets for similar (not identical) assets or liabilities;
- Quoted prices for identical or similar assets or liabilities in inactive markets;
- Input variables other than quoted prices observable for the asset or liability. These include interest rates and yield curves observable at commonly quoted intervals, volatility, loss ratio, credit risks and default percentages.

Level 3: Fair value not based on observable market data

The fair value of the level 3 assets and liabilities are determined in whole or in part using a valuation technique based on assumptions that are not supported by prices from observable current market transactions in the same instrument and for which any significant inputs are not based on available observable market data. The financial assets and liabilities in this category are assessed individually.

Valuation techniques are used to the extent that observable inputs are not available. The basic principle of fair value measurement is still to determine a fair, arm's length price. Unobservable inputs therefore reflect management's own assumptions about the assumptions that market participants would use in pricing the asset or liability (including assumptions about risk). These inputs are generally based on the available observable data (adjusted for factors that contribute towards the value of the asset) and own source information.

D.1.2 Assets per asset category

The balance sheet reports specify different asset categories. In this section, we describe the valuation of each material asset category. The figures correspond to the extended balance sheet which has been reported as QRT S 02.01.

1. Deferred acquisition costs

a.s.r.'s accounting policy is that all costs incurred to acquire insurance contracts (acquisition costs) are charged directly to the income statement, generally within one year.

2. Intangible assets

The intangible assets related to goodwill and other intangible assets are not recognized in the Solvency II framework and are set to nil.

3. Deferred tax assets

The basis for the deferred tax assets (DTA)/deferred tax liabilities (DTL) position in the IFRS balance sheet is temporary differences between fiscal and commercial valuation. This DTA / DTL position is the base for this line item on the Solvency II balance sheet, adjusted for Solvency II revaluations. The largest DTL mutation is mainly caused by the higher (valuation) mortgages and change of savings linked mortgages. The deferred tax effects involve a correction related to the fact that (most of) the revaluations as described in this chapter are gross of tax. The tax effect is calculated at 25.8%.

In accordance with the Delegated Regulation and the recommendations of DNB, netting is only allowed with same tax authority and with same timing. Based on this netting principles, a.s.r. life contains a DTA.

4. Property plant, and equipment held for own use

a.s.r. life recognises property at market value, equal to Solvency II measurement.

5. Investments - Property (other than for own use)

a.s.r. life owns the following categories of investment property; the method for calculating their fair value has been added:

- Residential – based on reference transaction and discounted cash flow method (DCF method);
- Retail – based on reference transaction and income capitalisation method;
- Rural – based on reference transaction and DCF method;
- Offices – based on reference transaction and DCF method;



- Other – based on reference transaction and DCF method;
- Under construction - based on both DCF and income capitalisation method.

6. Investments – Equity

Valuation of listed equities is based on the level 1 method of the fair value hierarchy. Unlisted fixed-interest preference shares are valued based on the level 2 method of the fair value hierarchy. The valuation techniques for financial instruments start from present value calculations; derivatives are valued based on forward-pricing and swap models. The observable market data contains yield curves based on company ratings and characteristics of unlisted fixed-interest preference shares. The main non-observable market input for private equity investments is the net asset value of the investment as published by the private equity company (or partner).

Valuation of private equity investments is based on the level 3 method of the fair value hierarchy. The main non-observable market input for private equity investments is the net asset value of the investment as published by the private equity company (or partner).

7. Investments – Bonds

The valuation of these assets is consistent with the IFRS fair value hierarchy as described in paragraph D.1.1.

8. Investments – Derivatives

The valuation of these assets is consistent with the fair value hierarchy as described in paragraph D.1.1. The valuation of listed derivatives is based on the level 1 method of the fair value hierarchy. The valuation of unlisted interest rate contracts is based on the level 2 method of the fair value hierarchy. The valuation techniques for financial instruments start from present value calculations; derivatives are valued based on forward-pricing and swap models. The observable market data contains yield curves based on company ratings and characteristics of unlisted fixed-interest preference shares.

9. Unit-linked investments

The valuation of these assets is consistent with the IFRS fair value hierarchy described in paragraph D.1.1

10. Loans and mortgages

The valuation of loans is based on the level 2 and level 3 (mortgages) method of the fair value hierarchy. The fair value of the loans is based on the discounted cash flow method. It is obtained by calculating the present value based on expected future cash flows and assuming an interest rate curve used in the market that includes an additional spread based on the risk profile of the counterparty. This asset category includes savings linked mortgages.

Many of the savings-linked mortgages that a.s.r. has sold in the past were combined with a mortgage loan from an external bank. This bank has undertaken to pay mortgage interest on the savings accrued in the insurance policy. To this end, the insurer transfers the premiums to a special deposit account with the

bank. According to IFRS, both the insurance policy and the loan are measured at amortised cost. For the purpose of Solvency II, they are both measured at fair value, allowing for any securities the insurer receives on the funds deposited with the bank. Future payments from saving-linked mortgages has to be reported as a derivative contract in accordance with the Delegated Regulation and the guidance provided by DNB.

The valuation method used to determine the fair value of a.s.r.'s mortgage portfolio bases the spread on the interest rate curve for discounting the mortgage portfolio cash flows on consumer rates. The valuation according to IFRS is based on amortised cost.

11. Reinsurance recoverables

Contracts that transfer a significant insurance risk from a.s.r. life to third parties are accounted for as reinsurance contracts, and are classified as outgoing reinsurance.

The amounts that can be collected from reinsurers are estimated using a method that is in line with the reinsurance contract and the fair-value method for determining liabilities arising from reinsurance contracts described in Section D2.

Assets arising from reinsurance contracts are recognised under reinsurance contracts, including current receivables from reinsurers. At each reporting date, a.s.r. life assesses whether objective evidence of impairment exists. If a reinsurance asset is impaired, its carrying amount is reduced to its recoverable amount. Therefore, current receivables from reinsurers are valued comparable with IFRS.

12. Cash and cash equivalents

The valuation of cash and cash equivalents is based on the level 1 method of the fair value hierarchy. Cash and cash equivalents include cash in hand, deposits held at call with banks, cash collateral and other short-term highly liquid investments with original maturities of three months or less.

13. Any other assets, not elsewhere shown

The valuation of these assets is based on the Solvency II valuation method. Other assets include different investments and interest income, property developments, tax assets and accrued assets.

D.2 Technical provisions

D.2.1 Introduction

In this section, the policies regarding methodology and assumptions for the technical provisions are described. These liabilities arise from insurance contracts issued by a.s.r. life that transfer significant insurance risks from the policyholder to a.s.r. life.

In this paragraph line items 14-18 from the simplified balance-sheet above are described.



D.2.2 Technical provisions methods

In this paragraph the methodology for calculating the technical provisions is described.

14 and 16. Technical Provisions and Unit – linked (best estimates)

Intrinsic Value

The intrinsic value is the net present value of projected cash flows from insurance contracts, i.e. benefits and claims, profit sharing liabilities and costs less premiums. These cash flows are estimated using best estimate assumptions with respect to mortality, claims experience, lapse, expense and inflation. Where applicable, the participating features of the insurance contracts, such as profit sharing, are taken into account in the future cash flows.

The cash flows are discounted using the term structure of risk-free interest rates (including volatility adjustment) as prescribed under Solvency II for the valuation of underwriting liabilities. The best estimate assumptions regarding mortality and longevity include recent trend assumptions for life expectancy in the Netherlands, as provided by the Dutch Actuarial Association.

In unit-linked contracts, the best estimate equals the fund value of the contract less the net present value of future margins on mortality and expense. For unit-linked contracts with a guaranteed minimum benefit on maturity the best estimate is increased with the loss on maturity date because of this guarantee if a loss occurs in the best estimate scenario.

Time value of options and guarantees

The time value of options and guarantees (TVOG) is calculated using stochastic techniques with respect to interest scenario's. It concerns the costs associated with the granted financial options and guarantees, such as profit-sharing and guarantees on maturity value in some index-linked and unit-linked policies. Only the time value of these options is added to the expected value; their intrinsic value has already been recognised in the expected value.

15. and 17. Technical Provisions and Unit – linked (risk margin)

The risk margin is determined using the Cost of Capital (CoC) method, using a CoC rate of 6%, in line with the Delegated Regulation. The risk margin is based on the SCR of all insurance risks, operational risk, unavoidable market risk (excluding interest rate risk) and counterparty default risk for reinsurance arrangements, SPVs and other material exposures which are closely related to insurance liabilities.

The SCRs involved are determined at the valuation date under the assumption that no VA is applicable. They are projected separately into the future using suitable risk drivers per risk group. These SCRs are aggregated in each future year, making allowance for the correlations between risks using correlation factors as defined in the standard model.

In determining the risk margin, allowance is also made for diversification benefits between risk groups within a legal entity.

The risks that are factored into the risk margin are mortality risk, longevity risk, disability-morbidity risk, lapse risk, catastrophe risk, expense risk and operational risk.

Best estimate assumptions

The valuation date is the end date of the reporting period and the starting point for projecting. Assumptions are calculated on the presumption that a.s.r. will pursue its business as a going concern reflecting the organisation's or industry's most realistic view.

Assumptions are considered to be best estimates when they represent the mean or probability-weighted average of possible outcomes of an uncertain event. The assumptions distinguish between economic assumptions and operating assumptions.

Economic assumption

Volatilities and correlations:

- The volatilities are set for each asset category: equities, property and fixed income.
- The correlations are set between each of the asset categories.

Expense inflation

The applied long-term expense inflation curve is based on an inflation curve as derived from available and liquid market instruments, corrected with two spreads. The reference for the market inflation curve is the European inflation swap sourced from Bloomberg with ticker EUSWI-CMPL Currency. The first applied spread is to translate the European price inflation curve to a Dutch inflation curve (CPI curve). The second applied spread is to increase the Dutch inflation curve with an additional wage inflation component. Due to the high volatility of the short maturities of the inflation curve a different methodology is used for the first one or two years. In these years the wage inflation is based on the wage inflation as determined in the collective labor agreement (CAO) of a.s.r.

The expense inflation curve is set every quarter on the applicable reference date. The spreads are set once a year. For the current valuation model, it is necessary to translate the inflation curve to a single inflation parameter. This parameter is set in such a way that applying the curve or the parameter leads to the same present value of costs. At the valuation date, 31 December 2022, the expense inflation (parameter) was set at 2.33%.

Operating assumptions

Operating or non-economic assumptions generally capture risks directly related to movements and uncertainty as a result of underwriting. Operating assumptions are generally based on analyses of recent experience. The goal is to make a best estimate of future experience, but staying cautious if there is broad scope for judgment. Operating assumptions are specific to the entity and rely on a combination of analysis of past experience and assessments of future trends. The operating assumptions are updated once a year. Operating assumptions are set by the product lines.



Mortality, longevity

The principles underlying mortality are two-fold: assumptions for developments in the mortality of the average population and assumptions for developments in the difference between the mortality rate of insured persons and the general population (mortality experience).

a.s.r. life bases its assumptions for developments in the mortality rate of the general population on recent external life expectancy tables. As of the third quarter of 2022 this is based on 'Prognosetafel AG 2022'.

a.s.r. life considers Prognosetafel AG 2022 the best table for forecasting the mortality rate of the Dutch population. It is the most recent life expectancy table and it is based on the latest academically validated techniques.

The experience factors for the mortality rate among insured persons are derived from own portfolio observations. These factors, which are broken down by age and gender, concern the mortality rate measured in insured amounts.

Surrenders, lapses, paid-up

A policy is assumed to become paid-up when the policyholder decides to terminate the contractual payments before the end of the policy term. A policy is assumed to be surrendered/lapsed when the policyholder decides to terminate the contract before the end of the policy term and agrees to receive the applicable contractually agreed surrender benefits.

In the product lines Life Individual and Funeral, the principles for lapses and early surrenders were determined based on:

- the elapsed duration of the policy;
- a series of historical observations for each system of records and by type of product.

On this basis, frequencies were extrapolated for the surrender of regular premium policies, conversion of regular premium policies into paid-up policies, surrender of paid-up policies and surrender of single premium policies. The surrender pattern for individual unit-linked portfolios has been subject to a different pattern since the miss-selling of such policies came to light in 2010. The determination of best estimate lapse rates for unit linked policies is based on the usual statistical methods, including back testing, taking into account the increased lapse after 2010 but with special attention to the most extreme years in the historical data.

Pension policies do not usually lend themselves to lapses and early surrender. The pension contracts and/or master agreements that a.s.r. life signs with employers can be terminated only at the expiry date of the contract. Only then can a policy be renewed, converted into a paid-up policy or transferred.

Expenses

The total of expenses allocated to modelled insurance activities in scope represents the actual expenses for the reporting period. They include direct operating expenses, local overhead expenses as well as investment expenses and group head office expenses. Expenses allocated to modelled business covers all expenses incurred to manage the total business, including investments in current systems required to support that business.

To determine the investment cost assumption, we start with the total actual investment costs, as known for a.s.r. group. The total investment costs of a.s.r. group are broken down into various activities and assigned to a.s.r. life. The total costs of a.s.r. life are then divided among the various product groups, whereby the starting point is that the distribution takes place on the basis of the extent to which the investments in characteristics match the obligations (BEL and RM). The investment cost parameter is then used to project the investment costs to the future.

Investment expenses related to managing assets that have already been deducted from related service fees are not included in the expenses. Investment expense that is already included in the valuation of the asset, which is the case for mortgages, are not included in the valuation of the best estimate.

The maintenance expense assumption is set before information about the actual expenses is available. The assumption is based on available data from the first two quarters of recent year and an estimate of the expenses incurred in the remaining period of most recent year. If any significant change in the actuals or expected costs occur in the last two quarters of the year, the best estimate is adjusted accordingly. The expenses related to the insurance portfolio are divided between acquisition and maintenance expenses according to their nature. Projected maintenance expenses include expense inflation.

The maintenance costs are divided into fixed costs, partially variable costs, variable costs and highly variable costs. Variable costs are considered to be scalable. Fixed costs however are considered not to be scalable, but are maximized in the projection. It is not realistic to assume that the remaining policies have to carry exponentially high costs. It is therefore taken into account that in the future a proportionate share of the fixed costs will be carried by new business. Also, expected expense reductions based on Future Management Actions (FMA) are included in the estimation of the fixed costs. Due to limitations of the current projection model it is not possible to use a fixed costs component separately. Therefore, the choice has been made to include the fixed costs component using a fixed spread as an addition to the inflation rate. These fixed spreads are determined for every product line separately.

Except from fixed costs, expected or anticipated expense reductions, e.g. because of productivity gains, are excluded from the calculations beyond what has been achieved in the current reporting period. Recurring expenses include development costs when they are recurrent and arise to safeguard the ability of the total business to continue as a going concern. These development cost are typically run off over a shorter term than other recurring expenses. These current costs are included for the estimated duration.



Expense allocation

Costs are allocated in line with IFRS financial statements. Costs are carefully allocated using cost drivers. This also applies to the cost allocations to the various products. Cost allocation is documented and reported.

Profit sharing/bonus rate

Some of the portfolio is subject to profit-sharing. The portfolio has been divided into groups with similar profit-sharing systems and rules. The time value and intrinsic value of any profit-sharing option is calculated for each group (model point).

Renewal assumptions

The renewal assumption for the collection commission has been determined for each portfolio based on the most recent available accounting records. The recognised collection commission is divided by gross premiums.

Morbidity and Disability

The assumption for disability-morbidity has been determined for each portfolio based on the most recent available accounting records and prior years. The provision, premiums, benefits and results relating to disability-morbidity have been used to define the assumption.

Risk-free yield curve

The basis for the reference rate of the best estimate is the swap rate at the date of valuation (31 December 2022). The following adjustments have been made to the swap curve:

- Reduction by 10 bps to account for counterparty default risk (30 December 2021: 10 bps);
- Extrapolation from year 20 to the ultimate forward rate of 3.45% in year 60 using the Smith-Wilson extrapolation method;
- Inclusion of a volatility adjustment (VA) of 19 bps, as provided by EIOPA, to the zero rates for the first 20 years (31 December 2021: VA 3 bps).

Impact volatility adjustment a.s.r. life applies the volatility adjustment for discounting cash flows to determine the best estimate and in determining the Required Capitals for the SCR. In the next table the impact is shown of this volatility adjustment on the financial position and own funds of a.s.r. life.

Impact of applying VA = 0 bps

| | VA = 19 bps | | VA = 3 bps | | VA = 0 bps | | Impact | |
|-------------------------|------------------|------------------|------------------|------------------|------------------|------------------|--------|--|
| | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | 31 December 2022 | 31 December 2021 | | |
| TP | 37,314 | 49,655 | 37,926 | 49,800 | 612 | 145 | | |
| SCR | 2,383 | 3,079 | 2,456 | 3,248 | 73 | 169 | | |
| MCR | 885 | 1,203 | 902 | 1,207 | 17 | 4 | | |
| Basic own funds (total) | 4,015 | 5,716 | 3,561 | 5,608 | -454 | -108 | | |
| Eligible own funds | 4,015 | 5,716 | 3,419 | 5,608 | -596 | -108 | | |

D.2.3 Level of uncertainty

a.s.r. distinguishes between two sources of uncertainty with regard to the level of the technical provisions. These sources are model risk and process risk. The uncertainty associated with these risks has been mitigated as described below.

Process risk

The process risk is mitigated using the Risk Control Matrix (RCM), which creates a reasonable degree of assurance as to the reliability of financial reports. Key controls have been identified and to a larger extent implemented for the calculation process. In addition, the effectiveness of the RCM framework is verified by an independent party and supplementary checks are performed where needed. As part of RCM or the additional checks, the four-eye principle has demonstrably been applied to the calculation of the technical provision.

Model risk

The second risk that a.s.r. has identified in relation to the technical provisions is model risk. Regular procedures have provided adequate certainty with regard to this risk. To illustrate, the reporting manager in charge signs off documents to demonstrate that the reported figures do not contain any material mistakes or that no key facts have been omitted. In addition, FRM, in its role as the second line of defence, performs an independent internal review of the technical provisions as described in the previous phase.

D.2.4 Reinsurance and special purpose vehicles (SPVs)

Contracts that transfer a significant insurance risk from a.s.r. life to third parties are accounted for as reinsurance contracts, and are classified as outgoing reinsurance.

a.s.r. life has reinsured a substantial part of all underwriting risk of a certain group pension contract on a proportional basis.

a.s.r. life does not make use of SPVs.



D.2.5 Technical provisions

In this table a reconciliation is made between the Solvency II and the IFRS valuation of provisions. Solvency figures are part of the Balance Sheet S.02.01. The next paragraph describes a brief explanation of these differences.

| Technical provisions: IFRS versus Solvency II | | | |
|---|---------------|---------------|---------------|
| 31 December 2022 | IFRS | Revaluation | Solvency II |
| Life | | | |
| Best estimate | - | | 25,910 |
| Risk margin | - | | 1,169 |
| Technical provision | 24,965 | 2,114 | 27,079 |
| Index-linked and unit-linked | | | |
| Best estimate | - | | 10,173 |
| Risk margin | - | | 62 |
| Technical provision | 13,007 | -2,771 | 10,235 |

D.2.6 Reconciliation between IFRS and Solvency II

Under Solvency II, the technical provisions are calculated using a different method compared to IFRS. In this section the reconciliation between IFRS and Solvency II is described per business line.

Life

The IFRS technical provisions are determined with assumptions that are equal to the assumptions underlying the premium. For longevity risk additional provisions are set up. Also under IFRS provisions are set up for realised capital gains, interest rate swaptions and shadow accounting (unrealised gains on bonds). In case that the policy-duration exceeds the length of the premium-paying period, a provision for administrative expenses is set up for the period where no premiums are due.

The Solvency II provision consists of a best estimate and a risk margin. The best estimate includes a time value of option and guarantees with respect to profit sharing. The best estimate is determined on best estimate assumptions and covers future benefits and future expenses to the extent that they are not covered by future premiums.

Index-linked and unit-linked

The technical provision for unit-linked policies under IFRS equals the fund value of the underlying assets of the units. Extra provisions are set up in case of minimum guarantees on the maturity-value provided by a.s.r. life and for the transparency issue.

The Solvency II technical provision consist of the fund value less the net present value of the best estimate value of the future profits. For policies where a guarantee with respect to the maturity-value is given, the value of the guarantee is determined on a market consistent basis. Also for the transparency issue a provision is set up.

Technical provisions Pension scheme a.s.r.

For a.s.r. life the pension scheme of a.s.r.-employees is involved on the balance sheet under technical provision life. On a.s.r. Group level this scheme is mentioned as an employee benefit obligation.

D.3 Other liabilities

D.3.1 Valuation of other liabilities

In line with the valuation of assets, the accounting principles for other liabilities used in the Pillar III reports are generally also based on the IFRS as adopted by the EU. Any differences between the valuation methods for IFRS and Solvency II purposes are addressed in detail per liability category. In this paragraph line items 18 – 21 from the simplified balance-sheet above are described.

18. Pension benefit obligations

Not applicable for a.s.r. life.

As of 1 January 2021 a defined contribution plan is in place. The existing defined benefit plan has ended and will not be renewed. The accrued pensions (until 1 January 2021) will remain guaranteed at a.s.r. life and are not transferred to the defined contribution plan. The plan amendment is recognised directly through profit of loss.

19. Deferred tax liabilities

Reference is made to 3. Deferred tax assets.

20. Subordinated liabilities

Not applicable for a.s.r. life.

21. Other liabilities

Other Liabilities contains different small line items:



Debts owed to credit institutions

The valuation of these liabilities follows the Solvency II fair value hierarchy as described in paragraph D.1.1

Financial liabilities other than debts owed to credit institutions

The valuation of these liabilities follows the IFRS fair value hierarchy as described in paragraph D.1.1

Subsequent valuation has to be consistent with the requirements of Article 75 of the Solvency II directive. Therefore, no subsequent adjustments to take account of the change in own credit standing shall take place. However, adjustments for changes in the risk-free rate must be accounted for subsequently. This means that the subordinated loans are discounted using the risk-free rate plus a credit spread at inception of the liability.

Insurance and Intermediaries payables

The valuation of these liabilities follows the Solvency II fair value hierarchy as described in paragraph D.1.1
This category is subject to the same valuation as the asset category Cash and Cash equivalents.

Trade payables (non-insurance)

The valuation of these liabilities follows the Solvency II fair value hierarchy as described in paragraph D.1.1
This category is subject to the same valuation as the asset category receivables.

Any other liabilities not disclosed elsewhere

The valuation of these liabilities follows the Solvency II fair value hierarchy as described in paragraph D.1.1. This item consists primarily of tax payables.

Contingent liabilities

Contingent liabilities are defined as:

- a possible obligation depending on whether some uncertain future event occurs, or
- a present obligation but payment is not probable or the amount cannot be measured reliably.

Contingent liabilities are recognised on the IFRS balance sheet if there is a probability of >50% that the contingent liability leads to an 'outflow of resources'. These liabilities are also recognised on the Solvency II balance sheet.

Solvency II prescribes that all contingent liabilities be recognized on the Solvency II balance sheet. This covers cases where the amount cannot be measured reliably or when the probability is <50%. For these cases, a regular process is in place to determine whether contingent liabilities should be recognized on the Solvency II balance sheet.

The a.s.r. life Solvency II capital ratio does not include contingent liabilities.

D.3.2 Reconciliation from Solvency II equity to EOF

The differences described in the above sections are the basis for the reconciliation of IFRS equity to Solvency II equity. To reconcile from Solvency II equity to EOF, the following movements are taken into consideration:

Subordinated liabilities

Not applicable for a.s.r. life.

Foreseeable dividends and distributions

Not applicable for a.s.r. life.

Deductions for participations in financial and credit institutions
Participations in financial and credit institutions exceeding 10% are not supervised by the Solvency II framework and are therefore excluded from the eligible own fund items.

Tier 3 Limitations

In accordance with the Delegated Regulation EOF is divided in tiering components. There are boundary conditions related to the size of these components. Excess of this limits results in capping of EOF. For a.s.r. life capping does not apply per year-end 2022.

D.4 Alternative methods for valuation

a.s.r. life does not apply alternative methods for valuation.

D.5 Any other information

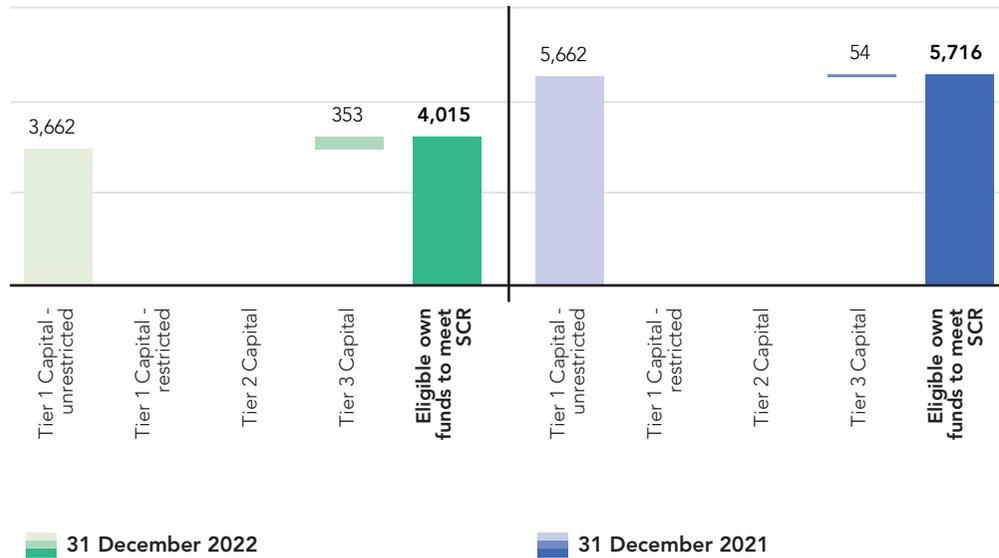
Not applicable for a.s.r. life.



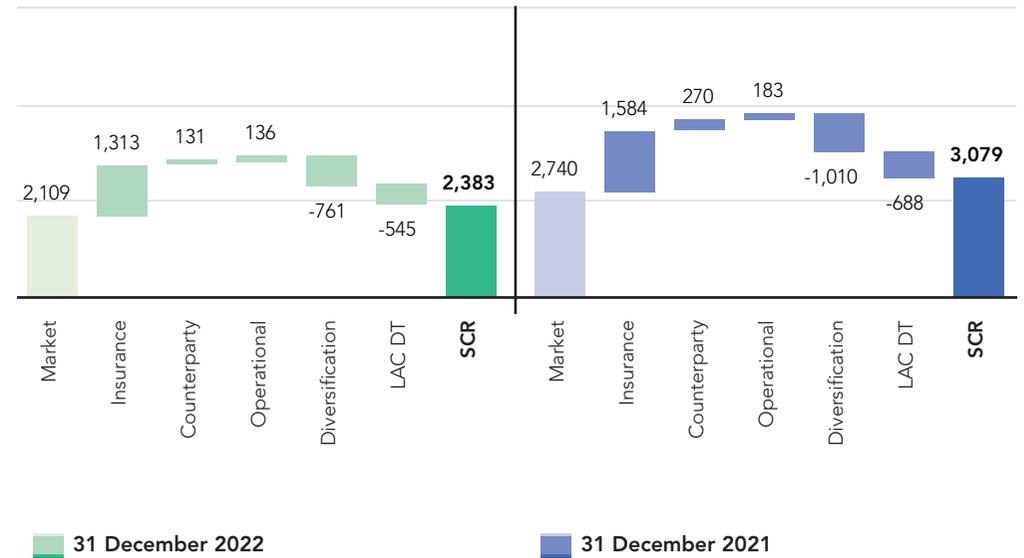
E Capital management

Key figures

Eligible own funds



SCR

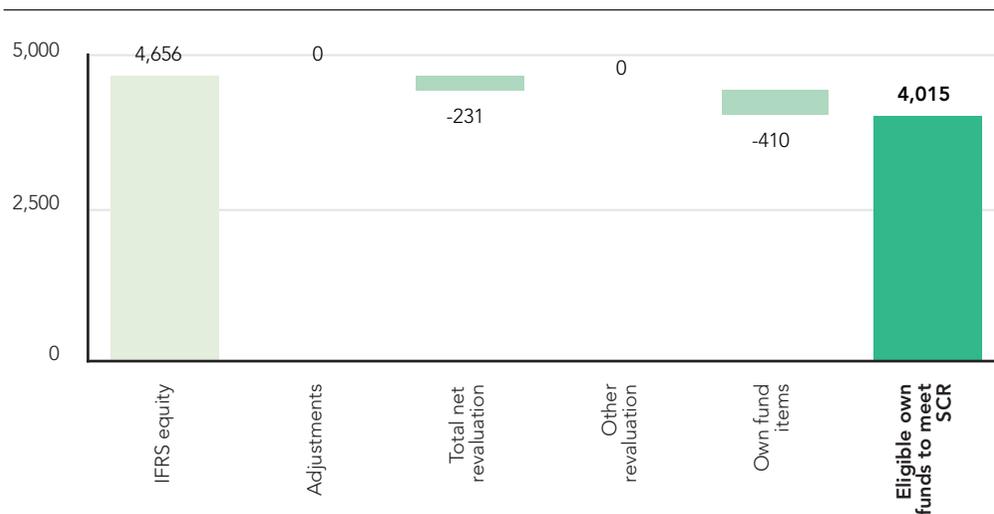


The solvency ratio stood at 168% as at 31 December 2022 (2021: 186%) based on the standard formula as a result of € 4,015 million EOF and € 2,383 million SCR. The decrease was mainly the result of the reduction of the UFR, increasing inflation, higher interest rates, widening of credit spreads and dividend upstream to the group. This was partly compensated by organic capital creation and a higher VA.

Note that the ratio of 168% is presented after deduction of a planned dividend upstream to a.s.r. Group. Excluding the deduction of the planned dividend upstream the ratio stood at 186%.



Reconciliation total equity IFRS vs EOF Solvency II



The difference between the IFRS equity and the eligible own funds at year-end 2022 is mainly due to the revaluation of loans and mortgages and the technical provisions (€ -231 million). The Own fund items relate to the foreseen dividend upstream in 2023 of € 410 million to a.s.r. Group for the acquisition of Aegon Nederland.

An extensive explanation of the reconciliation from IFRS equity to Solvency II eligible own funds was presented in section D.3.2.

E.1 Own funds

E.1.1 Capital management objectives Management

Overall capital management is administered at group level. a.s.r. currently plans to consider investing capital above the Solvency II ratio (calculated based on the standard formula) of 160% (management threshold level) with the objective of creating value for its shareholders. If and when a.s.r. operates at a level considerably above the management threshold level and it believes that it cannot invest this capital in value-creating opportunities for a prolonged period of time, it may decide to return (part of this) capital to shareholders. If a.s.r. chooses to return capital, it plans to do so in a form that is efficient for shareholders at that time. a.s.r. actively manages its in-force business, which is expected to result in free capital generation over time. Additionally, business improvement and balance sheet restructuring should

improve the capital generation capacity while advancing the risk profile of the company. The legal entities are individually capitalised and excess capital over management's targets for the legal entities is intended to be upstreamed to the holding company as far as is needed for amongst others covering external dividend, coupon payments on hybrids/senior financing instruments and holding costs and in so far the local regulations and the internal risk appetite statement allow.

Objectives

The group is committed to maintain a strong capital position in order to be a robust and sustainable insurer for its policyholders and other stakeholders. The objective is to maintain a solvency ratio well above the minimum levels as defined in the risk appetite statements and above the relevant management threshold levels. Sensitivities are periodically performed for principal risks and annual stress tests are performed to test a.s.r.'s robustness to withstand moderate to severe scenarios. An additional objective is to achieve a combination of a capital position and a risk profile that is at least in line with a 'single A' rating by Standard & Poor's.

The SCR is reported on a quarterly basis and proxies are made on both a monthly and weekly basis. The internal minimum solvency ratio for a.s.r. life as formulated in the risk appetite statement is 120%. The lower limit solvency target is 140%. The management threshold level for the solvency ratio is above 160%. The solvency ratio stood at 168% at 31 December 2022, which was comfortably above the internal requirement of 120% and the management threshold level of 160%. Note that the ratio of 168% is presented after deduction of a planned dividend upstream to a.s.r. Group. This differs from previous years when no planned dividends were foreseen and taken into account. Excluding the deduction of the planned dividend upstream the ratio stood at 186%.

The capital policy of a.s.r. focuses on the best possible use of available capital within the group and the different entities. In doing so, a.s.r. applies two principles: i) dividend distributions and capital contributions from or to a.s.r. life are made to satisfy the defined targets for capital, own funds and liquidity positions, and ii) available capital is maintained at a.s.r. life for the creation of return and capital generation.

In accordance with a.s.r.'s dividend policy, the liquidity of the underlying entities is not taken into account for the liquidity position of the group. However, the capital is recognised in the capital position of the group, since a.s.r. has the ability to realise the capital of this OTSO, for example by selling the entity. If a.s.r. life elects to return capital, it intends to do so in the form that is efficient for shareholders at that time. In 2022, € 490 million dividend upstream took place.

The table below shows how the EOF of a.s.r. life relates to the different capital targets.



Market value own funds under SCR



E.1.2 Tiering own funds

The table below details the capital position of a.s.r. life as at the dates indicated. With respect to the capital position, Solvency II requires the insurers to categorise own funds into the following three tiers with differing qualifications as eligible available regulatory capital:

- Tier 1 capital consists of Ordinary Share Capital and Reconciliation reserve.
- Tier 2 capital consists of ancillary own funds and basic Tier 2. Ancillary own funds consist of items other than basic own funds which can be called up to absorb losses. Ancillary own fund items require the prior approval of the supervisory authority. a.s.r. life has no ancillary own fund items.
- Tier 3 consists of Deferred tax assets. a.s.r. life has Tier 3 own fund items amounting to € 353 million at year-end 2022 (2021: 54 million).

The rules impose limits on the amount of each tier that can be held to cover capital requirements with the aim of ensuring that the items will be available if needed to absorb any losses that might arise.

Eligible Own Funds to meet the SCR

| | 31 December 2022 | 31 December 2021 |
|---------------------------------------|------------------|------------------|
| Tier 1 capital - unrestricted | 3,662 | 5,662 |
| Tier 1 capital - restricted | - | - |
| Tier 2 capital | - | - |
| Tier 3 capital | 353 | 54 |
| Eligible own funds to meet SCR | 4,015 | 5,716 |

E.1.3 Own funds versus MCR

The MCR calculation is based on the standard formula.

Eligible Own Funds to meet the MCR

| | 31 December 2022 | 31 December 2021 |
|---------------------------------------|------------------|------------------|
| Tier 1 capital - unrestricted | 3,662 | 5,662 |
| Tier 1 capital - restricted | - | - |
| Tier 2 capital | - | - |
| Tier 3 capital | - | - |
| Eligible own funds to meet MCR | 3,662 | 5,662 |

According to Delegated Regulation article 248 to 251 the MCR (€ 885 million) of a.s.r. life is calculated as a linear function of premiums, technical provisions and capital at risk.

E.1.4 List of hybrid loans

There are no hybrid loans at a.s.r. life.

E.2 Solvency Capital Requirement

Capital requirement

The required capital stood at € 2,383 million per 31 December 2022. The required capital (before diversification) consists for € 2,109 million out of market risk, € 1,313 million of insurance risk and the counterparty default risk amounted to € 131 million at 31 December 2022.



a.s.r. life's Solvency II ratio complied during 2022 with the applicable externally imposed capital requirement. The table below presents the solvency ratio as at the date indicated.

Solvency II ratio

| | 31 December 2022 | 31 December 2021 |
|--------------------------------|------------------|------------------|
| Eligible Own Funds Solvency II | 4,015 | 5,716 |
| Required capital | 2,383 | 3,079 |
| Solvency II ratio | 168% | 186% |

The Solvency II ratio stood at 168% at 31 December 2022 (2021: 186%). The Solvency II ratios presented are not final until filed with the regulators.

Under Solvency II it is permitted to reduce the required capital with the mitigating tax effects resulting from a 1-in-200-year loss ('Shock loss'). There is a mitigating tax effect to the extent that the Shock loss (BSCR + Operational risk) is deductible for tax purposes and can be compensated with taxable profits. This positive tax effect can only be taken into account when sufficiently substantiated ('more likely than not'). a.s.r. included a beneficial effect on its solvency ratio(s) due to the application of the LAC DT. The LAC DT benefit of a.s.r. life amounted to € 545 million (2021: € 688 million).

Relevant regulation and current guidance (Delegated Regulation, Level 3 guidelines, Dutch Central Bank Q&As and IAS 12) is taken into account in the development of the LAC DT methodology. a.s.r. life uses an advanced model for the LAC DT. In the advanced model future fiscal profits are used to underpin the LAC DT. The model will be updated in case constrained by additional guidance or legislation provided.

The a.s.r. life solvency ratio does not include any contingent liability potentially arising from any of the current and/ or future legal proceedings in relation to unit-linked insurance contracts or for other products sold, issued or advised on by a.s.r. life's insurance subsidiaries in the past, the reason being that it is impossible at this time to make reliable estimates of the number of expected proceedings, possible future precedents and the financial impact of current and possible future proceedings.

On 22 September 2021 the European Commission published its proposal for the revision of Solvency II. It consists of various changes to the Solvency II framework, affecting most notably the liability discount curve, the risk margin and the volatility adjustment (VA). In July 2022, the Council reached an agreement on their common position. The Parliament has tabled many amendments and will vote on their final position in early 2023. The next step then is for the European Parliament, the Council to negotiate the final legislative texts of the revision of Solvency II. It is expected that the changes will come into effect in 2025 at the earliest and that some measures will include a phase-in period. Quantitative impact of the EC

proposal has been analysed and appears to be more favourable compared to the earlier EIOPA advice, but a conclusion is only possible after specifications have been finalised.

Standard & Poor's confirmed the single A rating of a.s.r. life on 9 September, 2022 and on 27 October 2022 for a.s.r. including Aegon Nederland.

Ratings

| Ratings Standard & Poor's | Type | Rating | Outlook | Rating & outlook since |
|----------------------------|------|--------|---------|------------------------|
| ASR Levensverzekering N.V. | FSR | A | Stable | 23 August 2012 |
| ASR Levensverzekering N.V. | CCR | A | Stable | 23 August 2012 |

CCR: counterparty credit rating

FSR: financial strength rating

Rating reports can be found on the a.s.r. website: <http://asrnl.com/investor-relations/ratings>.

E.3 Use of standard equity risk sub-module in calculation of Solvency Capital Requirement

The transitional measure for equity risk applies for shares in portfolio at 01-01-2016 and ended per 31 December 2022. The SCR equity shock is 22% at 01-01-2016, and linear increasing to (i) 39% + symmetric adjustment for type I shares and (ii) 49% + symmetric adjustment for type II shares.

E.4 Differences between Standard Formula and internal models

a.s.r. solvency is governed by a standard formula, rather than the self-developed internal model. The EB believes that this should enhance transparency and consistent interpretation.

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

As a.s.r. life has not faced any form of non-compliance with the MCR or significant non-compliance with the SCR during the reporting period or at the reporting date, no further information is included here.

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