

# 2021

# Solvency and Financial Condition Report

Nationale-Nederlanden Levensverzekering Maatschappij N.V.

# Content Solvency II

## Solvency and Financial Condition Report

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# Summary

## Summary

### NN Leven's approach to the Solvency and Financial Condition Report

This Solvency and Financial Condition Report ('SFCR') provides public quantitative and qualitative disclosures for Nationale-Nederlanden Levensverzekering Maatschappij N.V. ('NN Leven') on Solvency II as required by the Solvency II legislation. NN Leven already discloses most of the information that is required to be included in the SFCR in its 2021 Annual Report ('Annual Report'). In order to ensure the most transparent and user-friendly approach, the information that is already included in the Annual Report is not duplicated in this SFCR. Therefore, this SFCR is prepared as a supplement to NN Leven's Annual Report. It includes all information required to be disclosed in the SFCR, either through a specific reference to the Annual Report or as supplemental information.

As required by the Delegated Regulation (EU) 2015/35/Annex XX "Structure of the Solvency and Financial Condition Report and Regular Supervisory Report", this SFCR follows the required standard chapter layout. The subjects addressed are based on Directive 2009/138/EC/ and (amended) Directive 2014/51/EU section 3 – Public Disclosures (articles 51-56), Delegated Regulation (EU) 2015/35 and (amended) Delegated Regulation (EU) 2016/467 and 2019/981 chapter XII Public Disclosures (articles 292-298).

NN Leven is required to submit the so-called Quantitative Reporting Templates ('QRTs') to its supervisor Dutch Central Bank ('DNB'). A subset of these QRTs, which are required to be publicly disclosed and which provide quantitative information in accordance with Solvency II as at 31 December 2021, are included in the appendix to this SFCR.

The amounts disclosed in this SFCR are consistent with the amounts in the Annual Report, in millions of euros unless stated otherwise. To comply with the Solvency II legislation, the amounts in the QRTs are in thousands of euros.

The Solvency ratio, as well as the amounts disclosed in this SFCR, are not final until filed with the regulators.

Chapter A 'Business and performance' describes the overall business profile and structure of NN Leven. It also provides insight into the underwriting and investment performance of NN Leven. Chapter B 'Governance system' explains the organisational governance structure and looks into the role and execution of key Solvency II functions. Chapter C 'Risk profile' analyses NN Leven's exposure to financial and non-financial risks and explains the risk mitigation techniques in place. Chapter D 'Valuation for group solvency purposes' elaborates on the differences in presentation and measurement of balance sheet elements between Solvency II and International Financial Reporting Standards ('IFRS'). Chapter E 'Capital management' discusses the composition of Available and Eligible Own Funds and the calculation of the Solvency Capital Requirement ('SCR').

### Covid-19 pandemic

Since early 2020, the spread of the Covid-19 pandemic is causing significant disruption to society and the world-wide economy, impacting NN Group, its employees, its customers and its suppliers. Financial markets have been severely impacted by significant volatility in interest rates, equity prices and spreads and the world-wide economy has been significantly impacted as well. Governments and central banks worldwide are responding to this crisis with aid packages and further supporting measures. NN Group is constantly monitoring the developments and the (potential) impact on NN Group. The most significant risks that NN Group is facing in this context are related to the financial markets (including interest rates, inflation, equity prices and spreads), insurance risk (including mortality and policyholder behavior) and operational risk (continuity of business processes). Note 52 'Risk management' in the 2021 Consolidated annual accounts includes extensive disclosure on the exposure to such risks and the risk management thereof.

The Covid-19 pandemic, and the related impact on the financial markets, impacted the financial reporting of NN Group mainly through additional uncertainties in the determination of the fair value of illiquid assets, including real estate investments and private equity investments. NN Group uses quarterly appraisals by external valuers as main input for the determination of fair value of its real estate investments. During 2020 uncertainties in the environment have led to the inclusion of 'material valuation uncertainty' clauses in certain external valuation reports. Such clauses do not imply that the valuation cannot be relied upon, but are used to indicate that – in the extraordinary circumstances – less certainty can be attached to valuations than would otherwise be the case.

In 2021, the Covid-19 pandemic continued, but the impact on NN Group's financial reporting in 2021 was limited. Valuation uncertainties were no longer included for valuations and there were no significant impairments (including debt and equity securities, loans and intangible assets). Furthermore, there was no significant impact from the Covid-19 pandemic on the technical provisions for Life insurance contracts. For Non-life disability insurance contracts there are both direct effects from insureds being affected by Covid-19 as well as indirect effects from longer disability as treatment is postponed. For specific portfolios this (may) lead to increased claims; however the observed and expected financial impact for NN Group is not significant. NN Bank offered postponements of interest and/or principal payments on an individual basis to retail borrowers who face temporary payment difficulties on their mortgage loans or consumer loans. The number of cases is limited and the financial impact for NN Group was not significant.

At the date of this report, it cannot be assessed whether there will be additional structural impact of the Covid-19 pandemic on results, capitalization and funding, long term assumptions and actual cash flows. Also the amount and profitability of new sales may be impacted but, at the date of this report, any (potential) structural impact cannot be assessed.

NN Group has established a business continuity plan to help ensure the continuity of its businesses, the well-being of its staff and its capability to support its customers, whilst maintaining financial and operational resilience.

## Summary continued

### Eligible Own Funds

Solvency II requires to hold Eligible Own Funds for covering the Solvency Capital Requirement. The Eligible Own Funds are classified in three tiers depending on whether the own fund items are available to absorb losses on a going concern basis and/ or in the case of winding-up as prescribed in the Solvency II legislation. Tier 1 Own Funds items are the highest grade capital and Tier 3 Own Funds are the lowest grade capital.

### Eligible Own Funds

In EUR million	2021	2020
Tier 1 (restricted and unrestricted)	11,424	11,319
Tier 2	1,177	1,201
Tier 3	928	874
<b>Total Eligible Own Funds</b>	<b>13,529</b>	<b>13,394</b>

Eligible Own Funds increased by EUR 135 million, from EUR 13,394 million at 31 December 2020 to EUR 13,529 million at 31 December 2021. The change in eligible Own Funds reflects operating capital generation and market variances, partially offset by the decrease in UFR level and dividend payments.

### Solvency Capital Requirement

NN Leven applies a Partial Internal Model ('PIM') approved by DNB to measure Solvency Capital Requirement (SCR).

### Solvency Capital Requirement

In EUR million	2021	2020
Market Risk	5,721	4,157
Counterparty Default Risk	39	125
Non-market risk	4,503	5,492
Market / Non-market risk diversification	-2,722	-2,291
<b>Partial Internal Model BSCR</b>	<b>7,542</b>	<b>7,483</b>
Operational Risk	490	526
Capital add-on	25	27
Loss-Absorbing Capacity of Technical Provisions	-52	-53
Loss-Absorbing Capacity of Deferred Taxes	-1,818	-1,888
<b>Total Solvency Capital Requirement</b>	<b>6,187</b>	<b>6,095</b>

In 2021 the market risks increased primarily due to a significantly lower Interest rate risk SCR, mainly as a result of model change. This led to a change in diversification benefits. The non-market risk decreased by EUR 989 million, mainly due to model and assumption changes, a new longevity reinsurance transaction, and higher interest rates compared to last year.

The loss-absorbing capacity of deferred taxes (LACDT) benefit decreased mainly due to a change in diversification benefit, partly offset by an increase in corporate tax rate. LACDT is calculated in line with the Guidelines that have been issued by DNB.

### NN Leven's Solvency II ratio

The following table presents the solvency ratio of NN Leven at year-end 2021 (and reported at year-end 2020).

### Solvency ratio

In EUR million	2021	2020
Eligible Own Funds (EOF)	13,529	13,394
Minimum Capital Requirement (MCR)	2,784	2,743
Solvency Capital Requirement (SCR)	6,187	6,095
<b>Surplus</b>	<b>7,342</b>	<b>7,299</b>
<b>Ratio (%) (EOF/SCR)</b>	<b>219%</b>	<b>220%</b>

NN Leven was adequately capitalised at year-end 2021. The Solvency II ratio of NN Leven decreased from 220% to 219% because the relative increase of the SCR slightly exceeds the relative increase of the EOF.

### Impact of long term guarantees and transitional measures

The quantification of the impact of changing the volatility adjustment to zero, the transitional measures on technical provisions and the transitional measures on interest rates on NN Leven's Solvency capital ratio – represented by an adjustment on the amount of technical provisions, the SCR, the Basic Own Funds and the Eligible Own Funds are included in the paragraph 'Matching and volatility adjustment, transitional measures and transitional risk-free interest rate term structure' in Section D.2 and QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix.

# Business and performance

## A. Business and performance

### Introduction

This chapter of the SFCR contains general information on NN Leven, a simplified organisational structure and NN Leven's financial performance over 2021.

### A.1 Business

#### General

Reference is made to the section 'Corporate Governance – General' of the 2021 Annual Report of NN Leven for the legal form of NN Leven and NN Leven's position within the legal structure of NN Group.

The supervisory authority responsible for financial supervision of NN Leven:

Dutch Central Bank  
Spaklerweg 4  
1096 BA Amsterdam  
The Netherlands

The contact details of NN Leven's external auditor are:

KPMG Accountants. N.V.  
F.M. van den Wildenberg RA  
Laan van Langerhuize 1  
1185 DB Amstelveen  
The Netherlands

Information on the appointment of the external auditor is included in the section 'Corporate governance- External auditor' in the 2021 Annual Report of NN Leven.

#### Qualifying holdings

A 'qualifying' holding is a direct or indirect holding in NN Leven which represents 10% or more of the capital or of the voting rights or which makes it possible to exercise a significant influence over the management of that undertaking.

NN Leven is a fully owned subsidiary of Nationale-Nederlanden Nederland B.V. ('NN Nederland') which in turn is a fully owned subsidiary of NN Insurance Eurasia N.V. ('NN Eurasia'). NN Eurasia is fully owned by NN Group.

As at 31 December 2021, there were no holders of qualifying holdings in NN Group.

#### Material lines of business and related undertakings

Reference is made to Note 39 'Principal Subsidiaries' in the 2021 Consolidated annual accounts of NN Group for more information on the material lines of business and geographical areas of NN Leven.

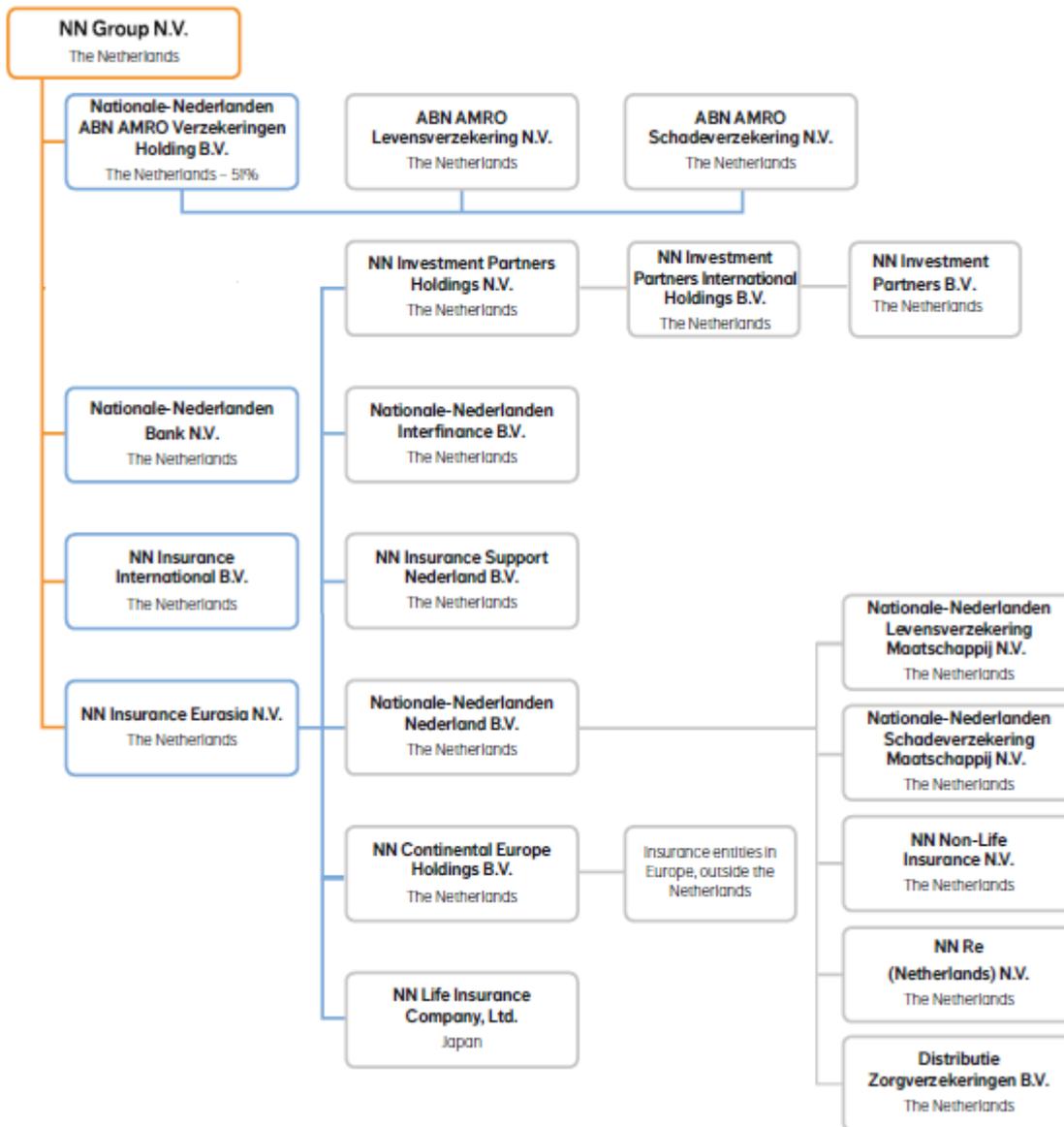
For information on any significant business events or other events that have occurred over the reporting period, reference is made to the Financial developments section in the 2021 Annual Report of NN Leven.

Reference is made to Note 39 'Principal subsidiaries' in the 2021 Annual Report of NN Leven for a list of material related undertakings and a description of the legal structure of NN Leven. Reference is made to the section 'Corporate Governance' of the 2021 Annual Report of NN Leven for information on the governance and organisational structure of NN Leven.

## Business and performance continued

### Simplified group structure

The simplified group structure as at 31 December 2021 is as follows:



## A.2 Underwriting Performance (see A.3 below)

### A.3 Investment Performance

NN Leven's operating result is analysed through a margin analysis, which includes the investment margin (investment performance), fees and premium-based revenues and the technical margin (underwriting performance). For information on underwriting and investment performance per material line of business, reference is made to the Financial developments section in the 2021 Financial Report. For the underwriting performance of entities in scope of Solvency II, reference is made to QRT S.05.01.02 'Premiums, claims and expenses by line of business' and QRT S.05.02.01 'Premiums, claims and expenses by country' in the Appendix.

Further reference is made to Note 20 'Investment income' in the 2021 Annual Report of NN Leven for information on income and expenses arising from investments by asset class and the components of such income and expenses.

Gains and losses on investments recognised directly in equity are disclosed in Note 13 'Equity' - revaluation reserve and in the Consolidated statement of comprehensive income in the 2021 Annual Report of NN Leven.

Information on investments in securitisations is included in Note 40 'Structured entities' in the 2021 Annual Report of NN Leven. Most of the investments in securitisations, issued by third parties relate to debt instruments of structured entities regarding asset-backed securities,

## Business and performance continued

classified as loans. Further reference is made to Note 5 'Available-for-sale investments' in the 2021 Annual Report of NN Leven for more information on these investments in structured entities.

### A.4 Performance of other activities

Other material income and expenses incurred over 2021 are disclosed in notes 19-28 and the Financial developments section in the 2021 Annual Report of NN Leven. Leasing arrangements are included in Note 27 'Other operating expenses'. Future rental commitments are disclosed in Note 37 'Contingent liabilities and commitments' in the 2021 Annual Report of NN Leven.

### A.5 Any other information

Reference is made to Financial development section in the 2021 Annual Report of NN Leven for any other material information regarding the business and performance of NN Leven.

# System of governance

## B. System of governance

### Introduction

This chapter of the SFCR contains information on the system of the governance of NN Leven in addition to governance information included in the 2021 Annual Report of NN Leven. The additional information includes relevant committees of the Management Board (hereafter 'MB'), a description of the main roles and responsibilities of the key functions and NN Leven's approach to the 'fit and proper' requirements and Own Risk and Solvency Assessment.

### B.1 General information on the system of governance

This chapter describes the structure of the committees, and explains the responsibilities, members and interdependencies of each committee. This chapter also sets out the governance and control framework effective in 2021.

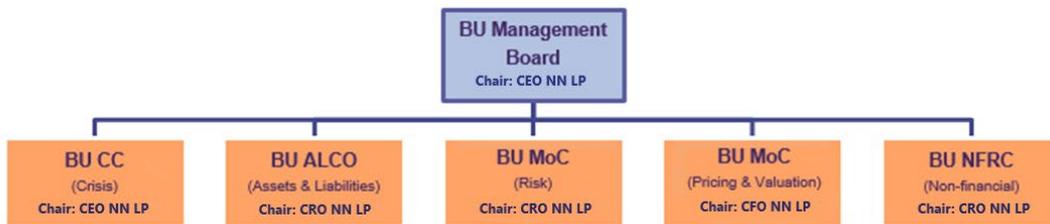
#### Structure of governance and changes in system of governance

In order to have effective and integrated risk management, NN Leven has implemented the NN Group Operating Model together with the NN Group Governance and the Three Lines of Defence Model. For a description of the structure of NN Group's administrative, management and supervisory body, reference is made to the Corporate Governance section and the Report of the Supervisory Board, both included in the NN Group 2021 Financial Report and to the NN Group website: <https://www.nn-group.com/our-company/Corporate-governance.htm>. These sources also describe the main roles and responsibilities of these bodies, provide a brief description of the segregation of responsibilities within these bodies and describe their relevant committees.

No material changes in the system of governance were made.

#### Management Board committees

The Management Board of NN Leven is responsible for defining, installing, and monitoring the risk management organisation in order to ensure its control systems are effective. The MB, or its (sub) committees, approves all risk management policies as well as the quantitative and qualitative elements of NN Leven's risk appetite. The Board reports and discusses these topics with the Supervisory Board, on a regular basis. While the Board retains responsibility for risk management, it has delegated certain responsibilities to committees which are responsible for day-to-day risk and finance related management decision-making, processes and controls. The following committees are in place: the Crisis Committee, the Asset & Liability Committee, the Model Committees and the Non-Financial Risk Committees. Representation in the various committees is provided from the relevant risk departments.



#### Crisis Committee

The main scope and responsibility of the Crisis Committee ('CC') is handling financial and non-financial crisis situations as defined by the MB of NN Leven. The Crisis Committee meets on an ad-hoc basis, but at least twice per year, face-to-face. The Crisis Committee is chaired by the Chief Executive Officer ('CEO') of NN Leven.

#### Asset and Liability Committee

The NN Leven Asset and Liability Committee ('ALCO') oversees the activities and market risks related to investments and the matching of assets and liabilities at NN Leven level. The NN Leven ALCO has decision making authorities that are allocated from the NN Leven MB. Investment decisions are taken by the ALCO. The Strategic Asset Allocation and the interest rate risk policy must be approved by the NN Group ALCO. The ALCO and/or -management board remain responsible for these decisions. For this reason the NN Group ALCO can only approve or decline proposals and request amendments. The ALCO and MB are required to inform the NN Group ALCO about any deviations from the requested amendments including a justification of their decision. The ALCO is chaired by the Chief Risk Officer ('CRO') of NN Leven. Reference is also made to Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

#### Authority, resources and operational independence of key functions

The key functions are positioned independently from the business (2nd line). These functions have, including but not limited to, strong hiring, career development and succession planning, appraisal as well as termination of employment rights to ensure adequate resources, and to allow them to act independently and with authority. The sections below further describe how the key functions have the necessary authority, resources and operational independence to carry out their tasks and how they report to and advise the MB of NN Leven.

#### Roles and responsibilities of key functions

NN Leven has organised its Solvency II key functions (the Risk Management Function Holder, the Actuarial Function Holder, the Compliance and Internal Audit Function) in accordance with the applicable Solvency II regulations. All Solvency key function holders within NN Leven have passed the applicable fit and proper test. All the Solvency II key functions are able to carry out their duties objectively and free from undue

## System of governance continued

influence, and do not simultaneously perform conflicting activities. They all have been given an appropriate standing in the organisation and can report relevant findings directly to the Board.

### Risk Function

The risk function is a Solvency II key function within NN Leven.

#### Role

The Chief Risk Officer of NN Leven is the Risk Management Function Holder and is entrusted with the day-to-day responsibility for NN Leven's risk management function. The CRO steers an independent risk organisation which supports the first line in their decision-making, but which also has sufficient countervailing power to prevent excessive risk taking. The CRO must ensure that both the Management Board and the Supervisory Board are at all times informed of and understand the material risks to which NN Leven is exposed. To ensure that the risk responsibilities of the CRO can be executed in an independent manner, the direct reports of the CRO are split into dedicated first line and second line teams.

The NN Leven CRO also has a functional reporting line to the NN Group CRO.

#### Responsibilities

Within the Management Board, the CRO is entrusted with the execution of the following tasks:

- Setting and monitoring compliance with NN Leven's overall risk policies issued by the Risk Management Function
- Formulating and communicating NN Leven's risk management strategy and ensuring that it is implemented throughout the organisation
- Supervising the operation of NN Leven's risk management and business control systems
- Reporting of NN Leven's risks, as well as the processes and internal business controls
- Making risk management decisions with regard to matters which may have an impact on the financial results of NN Leven or its reputation, without limiting the responsibility of each individual Management Board and Executive Board member in relation to risk management
- Sharing best practices across NN Leven.

### Actuarial Function Holder

The Actuarial Function Holder is a Solvency II key function within NN Leven. For a description of this function, role and responsibilities and implementation in the NN Leven structure, reference is made to section B.6.

### Compliance Function

The Compliance function is a Solvency II key function within NN Leven. For a description of this function, role and responsibilities and implementation in the NN Leven's structure, reference is made to section B.4.

### Internal audit Function

The Corporate Audit Services NN Group ('CAS') is also a Solvency II key function within NN Leven. For a description of this function, role and responsibilities and implementation in the NN Leven's structure, reference is made to section B.5.

#### Remuneration

Reference is made to Note 25 'Staff expenses' and Note 42 'Key management personnel compensation' as disclosed in the 2021 Annual Report of NN Leven for information on the remuneration policy and practices regarding administrative, management and supervisory bodies and employees.

#### Transactions with related parties

Reference is made to Note 41 'Related parties' and Note 42 'Key management personnel compensation' in the 2021 Annual Report of NN Leven for information about material transactions during the reporting period. Section B.7 in this SFCR contains more information on intra-group outsourcing arrangements. Transactions with people who exercise a significant influence on NN Leven and with members of the Management Board and Supervisory Board are disclosed in Note 42 'Key management personnel compensation' in the 2021 Annual Report of NN Leven.

#### Adequacy of system of governance

A description of the main characteristics of the system of governance and risk management and control systems of NN Group and its subsidiaries is disclosed in Note 44 'Risk management' in the 2021 Annual Report of NN Leven. NN Leven's system of governance consist of among others our risk management and internal control system which is aligned with the nature, scale and complexity of our organization. Elements of NN Leven's system of governance are regularly reviewed, and adapted when necessary, to ensure the system of governance is appropriate for our organization.

#### Consistent use of risk management, internal control systems and reporting procedures

Reference is made to Note 44 'Risk management' in the 2021 Annual Report of NN Leven for a description of how the risk management and internal control systems and reporting procedures are implemented consistently throughout NN Leven.

**System of governance** continued

**B.2 Fit and proper requirements**

For a description of NN Leven’s specific requirements concerning skills, knowledge and expertise applicable to the persons who manage NN Leven, reference is made to Note 44 ‘Risk management’ in the 2021 Annual Report of NN Leven. Requirements concerning skills, knowledge and expertise applicable to people who have other key functions, are included in the respective job profiles.

According to article 1.6 of the Supervisory Board Charter of NN Leven, the Supervisory Board shall meet at least once a year without the Management Board in attendance to discuss its own performance, the performance of the separate committees (if any have been set up) and of its individual members, and the conclusions that should be drawn. The desired profile, composition and competence of the Supervisory Board must also be discussed. Also, according to the Supervisory Board Charter (article 1.8) the Supervisory Board shall meet at least once a year without the Management Board in attendance to discuss the performance of the Management Board, as both an Insurer body and in terms of its individual members, and the conclusions that should be drawn.

Various NN Group policies and charters include provisions aiming to ensure that the people who effectively manage NN Leven and the people fulfilling key functions are fit and proper. During recruitment all candidates must have the professional qualifications, knowledge and experience that are required for sound and prudent management (‘fit’) and be of good reputation and have integrity (‘proper’). In an early stage of the hiring process and preferably at the time a position has become vacant, an approval request is put forward to the external regulator (DNB or AFM).

For a description of NN Leven’s process for assessing the fit and proper quality of the people who effectively run NN Leven, reference is made to article 1.4 (nn)(vii) and 2.5 of the Charter of the Supervisory Board, which is available on the NN Group website: <https://www.nn-group.com/our-company/Corporate-governance.htm>. As in previous years, permanent education sessions were organised for the Management Board and the Supervisory Board of NN Leven.

All people holding key functions are assessed against their performance objectives, leadership behaviours and any other requirements from their job profiles during the annual performance cycle and specifically during the year-end appraisal.

**B.3 Risk management system including the own risk and solvency assessment**

**Description of NN Leven’s risk management system**

Reference is made to Note 44 ‘Risk management’ in the 2021 Annual Report of NN Leven for:

- 1 a description of the risk management system which comprises strategies, processes and reporting procedures,
- 2 how NN Leven is able to effectively identify, assess, monitor, manage, and report, on a continuous basis, and
- 3 the risks to which NN Leven is or could be exposed on an individual and aggregated level

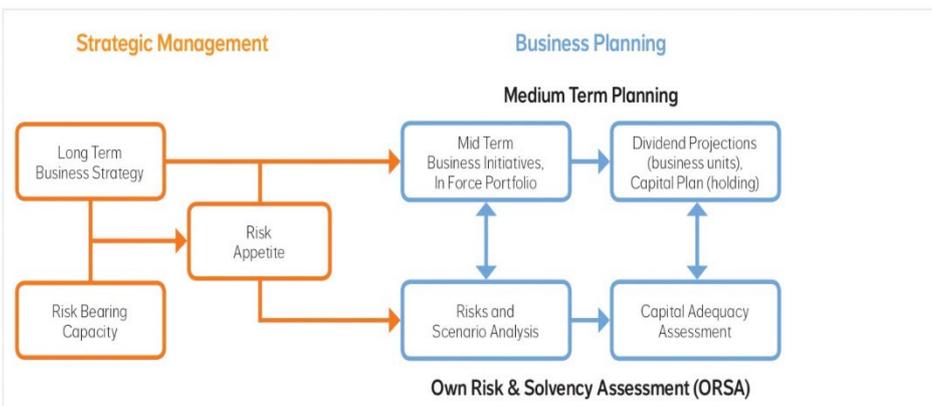
In the same note, a description is included on how the risk management system including the risk management function are implemented and integrated into the organisational structure and decision-making processes of NN Leven.

**Own Risk and Solvency Assessment**

The annual Own Risk & Solvency Assessment (ORSA) is an assessment whether NN Leven remains adequately capitalised during the Business Plan under a wide range of scenarios that may impact NN Leven’s solvency position. In the ORSA, NN Leven assesses:

- scenarios for risks that could have a significant impact on NN Leven’s Own Funds during the Business Plan period, both for risks that are modelled as part of NN Leven’s internal model as well as risks that are not modelled explicitly and
- the continuous appropriateness of our internal model in the context of NN Leven’s risk profile

As such, the ORSA is linked to the strategic management process and related decision-making framework as illustrated below:



## System of governance continued

### Regular frequency

NN Leven prepares an ORSA at least once a year. In the ORSA, NN Leven:

- articulates its strategy and risk appetite;
- describes its key risks and how they are managed;
- analyses whether or not its risks and capital are appropriately modelled, and;
- evaluates how susceptible the capital position is to shocks through stress testing and scenario analysis.

Stress testing examines the effect of several but plausible scenarios on the capital position of NN Leven. Stress testing can also be initiated outside the ORSA, either internally or by external parties such as DNB and the European Insurance and Occupational Pensions Authority ('EIOPA').

### Monitoring between regular ORSAs: possible ad-hoc ORSA

To the extent necessary, outcomes of the ORSA are translated in ad-hoc ORSA triggers (i.e. events that lead to a significant shock in the risk profile and/or capital position), risk metrics and management actions for identified material risks. Monitoring of ad-hoc ORSA triggers and risk metrics is performed as part of the regular Finance & Risk control cycle. Developments are documented in internal Finance & Risk reports and discussed during board and/or delegated committee meetings. The CRO within NN Leven is responsible for identifying the need of a(n) (partial) ad-hoc ORSA. NN Group will be informed as soon as possible when the decision for a(n) (partial) ad-hoc ORSA is made. In such cases, DNB is also informed.

### The regular ORSA process as undertaken within NN Leven

#### Capital plan and projections

The strategy is further translated into a Capital Plan. The capital planning process starts with the annual budgeting process in which a capital plan is prepared for NN Leven with a time horizon of 5 years. The Capital Plan is based on current expectations including macroeconomic assumptions. The base-case and projected technical provisions are reviewed by the Actuarial Function to assess whether they represent a true and fair view of future liabilities. The Actuarial Function also provides input concerning the risks arising from the calculation of technical provisions.

Capital adequacy is ensured through the capital planning process and further analysed using the 1-in-20 year scenarios and specific stress scenarios that might change from time to time. In the ORSA process, the capital plan is used as the basis to further assess a wide range of scenarios during the business plan period.

#### Strategy and risk appetite

A thorough (re-)assessment of strategy is usually done once every 3-5 years or when material developments in the (external or internal) environment require. Yearly assessments are made in the first half of the year whether to adjust the strategy for developments in the past year and/or revised assumptions on the future. Setting (and adjusting) the risk appetite is inextricably part of strategy setting (and adjusting).

#### Risk Assessment

Key to the ORSA is the identification of potentially solvency threatening risks by the Management Board of NN Leven, given the strategy and risk appetite. For both modelled and non-modelled risks, we apply stress testing to understand and quantify the impact of adversity of these scenarios on our consolidated balance sheet.

#### Appropriateness test of regulatory capital calculation

The assumptions and models for calculating regulatory solvency requirements are assessed against the actual risk profile. Differences are analysed in terms of future model improvements and/or non-modelled risks. The outcome of the analysis may lead to mitigating actions to overcome model shortcomings. If the deviations or uncertainties are considered material, quantification of the deviation is necessary in order to consider a (temporary) self-imposed capital add-on.

### Stress testing and overall assessment of capital adequacy

Based on the Business Plan and the outcomes of the ORSA risk assessment, (reverse) stress scenarios and their parameters are developed and documented. The MB is responsible for identifying the key uncertainties and the related scenarios.

Scenario testing, as well as (reverse) stress testing is required for each ORSA. When the outcomes of performed stress tests show solvency ratios dropping below 100%, realistic strategies for recovering the solvency ratio are considered and documented in the ORSA report. A capital downstream can only be considered if there is no other feasible management option left.

Ultimately, after the assessments and considerations (including formulated management actions) the ORSA is to conclude whether, going forward, NN Leven is adequately capitalised under a wide range of scenarios over the planning horizon.

### Governance of NN Leven's Partial Internal Model

For the model governance and validation process, reference is made to Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

## System of governance continued

### Model Validation

The Model Validation Function is internally outsourced to NN Group and aims to ensure that all material Cash Flow models and Risk models are fit for their intended purpose. Models and their disclosed metrics are approved by the Model Committee. The findings of the model validation department are also reported to the Model Committee via regular validations. This committee is responsible for modelling policies, processes, methodologies and parameters which are applied within NN Leven. Furthermore, the model validation department carries out validations of risk and valuation models particularly those related to Solvency II. Any changes to models that affect NN Leven risk figures above a certain materiality threshold are presented to one of the Model Committees.

Model validation is not a one-off assessment of a model, but an ongoing process whereby the reliability of the model is verified at different stages during its lifecycle: at initiation, before approval, when the model has been redeveloped or modified, and on a regular basis, based on a planning discussed and agreed with Model Development. It is not only a verification of the mathematics and/or statistics of the model but encompasses both a quantitative and qualitative assessment of the model. Accordingly, the validation process covers a mix of developmental evidence assessment, process verification and outcome analysis.

The validation cycle determines the maximum period between two model validations, which can be up to five years. This means that each model in scope will be independently validated at least once within the validation cycle. In general, the length of the validation cycle relates to the relative materiality of the models in scope. In addition, reference is also made for more detail to Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

### B.4 The Internal control system and compliance function

To effectively manage business conduct risk the Management Board has a Compliance Function which is headed by the Head of Legal & Compliance who has delegated the responsibility for day-to-day management of the Compliance Function to the Local Compliance Officer. The Compliance Function is positioned independently from the business it supervises. This independent position is, amongst others, warranted by independent reporting, unrestricted access to senior management as well as structural, periodic meetings with the CEO. Within NN Leven's broader risk framework, the purpose of the Compliance Function is to:

- Understand and advocate rules, regulations and laws for the effective management of risks in the scope of the compliance function
- Proactively work with and advise the business to manage business conduct and product suitability risk throughout NN Leven's products' life cycle and business' activities to meet stakeholder expectations
- Develop and enhance tools to strengthen the three lines of defence to detect, communicate, manage and to report on business conduct risks
- Support NN Leven's strategy by establishing clear roles and responsibilities to help embed good compliance practices throughout the business by using a risk based approach to align business outcomes with NN Leven's risk appetite
- Deepen the culture of compliance by partnering with the business to increase the culture of trust, accountability, transparency and integrity in evaluating, managing and in reporting on business conduct risk
- Monitor that management and employees act in accordance with NN Leven's policies and standards in scope of the function, as well as relevant material laws and regulation.

The Head of Legal & Compliance reports hierarchically to the CEO of NN Leven and functionally to the General Counsel of NN Group. The Local Compliance Officer as key function holder reports functionally to the Chief Compliance Officer of NN Group.

### B.5 Internal audit function

The Internal Audit Function is internally outsourced to Corporate Audit Services NN Group (CAS). CAS is the internal audit department within NN Group, it is an independent assurance function and its responsibilities are established by the Executive Board of NN Group, pre-discussed with the Audit Committee and approved by the Supervisory Board of NN Group. CAS independently assesses the design and effectiveness of the organisation and the quality of procedures and control measures. CAS is an essential part of the corporate governance structure of NN Leven.

CAS keeps in close contact with home and local supervisors and regulators as well as with the external auditor via regular meetings in which current (audit) issues are discussed, as well as internal and external developments and their impact on NN Leven and CAS. CAS also provides information like risk assessments and relevant (audit) reports.

## System of governance continued

The General Manager and staff of CAS are authorized to:

- Obtain without delay, from General Managers within NN Leven, information on any significant incident concerning NN Leven's operations including but not limited to security, reputation and/or compliance with regulations and procedures
- Obtain without delay, from responsible managers within NN Leven, a copy of all letters and reports received from external review agencies (e.g. external auditor, supervisors, regulators and other agencies providing assurance related services)
- Have free, full, unrestricted and unfettered access, at any time deemed appropriate, to all NN Leven departments, offices, activities, books, accounts, records, files, information. CAS must respect the confidentiality of (personal) information acquired
- Require all NN Leven staff and business management to supply such information and explanations, as may be needed for the performance of assessments, within a reasonable period of time
- Allocate resources, set frequencies, select subjects, determine scope of work and apply appropriate techniques required to accomplish the CAS's objectives
- Obtain the necessary assistance of personnel in various departments/offices of NN Leven where CAS performs audits, as well as other specialised/professional services where considered necessary from within or outside NN Leven. CAS should exercise its authority with the minimum possible disruption to the day-to-day activities of the area being assessed.

In compliance with the Dutch Corporate Governance Code, the NN Group Executive Board is responsible for the role and functioning of CAS, supervised by the Supervisory Board, supported by the Audit Committee. The General Manager of CAS is accountable to the CEO and functionally to the chair of the Audit Committee. On a day-to-day basis the General Manager of CAS reports to the CEO.

### B.6 Actuarial function

The primary objective of the Actuarial Function, that reports hierarchically to the CRO of NN Leven, is to ensure that technical provisions (under Solvency II and IFRS) are reliable and adequate, and as such that NN Leven is able to meet its obligations towards policyholders and to protect NN Leven from loss or reputational damage.

The Actuarial Function operates within the context of NN Leven's broader risk management system, reports hierarchically to the CRO of NN Leven and has a functional reporting line to the NN Group Chief Actuary. The Actuarial Function of NN Leven has unrestricted access to the NN Leven Management Board and NN Leven Supervisory Board in relation to Actuarial topics. This contributes to the financial solidity of NN Leven.

Within this system, the role of the Actuarial Function is to:

- Understand and advocate the rules, regulations and laws for effective management of the calculation process of technical provisions, covering elements such as data quality, assumption setting, models and methods, as well as underwriting and reinsurance arrangements; proactively advise the business to manage the risk of unreliable and inadequate technical provisions
- Inform management and the supervisory board on its opinion on the adequacy and the reliability of the technical provisions, the adequacy of reinsurance arrangements and the underwriting policy at least on an annual basis through the Actuarial Function Report
- Develop and enhance tools to strengthen the three lines of defence to detect, communicate, manage and to report on risks related to unreliable or inadequate technical provisions
- Support NN Leven's strategy by establishing clear roles and responsibilities to help embed good (actuarial) practices throughout the organisation by using a risk-based approach to align insights with NN Leven's risk appetite
- Strengthen the culture of professional risk management by challenging management and experts to increase the culture of trust, accountability, transparency and integrity in evaluating, managing and reporting on risks to unreliable or inadequate technical provisions
- Provide second line opinion when first line business initiatives can materially impact the risk profile of NN Leven or NN Group and/or provide additional assurance for presented key first line risk related information.

### B.7 Outsourcing

#### External Outsourcing arrangements

NN Leven has outsourced part of its operational and IT processes to external service providers. In the normal course of business, NN Leven enters into various outsourcing arrangements with related parties. Parties are considered to be related if one party has the ability to control or exercise significant influence over the other party in making financial or operating decisions. Related parties of NN Leven include, amongst others, its associates, shared service centres, joint ventures, key management personnel and the defined benefit and contribution plans. NN Leven has internal policies ensuring that a formal written agreement is in place with the service provider, covering the relevant business and financial risks. NN Leven has implemented improvements which are closely monitored by the management of NN Leven to ensure maintaining adequate control over outsourcing activities. There are no significant provisions recognised for doubtful debts or individually significant bad debt expenses on outstanding balances with these providers.

## System of governance continued

For these external outsourcing arrangements written service level agreements are in place, setting out:

- The mutual rights and obligations of the parties
- The duties and responsibilities of all parties involved
- The Service Provider's commitment to comply with applicable local laws and regulatory requirements, applicable to the outsourced function or activity and to cooperate with the Outsourcing Entity's relevant supervisory authority with regard to the outsourced function or activity
- The Service Provider's obligation to disclose any development which may have a material impact on its ability to carry out the outsourced functions and activities effectively and in compliance with applicable laws and regulatory requirements
- That the Service Provider and the Outsourcing Entity can only terminate the contract with a notice period
- That the Outsourcing Entity is able to terminate the arrangement for outsourcing where necessary without detriment to the continuity and quality of its provision of services to the policyholder and other clients
- That the Outsourcing Entity reserves the right to be informed about the outsourced functions and activities and their performance by the Service Provider as well as a right to issue general guidelines and individual instructions at the address of the Service Provider, as to what has to be taken into account when performing the outsourced functions or activities

### Intra-group Outsourcing arrangements

In the normal course of business, NN Leven enters into various arrangements with entities within the consolidated Group. Arrangements with entities within the consolidated Group take place on an arm's length basis and include distribution agreements, human resources-related arrangements and rendering and receiving of services.

All intra-group transactions are conducted under market-consistent conditions. Intra-group outsourcing arrangements include:

- Facility services carried out by group companies for insurance and other entities
- Various other shared services, including finance and information technology, carried out by group companies for insurance and other entities
- Staff of NN Leven is employed by NN Personeel B.V. NN Leven is charged for its staff expenses by NN Personeel B.V., under a service level agreement. Although these costs are not paid out in the form of salaries, they do have the character of staff expenses and they are therefore recognized as such. A staff provision for holiday entitlement and bonuses is recognized at NN Insurance Personeel. Actual spending is charged as per the contract with NN Personeel B.V.
- Transactions between NN Group and its Dutch subsidiaries concerning the payment of tax, as NN Group heads the fiscal unity in the Netherlands
- NN Re (Netherlands) N.V. carries out reinsurance activities of NN Leven and certain other NN Group entities
- The transactions in financial instruments, such as shares, bonds, loans (excluding mortgage loans) and derivatives, are conducted via a management agreement with NN Investment Partners Holding B.V.. NN Investment Partners B.V. makes use of Nationale-Nederlanden Interfinance B.V. for the execution of the transactions involving certain derivatives. The sale of in-house asset manager NN IP to Goldman Sachs Group, expected to close in the first half year of 2022.
- Nationale-Nederlanden Bank N.V. is the servicing and originating partner for mortgage loans held by NN Leven

For material intra-group outsourcing arrangements, a written service level agreement is in place, similar to the one used for external service providers.

### B.8 Any other information

Reference is made to the Corporate Governance section in the 2021 Annual report of NN Leven and the NN Group website:

<https://www.nn-group.com/our-company/Corporate-governance.htm> for other information regarding the system of governance of NN Leven and NN Group

# Risk profile

## C. Risk Profile

### Introduction

This chapter of the SFCR contains information on the risk profile of NN Leven and information on the 'prudent person principle' used when investing.

### Risk profile per risk category

Reference is made to Note 44 'Risk management' in the 2021 Annual Report of NN Leven for quantitative and qualitative information on the risk profile per risk category. The following risk categories have been disclosed:

#### C.1 Non-market risk (Underwriting risk)

Non-market risk is disclosed as insurance risk and business risk in Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

#### C.2 Market risk

Market risk is disclosed in Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

#### C.3 Counterparty Default risk (Credit risk)

Counterparty Default risk is disclosed in Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

#### C.4 Liquidity risk

NN Leven identifies two related liquidity risks: funding liquidity risks and market liquidity risks. These risks are disclosed in Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

#### C.5 Operational risk

For operational risk NN Leven has developed a framework governing the process of identifying, assessing, mitigating, monitoring and reporting operational risks. Operational risk is disclosed in Note 44 'Risk management' in the 2021 Annual Report of NN Leven.

#### C.6 Other material risks

##### Business conduct risk

Business conduct risk is the risk related to unethical or irresponsible corporate behaviour, inappropriate employee behaviour and customer suitability of products. For more details reference is made to Note 44 'Risk Management' in the 2021 Annual Report of NN Leven.

##### Concentration risks

NN Leven does not have an appetite for risk concentration and manages concentration risk with a limit structure. More information on the mitigation of several types of concentration risk is included in Note 44 'Risk Management' in the 2021 Annual Report of NN Leven.

##### Investing assets in accordance with the 'Prudent person principle'

###### Acceptable investments

NN Group and its subsidiaries (NN Leven among these) complies with the prudent person principles as set out in Directive 2009/138/EC/article 132: Prudent person principle. NN Group maintains a Global Asset List, which contains all asset classes in which NN Group and its subsidiaries are allowed to invest. Before an asset class is approved for this list, a specific assessment, called 'New Asset Class Assessment' ('NACA') must be followed.

The NACA should describe all relevant considerations on return, risk and operational consequences that are relevant to the decision whether a Business Unit of NN Group should invest in the proposed investment class.

The NACA request does not describe a specific transaction, but is a proposal for the potential investment in an investment class.

The NACA should nevertheless address the quantitative impact of potential future investments and include proposed portfolio limits for the product. This should always be in line with NN Group internal policies as well as external constraints (such as regulatory limits).

###### Governance of investments

Within the Three Lines-of-Defence model, investments are managed in the first line through a dedicated Central Investment Office, reporting directly to the CEO of NN Group. Within NN Leven the second line function Financial Risk Management reports to the CRO of NN Leven. Investment office, the Balance Sheet Management function within Finance and the CRO meet regularly in the NN Leven Asset & Liability Management Committee (ALCO), and in the Group ALCO for the most material issues. Operational activities regarding investments are performed by NN Investment Partners or third parties, which also provide advice on proposed or current investments.

## Risk profile continued

All investments related activities are performed within the boundaries as set by NN Group. These include among others the following:

- Asset Class Standard (NACA)
- Asset Liability Management policy
- Concentration Risk Standard
- Financial Regulations Standard
- Interest Rate Risk Management Standard
- Investment Management Policy
- Investment Mandate Standard
- Liquidity Risk Management Standard
- Responsible Investment framework policy

### Chief Investment Officer

Based on market views, NN Leven requirements and input from its assets managers, the Chief Investment Officer, will:

- Propose Investment Strategies for NN Leven
- Prepare proposals for mandates and for delegated approval levels for the Asset Managers
- Prepare Performance Measurement Guidelines of all investment decisions taken under the delegated approval authorities

NN Investment Partners prepares a market view, proposes investment ideas based on market developments and NN Leven requirements and makes investment decisions within allocated limits/thresholds. NN Investment Partners executes the Performance Measurement Guidelines as prepared by the Chief Investment Officer. In August 2021, NN Group announced that it had reached an agreement to sell its asset management activities executed by NN Investment Partners (NNIP) to Goldman Sachs for total cash proceeds of EUR 1.7 billion. Closing of the transaction is subject to customary conditions, and is expected to take place in the first half of 2022

### Asset & Liability Management Committee

The main responsibility of the ALCO is the oversight of risks related to the matching of assets and liabilities (Asset & Liability Management) and the consequences for the balance sheets and P&L of NN Leven. It includes risks related to the prevailing market circumstances and the possible adverse consequences for NN Leven. The ALCO also monitors and advises on insurance and business risks that can impact the balance sheet or P&L. The ALCO operates within the delegated authority of the NN Leven Board.

NN Leven ALCO monitors investment performance and decides on investment strategy, investment mandates as well as investment proposals within risk limits as set by the ALCO at NN Group:

- Investment strategy: the NN Leven ALCO decides on its investment strategy by taking the approved NN Group investment strategy into consideration.
- Investment mandates: the NN Leven ALCO decides on the investment mandates with its selected Asset Managers, taking the IOIC recommendations into consideration. This includes deciding on the approval authority delegated by the NN Leven ALCO to the IOIC regarding allocation of asset classes within bandwidths as determined by NN Leven SAA, and to the Asset Managers.
- Investment proposals: the NN Leven ALCO will decide on investment proposals where there is no approval authority delegated by the NN Leven ALCO.

### Sensitivity analysis

Reference is made to Note 44 'Risk Management' in the 2021 Consolidated annual accounts of NN Leven for a description of the methods used, the assumptions made and the outcome of a sensitivity analysis for material risks and events presented by the amount of the SCR and a breakdown by risk categories.

### Risk exposure from off-balance sheet positions and transfer of risk to special purpose vehicles

Reference is made to Note 44 'Risk management' in the 2021 Annual Report of NN Leven regarding the risk exposure of NN Leven, including the exposure arising from off-balance sheet positions and describing the measures used to assess these risks. Reference is made to the 2021 Annual Review ('Our Risk Profile') for the Material risks that that NN Leven is exposed to.

As at 31 December 2021, no material risks were transferred to special purpose vehicles outside the consolidation scope of NN Leven. For the risks transferred to consolidated special purpose vehicles, reference is made to Note 40 'Structured entities' in the 2021 Annual Report of NN Leven.

## C.7 Any other information relevant to the risk profile of NN Leven

### Techniques used for mitigation of risks

Reference is made to Note 44 'Risk management' in the 2021 Annual Report of NN Leven for a description of the techniques used for mitigating risks and the processes for monitoring the continued effectiveness of these risk mitigation technique

# Valuation for Solvency purposes

## D. Valuation for Solvency purposes

### Introduction

This chapter contains information on the valuation for solvency purposes of consolidated assets, insurance liabilities and other liabilities of NN Leven and explains the differences with the valuations in the 2021 Annual Report of NN Leven.

### Reconciliation IFRS Balance sheet to Solvency II Balance sheet

As at 31 December 2021. In EUR million	IFRS	Consolidation Scope	Presentation differences	Valuation differences	Solvency II
<b>Assets</b>					
Cash and cash equivalents	233	-190	0	0	43
Financial assets at fair value through profit or loss and Available-for-sale investments	101,889	-3,669	948	68	99,236
Loans	40,220	-359	-33	2,605	42,433
Reinsurance contracts	1,200	-0	0	-709	490
Associates and joint ventures	6,790	4,770	0	-66	11,494
Real estate investments	2,720	-2,630	0	0	89
Property and equipment	72	-33	0	-0	39
Intangible assets	50	0	0	-50	0
Deferred acquisition costs	235	0	0	-235	0
Deferred tax assets	33	-6	0	1,074	1,101
Other assets	3,370	-257	-948	-4	2,159
<b>Total assets</b>	<b>156,810</b>	<b>-2,375</b>	<b>-33</b>	<b>2,683</b>	<b>157,086</b>
<b>Equity</b>					
Shareholders' equity (parent)	25,313	0	0	-13,551	11,762
Minority interests	1,865	-1,865	0	0	0
Undated subordinated notes	800	0	-800	0	0
<b>Total equity / Excess of assets over liabilities</b>	<b>27,978</b>	<b>-1,865</b>	<b>-800</b>	<b>-13,551</b>	<b>11,762</b>
<b>Liabilities</b>					
Subordinated debt	1,120	0	847	20	1,986
Other borrowed funds	531	0	-1	55	585
Insurance and investment contracts	115,767	-1	0	19,726	135,492
Financial liabilities at fair value through profit or loss	1,681	-8	16	0	1,689
Deferred tax liabilities	3,916	-304	0	-3,612	0
Other liabilities	5,817	-196	-96	45	5,570
<b>Total liabilities</b>	<b>128,832</b>	<b>-510</b>	<b>767</b>	<b>16,234</b>	<b>145,323</b>
<b>Total equity and liabilities</b>	<b>156,810</b>	<b>-2,375</b>	<b>-33</b>	<b>2,683</b>	<b>157,086</b>

Reference is made to the 2021 Annual Report of NN Leven for more detailed information on the IFRS Balance sheet. Reference is made to QRT S.02.01.02 'Balance sheet' in the Appendix for the full Solvency II Balance sheet. The values in these tables may differ from those included in Note 44 'Risk Management' in the 2021 Annual Report of NN Leven. These differences are due to classification and valuation differences which reflect a risk management view.

For Solvency II reporting, Principal subsidiaries are not consolidated line-by-line while they are for IFRS reporting. The impact from this difference is reflected above in the column 'Consolidation scope'.

The valuation and presentation differences between IFRS and Solvency II, resulting from differences in accounting principles and methods are explained in the sections below. For items where no valuation differences occur, reference is made to Note 1 'Accounting policies', Note 29 'Fair value of financial assets and liabilities' and Note 30 'Fair value of non-financial assets' in the 2021 Annual Report of NN Leven. Which include a description of the bases, methods and main assumptions used for their valuation.

At 31 December 2021, the valuation and presentation differences between the insurance and investment contracts recognised in the IFRS balance sheet and the technical provisions recognised in the Solvency II balance sheet of NN Leven amounted to EUR 19,726 million. Methods and models used in calculating the Solvency II technical provisions and the IFRS insurance liabilities differ substantially. The main valuation differences between IFRS and Solvency II are outlined below:

## Valuation for Solvency purposes continued

- Different valuation rates are used to calculation the balance sheet value of insurance and investment contracts under IFRS and Solvency II.
- For Solvency II the latest risk-free interest rate curve with credit risk, VOLA and UFR as published by EIOPA is used. NN Leven does not apply a matching adjustment.
- For IFRS a fixed interest rate/guaranteed technical interest rate is used.
- Solvency II valuation of technical provisions includes a risk margin, which is not included in the IFRS statements.
- IFRS technical provisions largely reflects assumptions - interest, mortality, morbidity, expense, etc. - locked-in at policy issue date, which can depart significantly from the latest best estimate assumptions used for Solvency II provisioning.

Details of valuation, presentation and consolidation differences are included in Section D.1- D.3 below.

### D.1 Assets

#### Accounting principles, methods and main assumptions used

In general, Solvency II valuation requires a market consistent approach to the valuation of assets and liabilities. The default reference framework for valuing assets and liabilities, other than technical provisions, is IFRS as endorsed by the European Union ('IFRS-EU'). The exception is, if the IFRS valuation principle does not reflect a market consistent valuation (e.g. loans). For main assumptions used in fair valuing assets, reference is made to Note 29 'Fair value of financial assets and liabilities' and to Note 30 'Fair value of non-financial assets' in the 2021 Annual Report of NN Leven.

#### Cash and cash equivalents

In the IFRS balance sheet, cash and cash equivalents are reported at the notional amount. In the Solvency II balance sheet, cash and cash equivalents are reported at market value. There are no significant valuation differences between IFRS and Solvency II for cash and cash equivalents as the market value does not significantly different from the notional value. Differences due to a different scope of consolidation amounted to EUR -190 million as at 31 December 2021.

#### Financial assets at fair value through profit or loss and Available-for-sale investments

In the IFRS balance sheet, investments are for the main part reported at fair value, and for a small part at amortised cost. In the Solvency II balance sheet, investments are reported at market value. There are no significant valuation differences between IFRS and Solvency II for investments as fair value generally equals market value. Presentation differences of EUR 948 million as at 31 December 2021 are caused by the presentation of accrued interest as part of the investments, instead of a separate presentation as accrual under IFRS. Solvency II requires accrued interest to be presented as part of the investments ('dirty market value') where in the 2021 Annual Report of NN Leven ('clean market value') they are reported as other assets.

Valuation differences between IFRS and Solvency II represents the difference between amortised cost and market value of EUR 68 million as at 31 December 2021.

Differences due to a different scope of consolidation amounted to EUR -3,669 million as at 31 December 2021.

#### Loans

In the IFRS balance sheet, loans are reported at amortised cost. In the Solvency II balance sheet, loans are reported at market value. For loans that are repriced frequently and have had no significant changes in credit risk, the carrying values in the 2021 Annual Report of NN Leven represent a reasonable estimate of the market value for Solvency II. For other loans the market value is estimated by discounting expected future cash flows using a discount rate that reflects credit risk, liquidity and other current market conditions. The market value of mortgage loans is estimated taking into account prepayment behaviour and market tariffs. Loans with similar characteristics are aggregated for calculation purposes.

Valuation differences between IFRS and Solvency II for loans represents the difference between amortised cost and market value of EUR 2,605 million as at 31 December 2021.

Presentation differences of EUR -33 million as at 31 December 2021 are caused by:

- The different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the loans ('dirty market value') and not separately as other assets as in the 2021 Annual Report of NN Leven ('clean market value').
- Presentation of short term deposits as:
  - investments under Solvency II, instead of their inclusion in cash and cash equivalents under IFRS or
  - money market funds as loans under Solvency II, instead of their inclusion in cash and cash equivalents under IFRS.

Differences due to a different scope of consolidation amounted to EUR -359 million as at 31 December 2021.

## Valuation for Solvency purposes continued

### Reinsurance contracts

Reference is made to section D2 'Technical provisions' of this SFCR.

### Associates and joint ventures (Holdings in related undertakings)

In the IFRS balance sheet, associates and joint ventures are reported at net asset value (equity accounting).

In the Solvency II balance sheet, non-Solvency II entities are recognised as associates and measured at the local regulatory capital in accordance with the local (sectoral) rules. Where IFRS consolidates all balance sheet items line-by-line. Differences in Associates and joint ventures recognised in the IFRS and the Solvency II Balance sheets due to a different scope of consolidation amounted to EUR 4,770 million as at 31 December 2021 (IFRS values). Valuation differences of EUR -66 million as at 31 December 2021 represents the difference between the value of the consolidated line items under IFRS and the local regulatory capital of these entities.

All holdings in related undertakings were either valued using quoted market prices in active markets or by using the adjusted equity method (when a quoted market price was not available).

### Real estate investments

In the IFRS balance sheet, real estate investments are reported at fair value. In the Solvency II balance sheet, real estate investments are reported at market value. There are no significant valuation differences between IFRS and Solvency II for real estate investments as fair value generally equals market value. There are differences in real estate investments due to a different scope of consolidation amounted to EUR -2,630 million as at 31 December 2021.

### Property and equipment

In the IFRS balance sheet, property in own use is reported at fair value. In the Solvency II balance sheet, property in own use is reported at market value. There are no significant valuation differences between IFRS and Solvency II for property in own use as fair value generally equals market value. In the IFRS balance sheet, equipment is reported at cost less depreciation. In the Solvency II balance sheet, equipment is reported at market value. There are no significant valuation differences between IFRS and Solvency II for equipment, as market value is generally not significantly different from depreciated cost.

Differences due to a different scope of consolidation amounted to EUR -33 million as at 31 December 2021.

### Intangible assets

Goodwill and Value of Business Acquired ("VOBA") are not recognised for Solvency II purposes. Other intangibles including software can be recognised and measured at a value other than nil if they can be sold separately and if there is a quoted market price in an active market for the same or similar intangible assets. As there is no quoted market price for NN Leven's intangible assets, it is valued at nil for Solvency II purposes.

### Deferred acquisition costs

Deferred acquisition costs are not recognised for Solvency II purposes.

### Deferred taxes

Under IFRS, deferred tax assets are part of the other assets. In the IFRS balance sheet, deferred taxes, other than deferred tax assets arising from the carry forward of unused tax credits and the carry forward of unused tax losses, are valued on the basis of the difference between the tax bases of assets and liabilities and their carrying values. A positive value to deferred taxes is only attributed where it is probable that future taxable profit will be available against which the deferred tax asset can be used, taking into account any legal or regulatory requirements on the time limits relating to the carry forward of unused tax losses or credits.

Reference is made to Note 28 'Taxation' of the 2021 Annual Report of NN Leven for more information on the origin of the recognition of deferred tax assets and the amount and expiry date of deductible temporary differences, unused tax losses and unused tax credits for which no deferred tax asset is recognised in the IFRS balance sheet.

In the Solvency II balance sheet, deferred tax assets and liabilities are recognised and valued in conformity with IFRS. Differences in deferred tax assets due to differences in valuation of the underlying assets and liabilities amounted to EUR 1,074 million as at 31 December 2021.

### Other assets

In the IFRS balance sheet, other assets are reported at their notional amounts. In the Solvency II balance sheet, other assets (with the exclusion of deferred taxes) are reported at market value.

Presentation differences of EUR -948 million as at 31 December 2021 consist of the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the interest bearing investments ('dirty market value') and not separately as other assets as in the 2021 Annual Report of NN Leven ('clean market value').

Differences in other assets recognised in the IFRS and the Solvency II Balance sheets due to a different scope of consolidation amounted to EUR -257 million as at 31 December 2021. There is a slightly valuation difference between IFRS and Solvency II as fair value generally equals market value.

## Valuation for Solvency purposes continued

### Changes in valuation bases

In 2021 we included the further guidance from DNB on the saving mortgages (“spaarhypotheken”) to the asset and liability side of the saving mortgages.

## D.2 Technical provisions

### Value of the technical provisions

The value of technical provisions, including the amount of the Best Estimate of Liabilities (‘BEL’) and the Risk Margin (‘RM’) is disclosed below separately for each material line of business as at 31 December 2021:

### Value of technical provisions by Solvency II Business Line

As at 31 December 2021. In EUR million	BEL	Risk margin	Technical provisions
<b>Technical provision by Solvency II Business line:</b>			
1. Life	101,870	5,080	106,950
2. Health similar to life	-115		-115
3. Index-linked and Unit-linked	28,279	380	28,659
<b>Total</b>	<b>130,034</b>	<b>5,460</b>	<b>135,493</b>

### Bases, methods and main assumptions used for solvency valuation

Technical Provisions are measured for Solvency II purposes as the sum of the BEL and a Risk Margin. The BEL are equal to the probability-weighted average of the present value of the future liability cash flows, based on the relevant risk-free interest rate term structure. The Risk Margin is defined as the amount that an empty (re)insurance entity is expected to require in excess of the BEL in order to take over and meet the (re)insurance obligations.

#### Best estimate of liabilities

NN Leven uses cash flow models and best estimate assumptions to determine the BEL under Solvency II. Premiums, benefits, expenses and other relevant cash flows are projected for the policy term – subject to contract boundaries – and discounted at the currency specific risk-free interest rate term structure, including the Ultimate Forward Rate (‘UFR’), to allow for financial risk with the currency specific Credit Risk Adjustments (‘CRA’) and a volatility adjustment (‘VOLA’). This is the full-cash flow approach and is typical for traditional business. For unit-linked business, NN Leven mainly uses a method where margins are projected (expenses and charges) as investment risks are borne by the policyholder. Cash flows are either projected on a per policy basis or individual policies are grouped into representative model points.

UFR for the Euro currency applicable from 1st January 2021 was set to 3.60%. This is in accordance to the EIOPA UFR report in which EIOPA has calculated ultimate forward rate (UFR) for 2021 in accordance with the methodology to derive the UFR. Note that the annual change of the UFR is limited to 15 basis points according to the methodology. The UFR of 3.60% was for the first time applicable for the calculation of the risk-free interest rates of 1 January 2021. In 2022 the UFR will further decrease with 15 basis points.

Cash flows are projected along a sufficiently large number of future risk-free interest rate scenarios to allow for one-sided financial options and guarantees. This is typical for business with profit sharing on top of a fixed interest rate guarantee and unit-linked products with a return guarantee. The best estimate risk-free interest rate term structure is used in those instances where there are no embedded options or guarantees.

The cash flow projections consider management actions that can be taken to mitigate the loss to NN Leven. These actions may cover the distribution of future discretionary benefits and the predictability and profit sharing of liability cash flows. The cash flow projections used in the calculation of the BEL are based on the best estimate assumptions. The cash flow projection reflects the expected realistic future demographic, legal, medical, technological, social, environmental and economic developments that have a material impact on the best estimate liabilities.

Assumptions underlying the BEL are portfolio-specific rather than entity-specific. Entity-specific assumptions are used only insofar as those assumptions enable the entity to better reflect the characteristics of the portfolio or where the calculation of the BEL in a realistic, reliable and objective manner without those assumptions is not possible.

NN Leven reports a relative small portion of un-modelled Technical Provisions (approx. 4% of TP). For un-modelled business, in general Technical Provisions are estimated either by scaling of modelled business or by setting Solvency II Technical Provisions equal to IFRS provisions. Also a part of the Technical Provisions is calculated by means of other approximations or simplified modelling. The Actuarial Function Holder has provided an opinion that the approaches are acceptable given the materiality of these Technical Provisions.

#### Reinsurance and other recoverables

The BEL are estimated gross, without deduction of the amounts recoverable from reinsurance contracts. The amounts recoverable from reinsurance contracts and expected losses due to counterparty default are calculated separately. The principles used to calculate the amounts recoverable are consistent with those underlying the calculation of the gross best estimate liabilities.

## Valuation for Solvency purposes continued

### Risk margin

In addition to the BEL a Risk Margin is held to allow for non-hedgeable market and non-market risks. The calculation of the Risk Margin is performed by either explicitly calculating the SCR for each future year or by using a driver approach. Long-Term Guarantee (LTG) measures are excluded from the calculation of the SCRs and in the discounting, when calculating the Risk Margin.

With the driver approach, the relevant sub-risk SCRs - either Internal Model or Standard Formula - are projected using appropriate risk drivers, multiplied by the cost of capital of 6%, then discounted at the relevant risk free rate term structure. The sub-risks are aggregated using the relevant diversification factors. Note that this is a simplification as Solvency II requires the individual SCRs to be diversified at each future point in time. NN Leven's simplification does not lead to a material misestimation of the Risk Margin.

### Assumptions

#### Non-financial assumptions

Assumptions are set for expenses, mortality, morbidity and other relevant insurance risks using historical experience of the insurance portfolio. Assumptions are reviewed by NN Leven at least annually and submitted to the Model Committee (MoC) for approval or for information, depending on materiality, following NN Leven's model governance. Note that Best estimate assumptions are approved by the Pricing and Valuation MoC whereas Risk assumptions are approved by the Risk MoC.

Policyholder behaviour regarding lapses, partial and full surrenders and paid-ups are taken into account, subject to the boundaries of the contracts. Management actions are reflected in the cash flow projections. These are mostly current management actions related to dynamic decision rules in the asset liability models of NN Leven. Future management actions are assumed for portfolios including discretionary benefits and expense reserving.

Boundaries of insurance contracts are based on a detailed investigation of terms and conditions.

#### Financial assumptions

NN Leven follows EIOPA requirements in determining the basic risk-free rates and the volatility adjustment to determine the relevant currency specific risk free rate term structure for valuation of Technical Provisions. Because EIOPA curves are not published in time for NN Leven to start their valuations, NN Leven follows the EIOPA methodology to independently produce the curves. These are then compared to the published EIOPA curves when these are made available to ensure consistency between the EIOPA and the NN Leven manufactured curves. At year-end 2021, the EIOPA and NN Leven curves were identical.

#### Changes in assumptions

During 2021, NN Leven reviewed the best estimate assumptions as part of the regular process and updated them where necessary to reflect new insights.

#### Options and guarantees

When establishing technical provisions at NN Leven, all material financial guarantees and contractual options included within the contract boundary of insurance and reinsurance policies are taken into account. In doing so, factors which may affect the likelihood that policyholders will exercise contractual options or realise the value of financial guarantees are analysed.

The intrinsic value of financial options and guarantees is reflected in the single (deterministic) cash flow projection of technical provisions. These include the interest rate guarantees implicit in traditional products as well as policyholder options such as paid-up, surrender etc. where material.

A stochastic model is required to determine the time value of options and guarantees (TVoG) where cash flows vary asymmetrically with market returns. The stochastic model uses a number of Monte Carlo simulations (typically 1,000 to 5,000) to project future cash flows under various economic scenarios. The number of scenarios is set at a level that ensures the simulation error is within the tolerance level. Currently, such error should be less than 1% of the best estimate liabilities, as determined by taking 80% confidence interval of the mean standard error of the simulations. NN Leven performs a test to ensure the simulation error is within the established limits. The number of scenarios used is increased if the test does not satisfy the requirements. Nearly the entire TVoG for NN Leven is from NN Leven's group pension business.

Dynamic policyholder behaviour has been reflected where it is deemed material to the valuation under the different economic environments reflected in the stochastic scenarios. Where future profit sharing is dependent on economic conditions, the variability is taken into account in the TVoG. Where management actions have been taken into account, these are consistent with policies signed-off by the respective boards.

The Actuarial Function Holder has assessed the allowances made in respect of options and guarantees in the technical provisions and the underlying assumptions, and came to the conclusion that the allowances are appropriate.

#### Level of Uncertainty

For the level of uncertainty associated with the value of the technical provision, reference is made to Note 44 'Risk Management' in the 2021 Annual Report of NN Leven.

## Valuation for Solvency purposes continued

### Main differences between IFRS and Solvency II valuation of technical provisions

As at 31 December 2021. In EUR million	IFRS	Valuation differences	Solvency II
<b>Technical provision by Solvency II Business line:</b>			
1. Life	88,473	18,476	106,950
2. Health similar to life	33	-148	-115
3. Index-linked and Unit-linked	27,261	1,397	28,659
<b>Total</b>	<b>115,767</b>	<b>19,726</b>	<b>135,493</b>

#### Summary of main differences between IFRS and Solvency II as at 31 December 2021

At 31 December 2021, the valuation and presentation differences between the insurance and investment contracts recognised in the IFRS balance sheet and the technical provisions recognised in the Solvency II balance sheet of NN Leven amounted to EUR 19,726 million. Methods and models used in calculating the Solvency II technical provisions and IFRS insurance liabilities differ substantially. The main valuation differences between IFRS and Solvency II are outlined below:

- Different interest rates are used for the calculation of insurance and investment contracts under IFRS and Solvency II. For Solvency II the latest risk-free interest rate curve with credit risk, volatility adjustment and UFR where applicable is used. NN Leven does not apply a matching adjustment. For IFRS a fixed interest rate/guaranteed technical interest rate is used
- The difference between IFRS and Solvency II technical provisions is primarily reflected in the Life Business line. IFRS technical provisions largely reflect assumptions - interest, mortality, morbidity, expense, etc. - locked-in at policy issue, which can depart significantly from the latest best estimate assumptions reflected in the Solvency II provisioning.
- Insurance liabilities in the IFRS Balance sheet are established in accordance with IFRS 4 'Insurance Contracts'. Under IFRS 4, an insurer may continue its existing pre-IFRS accounting policies for insurance contracts, provided that certain minimum requirements are met. Upon adoption of IFRS-EU in 2005, NN Leven decided to continue the then existing accounting principles for insurance contracts under IFRS-EU
- A Risk Margin for non-hedgeable risks is added to the BEL to establish the Solvency II technical provisions
- The present value of future profits is recognised in Solvency II technical provisions but not in IFRS technical provisions
- Note that the IFRS technical provisions of the existing business of former Delta Lloyd Leven portfolio at date of the acquisition (31 March 2017) are valued against cost price. The cost price is established with fixed assumptions per 31 March 2017 and flat rates. New production after the merger is valued against tariff assumptions.
- For index-linked and unit-linked insurance the IFRS technical provisions are equal to the fund value of these contracts. For Solvency II technical provisions, the present value of the margins is deducted from the fund value.

#### Matching and volatility adjustment, transitional measures, and transitional risk-free interest rate-term structure

QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix provides the quantitative impact of excluding the so-called Long-Term Guarantee ('LTG') measures and Transitional measures from Own Funds and the SCR. QRT S.22.01.21 mandates disclosure of the quantitative impact of excluding:

- Transitional measures on technical provisions
  - Transitional measures on interest rates
  - Volatility adjustment
  - Matching Adjustment
- on:
- Technical provisions
  - Basic Own funds
  - Eligible Own Funds to meet Solvency Capital Requirement
  - Solvency Capital Requirement

All the elements of which the impact is excluded in this QRT are an integral part of the Solvency II framework. The resulting Own Funds and SCR should therefore not be seen as a replacement of, or alternative for, the Own Funds and SCR as determined in accordance with Solvency II. For NN Leven, the volatility adjustment is of relevance given its liability profile and its approach to match cash-flows of these liabilities with corresponding fixed income instruments. Transitional measures in respect of technical provisions and interest rates and Matching Adjustment are not applied by NN Leven.

#### Volatility adjustment

NN Leven applies the yield curve as published by EIOPA for the calculation of the technical provisions under Solvency II. In line with Solvency II regulations, this yield curve includes a Volatility adjustment component. As at 31 December 2021, the level of the volatility adjustment for the Euro currency was 3 bps (31 December 2020: 7 bps). The application of the volatility adjustment resulted in a reduction of EUR 428 million in technical provisions, contributing EUR 319 million (after tax) to Basic own funds and Eligible Own Funds as at 31 December 2021.

In the calculation of the SCR, NN Leven assumes no change to the volatility adjustment after a shock-event, but reflects the illiquidity of liabilities in the asset shocks to ensure appropriate solvency capital requirements. This volatility adjustment approach is approved by DNB, in particular to ensure appropriate risk incentives on asset allocation decisions. NN Leven also shocks all government bonds and its mortgage portfolio in the

## Valuation for Solvency purposes continued

calculation of spread risk capital requirements. Under the Standard Formula no capital is required to be held against spread risk arising from these assets, whereas under the Partial Internal Model substantial capital is held against these risks. volatility adjustment

The Partial Internal Model of NN Leven is an integrated model in which the current approach of reflecting the illiquidity of the liabilities in the asset shocks is an integral part. If the volatility adjustment would be excluded from the SCR calculation, spreads on government bonds and mortgages would, in the opinion of NN Leven, need to be adjusted accordingly. However, for the completion of QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix, NN Leven is required to reflect only the impact of excluding the volatility adjustment from Eligible Own Funds and the SCR, without adjusting the asset shocks.

The impact of removing the volatility adjustment from Own Funds decreased in 2021 versus 2020 as the level of the volatility adjustment in the yield curve as published by EIOPA has decreased from 7 bps per 31 December 2020 to 3 bps per 31 December 2021. During the year of 2021, the volatility adjustment was stable and gradually decreased to the 3 bps level by the end of the year.

### D.3 Other liabilities

#### Subordinated debt and Other borrowed funds

In the IFRS balance sheet, subordinated debt and other borrowed funds are reported at amortised cost. In the Solvency II balance sheet, these borrowings are reported at market value, excluding an adjustment for the change in NN Leven's own credit risk after initial recognition. In Solvency II value, the change in the own credit risk after initiation is not taken into account. The Solvency II value of subordinated debt is calculated using discounted cash flows based on current interest rates and credit spreads at issue date. The Solvency II value of other borrowed funds, is calculated by discounting expected future cash flows using a current market interest rate and credit spreads at issue date.

Presentation differences include accrued interest. Solvency II requires accrued interest to be presented as part of the interest bearing liabilities ('dirty market value') and not separately as other liabilities, as in the 2021 Annual Report of NN Leven ('clean market value'). In addition to this presentation difference, the undated subordinated notes presented as equity under IFRS are presented as liability under Solvency II. Total presentation differences for subordinated debt amounted to EUR 847 million as at 31 December 2021.

There are no differences due to a different scope of consolidation for the other borrowed funds as at 31 December 2021.

#### Deferred tax liabilities

In the Solvency II balance sheet, deferred tax assets and liabilities are recognised and valued in accordance with IFRS (reference is made to section D.1 'Assets' - Other assets). However, due to the differences in valuation of assets and liabilities as set out in sections D.1 'Assets', D.2 'Technical provisions' and D.3 'Other liabilities', EUR 3,612 million lower deferred tax liabilities are recognised in the Solvency II balance sheet as at 31 December 2021. Differences due to a different scope of consolidation amounted to EUR -304 million as at 31 December 2021.

On the Solvency II balance sheet the deferred tax assets and liabilities are netted to one entry.

#### Other liabilities

In the IFRS balance sheet, other liabilities are reported at the notional amount. In the Solvency II balance sheet, other liabilities are reported at market value.

Presentation differences amounted to EUR -96 million as at 31 December 2021 of accrued interest transferred to Subordinated debt and to Financial liabilities at fair value through profit or loss. Solvency II requires accrued interest to be presented as part of the interest bearing liability ('dirty market value') and not separately as other liabilities as in the 2021 Annual Report of NN Leven ('clean market value').

Differences due to a different scope of consolidation amounted to EUR -196 million as at 31 December 2021.

#### Contingent liabilities and provisions

Part of the other liabilities are the contingent liabilities and provisions. In the IFRS balance sheet, provisions are recognised when:

- An entity has a present obligation (legal or constructive) as a result of a past event
- It is probable that an outflow of resources embodying economic benefits will be required to settle the obligation
- A reliable estimate can be made of the amount of the obligation

In the IFRS balance sheet, provisions are recognised for the amount representing the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. Contingent liabilities are not recognised in the IFRS balance sheet. These are disclosed, unless the possibility of an outflow of resources embodying economic benefits is remote.

In the Solvency II balance sheet, all material contingent liabilities are recognised as liabilities for the expected present value of future cash flows required to settle the contingent liability over the lifetime of that contingent liability, using the basic risk-free interest rate term structure.

## Valuation for Solvency purposes continued

Valuation differences between IFRS and Solvency II for contingent liabilities and provisions represent:

- A recognition difference: contingent liabilities are not recognised in the IFRS balance sheet, but are recognised in the Solvency II balance sheet if the exposure can be reliably estimated
- A measurement difference: provisions are measured in the IFRS balance sheet using the best estimate outcome (i.e. the full amount that may be incurred), while Solvency II requires a provision for the probability weighted outcome (i.e. the probability multiplied by the impact of the differences as at 31 December 2021)

For more details on other provisions and contingent liabilities, reference is made to Note 37 'Contingent liabilities and commitments' and Note 38 'Legal proceedings' in the 2021 Annual Report of NN Leven.

The valuation difference between IFRS and Solvency II for provisions and contingent liabilities had no material impact at 31 December 2021.

### Expected profits in future premiums

For existing business, expected profits included in future premiums are reflected in the technical provisions and therefore contribute to the Own Funds. For more information on the expected profits in future premiums, reference is made to QRT S.23.01.01 'Own funds' as included in the Appendix.

### Outflow of economic benefits

For the expected timing of the outflows of economic benefits reference is made to Note 33 'Liabilities by maturity' in the 2021 Annual Report of NN Leven. Uncertainties surrounding the amount or timing of the outflows of economic benefits is described in the Liquidity Risk paragraph in Note 44 'Risk management' in the 2021 Annual Report NN Leven. The uncertainties in amount or timing of other liability cash flows are low. Deviation risk was not taken into account in the valuation of the other liabilities.

## D.4 Alternative methods for valuation

### Alternative valuation methods used

Alternative valuation methods are used by NN Leven to determine the fair value of assets and liabilities if quoted market prices in active markets are unavailable. Reference is made to Note 29 'Fair value of financial assets and liabilities' and Note 30 'Fair value of non-financial assets' in the 2021 Annual Report of NN Leven for more information on the valuation approaches used.

## D.5 Any other information

### Active markets

Information on the criteria used to assess whether markets are active is included in Note 1 'Accounting policies' in the 2021 Annual Report of NN Leven. The valuation methods used if the markets are inactive are described in Note 29 'Fair value of financial assets and liabilities' in the 2021 Annual Report of NN Leven.

### Estimation uncertainties

Reference is made to 'Strategy and value creation' in the 2021 Annual Review of NN Leven for assumptions and judgments used including those about the future. For the major sources of estimation uncertainty, reference is made to Note 44 'Risk Management' in the 2021 Annual Report of NN Leven.

# Capital management

## E. Capital Management

### Introduction

This chapter of the SFCR contains information on the capital management of NN Leven, including the reconciliation of IFRS equity to Solvency II Own Funds, NN Leven's Minimum Capital Requirement ('MCR') and detailed information on NN Leven's Partial Internal Model.

### E.1 Own funds

Reference is made to Note 45 'Capital and liquidity management' in the 2021 Annual Report of NN Leven for:

- The objectives, policies and processes employed by NN Leven for managing its own funds, including information on the time horizon used for business planning and on any material changes over the reporting period
- The structure, amount and quality of own funds, including the extent to which each material own fund item is available and subordinated, as well as its duration and any other features that are relevant for assessing its quality
- The amount of Eligible Own Funds to cover the SCR, split into the relevant tiers and taking into account eligibility restrictions

Solvency II Basic Own Funds represent the excess of assets over liabilities in the Solvency II balance sheet and subordinated liabilities. It comprises the following items:

- Paid-in ordinary share capital and the related share premium account
- Paid-in preference shares and related share premium account
- The amount equal to the value of net deferred tax assets
- A reconciliation reserve. The purpose of the reconciliation reserve is to reconcile the value of the above items to the total amount of the excess of assets over liabilities
- Paid-in subordinated liabilities.

NN Leven did not have ancillary own funds during 2021 or as at 31 December 2021.

### Impact of long term guarantees and transitional measures

The quantification of the impact of a change of the volatility adjustment to zero on NN Leven's financial position, represented by an adjustment on the amount of technical provisions, the SCR, the basic own funds and the Eligible Own Funds is included in Section D.2 and QRT S.22.01.21 'Impact of long term guarantees and transitional measures' in the Appendix. No transitional measures are applicable for NN Leven.

### Items deducted from own funds

Under Solvency II, Own funds are reduced by 'foreseeable dividends, distributions and charges'. This requirement differs from IFRS reporting, where dividends are deducted from equity (and a corresponding liability is recognised) when they are declared.

Recognition of 'foreseeable dividends, distributions and charges' under Solvency II are relevant for NN Leven in two circumstances:

- Dividends: no foreseeable dividends are subtracted from the 31 December 2021 available equity.
- Coupons on subordinated liabilities: from the equity per 31 December 2021 an amount of EUR 47 million is subtracted as accrued coupon in relation to the subordinated liabilities.

### Additional ratios

No additional ratios are disclosed in the Solvency and Financial Condition Report other than the ratios included in QRT S.23.01.01 'Own funds' as included in the Appendix; plus those that are included by reference into this report.

### Analysis of significant changes in own funds

Reference is made to Note 45 'Capital and liquidity management' in the 2021 Annual Report of NN Leven for an analysis of significant changes in own funds.

### The principal loss-absorbency mechanism

During 2021, subordinated liabilities issued by NN Leven and recognised as Tier 1 solvency capital had no principal loss-absorbency mechanism in place.

### Reconciliation reserve

The reconciliation reserve equals the total excess of assets over liabilities reduced by the following key elements:

- Paid-in ordinary share capital and related share premium account
- Paid-in preference shares and related share premium account
- The amount equal to the value of net deferred tax assets
- Foreseeable dividends, distributions and charges.

## Capital management continued

### Reconciliation IFRS equity to Own Funds

#### Reconciliation IFRS equity to Solvency II Basic Own Funds

In EUR million	2021	2020
IFRS Shareholders' Equity	25,313	29,508
Elimination of deferred acquisition costs and other intangible assets	-285	-289
Valuation differences on assets	1,894	2,141
Valuation differences on liabilities, including insurance and investment contracts	-19,846	-25,941
Deferred tax effects on valuation differences	4,686	6,003
<b>Excess assets/ liabilities</b>	<b>11,762</b>	<b>11,421</b>
Qualifying subordinated debt	1,986	2,020
Foreseeable dividends and distributions	-47	-47
<b>Basic Own Funds</b>	<b>13,702</b>	<b>13,394</b>

The differences between IFRS Shareholders' Equity in the 2021 Annual Report of NN Leven and Solvency II Basic Own Funds of NN Leven as at 31 December 2021 are mainly due to:

- Valuation differences:
  - Deferred acquisition costs are not recognised for Solvency II purposes
  - Intangible assets are not recognised or recognised at nil under Solvency II
- Different measurement of:
  - Loans and advances
  - Reinsurance contracts
  - Subordinated loans
  - Insurance and investment contract liabilities
- The other valuation differences mainly consist of the change in net Deferred Tax Assets or Deferred Tax Liabilities caused by using different valuations for some Solvency II balance sheet items whilst the tax base of these items remained the same.
- Other differences:
  - Foreseeable dividends and distributions are recognised for Solvency II purposes when determining the basic own funds.

Reference is made to section D 'Valuation for Solvency Purposes' for more information on the valuation and consolidation differences between IFRS and Solvency II.

#### Intra-group transactions

There are four kinds of significant transactions with other companies within NN Group worth mentioning.

- All liabilities stemming from commercial contracts from the Czech branch are reinsured at NN Re
- Most bilateral derivative trades are traded via Nationale - Nederlanden Interfinance B.V.
- NN Leven and NN Interfinance have entered a EUR 1,000 million loan agreement for the purpose of liquidity risk management. As per year-end 2021 NN Leven there was no funds borrowed under this loan agreement
- NN Leven has borrowed under three subordinated loans from NN Group N.V.. For more details on these loans refer to Note 45 'Capital and liquidity management'.

#### Eligibility of Own Funds

Reference is made to Note 45 'Capital and liquidity management' in the 2021 Annual Report of NN Leven for the eligibility of Own Funds of NN Leven.

## E.2 Solvency Capital Requirement and Minimum Capital Requirement

### SCR

Reference is made to QRT S.25.02.21 in the Appendix and Note 44 'Risk management' of the 2021 Annual Report of NN Leven for the amount of the SCR split by risk categories.

NN Leven determined the SCR including:

- Loss-absorbing capacity of technical provisions ('LAC TP'). 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
- Loss-absorbing capacity of deferred taxes ('LAC DT'). NN Leven's total loss in a 1-in-200 adverse event would be offset by tax recoveries and these are recognised to the extent to be expected to be recoverable. The determination of LAC DT is significantly dependent on various assumptions, such as capitalisation assumptions, the assumed investment returns and the projection period.

**Capital management** continued

**Minimum Capital Requirement**

In EUR million	2021	2020
Eligible Own Funds to cover Minimum Capital Requirements	11,981	11,868
of which Tier 1 unrestricted	10,614	10,501
of which Tier 1 restricted	810	819
of which Tier 2	557	549
<b>Minimum Capital Requirements</b>	<b>2,784</b>	<b>2,743</b>

**Deferred tax under Solvency II**

Reference is made to section E6 'Any other information' of this SFCR.

**E.3 Use of the duration-based equity risk sub-module in the calculation of the Solvency Capital Requirement**

NN Leven does not use the duration-based equity risk sub module during the reporting period.

**E.4 Differences between the Standard Formula and any Internal Model used**

**Internal Model vs Standard Formula**

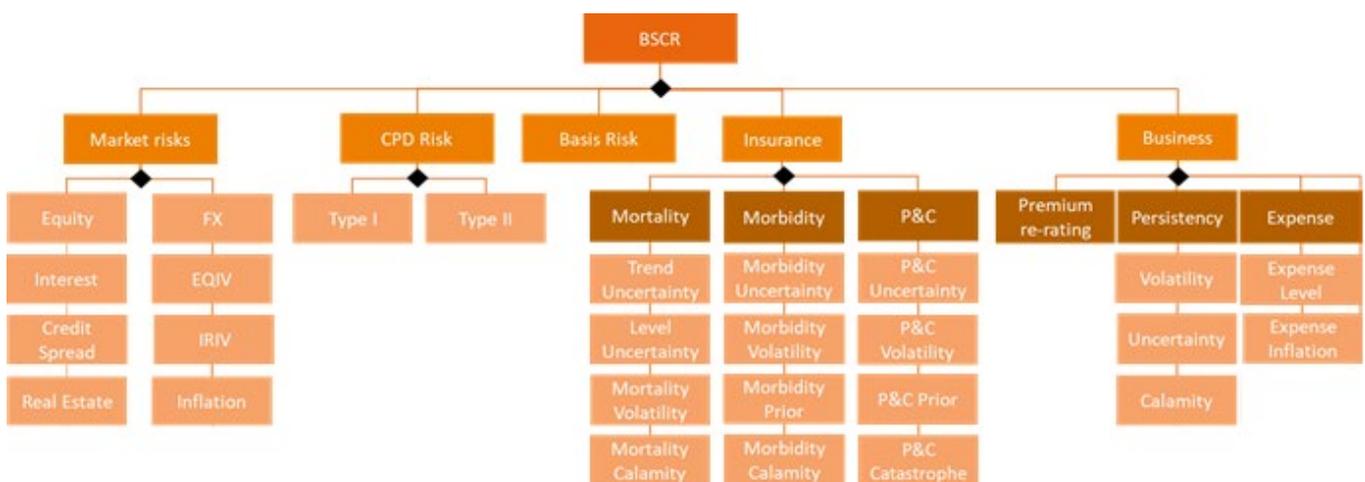
NN Leven applies a Partial Internal Model as it better reflects the risk profile and facilitates better risk management purposes. In particular:

- An Internal Model approach better reflects the specific assets and therefore the market risk in the portfolio of NN Leven e.g. property risk, sovereign and other credit spread risks. In addition, the approach to the most significant non-market risks within NN Leven such as life risk and expense risk is better tailored to the specific portfolio characteristics and statutory reserves set up according to local company law
- In the case of disability/morbidity risks, the product features and experience in the Dutch market are different from those in the wider European market, e.g. greater emphasis is placed on claimants returning to work in the Netherlands.
- The Standard Formula diversification assumptions do not recognise all the diversification of risks that exist in the NN Leven portfolios.
- The Internal Model accounts for the volatility adjustment by means of an approach recognizing the illiquidity of liabilities in the asset shocks. Reference is made to section D.2 (in paragraph 'Matching and volatility adjustment, transitional measures and transitional risk-free interest rate term structure' ) for further information on NN Leven's volatility adjustment

There are no differences between the Internal Model used at NN Leven and the Internal Model used to calculate the Group SCR.

**Risks covered by the Internal Model which are not –or differently- covered in the Standard Formula**

Risk arises from the possibility that actual occurrences will negatively deviate from expectations, resulting in economic losses for NN Leven. In this respect, NN Leven identified the risk factors and developed accompanying P&L distributions based on the NN Group Internal Model, leading to the Basic Solvency Capital requirement ('BSCR'). This scheme below reflects the NN Group Internal Model: P&C and Premium re-rating risks are not applicable for NN Leven. In addition NN Leven has a waiver to use the Standard Formula for Morbidity in the Internal Model.



◆ = Correlation matrix or diversification factor

## Capital management continued

- In addition to the risks covered in the Standard Formula, the Internal Model includes the following risks:
- Inflation risk is defined as the risk associated with adverse changes in both realised and future expected inflation rates
- Equity implied volatility refers to the possibility of adverse changes in Solvency II own funds due to adverse changes in the level of equity implied volatilities
- Interest rate implied volatility refers to the possibility of adverse changes in Solvency II own funds due to adverse changes in the level of interest rate implied volatilities
- Foreign exchange implied volatility refers to the possibility of adverse changes in Solvency II own funds due to adverse changes in the level of FX implied volatilities
- Basis risk is the risk that occurs if the underlying asset or liability behaves differently than the underlying of the hedge instrument

The most important differences between the Internal Model and the Standard Formula in covered risk factors are:

- Interest Rate Risk:
  - The Internal Model incorporates non-parallel shocks to the curve instead of only two parallel shocks used in the Standard Formula.
  - The Internal Model takes into account the change of the risk margin in the interest rate shock scenarios, whereas the Standard Formula calculation assumes that the amount of risk margin does not change in the shock scenarios
  - The Internal Model allows for shocking negative interest rates, whereas the Standard Formula does not.
  - In the Internal Model, firstly a shock is applied to the interest rates before extrapolating to the Ultimate Forward rate. Under the Standard Formula this occurs exactly the other way around where the interest rates are first extrapolated to the Ultimate Forward rate before a shock is applied
- Equity Risk:
  - The level of shocks differ mainly because of the higher granularity in the Internal Model and calibration to the equity portfolio of NN Leven.
- Credit Spread Risk:
  - Shocks in the Internal Model apply to all fixed income assets, whereas the Standard Formula does not apply shocks to the government bonds issued by members of the European Union in their own currency.
  - In the Internal Model mortgage exposure is treated under the Credit Spread Risk module, whereas in the Standard Formula these are treated under the Counterparty Default Risk module.
    - In contrast to the Standard Formula, the Internal Model recognises that volatility of credit spreads on our assets is mitigated by the illiquid nature of the liabilities through the use of the Aligned Reference Portfolio (ARP) approach.
- Real Estate Risk:
  - Shocks applied in the Standard Formula are calibrated to historical prices observed in the UK property market which are less representative for NN Leven's portfolio; shocks in the Internal Model are calibrated to historical prices observed in the property markets according to actual exposures of NN Leven.
- Counterparty Default Risk:
  - In the Internal Model mortgage exposure is treated under the Credit Spread Risk module, whereas in the Standard Formula these are treated under the Counterparty Default Risk module.
- Diversification within the Market Risk module:
  - Risk aggregation within the Internal Model is done on a different level than within the Standard Formula. The Internal Model captures the dependency between risk drivers, while Standard Formula correlates between losses.
- Life Risk:
  - The SF model treats liabilities exposed to mortality and longevity risk separately. For longevity risk, the SF model assumes an instantaneous 20% reduction of the Best Estimate mortality rates across all ages and for both genders. The SF assumes an instantaneous 15% increase of the Best Estimate mortality rates across all ages and for both genders for mortality risk. The SF does not differentiate between the uncertainty of the current mortality rates and the future improvement rates.
  - For PIM, the life risk (excl. volatility and calamity) is comprised of two separate elements: [1] the uncertainty related to the future mortality improvement rates [2] the uncertainty that originates from the current portfolio mortality level of the portfolio. The shocks are age and gender-specific for both components and calibrated on the European and portfolio data. For the first component, the (longevity) shock is unique across all portfolios. For the second component, the shock is portfolio-specific (either mortality or longevity depending on the portfolio).

The table below shows a breakdown of the SCR under the Internal Model in 2021 Q4:

### Solvency Capital Requirement

In EUR million	2021	2020
Market Risk	5,721	4,157
Counterparty Default Risk	39	125
Non-market risk	4,503	5,492
Diversification	-2,722	-2,291
<b>Partial Internal Model BSCR</b>	<b>7,542</b>	<b>7,483</b>
Operational Risk	490	526
Capital add-on	25	27
Loss-Absorbing Capacity of Technical Provisions	-52	-53
Loss-Absorbing Capacity of Deferred Taxes	-1,818	-1,888
<b>Total SCR</b>	<b>6,187</b>	<b>6,095</b>

## Capital management continued

The overall Market risk SCR increased by ~1.6 billion which can be largely attributed to a significantly lower Interest rate risk SCR, mainly as a result of model change. This led to a change in diversification benefits. The overall Non-Market risk SCR decreased by almost 1B, mainly due to model and assumption changes, a new longevity reinsurance transaction, and higher interest rates compared to last year.

The loss-absorbing capacity of deferred taxes (LAC DT) benefit decreased mainly due to a change in diversification benefit, partly offset by an increase in corporate tax rate. LACDT is calculated in line with the Guidelines that have been issued by DNB. In the above table, 'Other' includes loss-absorbing capacity of technical provisions (LAC TP).

### The nature and appropriateness of the data used in the Internal Model

Market data is collected from pre-defined external data sources. All relevant market data must be used when it is available and is of sufficient quality for most of the market risk models NN Group uses standard well established market data sources, e.g. Refinitiv. The data is analysed for correctness as part of the calibration process.

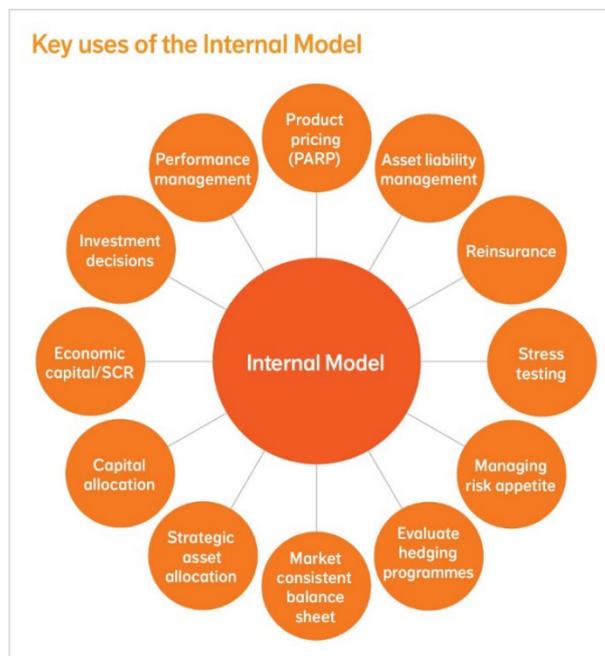
### The use of the Internal Model

The Internal Model allows NN Leven to treat different risk management activities in a consistent way:

- The model provides a framework which is consistent across risk types, businesses and the key uses such as market valuation, capitalisation, product pricing, investments, monitoring of risk appetite and risk mitigation/transfer.
- The model facilitates adequate risk management at all levels of the organisation and provides a framework to measure, monitor and manage risks versus NN Leven's risk appetite.
- The model allows NN Leven to manage risk in many different ways, e.g.:
  - Manage individual risk types at a much more granular approach, i.e. a stochastic (loss distribution) approach
  - Manage volatility in a stochastic rather than deterministic approach
  - Supports valuation, scenario- and stress analysis by running scenarios in a simple way using replicating portfolios
- The model allows NN Leven to proactively define its risk measurement and management approach rather than awaiting (generic) industry changes to the Standard Formula.

The Internal Model is used for different purposes. The Internal Model is used to measure and manage the risks at all levels within the company. This information is not only used to determine the SCR to cover tail risks; it is also used for, amongst others, wider risk management, capital management and business decisions such as product pricing and asset allocation.

The following diagram provides an overview of the key uses of the Internal Model.



### The methods used in the Internal Model for determining the probability distribution for risks and the Solvency Capital Requirement

For the market risk models the Normal Inverse Gaussian ('NIG') distribution is mostly used. NIG distributions are a flexible set of distributions that allows modelling of fat-tailed and skewed distributions. For some market risk models e.g. for the real estate risk model where fewer data points are available, the Normal or t-distribution is used.

## Capital management continued

Where there is lack of annual data, higher frequency data is used for the calibration of the distribution parameters. The distribution is then annualised for the calculation of the SCR.

To assess the quality of the calibration, the goodness-of-fit tests and back testing are applied.

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

NN Leven complied with the MCR and the SCR during the reporting period.

### E.6 Any other information

Reference is made to Note 45 'Capital and liquidity management' in the 2021 Annual Report of NN Leven for any other material information regarding the capital management of NN Leven and financial leverage of NN Leven.

#### Deferred tax under Solvency II

- Taxable or deductible temporary differences because the carrying amount of assets or liabilities in the balance sheet differs from the tax base of those assets or liabilities. These differences multiplied by the tax rate are recognised as a net deferred tax liability or a net deferred tax asset in the balance sheet. Reference is made to section D.1 'Assets' for the deferred tax asset recognised in the Solvency II balance sheet.
- Unused tax losses that are available for carry forward for tax purposes.
- The Loss Absorbing Capacity of deferred taxes on the Solvency Capital Requirement ('LAC DT' on the SCR)

Not all valuation differences between the tax basis and Solvency II and SCR shocks will lead to deferred tax as certain elements are exempt for tax. For example: valuation differences on certain equity securities and the equity shock in the SCR on these securities do not result in a deferred tax effect when equity returns are exempt from tax. Therefore, these are excluded from the valuation differences and SCR amounts in order to arrive at the deferred tax balances for Solvency II.

The total deferred tax amount for Solvency II is therefore built up in a number of steps:

- **deferred tax assets on unused tax losses**
- +/- **deferred tax assets/liabilities from valuation differences between IFRS and tax basis (except for non-taxable items)**
- = **deferred tax asset/liability in the IFRS balance sheet (deferred tax for IFRS)**
- +/- **deferred tax assets/liabilities from valuation differences between Solvency II and IFRS (except for non-taxable items)**
- = **deferred tax asset/liability in the Solvency II balance sheet (deferred tax for Own Funds)**
- + **deferred tax on SCR (LAC DT on the SCR) (except for non-taxable items)**
- = **total deferred tax amount for Solvency II**

The 'total deferred tax amount for Solvency II' represents the deferred tax position that would be reflected in a Solvency II balance sheet that is fully shocked in line with the SCR shock. Any net deferred tax asset/benefit - whether for IFRS, Own Funds or SCR - must be tested for recoverability. The general guidance on assessing recoverability is summarised as follows:

Tax assets can only be recognised when it is concluded that their recoverability is probable. This applies to both deferred tax assets from timing differences, deferred tax assets from unused tax losses carried forward and the LAC DT on the SCR.

Deferred tax assets are recoverable when:

- There are sufficient deferred tax liabilities relating to the same taxation authority and the same taxable entity. These deferred tax liabilities must be expected to reverse either in the same period as the tax asset or in periods into which a tax loss can be carried back or forward
- It is probable that the entity will have sufficient taxable profit relating to the same taxation authority and the same taxable entity in the same period as the reversal of the deductible temporary difference (or in the periods into which a tax loss arising from the deferred tax asset can be carried back or forward)
- Tax planning opportunities are available

Deferred taxes in the IFRS and Solvency II balance sheet are nominal, undiscounted, amounts. Therefore, recoverability testing also only considers nominal, undiscounted, amounts.

Specific guidance applies under Solvency II in respect of item b. 'Sufficient taxable profit' as, different from IFRS, this refers to Solvency II based profits (before and after a shock event) and not to regular (IFRS-based) profits.

In order to assess the recoverability of deferred tax, the total deferred tax amount for Solvency II (i.e. deferred tax in the Solvency II balance sheet plus the LAC DT on the SCR) must be equal to or lower than the total recoverable deferred tax amount in a Solvency II environment.

The recoverable amount must be assessed at the legal entity level and may not - except for the Solvency II balance sheet deferred tax asset only - include amounts from other entities in the Group, independent of existing fiscal unities or tax groups. While from a legal, tax and economic

## Capital management continued

perspective the recoverability would benefit from the existence of a fiscal unity, and therefore the benefit from a fiscal unity is 'real', the Solvency II requirements" (in line with Group SFCR) prohibits reflecting the benefit of a fiscal unity in supporting the LAC DT on the SCR. The fiscal unity may be reflected in supporting the deferred tax asset in the Solvency II balance sheet.

As the total deferred tax amount for Solvency II (i.e. the deferred tax asset that exists in a fully shocked SCR balance sheet) is the highest amount, it acts as starting point for the recoverability test. This total amount reflects the differences between the tax values and the Solvency II values for all assets and liabilities and the tax benefit on the SCR. Only if the total deferred tax is non-recoverable, the recoverability of the deferred tax in Own Funds becomes separately relevant.

It is reasonable to assume that NN Leven can continue as a going concern after the shock. The tax recoverability test of NN Leven is performed on this basis.

The total recoverable deferred tax amount in a Solvency II environment may come from various sources and includes both recoverability from items that never impact taxable profits and reverse over time as well as sources of profits and losses that would emerge in a Solvency II environment or a Solvency II environment after a SCR-type shock would have occurred. The recoverability is therefore based on an estimation of the total taxable results (including both income and expenses) that is expected to arise in a Solvency II environment after the shock. The sources of recoverability include all components of the estimated future taxable results, irrespective whether these are income ('profit') or expense ('loss'). In this calculation the Dutch corporate income tax rate of 25.8% as of 2022, that was enacted in December 2021, is used.

The following items are included in determining the total recoverable deferred tax amount:

- **The amount of the risk margin in the technical provision**
- **Taxable return on capital after the shock, after recapitalisation, net of expected dividends**
- **Taxable part of investment spread in excess of interest accretion on liabilities over their remaining life time.**
- **Other taxable items**

The most important assumption in determining estimated future taxable profits to support the DTA and LAC DT is the investment spread that is used both to determine taxable return on capital after the shock and the taxable part of investment spread in excess of interest accretion on liabilities and funding costs. This investment spread after shock is assumed to be similar to the investment spread before shock (i.e. the positive impact on spreads from the recovery after shock is not taken into account) and the spreads are set at the same level as used for other purposes (including strategic asset allocation and business and capital planning). In determining the total recoverable deferred tax amount, the uncertainty around future taxable profits and the increasing degree of uncertainty in future taxable profits as the projection horizon becomes longer is taken into account. This is done by excluding certain profit sources, setting conservative assumptions and/or calculating various alternative scenarios to assess the (potential) impact of these scenarios on the LAC DT. Scenarios that are used to reflect uncertainty include a scenario of higher/lower technical results (impacting the release of the risk margin), higher/lower investment spreads (impacting the investment return in excess of interest accretion on liabilities) and higher/lower new business profits. The average recoverable LAC DT resulting from these scenarios is determined and reflected in the recognised LAC DT.

The LAC DT recognised as at 31 December 2021 was EUR 1.818 million. This LAC DT was supported by expected taxable profits for the current year and future years. NN Leven has sufficient recoverable amounts to support the total deferred tax position recognised in SCR and on the balance sheet.

The net deferred tax asset is classified as Tier 3 capital. Tier 3 capital cannot exceed 15% of the SCR. Further information on Tiering is included in Note 45 'Capital and liquidity management' in the 2021 Annual Report of NN Leven.

### Subsequent events

Reference is made to Note 43 'Subsequent events' in the 2021 Annual Report of NN Leven for the nature and the effect of material events arising after the balance sheet date which are not reflected in the balance sheet, if any.

## Appendix 1

### Appendix 1: Quantitative Reporting Templates that form part of the Solvency and Financial Condition Report

This appendix includes certain Quantitative Reporting Templates ('QRTs') of NN Group, required to be reported to DNB and to be publicly disclosed :

Reference number	Title	Description
S.02.01.01	Balance sheet	Balance sheet information using Solvency II valuation methodology
S.05.01.02	Premiums, claims and expenses by line of business	Information on premiums, claims and expenses using the valuation and recognition principles used in NN Leven's Consolidated Annual Report
S.12.01.01	Life and health similar to life provisions	Information on life and health similar to life provisions split by line of business
S.22.01.01	Impact of long term guarantees and transitional measures	Information on the impact of the long term guarantee and transitional measures
S.23.01.01	Own Funds	Information on Own Funds, including Basic Own Funds
S.25.02.01	Solvency Capital Requirement	Information on the Solvency Capital Requirement calculated using the Standard formula and a partial Internal model
S.28.01.01	Minimum Capital Requirement	Information on the Minimum Capital Requirement

All amounts in this appendix are recorded in EUR 1,000.

## Appendix 1 continued

## S.02.01.01 Balance sheet

		<b>Solvency II value</b>
		<b>C0010</b>
<b>Assets</b>		
Goodwill	R0010	
Deferred acquisition costs	R0020	
Intangible assets	R0030	0
Deferred tax assets	R0040	1,100,663
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	39,262
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	84,118,735
Property (other than for own use)	R0080	89,280
Holdings in related undertakings, including participations	R0090	11,494,072
Equities	R0100	5,062,600
Equities - listed	R0110	4,794,473
Equities - unlisted	R0120	268,128
Bonds	R0130	58,907,286
Government Bonds	R0140	41,127,335
Corporate Bonds	R0150	15,652,924
Structured notes	R0160	474,100
Collateralised securities	R0170	1,652,927
Collective Investments Undertakings	R0180	1,971,855
Derivatives	R0190	6,335,108
Deposits other than cash equivalents	R0200	258,534
Other investments	R0210	0
Assets held for index-linked and unit-linked contracts	R0220	27,233,249
Loans and mortgages	R0230	42,157,968
Loans on policies	R0240	6,766
Loans and mortgages to individuals	R0250	26,705,486
Other loans and mortgages	R0260	15,445,717
Reinsurance recoverables from:	R0270	490,301
Non-life and health similar to non-life	R0280	
Non-life excluding health	R0290	
Health similar to non-life	R0300	
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	-272,400
Health similar to life	R0320	-120,899
Life excluding health and index-linked and unit-linked	R0330	-151,501
Life index-linked and unit-linked	R0340	762,701
Deposits to cedants	R0350	135
Insurance and intermediaries receivables	R0360	197,946
Reinsurance receivables	R0370	4,099
Receivables (trade, not insurance)	R0380	1,689,846
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	42,567
Any other assets, not elsewhere shown	R0420	13,442
<b>Total assets</b>	<b>R0500</b>	<b>157,088,212</b>

## Appendix 1 continued

		<b>Solvency II value C0010</b>
<b>Liabilities</b>		
Technical provisions – non-life	R0510	
Technical provisions – non-life (excluding health)	R0520	
Technical provisions calculated as a whole	R0530	
Best Estimate	R0540	
Risk margin	R0550	
Technical provisions - health (similar to non-life)	R0560	
Technical provisions calculated as a whole	R0570	
Best Estimate	R0580	
Risk margin	R0590	
Technical provisions - life (excluding index-linked and unit-linked)	R0600	106,834,765
Technical provisions - health (similar to life)	R0610	-115,092
Technical provisions calculated as a whole	R0620	
Best Estimate	R0630	-115,092
Risk margin	R0640	0
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650	106,949,857
Technical provisions calculated as a whole	R0660	
Best Estimate	R0670	101,869,757
Risk margin	R0680	5,080,100
Technical provisions – index-linked and unit-linked	R0690	28,658,682
Technical provisions calculated as a whole	R0700	
Best Estimate	R0710	28,279,105
Risk margin	R0720	379,577
Other technical provisions	R0730	
Contingent liabilities	R0740	
Provisions other than technical provisions	R0750	12,116
Pension benefit obligations	R0760	
Deposits from reinsurers	R0770	1,239,579
Deferred tax liabilities	R0780	0
Derivatives	R0790	1,688,457
Debts owed to credit institutions	R0800	3,372,175
Financial liabilities other than debts owed to credit institutions	R0810	539,253
Insurance & intermediaries payables	R0820	682,263
Reinsurance payables	R0830	23,267
Payables (trade, not insurance)	R0840	187,413
Subordinated liabilities	R0850	1,986,467
Subordinated liabilities not in Basic Own Funds	R0860	
Subordinated liabilities in Basic Own Funds	R0870	1,986,467
Any other liabilities, not elsewhere shown	R0880	101,848
<b>Total liabilities</b>	<b>R0900</b>	<b>145,326,285</b>
<b>Excess of assets over liabilities</b>	<b>R1000</b>	<b>11,761,926</b>

## Appendix 1 continued

## S.05.01.02 Premiums, claims and expenses by line of business

		Line of Business for: life insurance obligations				Total C0300
		Health insurance C0210	Insurance with profit participation C0220	Index-linked and unit-linked insurance C0230	Other life insurance C0240	
<b>Premiums written</b>						
Gross	R1410	39,344	295,917	1,743,512	1,902,758	3,981,530
Reinsurers' share	R1420	39,344	31,796	108,644	915,151	1,094,936
Net	R1500	-0	264,120	1,634,868	987,607	2,886,595
<b>Premiums earned</b>						
Gross	R1510	39,735	296,669	1,743,512	1,902,688	3,982,603
Reinsurers' share	R1520	39,735	32,548	108,644	915,081	1,096,009
Net	R1600	-0	264,120	1,634,868	987,607	2,886,595
<b>Claims incurred</b>						
Gross	R1610	7,269	957,448	1,295,320	3,665,889	5,925,926
Reinsurers' share	R1620	7,269	61,552	75,237	884,911	1,028,969
Net	R1700	-0	895,896	1,220,083	2,780,978	4,896,957
<b>Changes in other technical provisions</b>						
Gross	R1710	-1,667	186,515	-3,297,254	372,777	-2,739,630
Reinsurers' share	R1720	-1,667	21,592	-50,523	-75,957	-106,555
Net	R1800		164,922	-3,246,731	448,734	-2,633,075
<b>Expenses incurred</b>	<b>R1900</b>	<b>16,757</b>	<b>64,216</b>	<b>153,459</b>	<b>383,379</b>	<b>617,810</b>
Other expenses	R2500					
<b>Total expenses</b>	<b>R2600</b>					<b>617,810</b>

## Appendix 1 continued

## S.12.01.01 Life and Health SLT Technical Provisions

		Index-linked and unit-linked insurance				Other life insurance		Total (Life other than health insurance, incl. Unit-Linked) C0150
		Insurance with profit participation	Contracts without options and guarantees	Contracts with options or guarantees	Contracts without options and guarantees	Contracts with options or guarantees		
		C0020	C0030	C0040	C0050	C0060	C0070	
Technical provisions calculated as a whole	R0010							
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0020							
Technical provisions calculated as a sum of BE and RM								
Best Estimate								
Gross Best Estimate	R0030	18,779,197		20,947,609	7,331,497	66,034,692	17,055,868	130,148,862
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080	436,079		774,827	-12,126	-592,494	4,914	611,200
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090	18,343,118		20,172,782	7,343,622	66,627,186	17,050,954	129,537,662
Risk Margin	R0100	342,172	379,577			4,737,928		5,459,677
Amount of the transitional on Technical Provisions								
Technical Provisions calculated as a whole	R0110							
Best estimate	R0120							
Risk margin	R0130							
Technical provisions - total	R0200	19,121,368	28,658,682			87,828,488		135,608,539

## Appendix 1 continued

## S.12.01.01 Life and Health SLT Technical Provisions

		Health insurance (direct business)		
		Contracts without options and guarantees		Total (Health similar to life insurance)
		C0160	C0170	C0210
Technical provisions calculated as a whole	R0010			
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP as a whole	R0020			
Technical provisions calculated as a sum of BE and RM				
Best Estimate				
Gross Best Estimate	R0030		-115,092	-115,092
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080		-120,899	-120,899
Best estimate minus recoverables from reinsurance/SPV and Finite Re - total	R0090		5,807	5,807
Risk Margin	R0100	0		0
Amount of the transitional on Technical Provisions				
Technical Provisions calculated as a whole	R0110			
Best estimate	R0120			
Risk margin	R0130			
Technical provisions - total	R0200	-115,092		-115,092

## Appendix 1 continued

### S.22.01.01 Impact of long term guarantees and transitional measures

		Amount with LTG measures and transitionals C0010	Impact of transitional on technical provisions C0030	Impact of transitional on interest rate C0050	Impact of volatility adjustment set to zero 1) C0070	Impact of matching adjustment set to zero C0090
Technical provisions	R0010	135,493,447			428,213	
Basic own funds	R0020	13,701,552			-318,868	
Eligible own funds to meet SCR	R0050	13,528,961			-146,277	
SCR	R0090	6,187,141			10,094,812	
Eligible own funds to meet MCR	R0100	11,981,165			-171,924	
Minimum Capital Requirement	R0110	2,784,213			1,286,275	

1 This reflects the impact to set the volatility adjustment to zero; it does not reflect second order impacts, such as changes to LAC DT (which is kept constant).

Reference is made to Section D.2. (paragraph 'Matching and volatility adjustment, transitional measures and transitional risk free interest rate term structure') for more information on the impact of long term guarantees and transitional measures.

## Appendix 1 continued

## S.23.01.01 Own funds

		Total C0010	Tier 1 - unrestricted C0020	Tier 1 - restricted C0030	Tier 2 C0040	Tier 3 C0050
Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35						
Ordinary share capital (gross of own shares)	R0010	22,689	22,689			
Share premium account related to ordinary share capital	R0030	3,228,029	3,228,029			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings	R0040					
Subordinated mutual member accounts	R0050					
Surplus funds	R0070					
Preference shares	R0090					
Share premium account related to preference shares	R0110					
Reconciliation reserve	R0130	7,363,704	7,363,704			
Subordinated liabilities	R0140	1,986,467		809,900	1,176,568	
An amount equal to the value of net deferred tax assets	R0160	1,100,663				1,100,663
Other own fund items approved by the supervisory authority as basic own funds not specified above	R0180					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds						
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds	R0220					
Deductions						
Deductions for participations in financial and credit institutions	R0230					
Total basic own funds after deductions	R0290	13,701,552	10,614,423	809,900	1,176,568	1,100,663
Ancillary own funds						
Unpaid and uncalled ordinary share capital callable on demand	R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	R0310					
Unpaid and uncalled preference shares callable on demand	R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand	R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	R0370					
Other ancillary own funds	R0390					
Total ancillary own funds	R0400					
Available and eligible own funds						
Total available own funds to meet the SCR	R0500	13,701,552	10,614,423	809,900	1,176,568	1,100,663
Total available own funds to meet the MCR	R0510	12,600,890	10,614,423	809,900	1,176,568	
Total eligible own funds to meet the SCR	R0540	13,528,961	10,614,423	809,900	1,176,568	928,071
Total eligible own funds to meet the MCR	R0550	11,981,165	10,614,423	809,900	556,843	
SCR	R0580	6,187,141				
MCR	R0600	2,784,213				
Ratio of Eligible own funds to SCR	R0620	2.19				
Ratio of Eligible own funds to MCR	R0640	4.30				

## Appendix 1 continued

		<b>C0060</b>
<b>Reconciliation reserve</b>		
Excess of assets over liabilities	R0700	11,761,926
Own shares (held directly and indirectly)	R0710	
Foreseeable dividends, distributions and charges	R0720	46,841
Other basic own fund items	R0730	4,351,381
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740	
Reconciliation reserve	R0760	7,363,704
Expected profits		
Expected profits included in future premiums (EPIFP) - Life business	R0770	207,092
Expected profits included in future premiums (EPIFP) - Non- life business	R0780	
<b>Total Expected profits included in future premiums (EPIFP)</b>	<b>R0790</b>	<b>207,092</b>

## Appendix 1 continued

## S.25.02.01 Solvency Capital Requirement - for undertakings using the Standard Formula and Partial Internal Model

Unique number of component C0010	Components description C0020	Calculation of the Solvency Capital Requirement	Amount modelled
		C0030	C0070
1001	Total capital requirement for market risk	5,134,119	5,134,119
1002	Total capital requirement for market risk Seperate account business	3,430,693	3,430,693
1003	Total capital requirement for counterparty default risk	38,989	38,989
1004	Overall Insurance Risk	4,077,806	4,077,806
1005	Overall Business Risk	1,339,220	1,339,220
1006	Operational risk	490,393	490,393
8	Loss-absorbing capacity of tech. provisions if not modelled within components	-51,851	-51,851
9	Loss absorbing capacity for deferred taxes if not modelled within components	-1,818,318	-1,818,318

Calculation of Solvency Capital Requirement		C0100
Total undiversified components	R0110	12,641,051
Diversification	R0060	-6,478,910
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	
Solvency capital requirement excluding capital add-on	R0200	6,162,141
Capital add-ons already set	R0210	25,000
Solvency capital requirement	R0220	6,187,141
Other information on SCR		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	-51,851
Amount/estimate of the overall loss-absorbing capacity of deferred taxes	R0310	-1,818,318
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirements for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	

Approach to tax rate	Yes/No C0109
Approach based on average tax rate	No

## Appendix 1 continued

		Before the shock		LAC DT
		C0110	C0120	
DTA	R0600	1,100,662,546	2,918,980,420	0
DTA carry forward	R0610	0	0	0
DTA due to deductible temporary differences	R0620	1,100,662,546	2,918,980,420	0
DTL	R0630	0	0	0
<b>Amount/estimate of LAC DT</b>	R0640	0	0	-1,818,317,874
Amount/estimate of LAC DT justified by reversion of deferred tax liabilities	R0650	0	0	0
Amount/estimate of LAC DT justified by reference to probable future taxable profit	R0660	0	0	-1,772,393,874
Amount/estimate of LAC DT justified by carry back, current year	R0670	0	0	-45,924,000
Amount/estimate of LAC DT justified by carry back, future years	R0680	0	0	0
Amount/estimate of Maximum LACDT	R0690	0	0	-1,827,612,583

## Appendix 1 continued

## S.28.01.01 Linear formula component for life insurance and reinsurance obligations

		<b>C0040</b>	
MCR <sub>L</sub> Result	R0200		2,797,155
		<b>Net (of reinsurance/SP V) best estimate and TP calculated as a whole</b>	<b>Net (of reinsurance/SP V) total capital at risk</b>
		<b>C0050</b>	<b>C0060</b>
Obligations with profit participation - guaranteed benefits	R0210	18,291,267	
Obligations with profit participation - future discretionary benefits	R0220	51,851	
Index-linked and unit-linked insurance obligations	R0230	27,516,405	
Other life (re)insurance and health (re)insurance obligations	R0240	83,683,947	
<b>Total capital at risk for all life (re)insurance obligations</b>	R0250		247,281,209

		<b>C0070</b>	
Linear MCR	R0300		2,797,155
SCR	R0310		6,187,141
MCR cap	R0320		2,784,213
MCR floor	R0330		1,546,785
Combined MCR	R0340		2,784,213
Absolute floor of the MCR	R0350		3,700
Minimum Capital Requirement	R0400		2,784,213

# Appendix 1

Contact and legal information

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## Disclaimer

The 2020 Annual Report NN Leven is prepared in accordance with International Financial Reporting Standards as adopted by the European Union (IFRS-EU) and with Part 9 of Book 2 on the Dutch Civil Code.

In preparing the financial information in this document, the same accounting principles are applied as in the 2020 Annual Report NN Leven except as indicated in chapter D 'Valuation for Solvency Purposes' of the 2020 Solvency and Financial Condition Report.

All figures in this document are unaudited. Small differences are possible in the tables due to rounding.

Certain of the statements in this 2020 Solvency and Financial Condition Report are not historical facts, including, without limitation, certain statements made of future expectations and other forward-looking statements that are based on management's current views and assumptions and involve known and unknown risks and uncertainties that could cause actual results, performance or events to differ materially from those expressed or implied in such statements. Actual results, performance or events may differ materially from those in such statements due to, without limitation: (1) changes in general economic conditions, in particular economic conditions in NN Leven's core markets, (2) the effects of the Covid-19 pandemic and related response measures, including lockdowns and travel restrictions, on economic conditions in countries in which NN Leven operates, on NN Leven's business and operations and on NN Leven's employees, customers and counterparties, (3) changes in performance of financial markets, including developing markets, (4) consequences of a potential (partial) break-up of the euro or European Union countries leaving the European Union, (5) changes in the availability of, and costs associated with, sources of liquidity as well as conditions in the credit markets generally, (6) the frequency and severity of insured loss events, (7) changes affecting mortality and morbidity levels and trends, (8) changes affecting persistency levels, (9) changes affecting interest rate levels, (10) changes affecting currency exchange rates, (11) changes in investor, customer and policyholder behaviour, (12) changes in general competitive factors, (13) changes in laws and regulations and the interpretation and application thereof, (14) changes in the policies and actions of governments and/or regulatory authorities, (15) conclusions with regard to accounting assumptions and methodologies, (16) changes in ownership that could affect the future availability to NN Leven of net operating loss, net capital and built-in loss carry forwards, (17) changes in credit and financial strength ratings, (18) NN Leven's ability to achieve projected operational synergies, (19) catastrophes and terrorist-related events, (20) adverse developments in legal and other proceedings and (21) the other risks and uncertainties detailed in the Risk management section and/or contained in recent public disclosures made by NN Group and/or related to NN Group.

Any forward-looking statements made by or on behalf of NN Leven in this Solvency and Financial Condition Report speak only as of the date they are made, and, NN Leven assumes no obligation to publicly update or revise any forward-looking statements, whether as a result of new information or for any other reason.

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