FBD HOLDINGS PLC

2024 Solvency and Financial Condition Report
(Incorporating information on FBD Insurance plc)

FBD
INSURANCE

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Contents

Introduction

The EU-wide Solvency II Directive came into force with effect from 1 January 2016. This document is the ninth Solvency and Financial Condition Report (SFCR) published under this directive for FBD Holdings plc ('FBD' or the 'Group') which also includes information relating to FBD Insurance plc (the 'Company').

The SFCR provides narrative information in quantitative and qualitative form including quantitative reporting templates (QRTs).

The report covers the Business and Performance of the Group, its System of Governance, Risk Profile, Valuation for Solvency Purposes and Capital Management.

Business and Performance

FBD is one of Ireland's largest property and casualty insurers looking after the insurance needs of farmers, private individuals and business owners through its principal subsidiary, FBD Insurance plc. The Group also has a regulated intermediary offering general insurance, life insurance, investments and pensions. The Group is a holding company incorporated in Ireland.

The Business and Performance section highlights the profitability of FBD Holdings plc as the Group recorded a profit before tax of €77.1m (2023: €81.4m). The Group delivered an underwriting result of €66.6m (2023: €76.5m) under IFRS 17 as disclosed in the Alternative Performance Measures (APMs) in the 2024 Annual Report.

The IFRS17 Insurance service result reduced by €15.2m to €111.1m (2023: €126.3m). This reflects an increase in Insurance revenue of €40.0m net of an increase in Insurance service expenses of €68.4m and reinsurance expenses reduction of €13.2m.

The Group's IFRS 17 loss ratio increased by 3.6 percentage points to 57.1% (2023: 53.5%) reflecting increasing costs due to more normalised weather experience in 2024 and Damage claims inflation. There was favourable prior year reserve development in 2024 of €26.9m (2023: €44.4m).

The Group's expense ratio (incorporating both Insurance acquisition expenses and Non-attributable expenses) is 27.8% (2023: 27.4%). Total expenses of the Group in 2024 were €122.4m (2023: €109.9m). The increase includes inflationary impacts on employee expenses and IT costs along with an increase in depreciation costs as FBD increases capital investment in initiatives that support revenue growth and a more digitally enabled business.

FBD's total investment return for 2024 is +4.0% (2023: +5.3%). The investment return recognised in the Consolidated Income Statement is 2.3% (2023: 1.7%) and in the Consolidated Statement of Other Comprehensive Income (OCI) is 1.7% (2023: 3.6%).

On 24 January 2025, Storm Éowyn occurred, marking the most significant storm event in FBD's history. This followed a period of extreme cold weather earlier in the month, which resulted in substantial snow-related damage.

While the total number and gross cost of claims related to these weather events remain uncertain at this stage, FBD's reinsurance programme provides coverage for extreme events, mitigating the financial impact. As a result, the estimated net cost to FBD, including the reinstatement premium, is currently expected to be approximately €30 million.

As these events occurred after the reporting date, they are non-adjusting events under IAS 10 Events after the Reporting Period, and no adjustments have been made to the IFRS financial statements in respect of these weather events.

As the SCR calculation is forward looking, the weather events of January 2025, having a net impact of approximately €30 million to profit before tax, have an impact on the reported Solvency Capital Ratio position for 2024.

System of Governance

The Board of FBD Holdings plc is responsible for the long-term success of the Group. The primary role of the Board is to provide leadership and strategic direction while maintaining effective control over the activities of the Group. The Board is assisted by the Executive Management Team and key roles and functions within the business.

The Board has approved a Corporate Governance Framework setting out its role and responsibilities. This is reviewed annually as part of the Board's evaluation of its performance and governance arrangements.

At 31 December 2024 the Board comprised two Executive Directors and nine Non-Executive Directors, including the Chair. This structure was deemed appropriate by the Board.

The Board deem it appropriate that it should have between eight and twelve members and that this size is appropriate, being of sufficient breadth and diversity to ensure that there is healthy debate and input.

Risk Profile

An annual review is completed by the Risk Committee of all major risks to ensure all risks are identified and evaluated. Each risk is assessed by considering the potential impact and the probability of the event occurring. Impact assessments are made against financial, operational, regulatory, reputational and customer impact criteria. The Risk Profile details the Underwriting, Market, Credit and Concentration, Liquidity, Operational, Reputational, Strategy, Climate, Reinsurance, Consumer and Other material risks relating to FBD Holdings plc and FBD Insurance plc. For each of the risks, FBD has undertaken stress testing as part of its Own Risk and Solvency Assessment (ORSA). The outcome of the stress and scenario tests indicated that in each case FBD would have sufficient available capital to continue to meet the Solvency Capital Requirement (SCR).

Valuation for Solvency Purposes

The Valuation for Solvency Purposes outlines the difference between the Solvency II Valuation and the financial statements for the Group and FBD Insurance plc. FBD Holdings plc and FBD Insurance plc financial statements are prepared in accordance with International Financial Reporting Standards (IFRS).

Capital Management

The Capital Management section outlines the SCR and Minimum Capital Requirement (MCR) for the Group and the insurance entity. FBD measures and calculates capital using the Standard Formula. The solvency position is monitored on a regular basis to ensure compliance with the SCR and MCR.

At 31 December 2024 the Group Solvency Capital Ratio was 197%. The FBD Insurance plc ratio was 188%. This is after taking into consideration the weather events of January 2025 outlined above.

A. Business and Performance

A1. The Business

A1.1 The Undertaking

FBD Holdings plc is incorporated in Ireland. The only insurance entity in the Group is FBD Insurance plc, an insurer licensed in Ireland. The address of the Registered Office and Head Office is:

FBD Holdings plc
FBD House
Bluebell
Dublin 12
D12 YOHE
Ireland

A1.2 Supervisory Authority

FBD Holdings plc and FBD Insurance plc are domiciled in Ireland and the supervisory authority responsible for financial supervision of the undertakings is:

Central Bank of Ireland
New Wapping Street
North Wall Quay
Dublin 1
D01 F7X3
Ireland

A1.3 Independent Auditors

FBD's independent auditors are:

PricewaterhouseCoopers
Chartered Accountants and Statutory Audit Firm
One Spencer Dock
North Wall Quay
D01 X9R7
Ireland

A1.4 FBD shareholders with qualifying holdings:

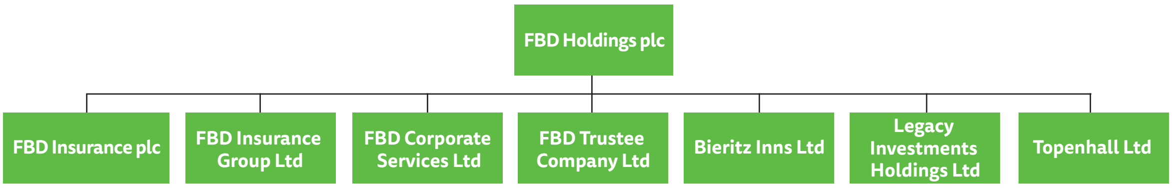
The shareholders below have interests above 10% in the Group.

Farmer Business Developments plc	No. of Shares	% of Class	% of Voting Rights
Ordinary shares of €0.60 each	8,531,948	23.77%	20.93%
8% Non-Cumulative Preference Shares	1,470,292	41.62%	3.61%
14% Non-Cumulative Preference Shares	1,340,000	100%	3.29%
Total % Voting Rights			**27.83%**

FBD Trust CLG	No. of Shares	% of Class	% of Voting Rights
Ordinary shares of €0.60 each	5,000,435	13.93%	12.27%
8% Non-Cumulative Preference Shares	2,062,000	58.38%	5.06%
Total % Voting Rights			**17.33%**

Sretaw Private Equity Unlimited Company	No. of Shares	% of Class	% of Voting Rights
Ordinary shares of €0.60 each	4,099,671	11.42%	10.06%
Total % Voting Rights			**10.06%**

A1.5 FBD Holdings plc Group Structure:



FBD Holdings plc ('FBD' or the 'Group')	Ireland A holding company which is parent to the other Group companies.
FBD Insurance plc ('the Company')	Ireland A regulated insurance company which underwrites motor, property, liability and other smaller insurance lines.
FBD Insurance Group Ltd t/a FBD Insurance	Ireland FBD Insurance Group Limited is a regulated intermediary, offering general insurance, life insurance, investments and pensions.
FBD Corporate Services Limited	Ireland This company employs all staff working for the Group.
FBD Trustee Company Limited	Ireland The principal activity of this company is to act as Trustee to FBD Insurance plc pension schemes.

Non-Principal Subsidiaries *(represents less than 1% of FBD Holdings Net Asset Value)*

Bieritz Inns Limited	Ireland The company is dormant and previous activities related to property investment and development.
Legacy Investments Holdings Limited	Ireland The company is dormant and was previously used for investment purposes.
Topenhall Limited	Isle of Man The principal activity is the holding of land in Warwickshire.

A1.6 Relevant operations transactions within the Group

All employees of the Group are employed by FBD Corporate Services Ltd which recharges the costs of the employees to the Group companies being FBD Holdings plc, FBD Insurance plc and FBD Insurance Group Ltd.

All direct general insurance premium for the Group is generated through the intermediary FBD Insurance Group Ltd which is paid commission by FBD Insurance plc for the revenue and incurs expenses related to the sales operations.

Inter-group loans are in place and inter-company transactions arise between the Group companies in the normal course of business.

A1.7 Material lines of business and geographical areas

FBD Insurance plc underwrites insurance for Farmer, Business and Retail customers covering Farm, Business, Home and Motor insurance in Ireland.

For Solvency II purposes the Company reports under the following lines of business:

1. Motor vehicle liability insurance;
2. Other motor insurance;
3. Fire and other damage to property insurance;
4. General liability insurance;
5. Income protection insurance; and
6. Marine, aviation and transport insurance.

Lines of business 5) Income protection and 6) Marine are combined under 'Other insurance' for the tables in this report.

A1.8 Significant Business or Events during the reporting period

As outlined in the Business and Performance section, the weather events of January 2025 had no impact on the IFRS financial statements for 2024. As the SCR calculation is forward looking, the weather events had an impact on the reported Solvency Capital Ratio position for 2024. There were no other significant or other events that occurred over the reporting period that had a material impact on the undertaking.

A2. Underwriting Performance

A2.1 The Undertaking

The Group's underwriting result by Solvency II material lines of business for 2024 and 2023 as per S.05.01 QRT, are set out in the tables below.

	Motor vehicle liability insurance 2024 €000s	**Other motor insurance 2024 €000s**	**Fire and other damage to property insurance 2024 €000s**	**General liability insurance 2024 €000s**	**Other insurance 2024 €000s**	**Total 2024 €000s**
Gross Written Premium	130,414	82,763	157,600	83,424	6,018	**460,219**
Net Earned Premium	112,725	76,189	127,747	76,637	5,501	**398,799**
Net Claims incurred	(49,474)	(46,484)	(68,016)	(36,827)	(3,721)	**(204,522)**
Expenses including CHE	(44,047)	(27,904)	(43,459)	(23,671)	(1,593)	**(140,674)**
Underwriting result by LOB	**19,204**	**1,801**	**16,272**	**16,139**	**187**	**53,603**
Balance – other technical income						**12,998**
Total underwriting result						**66,601**

	Motor vehicle liability insurance 2023 €000s	Other motor insurance 2023 €000s	Fire and other damage to property insurance 2023 €000s	General liability insurance 2023 €000s	Other insurance 2023 €000s	Total 2023 €000s
Gross Written Premium	119,134	73,571	136,020	79,123	5,745	**413,593**
Net Earned Premium	98,475	69,857	105,755	70,924	5,177	**350,188**
Net Claims incurred	(43,772)	(43,183)	(26,851)	(34,842)	(5,438)	**(154,086)**
Expenses including CHE	(44,680)	(30,328)	(36,278)	(20,719)	(1,503)	**(133,508)**
Underwriting result	**10,023**	**(3,654)**	**42,626**	**15,363**	**(1,764)**	**62,594**
Balance – other technical income						**13,866**
Total underwriting result*						**76,460**

* *2023 underwriting result has been restated to align to the underwriting result reported in the APMs section of the FBD Holdings plc Annual Report.*

FBD Holdings plc discloses total underwriting result in line with IFRS 17 reporting in the Annual Report, being €66.6m in 2024 (2023: €76.5m).

A2.2 Gross Written Premium

The Group's underwriting activities are conducted in Ireland.

Gross written premium increased to €460.2m in 2024 (2023: €413.6m), with Farmer, Business and Retail sectors all growing in 2024.

Written policy count increased by 6.3% (2023: 2.6%) with 33,000 additional policies written in 2024. Retention rates remain consistently high in 2024, particularly in Farmer and Business sectors. New business growth has remained consistently strong in our Farmer sector. Our Retail sector has also performed well with new business growth through FBD Direct as well as with An Post Insurance and Bank of Ireland.

Average premium increased by 5.8% across the portfolio, half of which relates to customers increasing their level of insurance cover and changing business mix, with some premium increases applied reflecting inflationary impacts. Private Motor average premium increased by 5.5%, in response to high levels of inflation and increased frequency experienced over 2022 to 2024 in relation to Damage claims. Home and Farm average premiums increased by 10.3% and 8.1% respectively, reflecting increases in property sums insured as rebuild costs continued to rise.

A2.3 Reinsurance

For 2024, the net expense from reinsurance contracts held reduced by €13.2m to €51.5m. In 2023, there was a significant reduction in the level of expected recoveries relating to Business Interruption claims as a result of the reduction in the associated gross best estimate. Reinsurance expense in 2024 has reduced €5.7m compared to 2023 reflecting reduced lower layer protection.

The reinsurance programme for 2025 was successfully renegotiated with some minor changes. Exposure growth related property lines (e.g. Home, Farm and Commercial Multiperil) contributed to an increase in the retention and upper limit of the Property Catastrophe programme. Reinsurance market conditions were more favourable than in recent years with a reduction in reinsurance rates of 1.4% for Casualty and 8.8% for Property on the comparable renewed cover.

A2.4 Claims and movement in other provisions

The Gross incurred claims increase of €54.6m reflects increasing costs due to more normalised weather experience in 2024, Damage claims inflation, and reflects business growth in FBD.

The Group's IFRS 17 loss ratio increased by 3.6 percentage points to 57.1% (2023: 53.5%). There was favourable prior year reserve development in 2024 of €26.9m (2023: €44.4m).

Property notifications increased 23% compared to 2023, with Storm Isha in January 2024 and Storm Darragh in December 2024 contributing significantly to this. The average cost of Property claims increased by 20% in 2024, due to a change in mix of claims, inflation and business interruption settlements.

Injury average settlement costs remained in line with prior year, however they are 7% lower than 2020, signalling a generally positive trend since the introduction of the Personal Injury Guidelines in 2021. FBD's Injuries Resolution Board (IRB) acceptance rates are approaching pre-Guidelines levels. Injury settlement rates increased 16% year on year, driven by the closure of historical cases and an increase in activity through the litigation channel.

For Motor Damage claims we are seeing indications that these costs are beginning to stabilise in the second half of 2024. However, there is evidence of continued inflationary pressure in Commercial Motor Damage claims.

Other provision charges of €6.7m included in the Income Statement (2023: €18.3m), are made up of Motor Insurers' Bureau of Ireland (MIBI) levy of €5.7m, the Motor Insurers Insolvency Compensation Fund (MIICF) contribution of €2.1m, net of small reductions in previous provisions.

A2.5 Industry Environment

Following the first review of the Personal Injuries Guidelines, the Judicial Council has recommended an overall increase of 16.7% in damages to be awarded for personal injuries. This amendment will require Oireachtas approval before being enacted. We welcome the inclusion of motor claims in the IRB mediation process.

A2.6 Weather, Claims Frequency and Large Claims

Net of reinsurance weather losses in 2024 were higher than that in 2023. This was primarily driven by Storm Isha and Storm Darragh, with a net cost to FBD of €14.7m.

Large injury claims, defined as a value greater than €250,000, in 2024 are slightly lower than the average of the past 10 years.

As mentioned above, the weather events of January 2025 is expected to have a net impact of approximately €30m.

A2.7 Expenses

The Group's expense ratio is 27.8% (2023: 27.4%). Insurance acquisition expenses and Non-attributable expenses are combined to calculate the total expense cost of €122.4m (2023: €109.9m). The increase includes inflationary impacts on employee expenses and IT costs along with an increase in depreciation costs as FBD increases capital investment in initiatives that support revenue growth and a more digitally enabled business.

A3. Investment Performance

A3.1 Investment Return

FBD's total investment return for 2024 was €45.1m (4.0% as a percentage of average assets under management for the year). This compares with €60.5m for 2023 (5.3%).

The table below shows the investment return of the Group by asset class:

	2024 €000s	2023 €000s
Actual return		
Corporate bonds	**22,597**	34,345
Government bonds	**6,886**	13,638
Deposits and cash	**4,517**	3,728
Investment property	**(658)**	(3,221)
Risk assets	**11,776**	11,996
Total investment income	**45,118**	60,486

The returns above are net of investment related expenses attributable to the respective asset class.

Income Statement returns from cash and bonds increased in 2024 as bond maturities continue to be reinvested at higher interest rates. Some of this increased return was offset by realised losses on bonds sold to enhance longer-term yield and reduce reinvestment risk. The European Central Bank (ECB) cut interest rates four times in 2024 which, along with tightening credit spreads, contributed to the positive OCI return. Risk assets contributed €11.9m to the overall income statement return with almost all asset classes experiencing positive returns, in large part due to a robust US economy. Private markets funds had another positive year while the valuation of our investment property decreased.

This following table shows the allocation of the Group's investment assets.

	31 December 2024		31 December 2023	
	€m	**%**	€m	%
Corporate bonds	**642**	**54%**	575	49%
Government bonds	**250**	**21%**	281	24%
Deposits and cash	**152**	**13%**	145	12%
Risk assets	**133**	**11%**	161	14%
Investment property	**11**	**1%**	12	1%
Total investment assets	**1,188**	**100%**	1,174	100%

The Group adopts a conservative investment strategy to ensure that its insurance contract liabilities are matched by cash and fixed interest securities of low risk and similar duration. Cash allocations remained relatively stable while €45m was reallocated to corporate bonds and €35m divested from government bonds. Mark-to-market gains also contributed to the overall increase in bond allocations. The average credit quality of the corporate bond portfolio has remained at A- with its BBB rated bond allocation stable at circa 39%. There was €40m divested from the risk asset portfolio to fund dividends and optimise the solvency capital position. The value of the investment property reduced due to revaluation.

A3.2 Investments in Securitisation

The Group has no investments in securitisation.

A4. Performance of other activities

There are no other activities that are material.

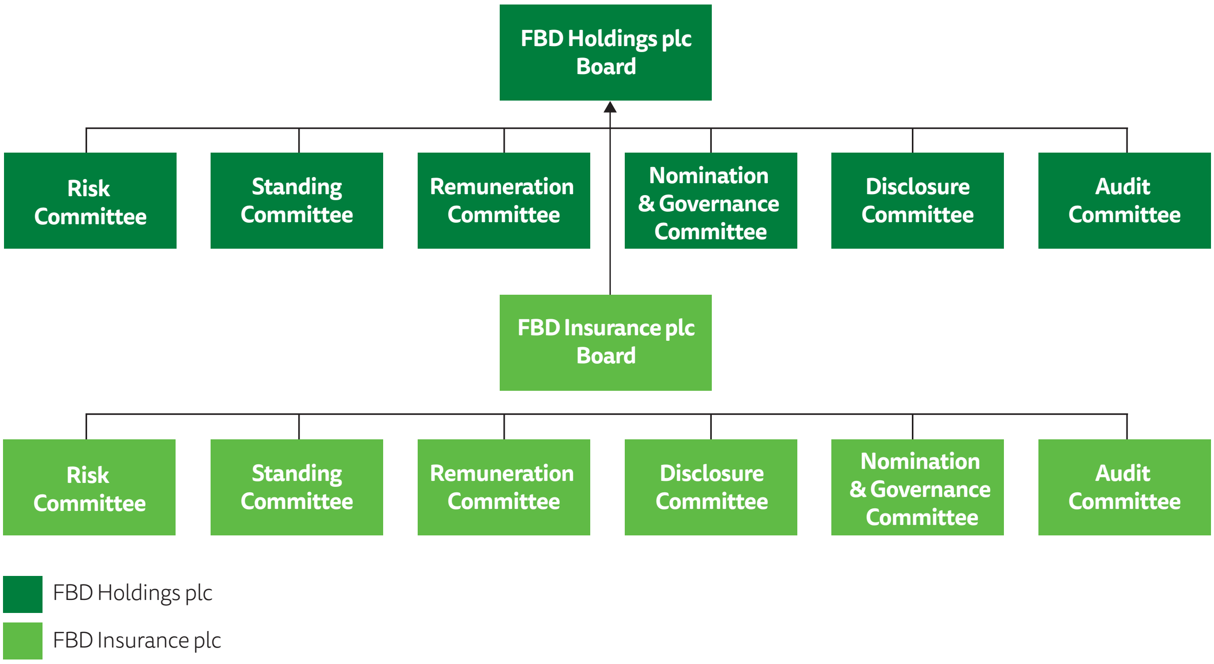
A5. Any other information

No other material information to be disclosed.

B. System of Governance

B1. General Information

B1.1 The Board and Committees Structure



The membership of the Board and Board committees for FBD Holdings plc and FBD Insurance plc are consistent with different Chairs appointed for each. When referring to the Board and Board committees below they cover both the FBD Holdings plc and FBD Insurance plc committees.

The Board

The primary role of the Board is to provide leadership and strategic direction while maintaining effective control over the activities of the Group.

The Board has approved a Corporate Governance Framework setting out its role and responsibilities. This is reviewed annually as part of the Board's evaluation of its performance and governance arrangements. The Framework includes a formal schedule of matters reserved to the Board for its consideration and decision, which includes but is not limited to:

- Approving the Group's long-term objectives and commercial strategy and any material changes;
- Reviewing performance in the light of the Group's strategy, objectives, business plans and budgets and ensuring that any necessary corrective action is taken;
- Approving the annual operating and capital expenditure budgets and any material changes;
- Overseeing FBD Group Operations;
- Approving the Risk Appetite and the Risk Management Framework;
- Approving changes to the Group capital structure, capital projects and approval of the dividend policy;
- Approving the Financial Statements and any significant change in accounting policies or practices;
- Ensuring maintenance of a sound system of internal control and risk management;
- Reviewing the Groups overall corporate governance arrangements;
- Appointing Directors and the Company Secretary; and
- Ensuring adequate succession planning for its Board, Executive Directors, the Company Secretary and senior Group management.

This schedule ensures that the skills, expertise and experience of the Directors are harnessed to best effect and ensures that any major opportunities or challenges for the Group come before the Board for consideration and decision. The schedule was last reviewed in December 2024.

Other specific responsibilities of the Board are delegated to Board appointed committees, details of which are given later in this report.

Risk Committee

The Board Risk Committee is the forum for risk governance within FBD. It is responsible for providing oversight and advice to the Board in relation to current and potential future risk exposures of the Group and future risk strategy. This advice includes recommending a Risk Management Framework incorporating strategies, policies, risk appetites and risk indicators to the Board for approval. The Risk Committee oversees the Risk function, which is managed on a daily basis by the Chief Risk Officer.

The key responsibilities delegated to the Committee include:

- Promoting a risk awareness culture within the Group;
- Ensuring that the material risks and emerging risks facing the Group have been identified and that appropriate arrangements are in place to manage and mitigate those risks effectively;
- Advising the Board on the effectiveness of strategies and policies with respect to maintaining, on an ongoing basis, the amounts, types and distribution of capital adequate to cover the risks of the Group;
- Reviewing and recommending the annual Compliance Plan and Compliance Framework to the Board for approval;
- Reviewing and recommending the Risk Management Framework to the Board for approval;
- Reviewing and challenging risk information received by the Chief Risk Officer from the business departments to ensure that the Group is not exceeding the risk limits set by the Board;
- Presenting a profile of the Group's key risks, Risk Management Framework, Risk Appetite and Tolerance and Risk policies at least annually together with a summary of the Committee's business to the Board;
- Meeting separately with the Head of Compliance, Chief Risk Officer, and the Head of Internal Audit at least annually to discuss any matters that the Committee or the Chief Risk Officer consider should be dealt with privately;
- Reviewing and ensuring that an appropriate risk culture is embedded throughout the Group; and
- Reviewing and recommending the Annual Data Protection Plan and the Annual Risk Function Plan to the Board for approval.

Audit Committee

The objective of the Committee is to assist the Board of the Group in fulfilling its oversight responsibilities for such matters as financial reporting, the system of internal control and management of financial risks and monitoring the corporate reporting process and the integrity of the financial statements of the Company, the audit process and the Group's process for monitoring compliance with laws and regulations.

The key responsibilities delegated to the Committee include:

- Reviewing the Group's financial results announcements and financial statements;
- Reviewing on an annual basis the Audit Committee Terms of Reference and recommend any change to the Board for approval;
- Reviewing and monitoring the effectiveness and adequacy of the Group's internal financial controls, and risk management systems;
- Considering any significant fraud, illegal acts, and deficiencies in internal control or similar issues;

- Reviewing of significant financial reporting judgements;
- Overseeing the relationship with the external auditors including reviewing and approving their terms of engagement and remuneration in respect of audit services;
- Reviewing and monitoring the independence and objectivity of the Statutory Auditor and the effectiveness of the audit process;
- Reviewing the findings of the audit with the Statutory Auditor;
- Approving the Internal Audit Annual Work Plan;
- Monitoring and reviewing the activities and effectiveness of the Group's Internal Audit Function;
- Reviewing the independence and scope of the Internal Audit Function;
- Reviewing and approving the Internal Audit Strategy on an annual basis, and the Internal Audit Charter periodically;
- Meeting separately with the Head of Internal Audit and the Statutory Auditor at least annually to discuss any matters that the Committee or the Head of Internal Audit consider should be dealt with privately;
- Monitoring the quality and integrity of sustainability disclosures within the Annual Report, including the effectiveness of internal control and risk management systems,
- Monitoring the CSRD reporting process, oversee assurance of CSRD reporting, reviewing and making recommendations to the Board on the approval of the annual Sustainability Statement that form part of the Annual Report; and
- Performing detailed reviews of specific areas of financial reporting as required by the Board or the Committee.

Remuneration Committee

The objective of the Committee is to assist the Board of the Group in ensuring that the level of remuneration in the Group and the split between fixed and variable remuneration are sufficient to attract, retain and motivate Executive Directors and Senior Management of the quality required to run the Group in a manner which is fair and in line with market norms, while not exposing the Group to unnecessary levels of risk.

The key responsibilities delegated to the Committee include:

- Ensuring that the Group's overall reward strategy is consistent with achievement of the Group's strategic objectives;
- Determining the broad policy for the remuneration of the Group's Executive Directors, Company Secretary and Executive Management;
- Reviewing the on-going appropriateness and relevance of the Remuneration Policy;
- Determining the total remuneration packages for the foregoing individuals, including salaries, variable remuneration, pension and other benefit provision and any compensation on termination of office;
- Ensuring that remuneration schemes promote long-term shareholdings by Executive Directors that support alignment with long-term shareholder interests;
- Ensuring that the Group operates to recognised good governance standards in relation to remuneration;
- Determining whether performance criteria has been met for the vesting of any share awards under the Group's approved share scheme;
- Making awards of shares under the Group's approved share scheme; and
- Preparation of the detailed Report on Directors' Remuneration.

Nomination and Governance Committee

The objective of the Committee is to ensure that the Board and its Committees are made up of individuals with the necessary skills, knowledge and experience to ensure that the Board is effective in discharging its responsibilities.

The key responsibilities delegated to the Committee include:

- Reviewing the structure, size and composition of the Board and making recommendations to the Board for any appointments or other changes;
- Recommending changes to the Board's Committees and the Board;
- Keeping under review the leadership needs of the Group and recommending the appointment of Directors, Executive Management and the Company Secretary to the Board;
- Advising the Board in relation to succession planning both for the Board and the Senior Executives in the Group;
- Monitoring the Group's compliance with corporate governance best practice with applicable legal, regulatory and listing requirements and to recommend to the Board such changes as deemed appropriate;
- Overseeing, in conjunction with the Board Chair, the conduct of the annual evaluation of the Board, Board Committees, Chair and individual Director Performance.

Disclosure Committee

The Disclosure Committee has delegated responsibilities from the Board, to oversee the Company's compliance with its obligations as laid down by the Irish Listing Rules, the Disclosure and Transparency Regulations, and the Market Abuse Regulation (EU) 596/2014 in respect of the disclosure and control of inside information directly concerning the Company.

The key responsibilities delegated to the Committee include:

- Ensuring that it is kept fully informed at all times about developments in respect of the Company's business and financial position that may constitute inside information;
- Continuously monitoring whether changes in circumstances may give rise to a disclosure obligation;
- Deciding whether particular information is inside information and, if so, the date and time at which that information first existed within the Company;
- Deciding whether inside information gives rise to an obligation to make an immediate announcement and, if so, the nature and timing of that announcement or whether it is permissible to delay the announcement; and
- Ensuring that when the disclosure of inside information is delayed all required records are maintained and that the conditions permitting delay are monitored.

Standing Committee

The Standing Committee is responsible in fulfilling the Board, in its oversight responsibility relating to the administrative actions and matters which are conducive or incidental to the attainment of the Company's objects or necessary or desirable in connection with the general management of FBD.

Reserving Committee

The Executive Management Team established a Reserving Committee for FBD Insurance plc with independent Non-Executive Directors as members, with formal Terms of Reference and with responsibility, inter alia, for the following:

- On a quarterly basis to review the adequacy of reserves and to recommend to the Board the level of Undiscounted Claims Reserves for approval and Solvency II Technical Provisions for inclusion in regulatory reporting; and
- The review of all material reports of the Head of Actuarial Function relating to reserves.

The Committee has full access to the Company's Head of Actuarial Function and any other person as deemed necessary by the Committee to effectively carry out its functions.

B1.2 Key Roles

The Chair

The role of the Chair is set out in writing in the Corporate Governance Framework. The Chair is responsible, inter alia, for:

- Setting the Board's agendas and ensuring that they cover the key strategic issues confronting the business;
- Leading the Board, encouraging discussions, challenging mindsets and facilitating the appropriate level of debate, promoting a culture of openness and debate at Board meetings and ensuring that the Directors apply sufficient challenge to management proposals;
- Nurturing relationships founded on mutual respect and open communication inside and outside the Boardroom, between the Non-Executive Directors and Senior Executives;
- Facilitating the effective contribution of Non-Executive Directors in particular and ensuring constructive relations between Executive and Non-Executive Directors are maintained;
- Ensuring that the Directors receive accurate, timely and clear information so that they can make a knowledgeable and informed contribution to Board discussions;
- Ensuring the Board receive adequate training about the operations and performance of the Company to ensure Non-Executive Directors make informed decisions;
- Ensuring that the performance of individual Directors and the Board as a whole and its committees is evaluated on an annual basis;
- Leading the Board appointment process in line with the Board Recruitment and Diversity Policy;
- Chairing the Annual General Meeting and deal with questions from shareholders; and
- Ensuring that there is effective communication with shareholders.

The Group Chief Executive Officer

The role of the Group Chief Executive Officer is set out in writing in the Corporate Governance Framework. They are responsible, inter alia, for:

- Developing a clear strategy for FBD with the Board and providing a formal process for review of strategy;
- Developing clear objectives and plans along with a suitable organisational structure to implement strategy;
- Establishing Key Performance Indicators quantifying individual and organisational goals for the business and the senior management team and evaluating performance accordingly;
- Ensuring that the organisation remains flexible to the changing business environment;
- Growing and motivating a top-class management team to meet the challenges of the business;
- Maximising the efficient and effective use of resources;
- Articulating, disseminating and providing leadership in relation to the vision, mission, objectives and values of FBD and maximising morale and efficiency within the organisation;
- Identifying and managing change within FBD and in the market and driving a process of continuous improvement;
- Providing career development and succession throughout the organisation, particularly at management level; and
- Representing FBD externally with shareholders, customers, regulators, media, providers and the public.

The Executive Management Team

The Group Chief Executive Officer has established an Executive Management Team ("EMT") comprising senior Group Executives to assist him in the discharge of his responsibilities for the Group's performance, operations and compliance.

The composition of this team is a matter for the decision of the Group Chief Executive and its role and responsibilities include:

- Managing the day -to -day running of the Group's business;
- Formulating the Group's strategic plans for the approval of the Board;
- Communicating the standards of performance, strategy and goals of the Group to meet the objectives approved by the Board;
- Leading the implementation of the agreed programme of priority development initiatives;
- Reviewing and communicating progress against the goals, providing direction to the Group's employees, removing barriers to achieving the goals and allocating the Group's resources to the areas of greatest importance; and
- Advising the Board, through the Group Chief Executive, on all matters concerning organisational strategy and performance.

The Board and senior management have ultimate responsibility for the governance of internal controls in FBD. A number of Board and executive committees have been established with specialised areas of focus such as:

- Board Risk Committee
- Board Audit Committee
- Board Remuneration Committee
- Board Nomination and Governance Committee
- Disclosure Committee
- Standing Committee
- Investment Committee
- Reserving Committee (includes at least one independent non-executive Director)
- Executive Risk Committee
- Pricing and Underwriting Committee
- Commercial Trading Committee
- Reinsurance Steering Committee
- IT Management and Operations Committee
- Strategy Oversight Committee
- Sustainability Committee

The executive committees report to the Executive Management Team through the EMT member via the monthly EMT meetings.

FBD Insurance plc: Under SEAR (CBI Individual Accountability Framework), all inherent and prescribed responsibilities are assigned to individuals who are in Pre-Approval Controlled Function (PCF) roles in accordance with their PCF designation and business areas. All responsibilities of each PCF are set in their Statement of Responsibilities. FBD is continuing implementation of the application of SEAR to Non-Executive Directors and Independent Non-Executive Directors commencing July 2025.

B1.3 Authority and independence of key functions

The control functions report regularly to the Board on the effectiveness of the System of Governance including the Internal Control System. The control functions are defined as the Risk Function, Compliance Function, Internal Audit Function, and Actuarial Function.

The Group uses a 'three lines of defence' framework in the delineation of accountabilities for internal control.

- Primary responsibility for risk management rests with line management;
- Line management is supported by the second line Risk, Actuarial and Compliance Functions;
- The third and final line of defence is the Internal Audit function, which provides independent assurance to the Audit Committee of the Board on risk-taking activities.

The second and third line of defence functions have defined Terms of Reference (ToR) reviewed at least annually by the appropriate committee.

Risk Function

The Group has an established Group Risk Function with Terms of Reference to have independent oversight of FBD's enterprise-wide risk management activities including promoting a sound and effective risk management culture across the Group. This Function is headed by an appropriately experienced Chief Risk Officer. The Chief Risk Officer reports quarterly to the Board Risk Committee and the Board and attends all Board meetings. The Risk Management Framework and Risk Appetite Framework is reviewed by the Board Risk Committee and the Board on an annual basis.

The Chief Risk Officer reporting line is to the Board Risk Committee with a dotted line to the Group Chief Executive on day-to-day operational matters. The Chief Risk Officer shall have direct access to the Chair of the Company.

Compliance Function

The Group has an established Group Compliance Function to manage its Regulatory Risks. This Function is headed by an appropriately experienced Head of Compliance. This role holder reports to the Chief Risk Officer and the Board Risk Committee on all matters. A quarterly compliance report is submitted to the Board for review and noting and the Annual Compliance Plan and the Compliance Framework is submitted to the Board Risk Committee and the Board for approval.

Actuarial Function

FBD Insurance plc has established an Actuarial Function with a formal Terms of Reference. This function is headed by an appropriately experienced Head of Actuarial Function (the "HoAF"). Reporting to the Group Chief Financial Officer, the HoAF is responsible for the day-to-day management of the Reserving Policy. The HoAF provides an Actuarial Opinion on Technical Provisions (AOTPs) annually to the Board and to the Central Bank of Ireland.

Internal Audit Function

The Group has an established Group Internal Audit function, with a formal charter and Terms of Reference.

Headed by an appropriately experienced Head of Internal Audit, the function is independent of management and business units. A core objective is the provision of independent assurance and consultancy services to the Group to add value and improve the Group's operations. The function assists the Group to achieve its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes.

The function reports to the Audit Committee through the Head of Internal Audit whose reporting line is to the Audit Committee Chair with a dotted line to the Group Chief Executive on day-to-day operational matters.

B1.4 Material changes during the period

There were 4 changes to the Board in 2024. The table below sets out the Directors who served during 2024:

Liam Herlihy	Chair
Jim Bergin	Independent Non-Executive Director (appointed 19 November 2024)
Mary Brennan	Independent Non-Executive Director
Sylvia Cronin	Senior Independent Non-Executive Director
Tim Cullinan	Independent Non-Executive Director (Resigned 9 September 2024)
Olive Gaughan	Independent Non-Executive Director (Appointed 22 May 2024)
Francie Gorman	Independent Non-Executive Director (Appointed 9 September 2024)
Patrick Murphy	Non-Executive Director
David O'Connor	Independent Non-Executive Director (Passed away 12 April 2024)
John O'Dwyer	Independent Non-Executive Director (Passed away 24 November 2024)
Tomás Ó Midheach	Executive Director and Group Chief Executive Officer
Richard Pike	Independent Non-Executive Director
Jean Sharp	Independent Non-Executive Director
Kate Tobin	Executive Director and Group Chief Financial Officer (Appointed 1 January 2024)

The same Directors comprise the Board of FBD Insurance plc. Richard Pike is the Chair of FBD Insurance plc.

B1.5 Remuneration policy and practices

The Group's Remuneration Policy is determined by the Board of FBD Holdings plc through the Remuneration Committee.

When determining Executive Director Remuneration policy and practices, the Committee addresses all of the following:

- **Clarity:** remuneration arrangements should be transparent and promote effective engagement with shareholders and the workforce;
- **Simplicity:** remuneration structures should avoid complexity, and their rationale and operation should be easy to understand;
- **Risk:** remuneration arrangements should ensure reputational and other risks from excessive rewards, and behavioural risks that can arise from target-based incentive plans, are identified and mitigated;
- **Predictability:** the range of possible values of rewards to individual directors and any other limits or discretions should be identified and explained at the time of approving the policy;
- **Proportionality:** a significant part of an Executive's reward is linked to performance with a clear line of sight between business performance and the delivery of shareholder value and
- **Alignment to culture:** the incentive arrangements and the performance measures used are strongly aligned to those that the Board considers when determining the success of the implementation of the Group's purpose, values and strategy.

Remuneration Principles

The Committee aims for the disclosure to be clear to allow shareholders to understand the range of potential values which may be earned under the remuneration arrangements. Please find key principles set out hereunder:

- **Fair:** FBD aims to reward employees fairly and transparently for their contribution and to ensure all employees have an equal opportunity to progress their careers and enhance their earning potential and the Diversity Policy is key to ensuring fairness;

- **Performance:** performance management plays a key role in aligning individual objectives with FBDs overall strategy, goals and values. Performance outcomes using a combination of financial objectives and non-financial behaviours which underpin individual remuneration and provide a clear alignment between performance and remuneration;
- **External Factors:** FBD aims to align remuneration with competitors and the relevant sectors for talent assessed against market benchmarks from recognised providers of benchmarking data; and
- **Risk Aligned:** remuneration is designed to promote high performance, a strong risk management culture and risk taking which is aligned to FBDs risk appetite. All employees are required to have a risk objective in their performance plan.

The remuneration of the Non-Executive Directors of the Group is determined by the Board. The individual remuneration packages of Senior Executives are determined by the Remuneration Committee who report to the Board.

B1.5.1 Components of Remuneration

Fixed Remuneration

Base Salary and Allowances

FBD's current remuneration structure predominantly consists of fixed pay elements, i.e. base salary, allowances. Base salary is the principal component of fixed remuneration and is designed to be fair and competitive and set according to appropriate salary ranges which reflect the size and level of responsibilities of each role.

Base salary is normally reviewed annually having regard to personal performance, Group performance and competitive market practice.

Benefits and Wellbeing

FBD provides, depending on role or competitive market practice/business needs, a car allowance. The company also makes a fixed percentage contribution to the private health insurance costs of Executive Directors.

FBD takes the wellbeing of employees very seriously and provides access to a variety of health and wellbeing initiatives.

Variable Remuneration

Variable remuneration is based on individual and Group performance and is awarded to all permanent employees and varies by amount and structure depending on role but in all cases is designed to encourage and reward enhanced performance.

1. Short Term Incentives

Bonus – Head Office Employees and Management

Annual bonus is based on stretching performance conditions set by the Remuneration Committee at the start of the year. The maximum opportunity level under the Policy for the Group Chief Executive Officer is 120% of base salary and 100% of base salary for other Executive Directors. In a given year, the Committee may determine that a maximum opportunity level below the above Policy levels will be operated.

Annual bonus outcomes will be determined based on performance against Group financial targets and the achievement of defined individual strategic objectives. The Remuneration Committee will determine the performance measures, their weightings and the calibration of targets each year and will clearly disclose these in the Remuneration Report.

Financial targets will determine the majority of the bonus. Financial targets will be set in a manner which will encourage enhanced performance in the best interests of the Group and its shareholders and will be approved by the Remuneration Committee.

In addition, if annual Group profit before tax does not reach a minimum level, to be determined annually by the Remuneration Committee after the budget has been approved, then the bonus may be revised downwards potentially to zero, the ultimate discretion over which rests with the Remuneration Committee following consultation with the Group Chief Executive Officer.

Individual performance will be assessed against agreed performance objectives, which will include a risk objective to ensure that all employees identify, evaluate and mitigate and control risks as part of our overall objectives to meet the organisation's strategic goals.

The Remuneration Committee has the discretion to override formulaic outcomes in circumstances where it judges it would be appropriate to do so. Any such discretion would be fully disclosed in the relevant annual report.

Any bonus payments are subject to the potential for the Remuneration Committee to apply provisions to withhold, reduce or require the repayment of awards for up to two years after payment if there is found to have been (a) material misstatement of the Group's financial results or (b) gross misconduct on the part of the individual.

30% of any executive bonus will be deferred into FBD shares for a period of three years. This practice allows the Committee to have flexibility to apply clawback if circumstances warranted.

Bonus – Sales Employees

Sales employees' bonus arrangements are based on the achievement of KPIs which are agreed annually including targets for such matters as gross written premium, retention levels, discretionary discounts ceded, compliance standards and business quality. This bonus is paid quarterly in arrears. Any bonus or variable pay proposals must be in compliance with Central Bank guidelines on variable pay.

2. Long Term Incentives

FBD Holdings plc, the Company's parent, has established the FBD Performance Share Plan ("LTIP") which was approved by its shareholders. Under the LTIP, the Remuneration Committee may, at its sole discretion, make conditional awards of shares to Executives.

Conditional awards of shares under the LTIP are limited to 10% in aggregate with any other employee share plan of the Company's issue ordinary shares of €0.60 each over a rolling 10-year period. The market value of shares which are the subject of a conditional award to an individual may not, in any financial year, normally exceed 150% of the participants base salary as at the date of the grant.

The Remuneration Committee set performance conditions each year, selecting appropriate metrics based on key strategic priorities. The period over which the performance conditions applying to a conditional award under the LTIP are measured may not be less than three years. The extent to which a conditional award may vest in the future will be determined by the Remuneration Committee by reference to the performance conditions set at the time of the reward.

These conditions are designed to ensure alignment between the economic interest of the plan participants and those of shareholders. Different conditions, or the same conditions in different proportions, can be used by the Remuneration Committee in different years under the LTIP rules, provided that the Committee is satisfied that they are challenging targets and that they are aligned with the interest of the Group's shareholders.

Consistent with prior periods, the LTIP rules allow the Remuneration Committee (at its sole discretion) to make awards which may be subject to an additional post vesting holding period. Awards will vest after three years once applicable performance conditions have been achieved and the vested shares (net of tax) will be required to be held for a further two-year period to provide continued alignment with shareholders.

The Remuneration Committee has the discretion to override formulaic outcomes in circumstances where it judges it would be appropriate to do so, and any such discretion will be fully disclosed in the relevant annual report.

The LTIP includes provisions that allow the Remuneration Committee to withhold, reduce or require the repayment of rewards for up to two years after vesting (i.e. up to five years after grant) if there is found to have been (a) material misstatements of the Group's financial results: (b) gross misconduct on the part of the award holder.

B1.5.2 Components of Remuneration

The remuneration of persons who exercise a significant influence on the undertaking and with members of the administrative, management or supervisory body (which comprises the Board of Directors and Company Secretary of FBD Holdings plc and the Group's primary subsidiary, FBD Insurance plc and the members of the Executive Management Team) is as follows:

	2024 €000s	2023 €000s
Short term employee benefits[1]	**5,641**	5,077
Post-employment benefits	**288**	306
Share based payments	**2,052**	1,436
Charge to the Consolidated Income Statement	**7,981**	**6,819**

1 *Short term benefits include fees to Non-Executive Directors, salaries, and other short-term benefits to all key management personnel.*

B1.5.3 Special Arrangements for Risk, Compliance and Internal Audit Roles

In the case of employees who hold roles in the Risk, Compliance and Internal Audit functions, so as to ensure the independence of these role holders and that their ability to perform their second and third line of defence roles is not in any way compromised, there will be no linkage between Annual Bonus and Group performance targets. In the event that performance related bonuses are paid by the Group in any financial year, those awarded to second- and third-line employees will be conditional only on the attainment of individual performance objectives.

Remuneration of Non-Executive Directors

Non-Executive Directors

The remuneration of the Non-Executive Directors is determined by the Board and reflects the time commitment and responsibilities of their role. In setting this level, the Board has regard to the fees payable to the Non-Executive Directors of the other Irish publicly listed companies and also to the developments and policy for the remuneration of the employees in the wider Group.

Non-Executive Directors receive a basic fee. Additional fees are paid for acting as Senior Independent Director, being a member of and/or chairing Board committees. These fees are reflective of their added responsibilities and time commitment.

Non-Executive Directors are not members of the Group's pension schemes and are not eligible for participation in the Group's long-term incentive schemes.

B1.6 Supplementary Pension

FBD operates a defined contribution pension arrangement for its employees, where both the employee and employer contribute to the retirement fund. FBD also operates a legacy defined benefit arrangement, which is closed to future accrual.

Pension

FBD offers employees a competitive defined contribution pension benefit. Employees are enrolled in the group scheme which provides a standard employer contribution rate of 8%. The pension contribution level for the Group Chief Executive Officer and the Group Chief Financial Officer in 2024 was 8% of base salary, which is in line with the rate for the wider workforce.

B1.7 Adequacy of System of Governance

The Systems of Governance is considered to be appropriate for FBD, taking into account the nature, scale and complexity of the risks inherent in the business.

B1.8 Material Transactions

There are no material transactions to note.

B2. Fit and proper requirements

B2.1 Fitness and Probity Policy

The Fitness and Probity Regime was introduced by the Central Bank under the Central Bank Reform Act 2010 (the 2010 Act). The core function of the Fitness and Probity Regime is to ensure that individuals in key and customer facing positions (referred to in the legislation as Controlled Functions (CFs) and Pre-Approval Controlled Functions (PCFs)) within a Regulated Financial Service Provider are competent and capable, honest, ethical and of integrity and also financially sound. The Central Bank has issued a number of statutory codes pursuant to its powers under section 50 of the 2010 Act, to set out the minimum standards of Fitness and Probity for individuals performing CFs or PCFs, including the Fitness and Probity Standards for Regulated Firms. The Central Bank (Individual Accountability Framework) Act 2023 amended the Central Bank Reform Act 2010.

As a regulated entity, FBD is subject to the F&P Standards. The annually reviewed and Board approved FBD Fitness and Probity Policy sets out the structures, processes and procedures in place to ensure the initial and ongoing assessment of individuals performing 'Controlled Functions' and 'Pre-Approval Controlled Functions', including Directors, senior management and those employees whose activities have a material impact on the business. The policy includes clearly defined roles and responsibilities, due diligence requirements including for outsourced arrangements, fitness and probity certification process, escalation processes, reporting requirements and record keeping.

FBD considers itself to be in compliance with the F&P Standards.

FBD Insurance plc: Under SEAR (CBI Individual Accountability Framework), all inherent and prescribed responsibilities are assigned to individuals who are in Pre-Approval Controlled Function (PCF) roles in accordance with their PCF designation and business areas. All responsibilities of each PCF are set in their Statement of Responsibilities and an up-to-date Management Responsibility Map is in place. FBD is continuing implementation of the application of SEAR to Non-Executive Directors and Independent Non-Executive Directors commencing July 2025.

B2.2 Selection due diligence

The Group operates robust Board and HR recruitment and selection controls which ensure that FBD selects only candidates that meet the F&P Standards (i.e. competent and capable, honest ethical and act with integrity and financial soundness). These controls include appropriate screening of candidates, the assessment of completed Fitness and Probity Questionnaires and fitness and probity certification prior to commencing the role. This includes screening for amongst other things: educational qualification and work experience, conflicts, bankruptcy and debt judgements and regulatory sanctions, where appropriate.

In addition, employment contract terms require continuing adherence to all regulatory standards including, amongst others, the F&P Standards, Conduct Standards and Minimum Competency Code (MCC) obligations. The F&P Standards and Conduct Standards also for part of a Non-Executive Director's Letter of Appointment.

B2.3 Continuous due diligence

The Group operates a continuous due diligence programme which covers all Directors, Senior Executives and relevant employees across the Group. Under this programme, training and a Fitness and Probity questionnaire are required to be completed annually by Controlled Function and Pre-Approval Controlled Function role holders, through the annual Fitness and Probity Certification Process. This requires employees to complete an F&P Declaration confirming that they remain fit and proper, agree to abide by F&P Standards and to notify FBD immediately if for any reason they no longer believe they comply with the F&P standards.

HR and Company Secretarial Function independently undertake validation and assessment of completed Individual Questionnaires and/or any F&P concern raised. Where this review causes the Chief HR Officer or the Company Secretary to form the opinion that there is reason to believe or suspect a person's fitness and probity to perform the relevant function, a formal assessment process will be conducted which may result in the person being removed from carrying out the regulated function. Such circumstance may include, but is not limited to, potential issues identified or reported during the normal course of business, material or undeclared judgements; criminal or civil convictions or regulatory censure. In assessing the impact of these circumstances, FBD takes into consideration all relevant matters including the circumstances surrounding the issue; the length of time since the issue; the explanation given and the proposed role and its impact.

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

B3.1 Risk Management Framework

FBD has adopted an enterprise Risk Management Framework which comprises of strategies, policies, processes and reporting procedures necessary to identify, assess, monitor, manage and report, on a continuous basis the risks, at an individual and at an aggregated level, to which the Group could be exposed. The key elements of the enterprise Risk Management Framework are Risk Appetite, Risk Governance, Risk Process and People. FBD has established procedures to monitor and report on the system of controls and it follows the three lines of defence model outlined previously.

Key components of monitoring and reporting of the system of control include:

- Business Unit Quality Assurance;
- Business Unit Management Information;
- Risk Control Self-Assessment;
- Impact Risk & Opportunity Self-Assessment;
- Error Reporting;
- First Line Reviews;
- Second Line Reviews;
- Third Line Internal Audits; and
- Board/Executive Committee Reporting.

B3.2 Risk Implementation and Integration

All staff are expected to demonstrate appropriate standards of behaviour in the development of strategy and the pursuit of objectives. This philosophy is supported by the following guiding principles. Management and employees shall:

- Consider all forms of risk in decision-making;
- Create and evaluate business-unit level and Group-level risk profile to consider what's best for their individual business unit and department and what's best for the Group as a whole;
- Support Executive Management's creation of a Group-level portfolio view of risk;
- Retain ownership and accountability for risk and risk management at the business unit or other point of influence level;
- Strive to achieve best practices in enterprise risk management;
- Read and understand all policies and procedures relevant to their role;
- Monitor compliance with policies and procedures and the state of enterprise risk management;
- Leverage existing risk management practices, wherever they exist within the Group;

- Use the Group's Speak up Policy if they have a concern about unlawful conduct, financial malpractice, danger to the public or environment or possible fraud or risks to the Group;
- Document and report all significant risks and enterprise risk management deficiencies; and
- Accept that enterprise risk management is mandatory, not optional.

Roles and Responsibilities

While the Board has ultimate responsibility for all risk-taking activity within the Group, it has delegated some risk governance tasks to a number of committees or key officers. The Group uses a 'three lines of defence' framework in the delineation of accountabilities for risk governance as outlined in B1.3.

The Risk Management Function maintains a Corporate Risk Register with each risk assigned to a Risk Owner and a Risk Champion/Business Risk Partner in the Business.

Line Management/Risk Owner

The first line of defence within each business and support unit is line management. Line management has primary responsibility for ensuring that the business complies with their specific obligations. In addition, the first line of defence is responsible for working with the Risk Management Function to identify, assess, monitor and report risk. Line management is also responsible for ensuring that all staff members receive appropriate training. Line management must also inform the Risk, Compliance, Actuarial and Internal Audit Functions (where appropriate) of any facts relevant for the performance of their duties.

Risk Champion

Risk Champions report to their departmental manager. These individuals are well placed in FBD to ensure the continuous monitoring and reporting of their risk and control environment. Risk Champions are also responsible for promoting a positive risk culture in the organisation.

Business Risk Partners

These roles act as a 1.5 line of defence in the oversight of risks and controls within the Underwriting, Sales, Claims and IT business areas. The Business Risk Partners are responsible for supporting the Risk Owners in the management of their risks. They promote a positive risk and compliance culture and awareness through the development and roll out of appropriate and tailored training for staff.

Risk Appetite Framework

Risk appetite is a measure of the amount and type of risks FBD is willing to accept or not accept over a defined period of time in pursuit of its objectives. The Risk Appetite Framework defines FBD's appetite for each main risk category describing at a high level the type of risk it is willing to take.

The Group's appetite is to maintain sustainable profit and a strong capital position while acting in the best interests of consumers. The risk appetite in FBD is driven by an overarching desire to protect the solvency of the Group at all times. Through the proactive management of risk, FBD ensures that it does not currently have or will not take on an individual risk or combination of risks that could threaten the solvency of the Group. This ensures that FBD has and will have in the future sufficient capital to pay its policyholders and all other creditors in full as these liabilities fall due.

The management of risks are outlined further in Section C of this report. The Risk Appetite Framework is reviewed and approved at least annually by the Board and is monitored and reported by the Risk Function in order to support and embed risk in the decision-making process of the Group.

Risk Policies

The Group has developed a number of risk management policies which clearly set out the following:

- Definition of risk;
- Objective;

- Roles and Responsibilities;
- Processes; and
- Reporting procedures to be applied.

The risk policies are reviewed at least annually by the Board or more frequently if the system, or area concerned, undergoes significant change.

B3.3 The Own Risk and Solvency Assessment (ORSA) Process

B3.3.1 ORSA Process Overview

The ORSA is a continuous process and FBD considers the process outputs when managing Capital risk. The key elements of the ORSA process include the following;

- An assessment of the Group's risk profile;
- An assessment of the appropriateness of the Standard Formula for FBD;
- The calculation of Capital projections based on the Group's Business Plan;
- Stress and Scenario testing;
- A review of the Capital Recovery Plan; and
- A review of the Capital Risk Appetite Statement and tolerance limits.

The ORSA process is an integral part of the business strategy. When making strategic decisions the ORSA process is considered. The ORSA process is fully integrated into the following decisions;

- Setting Shareholder Dividend Policy;
- Setting Investment Strategy;
- Purchasing Reinsurance Programmes;
- Setting Underwriting Policy;
- Or, in any other business decision where there may be a Capital impact.

Where relevant to decisions, Board Papers include information on the capital implications of that decision.

B3.3.2 ORSA Approval by the Administrative, Management or Supervisory Body (AMSB)

The ORSA is a top-down process owned by the Board. It is an ongoing process, which ensures that the business is managed soundly and prudently by identifying, assessing and monitoring current and future solvency needs in light of all the risks faced. FBD must submit at least one ORSA Report to the Central Bank of Ireland each year.

The ORSA is a very important process as it provides the Board with a comprehensive understanding of the Group's key risks. These risks include both current and emerging risks. FBD's overall solvency needs are assessed having considered these risks.

The ORSA Supervisory Report is prepared by the Chief Risk Officer and is subject to Board Risk Committee and Board approval prior to submission to the Central Bank.

B3.3.3 Overall Solvency Needs

FBD's overall solvency needs are assessed at least annually as part of the ORSA process. The assessment takes into account the specific risk profile, approved risk tolerance limits and the business strategy of the Group.

A key part of this assessment is to review the significance of any deviation between the risk profile of FBD and the assumptions underlying the Standard Formula SCR calculation.

As part of the overall solvency needs assessment, the Group's Strategy and Business Plan is also considered. Base case financial projections covering the FBD planning cycle period are developed. Based on these financials the Group's capital position is projected. This capital projection is then subjected to a number of stress tests, reverse stress tests and scenario analyses. Based on the outputs of these tests the Group reviews the appropriateness of their Capital Risk Appetite.

The Risk Function with input from key stakeholders develops the stress and scenario tests. The stress and scenarios chosen, take into account the material risks facing the Group, external environment and likelihood of occurring based on historical analysis. These tests are presented to the Board Risk Committee for review and challenge and to the Board for review, challenge and approval.

B4. Internal control system

B4.1 Internal Control Environment

The Board has overall responsibility for the Group's system of internal control and for reviewing its effectiveness. The system which operates in FBD is designed to manage rather than eliminate the risk of failure to achieve business objectives and can provide only reasonable and not absolute assurance against material misstatement or loss.

In accordance with the Financial Reporting Council (FRC) guidance for Directors on internal control published in September 2014, "Guidance on Risk Management, Internal Control and Related Financial and Business Reporting", the Board confirms that there is an ongoing process for identifying, evaluating and managing any significant risks faced by the Group, that it has been in place for the year under review and up to the date of approval of the financial statements and that this process is regularly reviewed by the Board.

The key risk management and internal control procedures which cover all material controls include:

- Skilled and experienced management and staff in line with fit and proper requirements;
- Roles and responsibilities including reporting lines clearly defined with performance linked to Group objectives;
- An organisation structure with clearly defined lines of responsibility and authority documented in the FBD Management Responsibility Map;
- The maintenance of proper accounting records;
- A comprehensive system of financial control incorporating budgeting, periodic financial reporting and variance analysis;
- A Risk Committee of the Board and a Risk Management Framework comprising a Risk Function headed by a Chief Risk Officer, a clearly stated Risk Appetite and Risk Strategy supported by approved risk management policies and processes;
- An Executive Risk Committee comprising of senior management whose main role includes reviewing and challenging key risk information and to assist the Board Risk Committee, described earlier, in the discharge of its duties between meetings;
- IT Risk and Operational Resilience Risk Committee reporting to the Executive Risk Committee. This Committee is comprised of Executive and Senior Management with responsibility for the oversight of IT risks and Operational Resilience risk and the control environment in place to manage these risks;
- IT and Operations Management Committee reporting to the Executive Management Team;
- The risk strategy, framework and appetite are articulated in a suite of policies covering all risk types and supported by detailed procedural documents. Each of these documents is subject to annual review and approval by the Board;
- Performance of an ORSA linking risk management, strategy and capital management;
- A Group Internal Audit Function;

- A Group Compliance Function;
- A Data Protection Officer;
- A Board Audit Committee whose formal Terms of Reference include responsibility for reviewing the adequacy and effectiveness of controls operated by Management to mitigate regulatory, operational and financial risk;
- A Disaster Recovery Framework is in place and is regularly tested;
- A Business Continuity Framework is in place and is regularly tested;
- An IT Risk Management Framework; and
- A number of key Group policies in place include a Corporate Governance Framework, Individual Accountability Policy, Fitness and Probity Policy, Conduct Standards Policy, Speak Up Policy and Code of Conduct.

The Annual Budget, Half-Yearly Report and Annual Report are reviewed and approved by the Board. Financial results with comparisons against budget are reported to Executive Directors on a monthly basis and are reported to the Board quarterly.

The risk management, internal control, reporting and forecasting processes are important to the Board in the exercise of its Governance and Oversight role. The Board constantly strives to further improve their quality. The Group has established a Speak Up Policy for workers* (as defined by the Protected Disclosures (Amendment) Act 2022), the purpose of which is to ensure that:

- Workers* are aware of the arrangements and protection in place for raising concerns in respect of wrongdoing in the Group.
- Workers* are aware that it is safe and appropriate for all employees to raise a concern.
- FBD take appropriate measures to ensure concerns are appropriately investigated and to safeguard workers* who:
  - Raise genuine concerns; or
  - Are the subject to an investigation; or
  - Were the subject to an investigation and where no evidence of wrongdoing was discovered.

The Speak Up Policy and supporting procedures are reviewed annually and the Policy is available on the FBD Group website, and all employees receive annual mandatory training.

**Workers as defined by the Protected Disclosures (Amendment) Act 2022.*

Internal Controls over Financial Reporting

The main features of the Internal Control Framework which supports the preparation of the consolidated financial statements are as follows:

- A comprehensive set of accounting policies are in place relating to the preparation of the interim and annual financial statements in line with IFRS;
- A number of policies and controls are in place to support the delivery of the Annual Report and half yearly report including a Financial Reporting Policy; a Non-Financial Reporting policy and Internal Control Policy;
- An appropriately qualified and skilled Finance team is in place operating under the supervision of experienced management who are compliant with fit and proper requirements;
- Appropriate financial and accounting software is in place;

- A control process is followed as part of the interim and annual financial statements preparation, involving the appropriate level of management review of the significant account line items, and where judgments and estimates are made, they are independently reviewed to ensure that they are reasonable and appropriate. This ensures that the consolidated financial information required for the interim and annual financial statements is presented fairly and disclosed appropriately;
- Preparation and review of key account reconciliations;
- The Board Audit Committee members attend a series of meetings in the lead up to the annual financial statements to consider and review the financial statements in detail and to have early sight of Key Methodologies, Uncertainties and Judgements;
- Detailed papers are prepared for review and approval by the Audit Committee covering all significant Key Methodologies, Uncertainties and Judgements and technical accounting issues together with any significant presentation and disclosure matters; and
- The Audit Committee has a number of responsibilities delegated to it under its Terms of Reference. On an annual basis an assessment is carried out of the Committee's compliance with its Terms of Reference.

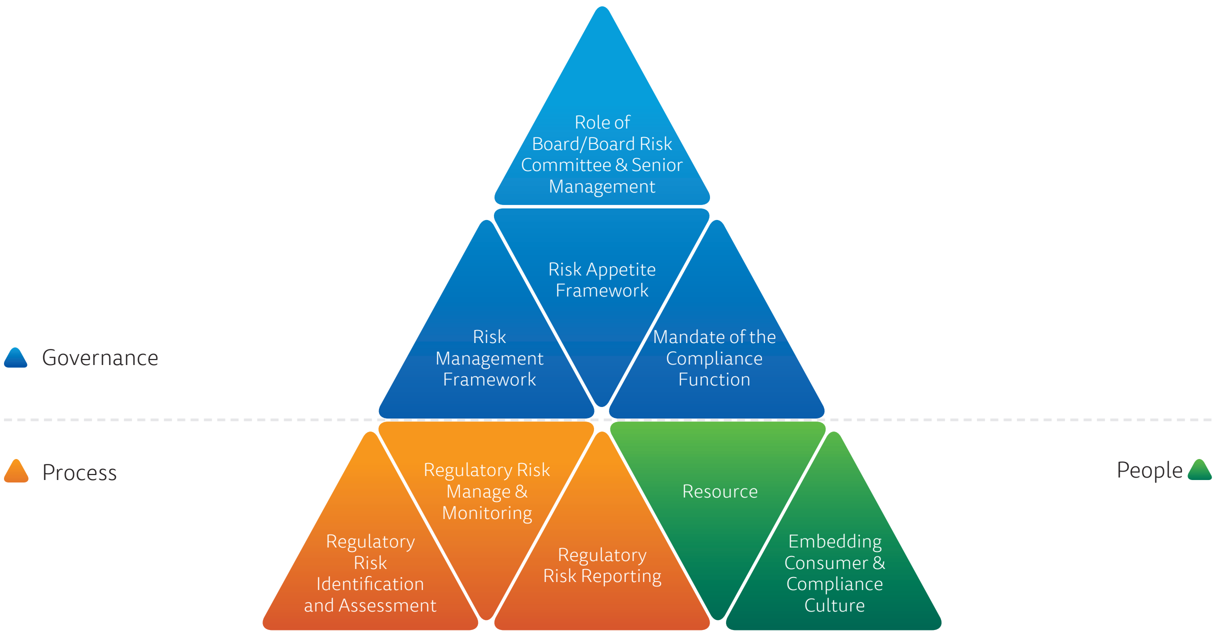
The Board confirms that it has reviewed the effectiveness of the Group's Systems of Internal Control for the year ended 31 December 2024. The 2024 internal control assessment provides reasonable assurance that the Group's controls are effective, and that where control weaknesses are identified, they are subject to management oversight and action plans.

B4.2 Compliance Function Implementation

Compliance Framework

The Compliance Function operates in the second line of defence and through the Head of Compliance develops and implements the Board approved Compliance Framework. The Compliance Framework sets out how regulatory risk is managed in FBD under the headings of governance, process and people. The framework outlines the various compliance related activities which are undertaken and provides a structure and clarity over compliance activities.

The key elements of the Compliance Framework are illustrated below:



The Annual Compliance Plan is developed by the Head of Compliance and approved by the Board.

B5. Internal Audit Function

B5.1 How the Internal Audit Function is implemented

The Internal Audit Function is the third line of defence in the risk governance structure operated by the Group. Internal Audit provides independent assurance to the Board through the Audit Committee on risk-taking activities. The Internal Audit Function is formally established through its Charter, which is reviewed and approved by the Audit Committee annually. The 2024 Internal Audit Charter states that Internal Audit is to operate in compliance with the International Standards for the Practice of Internal Auditing issued by the Institute of Internal Auditors ("IIA"), the IIA's Internal Audit Financial Services Code of Practice and the IIA's Code of Ethics. The Standards, Code of Practice, together with the Code of Ethics, encompass all mandatory elements of the International Professional Practices Framework ("IPPF") which were relevant up to 31 December 2024; therefore, conformance with the Code of Ethics and the Standards demonstrates conformance with all mandatory elements of the International Professional Practices Framework.

B5.2 Maintaining independence and objectivity

The Head of Internal Audit (HIA) has a direct reporting line to, with direct and unlimited access to, the Chair of the Board Audit Committee. The Board Audit Committee is responsible for the appointment and removal of the HIA. The 2024 Internal Audit Charter notes that Internal Audit is specifically prohibited from performing management activities, including:

- Performing Operational duties; including operation of policies and procedures;
- Initiating or approving accounting transactions; and
- Undertaking consulting engagements where the primary aim includes process improvement, implementation of systems, or advising on operating practices.

The Charter also notes that in order to minimise the risk of conflicts of interest the HIA will, where possible taking into account the size of the audit team, rotate members of the audit team assigned to audits that they have participated in previously. Lastly, the Internal Audit Manual states: "To maintain independence/ objectivity Internal Audit staff are required to refrain from auditing operations for which they were responsible within the preceding 12 months and specific operations where there is a personal conflict of interest".

B6. Actuarial Function

B6.1 Description

The Actuarial Function is part of the second line of defence within the "three lines of defence" model operated by the Group. The Actuarial Function is responsible for calculating the Best Estimate Technical Provisions and expressing an Opinion on the Technical Provisions, the Underwriting Policy, the adequacy of reinsurance arrangements and the ORSA.

The Actuarial Function annual activities are prescribed within a Terms of Reference which is included in the Actuarial Function Report that is reviewed by the Board annually. The Actuarial Function shall have full, unrestricted access to all information, explanations, records, and personnel necessary for the completion of those activities.

B6.2 Reporting

The Head of Actuarial Function reports directly to the Group Chief Financial Officer. Also, the Head of Actuarial Function has access to the Independent Non-Executive Directors of the Reserving Committee.

The Head of Actuarial Function presents all Opinions to the necessary Board committees and the Board on an annual basis. In addition, results from quarterly reserving analyses and other material analyses are reported to the Reserving Committee, Audit Committee and the Board.

B7. Outsourcing

FBD outsources a number of processes, services and activities to service providers to assist in achieving its strategic objectives and delivering a high level of service to its customers. FBD has an Outsourcing Policy in place, the purpose of which is to provide guidance governing the definition of outsourcing and criticality of outsourcers and includes sections on:

- Outsourcing strategy;
- Roles and responsibilities;
- Onboarding process;
- Due diligence;
- Business continuity;
- Contract agreements;
- Risk appetite and framework;
- Outsourcing templates; and
- Outsourcing log.

The outsourcing arrangements in place for the Group are reviewed annually in line with the policy and the Board approve all "Critical Outsourcing" arrangements.

Critical Outsourcing Service Provided	Jurisdiction
Co-location of the data centre, System Monitoring and Data Backup/Restores	Ireland
Management of the Corporate Bond Portfolio	UK*
Management of the Sovereign Bond Portfolio	Ireland
Management of the collective investment schemes	Ireland
Batch, print and dispatch of customer documentation	Ireland
Service Desk provision	Ireland

* *FBD is contracted with a UK legal entity to provide asset management services on its Corporate Bond Portfolio. The asset manager has its headquarters based in an EU27 country.*

B8. Any other information

No other material information to be disclosed.

C. Risk Profile

In accordance with Group policy, business unit management has primary responsibility for the effective identification, management, monitoring and reporting of risks. There is an annual review by the Risk Committee of all major risks to ensure all risks are identified and evaluated. Each risk is assessed by considering the potential impact and the probability of the event occurring. Impact assessments are made against financial, operational, regulatory and reputational criteria. All amounts included in this section are reported on an IFRS basis.

C1. Underwriting risk

Underwriting

The Group has developed its insurance underwriting strategy to diversify the type of insurance risks written and within each of the types of cover, to achieve a sufficiently large population of risks to reduce the variability of the expected outcome. The principal insurance covers provided by the Group include Motor, Employers' and Public Liability and Property.

The Group manages these risks through its underwriting strategy, proactive claims handling and its reinsurance arrangements. The Group has developed its insurance underwriting strategy to diversify the type of insurance risks written and to reduce the variability of the expected outcome by each risk category. The only significant concentration of insurance risk is that all of the Group's underwriting business is conducted in Ireland. Within Ireland there is no significant concentration risk in any one area.

The Group's underwriting strategy is incorporated in the overall corporate strategy which is approved by the Board of Directors and includes the employment of appropriately qualified underwriting personnel; the targeting of certain types of business that conform with the Group's risk appetite and reinsurance treaties; constant review of the Group's pricing policy using up-to-date statistical analysis and claims experience; and the surveying of risks carried out by experienced personnel. All risks underwritten are within the Group's underwriting policies.

The Group seeks to identify opportunities to promote a transition to a low carbon environment and take into consideration climate change and ESG considerations in the product development process.

Reserving

While the Group's underwriting risk appetite is constantly reviewed and managed, there is no certainty that the cost of claims will not rise due to abnormal weather events, increased claims frequency, increased severity, changes in regulatory environment, change in economic activity or any other reason. Such an increase could have a material impact on the results and financial condition of the Group.

The Group uses statistical and actuarial methods to calculate the quantum of claims provisions and uses independent actuaries to review its liabilities to ensure that the carrying amount of the liabilities is adequate. An uncertainty analysis is carried out which inputs into the setting of the risk adjustment under IFRS17. The Reserving Committee assists the Board in its review of the adequacy of the Group's claims provisions.

Case reserve estimates are subject to robust controls including system controls preventing claim handlers from increasing reserves above their reserve limits without supervisor approval and secondary review and challenge of case reserve estimates.

Catastrophe Risk

The Group purchases reinsurance protection to limit its exposure to single large claims and the aggregation of claims from catastrophic events. The Group's reinsurance programme is approved by the Board of Directors on an annual basis.

The Group has purchased a reinsurance programme which has been developed to meet the local domestic risk profile and tailored to the Group's risk appetite. The programme protects, Motor, Liability, Property and other classes against both individual and cumulative large losses and events.

C1.1 Concentration risk

Concentration risk is the risk of loss due to over-dependence on a singular investment or category of business. While all of the Group's underwriting business is conducted in Ireland, with a significant focus on the Agri sector, it is spread over a wide geographical area with no concentration in any one county or region. The resultant concentration risk from adverse weather events, i.e. floods, storms or freezes in Ireland, are mitigated by a flood mapping solution and an appropriate reinsurance strategy.

Receivables have no significant concentration of risk.

C1.2 Risk sensitivity for underwriting risks

The Group carries out stress and scenario testing as part of the ORSA process which includes stress testing for material underwriting risks. For the 2024 ORSA, the solvency position at 30 September 2024 and the projected solvency position over the business planning period were tested for high impact low likelihood adverse stresses.

The outcome of the stress and scenario tests is that in each case FBD would have sufficient available capital to continue to meet the SCR.

C2. Market risk

The Group has invested in term deposits, listed debt securities, investment property and externally managed collective investment schemes which provide exposure to a broad range of asset classes. These investments are subject to market risk, whereby the value of the investments may fluctuate as a result of changes in market prices, changes in market interest rates or changes in the foreign exchange rates of the currency in which the investments are denominated.

The extent of the exposure to market risk is managed by the formulation of, and adherence to, an Investment Policy incorporating clearly defined investment limits and rules, as approved annually by the Board of Directors, and employment of appropriately qualified and experienced personnel and external investment management specialists to manage the Group's investment portfolio. The overriding philosophy of the Investment Policy is to protect and safeguard the Group's assets and to ensure its capacity to underwrite is not put at risk.

The Group abides by the Prudent Person Principle meaning that it will only invest in assets the risk of which can be properly identified, measured, monitored, managed, and controlled.

The Group has an Asset Liability Matching policy whereby its liabilities are backed by fixed interest assets of similar currency and duration. The Group also monitors its allocation to the various asset classes and has a long-term Strategic Asset Allocation target.

C2.1 Interest rate and spread risk

Interest rate and spread risk arises primarily from the Group's investments in listed debt securities and deposits and their movement relative to the Group's liabilities. The Group reviews its exposure to interest rate and spread risk on a quarterly basis by conducting an asset liability matching analysis. As part of this analysis, it monitors the movement in assets minus liabilities for defined interest rate stresses and ensures that they remain within set limits as laid out in its Asset Liability Management Policy. Similar monitoring is done for spread risk.

At 31 December 2024, the Group held the following deposits and listed debt securities:

	2024		2023	
	Market Value €000s	**Weighted average interest rate %**	**Market Value €000s**	**Weighted average interest rate %**
Time to maturity				
In one year or less	**123,481**	**1.08**	72,619	1.14
In more than one year, but not more than two years	**190,199**	**1.01**	126,160	1.07
In more than two years, but not more than three years	**158,842**	**1.12**	206,202	1.05
In more than three years, but not more than four years	**116,887**	**1.44**	152,803	1.12
In more than four years, but not more than five years	**61,799**	**1.99**	113,674	1.46
More than five years	**240,748**	**2.71**	187,416	2.22
Total	**891,956**		858,874	

C2.2 Other Market Risks

The Group is subject to equity price risk due to its holdings in collective investment schemes which invest in listed equities.

The amounts exposed to equity price risk at the reporting date are:

	2024 €000s	**2023 €000s**
Equity exposure	**33,840**	47,982

The Group is subject to property price risk due to its investment property holdings. The amounts exposed to property price risk at the reporting date are:

	2024 €000s	**2023 €000s**
Investment property exposure	**11,300**	11,953
Owner occupied property exposure	**14,074**	14,074
Total property exposure	**25,374**	26,027

The Group has the following holdings in other risk assets, primarily held in collective investment schemes, as at the reporting date:

	2024 €000s	**2023 €000s**
Other risk asset exposure	**98,926**	113,194

These assets comprise of High Yield Bond, Emerging Market Debt, Absolute Return Fixed Income, Senior Private Debt, Infrastructure Equity and Global Impact Funds as well as some immaterial exposure to directly held unlisted assets. These assets are mainly subject to foreign exchange, interest rate and spread risk.

C2.3 Risk sensitivity for market risks

FBD carries out stress and scenario testing as part of the ORSA process which includes stress testing for the material market risks. For the 2024 ORSA, the solvency position at 30 September 2024 and the projected solvency position over the business planning period were tested for high impact low likelihood adverse stresses.

The outcome of the stress and scenario tests is that in each case FBD would have sufficient available capital to continue to meet the SCR.

C3. Credit risk

Credit risk is the risk of loss in the value of financial assets due to counterparties failing to meet all or part of their obligations.

Credit risk is measured separately for:

- Reinsurance contracts held;
- Other receivables;
- Cash and Cash equivalents; and
- Listed debt securities.

The Group purchases reinsurance protection to limit its exposure to single claims and the aggregation of claims from catastrophic events. The Group only places reinsurance with companies that it believes are strong financially and operationally. Credit exposures to these companies are closely monitored by senior management. All of the Group's current reinsurers have a credit rating of A- or better. The Group has assessed these credit ratings and security as being satisfactory in diminishing the Group's exposure to the credit risk of its reinsurance receivables.

Financial assets are graded according to current credit ratings issued by the main credit rating agencies. Investment grade financial assets are classified within the range of AAA to BBB ratings. Financial assets which fall outside this range are classified as speculative grade. All of the Group's bank deposits are with financial institutions which have a minimum A- rating. The Group holds the following listed government bonds (average credit rating: A) and listed corporate bonds (average credit rating: A-), with the following credit profile:

FBD Holdings plc	2024		2023	
	Market Value €000s	Weighted Average Duration	Market Value €000s	Weighted Average Duration
Government Bonds				
AAA	**-**	**0.0**	15,489	0.0
AA+	**26,701**	**1.3**	25,975	2.3
AA	**11,139**	**7.0**	50,969	3.2
AA-	**72,605**	**3.0**	51,386	4.5
A-	**43,773**	**3.6**	43,549	4.5
BBB+	**65,628**	**2.4**	64,705	3.3
BBB	**—**	**0.0**	—	0.0
BBB-	**29,706**	**1.9**	29,009	2.8
Total	**249,552**	**2.8**	281,082	3.3
Corporate Bonds				
AAA	**16,352**	**6.0**	14,852	5.7
AA+	**8,804**	**3.6**	8,684	4.5
AA	**10,050**	**4.1**	8,391	5.1
AA-	**47,452**	**4.6**	41,358	4.9
A+	**88,651**	**3.5**	90,527	4.1
A	**70,503**	**3.4**	55,764	3.0
A-	**152,782**	**3.1**	132,116	3.7
BBB+	**164,631**	**3.3**	119,510	3.4
BBB	**69,806**	**2.2**	74,035	2.6
BBB-	**13,373**	**1.1**	29,670	1.6
Total	**642,404**	**3.3**	574,907	3.6

The extent of the exposure to credit risk relating to investments is managed by the formulation of, and adherence to, an Investment Policy incorporating clearly defined investment limits and rules, as approved annually by the Board of Directors.

C3.1 Concentration risk

Concentration risk is the risk of loss due to over-dependence on a singular investment or category of business. The main concentration risks to which the Group is exposed, and how they are mitigated, are as follows:

- Exposure to a single country, counterparty or security as part of its sovereign or corporate bond portfolio. The Group mitigates this risk by placing limits on these exposures with its investment managers, which are continuously monitored.
- Exposure to a single counterparty as part of its cash and deposit holdings. The Group mitigates this risk by placing limits on its total exposures to banking counterparties as set out in the Group's Investment Policy, which is approved annually by the Board of Directors.
- While all of the Group's underwriting business is conducted in Ireland, with a significant focus on the farm-sector, it is spread over a wide geographical area with no concentration in any one county or region. The resultant concentration risk from adverse weather events, i.e. floods, storms or freezes in Ireland, are mitigated by a flood mapping solution and an appropriate reinsurance strategy.
- The reinsurance programme structure ensures that there is no significant concentration of risk.

Receivables have no significant concentration of risk.

C3.2 Risk sensitivity for credit risks

FBD carries out stress and scenario testing as part of the ORSA process which includes stress testing for the material credit risks. For the 2024 ORSA, the solvency position at 30 September 2024 and the projected solvency position over the business planning period were tested for high impact low likelihood adverse stresses.

The outcome of the stress and scenario tests is that in each case FBD would have sufficient available capital to continue to meet the SCR.

C4. Liquidity risk

The Group is exposed to daily calls on its cash resources, mainly for claims payments. The Group manages liquidity risk by continuously monitoring forecast and actual cash flows and ensuring that the maturity profile of its financial assets is well matched to the maturity profile of its liabilities and maintaining a minimum cash amount available on short term access at all times.

The following tables provide a maturity analysis of the Group's insurance and reinsurance contracts, which reflects the dates on which the cashflows are expected to occur. Liabilities for remaining coverage measured under the premium allocation approach have been excluded from this analysis.

2024 **FBD Holdings plc**	**Up to 1 year** **€000s**	**1-2 years** **€000s**	**2-3 years** **€000s**	**3-4 years** **€000s**	**4-5 years** **€000s**	**5+ years** **€000s**	**Total** **€000s**
Gross liability for incurred claims	197,705	122,576	85,150	58,973	38,752	58,045	561,201
Reinsurance liability for incurred claims	(26,761)	(11,161)	(8,724)	(6,578)	(4,959)	(14,475)	(72,658)

2023 **FBD Holdings plc**							
Gross liability for incurred claims	208,514	115,054	81,578	60,198	42,084	71,062	578,490
Reinsurance liability for incurred claims	(36,262)	(13,276)	(11,189)	(8,036)	(5,395)	(17,410)	(91,568)

2024 FBD Insurance plc	Up to 1 year €000s	1-2 years €000s	2-3 years €000s	3-4 years €000s	4-5 years €000s	5+ years €000s	Total €000s
Gross liability for incurred claims	197,705	122,576	85,150	58,973	38,752	58,047	561,203
Reinsurance liability for incurred claims	(26,761)	(11,161)	(8,724)	(6,578)	(4,959)	(14,475)	(72,658)

2023 FBD Insurance plc							
Gross liability for incurred claims	208,514	115,054	81,578	60,198	42,084	71,062	578,490
Reinsurance liability for incurred claims	(36,262)	(13,276)	(11,189)	(8,036)	(5,395)	(17,410)	(91,568)

The following tables summarise the maturity profile of financial assets and liabilities of the Group based on remaining undiscounted contractual cash flows, including interest receivable:

2024 FBD Holdings plc	Up to1 year €000s	1-2years €000s	2-3years €000s	3-4years €000s	4-5years €000s	5+years €000s	Total €000s
Cash and cash equivalents	152,320	—	—	—	—	—	**152,320**
Equity and debt instruments at FVTPL	80,654	—	—	—	—	52,113	**132,767**
Debt instruments at FVOCI	151,012	211,172	163,356	136,521	80,765	248,469	**991,295**
Deposits	—	—	—	—	—	—	**—**
Loans and other receivables	23,017	—	—	—	—	—	**23,017**
Other payables	43,066	—	—	—	—	—	**43,066**
Other provisions	14,398	—	—	—	—	—	**14,398**
Subordinated debt	2,500	2,500	2,500	2,500	50,000	—	**60,000**

2023 FBD Holdings plc	Up to1 year €000s	1-2years €000s	2-3years €000s	3-4years €000s	4-5years €000s	5+years €000s	Total €000s
Cash and cash equivalents	142,399	—	—	—	—	—	**142,399**
Equity and debt instruments at FVTPL	113,257	—	—	—	—	47,921	**161,178**
Debt instruments at FVOCI	90,819	147,730	224,171	160,665	125,548	209,771	**958,704**
Deposits	2,933	—	—	—	—	—	**2,933**
Loans and other receivables	17,786	—	—	—	—	—	**17,786**
Other payables	35,352	—	—	—	—	—	**35,852**
Other provisions	20,083	—	—	—	—	—	**20,083**
Subordinated debt	2,500	2,500	2,500	2,500	2,500	50,000	**62,500**

2024 FBD Insurance plc	Up to1 year €000s	1-2years €000s	2-3years €000s	3-4years €000s	4-5years €000s	5+years €000s	Total €000s
Cash and cash equivalents	127,575	—	—	—	—	—	**127,575**
Equity and debt instruments at FVTPL	80,654	—	—	—	—	52,112	**132,766**
Debt instruments at FVOCI	151,012	211,172	163,356	136,521	80,765	248,469	**991,295**
Loans and other receivables	17,800	—	—	—	—	—	**17,800**
Other payables	39,119	—	—	—	—	—	**39,119**
Other provisions	14,398	—	—	—	—	—	**14,398**
Subordinated debt	2,500	2,500	2,500	2,500	2,500	50,000	**60,000**

2023 FBD Insurance plc	Up to1 year €000s	1-2years €000s	2-3years €000s	3-4years €000s	4-5years €000s	5+years €000s	Total €000s
Cash and cash equivalents	145,284	—	—	—	—	—	**145,284**
Equity and debt instruments at FVTPL	113,257	—	—	—	—	47,920	**161,177**
Debt instruments at FVOCI	90,819	147,730	224,171	160,665	125,548	209,771	**958,704**
Loans and other receivables	17,800	—	—	—	—	—	**17,800**
Other payables	35,386	—	—	—	—	—	**35,386**
Other provisions	17,583					—	**17,583**
Subordinated debt	2,500	2,500	2,500	2,500	2,500	50,000	**62,500**

C4.1 Expected Profit included in Future Premium

The expected profit included in future premiums (EPIFP) is €4.9m net of reinsurance.

C4.2 Risk sensitivity for liquidity risks

FBD carries out stress and scenario testing as part of the ORSA process which includes liquidity assessments. In order to mitigate liquidity risk, FBD has set a Minimum Liquidity Requirement cash amount that it must hold at all times. A liquidity assessment was performed prior to approval of the special dividend. The results of this stress test concluded that the Company had sufficient funds available to meet liquidity requirements. FBD also has a recovery plan in place which sets out measures to be taken by FBD to restore its financial position or maintain its viability following a significant deterioration of its financial situation.

C5. Operational risk

Operational risk could arise as a result of inadequately controlled internal processes or systems, human error or from external events. Operational risks are regularly assessed against financial, operational, regulatory and reputational criteria. Operational risk is governed through business standards covering key processes. This is complemented by our Risk Management Framework that defines the structure in place to identify, measure, manage, monitor and report on operational risks and mitigating controls with defined risk tolerances and Key Risk Indicators (KRIs). There is a 'three lines of defence' system in place, with line management being primarily responsible for risk management, with extensive second and third line challenge over the operational control environment. The ORSA provides a scenario based approach to determine the appropriate level of capital to be held in respect of operational risks.

This definition is intended to include all risks to which the Group is exposed and that are not considered elsewhere. Hence, operational risks include for example, information technology, information security, human resources, project management, outsourcing, taxation, legal, fraud and regulatory risks. Business

Unit Management has primary responsibility for the effective identification, management, monitoring and reporting of operational risks which are overseen by the second- and third-line functions.

FBD Insurance plc is regulated by the Central Bank of Ireland and must ensure that it conducts its business in accordance with regulatory requirements at all times. FBD Insurance plc has no appetite for confirmed and quantified breaches of compliance with regulatory requirements and has an embedded Compliance Framework with regular reporting to the Board which provide assurance that compliance controls are operating effectively in the Group.

The success of the Group depends upon its ability to retain, attract, motivate and develop talent. FBD are committed to providing employees at all levels with appropriate training, development and education relevant to their role. Training needs are identified through performance management and operational planning. A Talent Management and Succession Plan is in place and reviewed regularly. This ensures that FBD develops and retains key talent and is best placed to replace key roles in a seamless manner should the need arise.

The Group relies significantly on information technology to support the business and as such may be susceptible to risks associated with information security, be that through security breaches, cyber-attacks or other failures or malfunctions. Information technology controls are in place across the Group, including a dedicated IT security team with overall responsibility for managing information technology security standards, which together with on-going employee training and regular cyber-risk reviews are used to mitigate such information technology risks.

In addition, the Group has taken significant steps to minimise the impact of Business Interruption that could result from a major external event. Formal Business Continuity and Disaster Recovery plans are in place for both workspace recovery and retrieval of communications, IT systems and data. If a major event occurs, these plans will enable the Group to either move the affected operations amongst its various sites or invoke remote working from home. FBD carries out two minor and one major Business Continuity/Disaster Recovery exercises per year. An Operational Resilience Framework has been developed incorporating important business services and associated impact tolerances.

C5.1 Risk sensitivity for operational risks

FBD carries out stress and scenario testing as part of the ORSA process which includes stress testing for the material operational risks. For the 2024 ORSA, the solvency position at 30 September 2024 and the projected solvency position over the business planning period were tested for high impact low likelihood adverse stresses. The stress and scenarios chosen has taken into account the material operational risks facing the Group including cyber and IT risk.

The outcome of the stress and scenario tests is that in each case FBD would have sufficient available capital to continue to meet the SCR.

C6. Other material risks

C6.1 Strategy Risk

Strategy risk is a risk that the strategy adopted by the Board is incorrect or not implemented appropriately resulting in sub-optimal performance and impact on profitability. The Group has a strategic planning cycle which commences with a fundamental review of strategy at least every 5 years. Further supporting this is an annual review of the strategy by the Board to determine the continuing relevance. To ensure the strategy is implemented effectively, the Group engages in a robust business planning and review process that results in an annual plan including key initiatives and budget along with the development of a Strategic Risk Policy.

The Group also has a 2025-2029 Strategy in place which notes the importance of developing a clear ESG strategy, as well as having defined metrics and targets to ensure FBD is making a meaningful impact on wider ESG considerations.

C6.2 Reputational Risk

Reputational risk is the risk of reputational or brand damage arising from inadequate or failed processes and systems or badly executed strategy/poorly executed communication. The Group's Board and senior management set the ethical and behavioural tone for the Group. In support of this a number of Group policies are utilised which influence employee behaviour, including a Reputational Risk Policy, Fitness & Probity Policy, an Anti-Fraud Policy, Code of Conduct Policy, Conflicts of Interest Policy and a Speak Up Policy.

The Group has established a Corporate Governance Framework which is in full compliance with the requirements of the Central Bank of Ireland's Corporate Governance Requirements for Insurance Undertakings and the UK Corporate Governance Code 2018 Irish Annex. The Group has aligned its Environmental, Social and Governance (ESG) initiatives to assist it focus and influence on improving the lives of our customers and wider Irish society.

Reputation, integrity and character of persons are key considerations in establishing business arrangements and throughout the life of the relationship. Independent customer satisfaction research is undertaken and customer complaints are dealt with efficiently to ensure the quality of products and services offered to customers. The Group's claims philosophy is to be "Fair to the customer and fair to FBD". This philosophy guides the Claims function in its handling of all customer claims. The Group has a Sustainability Committee that reports into the Board through the CEO and the Group has a company wide ESG strategy which they will implement over the coming years. The UN Principles for Sustainable Insurance will continue to guide our sustainability related goals, delivered by the business through the clearly defined pillars of our ESG strategy.

C6.3 Climate Risk

The management of climate risk is strategically important to FBD, from both a commercial and stakeholder perspective. It is an area of focus for the Group and under active consideration, particularly, physical risks to property and person from variable weather patterns and long-term climate change and transition risks from the process of adjustment to a low carbon economy.

The Group selected the Central Banks and Supervisors Network for Greening the Financial System (NGFS) framework as the most appropriate framework from which to choose a baseline scenario. Following due consideration of each scenario under the NGFS scenario framework, the current climate change path and progress made, and the climate change outlook, the Group selected the Nationally Determined Contributions (NDC) scenario as its baseline scenario.

In addition to the NDC scenario, analysis has been performed on two additional scenarios (Net Zero 2050 and Delayed Transition) and implications between scenarios have been considered. The appropriateness of the baseline scenario will be reviewed annually. A Double Materiality Assessment (DMA) has been performed and has identified key climate-related risks and opportunities (ROs). These ROs have been qualitatively assessed in the context of the selected climate change scenarios (i.e., NDC, Net Zero 2050, Delayed Transition) and over the Group's defined time horizons. The Group will perform periodic assessments to assess the materiality of climate change exposures at a Group level. Climate risk has been considered as part of capital planning during the ORSA process.

The appropriateness of the risks and controls related to Climate Risk, including the potential risks, time horizon and double materiality impact are assessed on a quarterly basis via the Risk and Control Self-Assessment (RCSA) process. The Group has a Sustainability Committee that reports to the Board through the CEO and the Company has agreed a companywide ESG strategy which they will implement over the coming years. The Group has followed the guidance issued by the Central Bank of Ireland (CBI) "Guidance for (Re)Insurance Undertakings on Climate Change Risk".

C6.4 Consumer Risk

Consumer risk is the risk that the Group does not treat consumers fairly resulting in unsatisfactory consumer outcomes. The Consumer Risk Framework is a subset of the Risk Management Framework and utilises the same structures and processes in place to identify, assess, monitor, manage and report risk. The objective of the Consumer Risk Framework is to provide a systematic, effective and efficient way for managing consumer risk in the Group and to ensure it is consistent with the overall business strategy and the risk appetite of the Group.

The Group has a Consumer and Culture Committee that facilitates review and challenge on consumer and culture risk information received from the business areas. This includes but is not limited to consumer risks, consumer risk appetite, monitoring key consumer risk metrics and trends. The Group has a 2025-2029 Strategy in place which notes that it's the Group's ambition to be a customer-led organisation, delivering quality products and levels of service to our customers. In support of this Strategy a number of Group policies are utilised which mitigates consumer risk, including a Product Oversight and Governance Policy, Code of Conduct Policy, Vulnerable Customer Policy and Data Protection Policy.

C6.5 Reinsurance Risk

Reinsurance risk is the risk that the Reinsurance programme will not be effective in restricting loss from claims due to an inappropriate structure being put in place caused by failed decision-making processes or from events occurring outside of standard modelling processes resulting in a material impact on the solvency of the Group or failure to assist the Group in reducing fluctuations in financial results.

The Group purchases reinsurance protection to limit its exposure to single claims and the aggregation of claims from catastrophic events. The Group's reinsurance programme is approved by the Board on an annual basis. FBD has purchased a reinsurance programme which has been developed to meet the local domestic risk profile and tailored to FBD's risk appetite. The programme protects Motor, Liability, Property and other classes against both individual large losses and events.

C6.6 Inflation and Geopolitical Risk

The worst of the inflation shock appears to have passed, albeit with inflation rates expected to settle above their pre-pandemic level, with the global economy proving unusually resilient throughout the disinflationary process thus far. Central banks have now switched their focus to a monetary easing process although the US has lagged in this regard as strong growth has been accompanied by more persistent inflation. In Ireland, headline inflation is forecast to average 1.8% over the next three years with domestically driven services inflation being the main contributor. Most measures of underlying inflation suggest that Eurozone inflation will settle at around the Governing Council's 2% medium-term target on a sustained basis. Domestic Eurozone inflation has edged down but remains high, mostly because wages and prices in certain sectors are still adjusting to the past inflation surge with a substantial delay. The ECB cut interest rates four times in 2024 and two times in the first quarter of 2025 and is projected to make another two cuts in 2025 for a terminal rate of 2%, although weakening growth prospects suggest this could go lower. The Group is exposed to interest rate fluctuations through the bond portfolios although the impact of any unexpected rises may be offset by the unwind of the accumulated losses from the 2022 shock as these bonds approach maturity.

The high level of inflation during 2024 has a resultant impact on reserving for future claims and pricing of written business. The Group's Actuarial team is continually monitoring the rate of inflation for the purposes of reserving and pricing. During 2024 there was significant inflation in relation to property claims. This was primarily driven by an increase in the proportion of higher value subsidence and flood claims. Following constant monthly increases post Covid-19, there was some stabilisation in average Motor Damage costs during 2024. The Group's Claims team are closely monitoring the effects of inflation on Property and Motor Damage claims with reporting and analysis in monthly business review meetings and regular reporting to senior management.

Geopolitical risks and market impacts have increased due in large part to the unpredictability of the Trump administration's approach to international and trade relations. The unilateral manner in which they have dealt with geopolitical issues in the Middle East and Russia/Ukraine has led to extreme measures being taken by allies to secure their own defence. Similarly, the approach to economic issues including external tariffs and domestic cost-cutting has created high levels of uncertainty and impacted business and consumer confidence as well as stoking inflation and causing a number of recession indicators to flash warning signals. Ireland as a small open economy is particularly exposed to impacts of a global trade war or a downturn in the US economy as the US is the largest single bi-lateral trading partner and largest source of foreign direct investment. The intent to rebalance the global taxation landscape in the US' favour poses risks to corporation tax receipts that are heavily reliant on US multi-nationals. Endeavours to end the major conflicts in the Middle East and

Ukraine carry risks of escalation if agreements are not reached. An escalation in these risks may impact the Group in the form of market, economic and inflation risk.

C6.7 Emerging Risks

An emerging risk is a risk which may or may not develop, is difficult to quantify, may have a high loss potential and is marked by a high degree of uncertainty. We have a defined process in place for the identification of and response to emerging risks, which is informed through the use of subject matter experts, workshops, Risk and Control Self-Assessments and consulting a range of external resources.

Key emerging risks are monitored regularly by the Board and Risk Committees to assess whether they might become significant for the business and require specified action to be taken.

Key Emerging Risks include:

- An increased frequency of cyber-attacks, and the impact that these factors may have on society's future insurance needs and claims types and frequencies.
- Accelerated adoption and advances in the use and misuse of artificial intelligence.
- Restricted data sharing due to retention of driver analytics by manufacturers enabling them to offer insurance as part of the vehicle price.
- There is a risk of mass disease which may cross species resulting in a negative impact on the economy and FBD's agricultural customers.
- Technological advances changing the shape of the insurance industry and competitive environment.
- Changes to motor vehicle ownership where there is a significant increase in fleet owners/shared ownership in urban areas.
- Global deterioration in economic conditions and particularly in Ireland may lead to a reduction in revenue and profits.
- Global socio-political uncertainty that may cause an adverse impact on profitability.
- Evolving regulatory and legislative landscape.
- Due to greater numbers of electric cars, there is an increased use in lithium-ion rechargeable batteries which can present a higher risk of fire.

C6.8 Off Balance Sheet positions

The Group does not have any risk exposure arising from Off Balance Sheet positions.

C6.9 Special Purpose Vehicles

The Group does not have any risk exposure arising from Special Purpose Vehicles.

C7. Any other information

No other material information to be disclosed.

D. Valuation for Solvency Purposes

This section contains information regarding the valuation of the Balance Sheet items. For each material asset class the bases, methods and main assumptions used for valuation for solvency purposes are described. Each material class of asset includes a quantitative and qualitative explanation of any material difference between the valuation for solvency purposes and the valuation in the financial statements. There are some small rounding differences as the figures are agreed to the Quantitative Reporting Templates (QRTs) prepared at a more granular level.

FBD Holdings plc Balance Sheet	**Solvency II value 31 December 2024 €000s**	**IFRS 31 December 2024 €000s**
Intangible assets	-	36,789
Deferred tax assets	6,221	-
Pension benefit surplus	-	6,393
Property, plant & equipment held for own use	23,139	23,139
Policy Administration System	1,930	10,750
Property (other than for own use)	11,300	11,300
Right of use assets	2,741	2,741
Financial Assets – Equities	1,149	1,149
Financial Assets – Government Bonds	251,920	249,552
Financial Assets – Corporate Bonds	647,814	642,404
Financial Assets – Collective investment schemes	202,979	131,618
Deposits (including cash and cash equivalents)	83,213	152,320
Loans and mortgages	386	386
Reinsurance recoverables	111,882	75,096
Reinsurance receivables	2,577	-
Receivables (trade, not insurance)	11,041	9,858
Any other assets, not elsewhere shown	5,138	12,773
Total assets	**1,363,430**	**1,366,268**

	Solvency II value 31 December 2024 €000s	**IFRS 31 December 2024 €000s**
Technical provisions- non- life	788,760	767,852
Provisions other than technical provisions	14,328	14,398
Deferred tax liabilities	2,184	560
Payables (trade, not insurance)	51,374	44,495
Lease liability	3,056	3,056
Subordinated liabilities	50,000	49,780
Total liabilities	**909,702**	**880,141**
Excess of assets over liabilities	**453,728**	**486,127**

FBD Insurance plc Balance Sheet	Solvency II value 31 December 2024 €000s	IFRS 31 December 2024 €000s
Intangible assets	-	36,789
Deferred tax assets	6,875	-
Pension benefit surplus	-	4,094
Property, plant & equipment held for own use	16,374	16,374
Policy Administration System	1,930	10,750
Property (other than for own use)	15,452	15,453
Right of use assets	2,534	2,534
Financial Assets – Equities	1,148	1,148
Financial Assets – Government Bonds	251,920	249,552
Financial Assets – Corporate Bonds	647,814	642,404
Financial Assets – Collective investment schemes	187,504	131,618
Deposits (including cash and cash equivalents)	71,591	127,575
Loans and mortgages	47	47
Reinsurance recoverables	111,882	75,096
Reinsurance receivables	2,577	-
Receivables (trade, not insurance)	9,543	8,316
Any other assets, not elsewhere shown	5,076	12,706
Total assets	**1,332,267**	**1,334,456**

	Solvency II value 31 December 2024 €000s	IFRS 31 December 2024 €000s
Technical provisions – non- life	788,760	767,851
Provisions other than technical provisions	14,328	14,398
Deferred tax liabilities	3,188	621
Payables (trade, not insurance)	45,503	40,931
Lease liability	2,829	2,829
Subordinated liabilities	50,000	49,780
Total liabilities	**904,608**	**876,410**
Excess of assets over liabilities	**427,659**	**458,046**

D1. Assets

Solvency II Valuation for each material class of asset is listed below. The FBD Holdings plc (Group) financial statements and FBD Insurance plc (Company) financial statements are prepared in line with IFRS. The differences in the financial statement valuations to Solvency II are detailed below.

D1.1 Intangible Assets

Intangible assets are valued at cost less accumulated amortisation and less any accumulated impairment losses. Intangible assets comprise computer software and these assets are amortised over expected useful lives on a straight-line basis over a five-year period. Intangible assets are not recognised in the Solvency II framework and are therefore removed under Solvency II.

D1.2 Deferred Tax Asset

The Group has recognised a deferred tax asset under Solvency II, and a deferred tax liability under IFRS. This is mainly due to the impact of January 2025 weather events which have been included in Solvency II calculations as foreseeable events. Under IFRS deferred tax assets and liabilities are shown on a net basis, however under Solvency II deferred tax assets and liabilities are shown separately.

D1.3 Pension Benefit Surplus

The pension surplus is not recognised in the Solvency II framework and is therefore removed.

D1.4 Property, plant and equipment

D1.4.1 Property

In the Group, Property (other than for own use) comprises of an investment property held for rental in Ireland. In the Company there are additional properties occupied by Group companies recognised as Property (other than for own use).

Properties were valued at fair value at 31 December 2024 by independent external professional surveyors, CB Richard Ellis, Valuation Surveyors. The valuation was prepared in accordance with RICS Valuation – Global Standards 2022 (Red Book) incorporating the IVSC International Valuation Standards issued January 2022. The valuers confirm that they have sufficient current local and national knowledge of the particular property market involved and have the skills and understanding to undertake the valuations competently.

The valuation statement received from the external professional valuers state that the valuations have been prepared on the basis of "Market Value" which they define as "the estimated amount for which a property should exchange on the date of valuation between a willing buyer and a willing seller in an arm's-length transaction after proper marketing wherein the parties had each acted knowledgeably, prudently and without compulsion".

D1.4.2 Plant and equipment

Plant and equipment is stated in the IFRS financial statements at cost less accumulated depreciation and accumulated revaluation profits/(losses). Plant and equipment is stated at fair value under Solvency II as assessed by the Board on an annual basis. FBD Holdings plc has higher property, plant and equipment held for own use than the Company as it includes the properties occupied by the Group companies.

Depreciation is provided in respect of all plant and equipment and is calculated to write off the cost or valuation of the assets over their expected useful lives. The useful life of plant and equipment is estimated to be three to ten years dependent on the asset. Depreciation on assets in development commences when the assets are ready for their intended use.

D.1.4.3 Policy Administration System

Under IFRS the Policy Administration System is stated at cost less accumulated amortisation and accumulated impairment losses. Amortisation is provided in respect of the Policy Administration System and is calculated in order to write off the costs incurred to date, over its remaining useful life which is determined to be 1.5 years on a straight-line basis. The Policy Administration System is reported under Solvency II at €1.9m with no value given to the database, middleware and policy administration application for Solvency II purposes.

D1.5 Right of Use Assets

On adoption of IFRS 16, the Group recognised a lease liability and a right of use asset for each of the leases which had previously been classified as 'operating leases' under the principles of IAS17 Leases. The right of use assets were measured at the amount equal to the lease liability, adjusted by the amount of any prepaid or accrued lease payments relating to that lease recognised in the IFRS Statement of Financial Position at 31 December 2024. There were no onerous lease contracts that would have required an adjustment to the right of use assets at the date of initial application. There is no difference between the IFRS valuation and the Solvency II valuation.

D1.6 Financial Assets

Financial assets are quoted investments in active markets which are stated at fair value. They are recognised on a trade date basis at fair value and are revalued at subsequent reporting dates at fair value, using the closing bid price.

The Group assumes that the quoted closing bid price for these assets is the price that would be achievable had the assets been sold at the time of valuation.

The total value of the financial assets in the financial statements is the same as the Solvency II valuation, however there are some classification differences in the reporting of the assets. Certain corporate bonds in the financial statements are classified as government bonds for Solvency II.

Accrued income on bonds is reflected on the bond line for Solvency II but is shown in other assets in the financial statements.

D1.7 Deposits, cash and cash equivalents

Cash and cash equivalents comprise cash on hand, demand deposits and money market funds with maturities of 95 days or less held for the purpose of meeting short-term cash commitments rather than for investment or other purposes. Deposits with banks and cash and cash equivalents are valued at amortised cost. The money market funds are valued at fair value through profit and loss. The Directors believe that this represents fair value and that the above values are the recoverable amounts. Accrued interest on deposits and accrued interest on cash and cash equivalents are reflected in the deposits and cash and cash equivalent lines for Solvency II but are shown in other assets in the Group and Company financial statements.

D1.8 Trade receivables

Trade receivables are valued at amortised cost using the effective interest rate method. The Directors believe that this represents fair value and that the above values are the recoverable amounts. There is no difference between the IFRS valuation and the Solvency II valuation.

D1.9 Any other assets, not elsewhere shown

As described in above sections, accrued income and accrued interest are included in Any other assets for IFRS however for the Solvency II valuation accrued income and accrued interest are reflected in the Bond lines and Cash/Deposit lines respectively.

D1.10 Reinsurance recoverables

Reinsurance recoverables are stated at a discounted best estimate value in line with Solvency II rules.

D1.11 Reinsurance receivables

Reinsurance receivables relate to expected receivables from reinsurers at the reporting date. Under IFRS these amounts are included in reinsurance technical provisions.

D2. Technical provisions

D2.1 Technical Provision by material line of business

The table below shows the Technical Provisions as at 31 December 2024 by line of business. FBD Holdings plc and FBD Insurance plc (both prepared under IFRS) have the same Technical Provisions listed below.

Technical Provisions 2024	Motor vehicle liability insurance €000s	Other motor insurance €000s	Fire and other damage to property insurance €000s	General liability insurance €000s	Other insurance €000s	Total €000s
Gross Best Estimate Liab.	288,094	32,649	167,199	258,480	8,473	754,895
Risk Margin	11,452	3,135	5,339	13,427	512	33,865
Gross Technical Provisions	**299,546**	**35,784**	**172,538**	**271,907**	**8,985**	**788,760**
Recoverables	(42,337)	-	(57,378)	(12,167)	-	(111,882)
Net Technical Provisions	**257,209**	**35,784**	**115,160**	**259,740**	**8,985**	**676,878**

Technical Provisions 2023	Motor vehicle liability insurance €000s	Other motor insurance €000s	Fire and other damage to property insurance €000s	General liability insurance €000s	Other insurance €000s	Total €000s
Gross Best Estimate Liab.	307,909	27,976	92,722	250,309	9,141	688,057
Risk Margin	10,691	2,672	4,363	12,762	525	31,013
Gross Technical Provisions	**318,600**	**30,648**	**97,085**	**263,071**	**9,666**	**719,070**
Recoverables	(57,889)	-	(12,834)	(9,305)	(21)	(80,049)
Net Technical Provisions	**260,711**	**30,648**	**84,251**	**253,766**	**9,645**	**639,021**

D2.2 Methodology

The Company values Technical Provisions using the methodology prescribed by the Solvency II Directive and the regulations made under the Directive.

The Company uses homogeneous risk groups in the calculation of Technical Provisions. The groupings are based on the type of business giving rise to the claim (Line of Business) and the size of the claim. When determining groupings, the credibility of data is balanced against homogeneity. The modelling approach for each group is similar, though assumptions may vary.

Claims provisions represent the estimation of the cost of claims outstanding under insurance contracts written. Actuarial techniques such as Chain Ladder Methods, Bornhuetter-Ferguson methods, Frequency Severity Methods, Cashflow projections and loss ratio methods which form part of a statistical analysis of past experience are used to calculate the estimated cost of claims outstanding at year end. The key uncertainties which have been addressed within the methodologies above or adjustments to these methods are Inflation and the Personal Injuries Guidelines.

At 31 December 2024 an allowance was included within the Premium Provision of the estimate impact of the January 2025 weather events. This estimate was carried out by reference to development patterns from historic weather events.

Ultimate gross claims for earned premium are converted to net of reinsurance utilising reinsurance treaty information. At the valuation date 31 December 2024, the Company had both incepted unearned business and business that was bound but not incepted. The ultimate gross claims, expenses and reinsurance recoveries for the unearned business are taken from the Company's premium reserve model. This is a deterministic model that calculates ultimate loss and expense ratios on a gross and net basis.

Reserves are added to liabilities in respect of earned and unearned business to account for events that may occur but have not been seen historically. A binary modelling approach using frequency and severity expectations around each event is used to determine reserves.

Best estimate of the claims, premiums and expense cash flows are discounted to give best estimate liabilities. A risk margin is added to best estimate liabilities to arrive at the Technical Provisions. Under IFRS, FBD defers certain acquisition cashflows. This is not recognised in the Solvency II framework and is therefore removed under Solvency II.

D2.3 Key areas of uncertainty

D2.3.1 Estimation of outstanding loss reserves ("OSLR")

While information about claims is generally available, assessing the cost of settling the claim is subject to some uncertainty.

The calculations are particularly sensitive to the estimation of the ultimate cost of claims for each class of business and the estimation of future claims handling costs. Actual claims experience may differ from the assumptions on which the actuarial best estimate is based and the cost of settling individual claims may exceed that assumed.

The actual amount recovered from reinsurers is sensitive to the same uncertainties as the underlying large claims. To the extent that the underlying claim settles at a lower or higher amount than that assumed will have a direct influence on the associated reinsurance asset.

D2.3.2 Estimation of losses relating to claims

Estimation of the losses relating to claims which have been incurred but not reported ("IBNR") is generally subject to a greater degree of uncertainty than estimating the OSLR since the nature of the claims is not known at the time of reserving.

D2.3.3 Unexpired Risks

Estimation of claims arising on business which has not yet expired ("unexpired risks") is uncertain as the claims have not yet been incurred but are expected to be incurred on the business which the Company has written.

D2.3.4 Market environment

Changes in the market environment increase the inherent uncertainty affecting the business. In particular, claims inflation and the Personal Injuries Guidelines have impacted the market environment in recent years and may impact the market environment in the coming years.

D2.3.5 Events not in data ('ENID loading')

Estimating a provision for events not in data is subject to considerable uncertainty as the events being considered have not been observed.

D2.3.6 Run-off expenses

The estimation of the change in expense base for run-off of the Company is inherently uncertain due to the estimations around the period of the run-off, base costs and inflation.

D2.3.7 Risk Margin

The Risk Margin, being the margin payable to transfer the business to another insurance carrier, is uncertain due to the requirement to forecast future solvency capital requirements over the period of a run-off. This therefore shares the same uncertainties of the run-off expenses provision considered at D.2.3.6, as well as the inherent uncertainties around forecasting future solvency capital requirements.

D2.4 Risk Management

The Group manages the risks around these uncertainties via the following actions:

- On-going monitoring of claims, including regular reviews of claims handling functions;
- Maintaining a number of reinsurance arrangements to limit the impact of adverse claims development;
- Internal controls through the Reserving Committee and Actuarial Function which monitor claims development and reinsurance arrangements; and
- Regular external actuarial reviews.

D2.5 Transition from IFRS to Solvency II

The changes required to transition from IFRS accounts to Technical Provisions for solvency purposes are consistent for all lines of business and are noted below.

D2.5.1 Claims provisions

The Company makes adjustments in line with section D2.5.5 below to the projected claims provisions used in its IFRS accounts in recording the claims provisions for solvency purposes. Gross claims provisions as at 31 December 2024 are €567.9m.

D2.5.2 Reinsurance share of claims provisions

The Company makes adjustments in line with section D2.5.5 below to the reinsurance recoveries in its IFRS accounts in recording the reinsurance share of claims provisions for solvency purposes. The reinsurance share of claims provisions as at 31 December 2024 is €67.4m.

D2.5.3 Unexpired risks

The Group has estimated the claims which will be payable on unexpired risks, termed "premium provisions", based on the ultimate loss and expense ratios from the claims provisions and premium rate adjustments related to the unearned book of business. Gross premium provisions as at 31 December 2024 are €187.0m. The net premium provisions as at 31 December 2024 are €142.6m. The premium provisions have increased considerably at year-end 2024 compared to the prior year-end to allow for weather events of January 2025.

D2.5.4 Risk Margin

The Risk Margin has been considered to ensure that the value of the Technical Provisions is equivalent to the amount that would be expected to have to be paid to a third-party insurance company in order to take over and meet the insurance obligations of the Company. The Risk Margin has been calculated based on the estimated capital requirements to run-off the Company's obligations and applying a cost of capital of 6%.

The Risk Margin is calculated using a simplified method allowed under Article 58 of Commission Delegated Regulation 2015/35. The capital required to run-off the portfolio is based on the future estimated SCRs, taking account of underwriting risk, reinsurance counterparty risk and operational risk. The Company approximates the whole SCR for each future year by using a ratio of the best estimate liabilities at each future year to the best estimate liabilities at the valuation date. This results in a Risk Margin of €33.9m.

D2.5.5 Other

Other than the ENID, expenses and discounting adjustments already mentioned above, the Company has made further adjustments for cheques outstanding, premium rebates (if any), outstanding reinsurance balances, reinstatement premiums and counterparty default.

D2.6 Adjustments not applied

The Company has not applied the matching adjustment, volatility adjustment, transitional risk-free interest term structure or the transitional deduction in calculating its Technical Provisions.

D2.7 Changes in Assumptions

The ultimate cost of claims continues to be adjusted for the impacts of inflation and Personal Injuries Guidelines. The assumptions for these external factors were revised at year-end 2024 in light of the recommendation made by the by the Judicial Council to the Minister for Justice that the awards made under the Personal Injuries Guidelines be uplifted by 16.7%.

D2.8 Special Purpose Vehicles

The Company does not have any Special Purpose Vehicles.

D3. Other liabilities

D3.1 Provision other than Technical Provisions

Provisions other than Technical Provisions include a provision for Motor Insurers' Bureau of Ireland ("MIBI"), Motor Insurers' Insolvency Compensation Fund ("MIICF") net of small reductions in previous periods. The provisions are included under IFRS at fair value and are not discounted. The MIBI provision is discounted for the Solvency II valuation.

D3.2 Deferred Tax Liabilities

The Group and the Company have recognised a deferred tax liability under Solvency II. Under IFRS deferred tax assets and liabilities are shown on a net basis however they are shown separately under Solvency II.

D3.3 Payables (trade, not insurance)

Payables (trade, not insurance) and debts owed to credit institutions as they are held at fair value under IFRS and Solvency II. The difference between the two is due to outstanding payments being included in Cash and Cash Equivalents under IFRS but in payables under Solvency II.

D3.4 Lease liability

On adoption of IFRS 16, the Group recognised a lease liability and a right of use asset for each of the leases which had previously been classified as 'operating leases' under the principles of IAS17 Leases. The right of use assets were measured at the amount equal to the lease liability, adjusted by the amount of any prepaid or accrued lease payments relating to that lease recognised in the IFRS Statement of Financial Position as at 31 December 2024. There were no onerous lease contracts that would have required an adjustment to the right of use assets at the date of initial application. There is no difference between the IFRS valuation and the Solvency II valuation.

D3.5 Subordinated liabilities

The amount relates to €50,000,000 Callable Dated Deferrable Subordinated Notes due 2028. The coupon rate on the notes is 5%. Finance costs recognised in the Consolidated Income Statement total €2,556,000 in 2024 (2023: €2,559,000). Finance costs are made up of interest costs associated with the subordinated notes totalling €2,500,000 (2023: €2,500,000) which were incurred and recognised in the year, amortisation in the year of €59,000 (2023: €59,000) and adjusted for accrued amounts at each year end, €nil in 2024 (2023: €nil).

	2024 €000s	**2023 €000s**
Balance at 1 January	**49,721**	49,662
Amortised during the year	**59**	59
Balance at 31 December	**49,780**	49,721

All figures stated in the table above are IFRS values.

D3.6 Reconciliation of Total Liabilities to Solvency II Balance Sheet

The following are the material movements for the Group;

- Technical Provisions, Deferred tax liabilities and Subordinated Liabilities are revalued for the Solvency II valuation as explained above.
- Provisions other than Technical Provisions include a Solvency II reclassification and are also subject to discounting for the Solvency II valuation.

The following are the material movements for FBD Insurance plc;

- Technical Provisions, Deferred tax liabilities and Subordinated Liabilities are revalued for the Solvency II valuation as explained above.
- Provisions other than Technical Provisions include a Solvency II reclassification and are also subject to discounting for the Solvency II valuation.

D4. Alternative methods for valuation

The Group does not use any alternative valuation methods.

D5. Any other information

No other material information to be disclosed.

E. Capital Management

E1. Own funds

E1.1 Objectives, policies and processes for managing own funds

The solvency objective is to ensure that the Group has and will have in the future sufficient capital to pay its policyholders and all other creditors in full as these liabilities fall due. This means the Group must hold an appropriate amount and quality of capital to meet regulatory requirements as well as a buffer relevant to the specific capital needs given its risk profile, financial condition, business model and strategies, overall complexity, sensitivity to changing conditions and other factors that may arise from time to time. The Group believes that maintaining a strong capital position is imperative to being able to continue to operate through periods of severe stress.

FBD measures and calculates capital using the Standard Formula. The Solvency Capital Requirement (SCR) measures the amount of capital which is required to be held to cover a 1/200 year event over a 1-year horizon and reflects the risk profile of the Group. The MCR, lower than the SCR, is the minimum level of regulatory capital required.

The ORSA considers the key risks associated with managing own funds. It reviews the Group's Capital Risk Appetite. The Risk Appetite sets a desired level of own funds that ensures a level of SCR coverage where the likelihood of a Regulatory breach is low. The ORSA also includes SCR projections that assist in managing own funds over the business planning period.

The Medium-Term Capital Management Plan is updated at least annually in accordance with the most up to date SCR calculations and capital position is monitored on an on-going basis with regard to performance and emerging trends. Any issues arising are highlighted to the Executive Management Team (EMT) and the Board as appropriate. As part of the overall strategy the Group prepares financial forecasts over the business planning period. These financial forecasts include projected Solvency Capital Ratios and are presented to both the EMT and the Board.

The Group has a Recovery Plan. The Recovery Plan details a list of feasible recovery options that could be used to increase own funds after a stress event. The Recovery Plan also includes a set of Recovery Indicators that are designed to identify emerging stresses so that management actions can be taken early reducing any impact on own funds.

E1.2 Information on the structure, amount and quality of own funds

FBD Holdings plc	Tier 1 €000s	Tier 2 €000s	Tier 3 €000s	Total €000s
1 January 2024	420,772	52,923	2,412	476,107
Movement during year	(10,184)	-	1,625	(8,559)
31 December 2024	**410,588**	**52,923**	**4,037**	**467,548[1]**
Eligible amount to cover the SCR	**410,588**	**52,923**	**4,037**	**467,548**
Eligible amount to cover MCR	**410,588**	**19,752**	**-**	**430,340**
1 January 2023	426,137	52,923	2,135	481,195
Movement during year	(5,365)	-	277	(5,088)
31 December 2023	**420,772**	**52,923**	**2,412**	**476,107[2]**
Eligible amount to cover the SCR	**420,772**	**52,923**	**2,412**	**476,107**
Eligible amount to cover MCR	**420,772**	**18,100**	**-**	**438,872**

1 Own funds available to cover SCR have been reduced by the foreseeable dividends of €36.2m.
2 Own funds available to cover SCR have been reduced by the foreseeable dividends of €36.1m and share repurchase of €4.0m.

FBD Insurance plc	Tier 1 €000s	Tier 2 €000s	Tier 3 €000s	Total €000s
1 January 2024	404,492	50,635	1,781	456,908
Movement during year	(17,335)	-	1,906	(15,429)
31 December 2024	**387,157**	**50,635**	**3,687**	**441,479[1]**
Eligible amount to cover the SCR	**387,157**	**50,635**	**3,687**	**441,479**
Eligible amount to cover MCR	**387,157**	**19,752**	**-**	**406,909**
1 January 2023	406,720	50,635	1,688	459,043
Movement during year	(2,228)	-	93	(2,135)
31 December 2023	**404,492**	**50,635**	**1,781**	**456,908[2]**
Eligible amount to cover the SCR	**404,492**	**50,635**	**1,781**	**456,908**
Eligible amount to cover MCR	**404,492**	**18,100**	**-**	**422,592**

1 Own funds available to cover SCR have been reduced by the foreseeable dividends of €36.2m.

2 Own funds available to cover SCR have been reduced by the foreseeable dividends of €35.9m.

E.1.2.1 Ordinary share capital

FBD Holdings plc has fully paid-up ordinary share capital of €21.8m (2023: €21.7m). FBD Insurance plc has fully paid-up ordinary share capital of €74.2m (2023: €74.2m). This is available to fully absorb losses, and in the case of winding up, ranks behind all other obligations. This share capital satisfies all the requirements of Tier 1 own funds as set out in article 71 of the Commission Delegated Regulations (EU) 2015.

E.1.2.2 Reconciliation reserve

The reconciliation reserve is equal to the total excess assets over liabilities reduced by the other basic own fund items. The reconciliation reserve is fully available to absorb losses.

FBD Holdings plc	2024 €000s	2023 €000s
Excess of assets over liabilities	**453,727**	466,247
Foreseeable dividends, distributions and charges	**(36,179)**	(40,139)
Other basic own fund items*	**(44,957)**	(38,782)
Reconciliation reserve	**372,591**	387,326

** Other basic own fund items for 2023 has been adjusted to include Share Premium as per IFRS reporting as it satisfies all the requirements of Tier 1 own funds as set out in article 71 of the Commission Delegated Regulations (EU) 2015.*

FBD Insurance plc	2024 €000s	2023 €000s
Excess of assets over liabilities	**427,658**	442,765
Foreseeable dividends, distributions and charges	**(36,179)**	(35,857)
Other basic own fund items	**(78,509)**	(76,602)
Reconciliation reserve	**312,970**	330,306

E1.2.3 Preference share capital

FBD Holdings plc has fully paid-up preference share capital of €2.9m (2023: €2.9m). FBD Insurance plc has fully paid-up preference share capital of €0.6m (2023: €0.6m). It is available to fully absorb losses, and in the case of winding up, ranks behind all other obligations with the exception of ordinary share capital. It satisfies all the requirements of Tier 2 own funds as set out in article 73 of the Commission Delegated Regulations (EU)

2015. It does not fully meet the requirements to be classified as Tier 1 capital, as they do not comply with article 71, part 4(d), whereby there is an obligation to make a distribution on the preference share capital if a distribution has been made on the ordinary share capital of the Group.

E1.2.4 Subordinated Liabilities

Included within Tier 2 of both FBD Holdings plc and FBD Insurance plc €50,000,000 of Callable Dated Deferrable Subordinate Notes due 2028. The agreed coupon for the notes is 5%. This subordinated bond satisfies all the requirements of Tier 2 own funds as set out in article 73 of the Commission Delegated Regulations (EU) 2015.

E1.2.5 Ancillary own funds

The Group has no ancillary own funds.

E1.2.6 Analysis of material changes in each Tier

FBD Holdings plc reflects a €10.2m decrease in the 2024 Tier 1 Own Funds. The decrease is due to a decrease in the Reconciliation Reserve primarily driven by a special dividend of €35.9m paid in 2024 and foreseeable dividend of €36.2m payable in 2025. This is offset by the operating profit reported in 2024.

FBD Insurance plc reflects a €17.3m decrease in the 2024 Tier 1 Own Funds. The decrease is primarily driven by a special dividend of €37.4m paid in 2024 and foreseeable dividend of €36.2m payable in 2025. This is offset by the operating profit reported in 2024.

There is no change in the Tier 2 Own Funds for both FBD Holdings plc and FBD Insurance plc.

FBD Holdings plc reflects a €1.6m increase in the 2024 Tier 3 Own Funds. The increase is due to additional net deferred tax asset being recognised in 2024.

FBD Insurance plc reflects a €1.9m increase in the 2024 Tier 3 Own Funds. The increase is due to additional net deferred tax asset being recognised in 2024.

E1.2.7 Difference between Equity shown in the financial statements and the Solvency II value of excess assets over liabilities

FBD Holdings plc	2024 €000s	2023 €000s
Equity per financial statements		
Ordinary share capital	**21,768**	21,744
Retained Earnings	**461,436**	455,292
Preference Share Capital	**2,923**	2,923
Financial Liabilities at amortised Cost	**49,780**	49,721
Total Equity (including Tier II debt)	**535,907**	529,680
Adjustments for Solvency II		
Difference in technical provisions net of reinsurance	**(26,150)**	(823)
Pension benefit surplus not recognised	**(6,393)**	(7,044)
Deferred tax	**4,597**	1,919
Provisions other than technical provisions	**(4,234)**	(7,485)
Solvency II value of excess assets over liabilities (Including Tier II Debt)	**503,727**	516,247

FBD Insurance plc	2024 €000s	2023 €000s
Equity Per financial statements		
Ordinary share capital	**74,187**	74,187
Retained Earnings	**383,223**	379,440
Preference Share Capital	**635**	635
Financial Liabilities at amortised Cost	**49,780**	49,721
Total Equity (including Tier II debt)	**507,825**	503,983
Adjustments for Solvency II		
Difference in technical provisions net of reinsurance	**(26,150)**	(823)
Pension benefit surplus not recognised	**(4,094)**	(4,513)
Deferred tax	**4,309**	1,603
Provisions other than technical provisions	**(4,232)**	(7,485)
Solvency II value of excess assets over liabilities (Including Tier II Debt)	**477,658**	492,765

E1.2.8 Transitional Arrangements

There are no own funds items subject to transitional arrangements.

E2. Solvency Capital Requirement and Minimum Capital Requirements

E2.1 Solvency Capital Requirement (SCR) Net

The Group solvency ratio stood at 197% (FBD Insurance plc ratio 188%) as at 31 December 2024 and is based on the Standard Formula.

The Directive prescribes two methods for the calculation of the Group solvency:

- Method 1 – standard method based on the consolidation of financial statements
- Method 2 – alternative method based on deduction and aggregation

FBD Holdings plc applies method 1 for the determination of the Group solvency.

The table below shows the inputs into the Solvency Capital Requirement (SCR) calculation as at 31 December 2024.

FBD Holdings	2024 Net SCR €000s	2023 Net SCR €000s
Non-life Underwriting Risk	187,833	178,899
Health Underwriting Risk	3,437	3,675
Market Risk	97,405	100,690
Counterparty Default Risk	9,665	7,206
Undiversified BSCR	298,340	290,470
Diversification Credit	(60,659)	(60,111)
Basic SCR	237,681	230,360
Operational Risk	22,647	20,642
Loss absorbing capacity of technical provisions and deferred tax	(23,107)	(27,103)
Solvency Capital Requirement	**237,221**	**223,898**

FBD Insurance plc	2024 Net SCR €000s	2023 Net SCR €000s
Non-life Underwriting Risk	187,833	178,899
Health Underwriting Risk	3,437	3,675
Market Risk	94,490	97,342
Counterparty Default Risk	8,728	6,345
Undiversified BSCR	294,488	286,261
Diversification Credit	(59,114)	(58,499)
Basic SCR	235,374	227,762
Operational Risk	22,647	20,642
Loss absorbing capacity of technical provisions and deferred tax	(23,457)	(27,103)
Solvency Capital Requirement	**234,564**	**221,301**

E2.2 Minimum Capital Requirement

The table below shows the inputs into the Minimum Capital Requirement (MCR) calculation as at 31 December 2024.

Minimum Capital Requirement FBD Holdings	2024 €000s	2023 €000s
Linear MCR	98,761	90,501
SCR	237,221	223,898
Combined MCR	98,761	90,501
Minimum Capital Requirement	**98,761**	**90,501**

FBD Insurance plc	2024 €000s	2023 €000s
Linear MCR	98,761	90,501
SCR	234,564	221,301
Combined MCR	98,761	90,501
Minimum Capital Requirement	**98,761**	**90,501**

E2.3 Simplified calculations

The Group does not use simplified calculations for risk modules and sub-modules of the Standard Formula.

E2.4 Compliance with the MCR and the SCR

The solvency position is monitored on a regular basis to ensure compliance. The Group was compliant with both the MCR and SCR throughout 2024.

E2.5 Material changes in MCR & SCR during the year

The MCR has increased in the year from €91m to €99m for FBD Insurance plc and FBD Holdings plc. The primary reason for this movement is premium growth and an increase in net technical provisions experienced during the year.

The SCR has increased in the year from €221m to €235m for FBD Insurance plc and from €224m to €237m for FBD Holdings plc. The increase in SCR is driven by increased retention following the 2025 reinsurance renewal, premium growth experienced over the year, increase in operational risk due to an increase in technical provisions, increase in counterparty default risk and a decrease in the LACDT.

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

The Group does not use the duration-based equity sub-module in the calculation of the Solvency Capital Requirement.

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

The Group does not use an internal model to calculate the SCR.

E5. Non-compliance with the Minimum Capital Requirements and non-compliance with the Solvency Capital Requirements

There is no foreseeable risk of non-compliance with the SCR and the MCR. The ORSA document includes a number of stress and scenario tests. None of the stressed positions breached the SCR or the MCR.

E6. Any other information

The Group's business activities, together with the factors likely to affect its future development, performance and financial position are set out in Section A as is the financial position of the Group. In addition, Section B3 and Section C include the Group's policies and processes for risk management.

The Directors have a reasonable expectation that the Company and the Group have adequate resources to continue in operational existence for the foreseeable future being a period of at least twelve months from the date of this report.

In making this assessment the Directors considered the Group's Budget for 2025 and forecast for 2026, which reflect the latest assumptions used by the business, including an allowance for January 2025 weather events. In addition, the ORSA process monitors current and future solvency needs. The scenarios were projected as part of the ORSA process as well as a number of more extreme stress events. In all scenarios the Group's capital ratio remained in excess of the Solvency Capital Requirement.

On the basis of the scenarios projected by the Group and the additional ORSA scenarios carried out, the Directors are satisfied that there are no material uncertainties which cast significant doubt on the ability of the Group or Company to continue as a going concern over the period of assessment being not less than 12 months from the date of this report. Therefore, the Directors continue to adopt the going concern basis of accounting in preparing the financial statements.

F. Appendices

FBD Holdings plc Quantitative Reporting Templates

S.02.01.02 – Balance Sheet

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

S.05.02.04 – Premiums, claims and expenses by country

S.23.01.22 – Own Funds

S.25.01.22 – Solvency Capital Requirement – for Groups on Standard Formula

S.32.01.22 – Undertakings in the scope of the Group

FBD Insurance plc Quantitative Reporting Templates

S.02.01.02 – Balance Sheet

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

S.17.01.02 – Non-Life Technical Provisions

S.19.01.21 – Non-Life Insurance Claims

S.23.01.01 – Own Funds

S.25.01.21 – Solvency Capital Requirement – for Undertakings on Standard Formula

S.28.01.01 – Minimum Capital Requirement – Only life or only non-life insurance or reinsurance activity

FBD HOLDINGS PLC

General Information

Participating undertaking name	FBD Holdings Plc
Group identification code	635400HNBZBITDHQJG48
Type of code of group	LEI
Country of the group supervisor	IE
Language of reporting	en
Reporting reference date	31 December 2024
Currency used for reporting	EUR
Accounting standards	IFRS
Method of Calculation of the group SCR	Standard formula
Method of group solvency calculation	Method 1 is used exclusively
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02 - Balance sheet

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

S.05.02.04 - Premiums, claims and expenses by country

S.23.01.22 - Own Funds

S.25.01.22 - Solvency Capital Requirement - for groups on Standard Formula

S.32.01.22 - Undertakings in the scope of the group

FBD HOLDINGS PLC

S.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	
R0040	Deferred tax assets	6,221
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	27,808
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	1,169,954
R0080	*Property (other than for own use)*	11,300
R0090	*Holdings in related undertakings, including participations*	0
R0100	*Equities*	1,149
R0110	*Equities - listed*	
R0120	*Equities - unlisted*	1,149
R0130	*Bonds*	899,735
R0140	*Government Bonds*	251,920
R0150	*Corporate Bonds*	647,814
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	202,979
R0190	*Derivatives*	
R0200	*Deposits other than cash equivalents*	54,792
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	386
R0240	*Loans on policies*	
R0250	*Loans and mortgages to individuals*	386
R0260	*Other loans and mortgages*	
R0270	Reinsurance recoverables from:	111,882
R0280	*Non-life and health similar to non-life*	111,882
R0290	*Non-life excluding health*	111,882
R0300	*Health similar to non-life*	0
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	0
R0320	*Health similar to life*	
R0330	*Life excluding health and index-linked and unit-linked*	
R0340	*Life index-linked and unit-linked*	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	
R0370	Reinsurance receivables	2,577
R0380	Receivables (trade, not insurance)	11,041
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	28,421
R0420	Any other assets, not elsewhere shown	5,140
R0500	**Total assets**	1,363,430

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	788,759
R0520	*Technical provisions - non-life (excluding health)*	779,776
R0530	*TP calculated as a whole*	
R0540	*Best Estimate*	746,422
R0550	*Risk margin*	33,354
R0560	*Technical provisions - health (similar to non-life)*	8,983
R0570	*TP calculated as a whole*	
R0580	*Best Estimate*	8,473
R0590	*Risk margin*	510
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	*Technical provisions - health (similar to life)*	0
R0620	*TP calculated as a whole*	
R0630	*Best Estimate*	
R0640	*Risk margin*	
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	0
R0660	*TP calculated as a whole*	
R0670	*Best Estimate*	
R0680	*Risk margin*	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	*TP calculated as a whole*	
R0710	*Best Estimate*	
R0720	*Risk margin*	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	14,328
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	2,184
R0790	Derivatives	
R0800	Debts owed to credit institutions	
R0810	Financial liabilities other than debts owed to credit institutions	
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	0
R0840	Payables (trade, not insurance)	54,430
R0850	Subordinated liabilities	50,000
R0860	*Subordinated liabilities not in BOF*	
R0870	*Subordinated liabilities in BOF*	50,000
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	909,702
R1000	**Excess of assets over liabilities**	453,727

FBD HOLDINGS PLC

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)						
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Total
		C0020	C0040	C0050	C0060	C0070	C0080	C0200
	Premiums written							
R0110	**Gross - Direct Business**	6,001	130,414	82,763	17	157,600	83,424	460,219
R0120	Gross - Proportional reinsurance accepted							0
R0130	Gross - Non-proportional reinsurance accepted							0
R0140	Reinsurers' share	316	10,811	1,645	0	17,880	4,578	35,231
R0200	Net	5,685	119,602	81,118	17	139,720	78,846	424,988
	Premiums earned							
R0210	Gross - Direct Business	5,799	124,737	77,834	18	146,387	81,215	435,991
R0220	Gross - Proportional reinsurance accepted							0
R0230	Gross - Non-proportional reinsurance accepted							0
R0240	Reinsurers' share	316	12,013	1,645	0	18,640	4,578	37,193
R0300	Net	5,482	112,725	76,189	18	127,747	76,637	398,798
	Claims incurred							
R0310	Gross - Direct Business	3,729	36,324	46,484	-30	60,258	40,606	187,370
R0320	Gross - Proportional reinsurance accepted							0
R0330	Gross - Non-proportional reinsurance accepted							0
R0340	Reinsurers' share	0	-13,150	0	-22	-7,758	3,778	-17,152
R0400	Net	3,729	49,474	46,484	-8	68,016	36,827	204,522
R0550	**Expenses incurred**	1,614	44,387	28,224	5	43,927	23,924	142,080
R1210	**Balance - other technical expenses/income**							-12,998
R1300	**Total technical expenses**							129,083

FBD HOLDINGS PLC

S.05.02.04

Premiums, claims and expenses by country

Non-life

		C0010	C0020	C0030	C0040	C0050	C0060	C0070
		Home Country	Top 5 countries (by amount of gross premiums written) - non-life obligations					Total Top 5 and home country
R0010		C0080	C0090	C0100	C0110	C0120	C0130	C0140
	Premiums written							
R0110	Gross - Direct Business	460,219						460,219
R0120	Gross - Proportional reinsurance accepted							0
R0130	Gross - Non-proportional reinsurance accepted							0
R0140	Reinsurers' share	35,231						35,231
R0200	Net	424,988						424,988
	Premiums earned							
R0210	Gross - Direct Business	435,991						435,991
R0220	Gross - Proportional reinsurance accepted							0
R0230	Gross - Non-proportional reinsurance accepted							0
R0240	Reinsurers' share	37,193						37,193
R0300	Net	398,798						398,798
	Claims incurred							
R0310	Gross - Direct Business	187,370						187,370
R0320	Gross - Proportional reinsurance accepted							0
R0330	Gross - Non-proportional reinsurance accepted							0
R0340	Reinsurers' share	-17,152						-17,152
R0400	Net	204,522						204,522
R0550	**Expenses incurred**	142,080						142,080
R1210	**Balance - other technical expenses/income**							-12,998
R1300	**Total technical expenses**							129,083

FBD HOLDINGS PLC

S.23.01.22

Own Funds

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
	Basic own funds before deduction for participations in other financial sector	C0010	C0020	C0030	C0040	C0050
R0010	Ordinary share capital (gross of own shares)	21,768	21,768		0	
R0020	*Non-available called but not paid in ordinary share capital to be deducted at group level*	0				
R0030	Share premium account related to ordinary share capital	16,228	16,228		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0060	*Non-available subordinated mutual member accounts to be deducted at group level*	0				
R0070	Surplus funds	0	0			
R0080	*Non-available surplus funds to be deducted at group level*	0				
R0090	Preference shares	2,923		0	2,923	0
R0100	*Non-available preference shares to be deducted at group level*	0				
R0110	Share premium account related to preference shares	0		0	0	0
R0120	*Non-available share premium account related to preference shares at group level*	0				
R0130	Reconciliation reserve	372,591	372,591			
R0140	Subordinated liabilities	50,000		0	50,000	0
R0150	*Non-available subordinated liabilities to be deducted at group level*	0				
R0160	An amount equal to the value of net deferred tax assets	4,037				4,037
R0170	*The amount equal to the value of net deferred tax assets not available to be deducted at the group level*	0				
R0180	Other items approved by supervisory authority as basic own funds not specified above	0	0	0	0	0
R0190	*Non available own funds related to other own funds items approved by supervisory authority to be deducted*	0				
R0200	Minority interests at group level	0				
R0210	*Non-available minority interests to be deducted at group level*	0				
R0220	**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**					

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector					
R0230	**Deductions for participations in other financial undertakings, including non-regulated undertakings carrying out financial activities**	0				
R0240	*whereof deducted according to art 228 of the Directive 2009/138/EC*	0				
R0250	Deductions for participations where there is non-availability of information (Article 229)	0				
R0260	Deduction for participations included via Deduction and Aggregation method (D&A) when a combination of methods are used	0				
R0270	**Total of non-available own fund items to be deducted**	0	0	0	0	0
R0280	**Total deductions**	0	0	0	0	0
R0290	**Total basic own funds after deductions**	467,548	410,588	0	52,923	4,037
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0380	Non available ancillary own funds to be deducted at group level	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0
	Own funds of other financial sectors					
R0410	Credit Institutions, investment firms, financial institutions, alternative investment fund managers, UCITS management companies	0				
R0420	Institutions for occupational retirement provision	0				
R0430	Non regulated undertakings carrying out financial activities	0				
R0440	**Total own funds of other financial sectors**	0	0	0	0	0

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
	Basic own funds before deduction for participations in other financial sector	C0010	C0020	C0030	C0040	C0050
	Own funds when using the D&A, exclusively or in combination with method 1					
R0450	Own funds aggregated when using the D&A and combination of method	0				
R0460	Own funds aggregated when using the D&A and combination of method net of IGT	0				
R0520	Total available own funds to meet the consolidated part of the group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	467,548	410,588	0	52,923	4,037
R0530	Total available own funds to meet the minimum consolidated group SCR	463,511	410,588	0	52,923	
R0560	Total eligible own funds to meet the consolidated part of the group SCR (excluding own funds from other financial sector and from the undertakings included via D&A)	467,548	410,588	0	52,923	4,037
R0570	Total eligible own funds to meet the minimum consolidated group SCR (group)	430,340	410,588	0	19,752	
R0610	**Minimum consolidated Group SCR**	98,761				
R0650	**Ratio of Eligible own funds to Minimum Consolidated Group SCR**	435.74%				
R0660	**Total eligible own funds to meet the total group SCR (including own funds from other financial sector and from the undertakings included via D&A)**	467,548	410,588	0	52,923	4,037
R0680	**Total Group SCR**	237,221				
R0690	**Ratio of Total Eligible own funds to Total group SCR - ratio including other financial sectors and the undertakings included via D&A**	197.09%				

	Reconciliation reserve	C0060
R0700	Excess of assets over liabilities	453,727
R0710	Own shares (held directly and indirectly)	
R0720	Foreseeable dividends, distributions and charges	36,179
R0730	Other basic own fund items	44,957
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0750	Other non available own funds	
R0760	**Reconciliation reserve**	372,591
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	-4,071
R0790	**Total Expected profits included in future premiums (EPIFP)**	-4,071

FBD HOLDINGS PLC

S.25.01.22

Solvency Capital Requirement - for groups on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	97,405		
R0020	Counterparty default risk	9,664		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	3,437		
R0050	Non-life underwriting risk	187,833		
R0060	Diversification	-60,659		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	237,681		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	22,647
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	-23,107
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement calculated on the basis of Art. 336 (a) of Delegated Regulation (EU) 2015/35, excluding capital add-on**	237,221
R0210	Capital add-ons already set	0
R0211	*of which, capital add-ons already set - Article 37 (1) Type a*	0
R0212	*of which, capital add-ons already set - Article 37 (1) Type b*	0
R0213	*of which, capital add-ons already set - Article 37 (1) Type c*	0
R0214	*of which, capital add-ons already set - Article 37 (1) Type d*	0
R0220	**Consolidated Group SCR**	237,221

USP Key

For life underwriting risk:
1 - Increase in the amount of annuity benefits
9 - None

For health underwriting risk:
1 - Increase in the amount of annuity benefits
2 - Standard deviation for NSLT health premium risk
3 - Standard deviation for NSLT health gross premium risk
4 - Adjustment factor for non-proportional reinsurance
5 - Standard deviation for NSLT health reserve risk
9 - None

For non-life underwriting risk:
4 - Adjustment factor for non-proportional reinsurance
6 - Standard deviation for non-life premium risk
7 - Standard deviation for non-life gross premium risk
8 - Standard deviation for non-life reserve risk
9 - None

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
	Other information on SCR			
R0400	Capital requirement for duration-based equity risk sub-module	0		
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0		
R0470	Minimum consolidated group solvency capital requirement	98,761		
	Information on other entities			
R0500	Capital requirement for other financial sectors (Non-insurance capital requirements)	0		
R0510	*Credit institutions, investment firms and financial institutions, alternative investment funds managers, UCITS management companies*	0		
R0520	*Institutions for occupational retirement provisions*	0		
R0530	*Capital requirement for non- regulated entities carrying out financial activities*	0		
R0540	Capital requirement for non-controlled participation requirements	0		
R0550	Capital requirement for residual undertakings	0		
R0555	Capital requirement for collective investment undertakings or investments packaged as funds	0		
	Overall SCR			
R0560	SCR for undertakings included via D&A method	0		
R0570	**Total group solvency capital requirement**	237,221		

FBD HOLDINGS PLC

S.32.01.22

Undertakings in the scope of the group

	Country	Identification code of the undertaking	Type of code of the ID of the undertaking	Legal Name of the undertaking	Type of undertaking	Legal form	Category (mutual/ non mutual)	Supervisory Authority
Row	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080
1	IE	635400HQZXKIXB5YCS61	LEI	FBD INSURANCE PLC	Non life insurance undertaking	Incorporated companies limited by shares or by guarantee or unlimited	Non-mutual	THE CENTRAL BANK OF IRELAND
2	IE	140134	Specific code	FBD INSURANCE GROUP	Credit institution, investment firm and financial institution		Non-mutual	THE CENTRAL BANK OF IRELAND
3	IE	155113	Specific code	BIERITZ INNS LIMITED	Other		Non-mutual	
4	IE	51715	Specific code	LEGACY INVESTMENT HOLDINGS LIMITED	Other		Non-mutual	
5	GB	7010V	Specific code	TOPENHALL LIMITED	Other		Non-mutual	
6	IE	635400HNBZBITDHQJG48	LEI	FBD HOLDINGS PLC	Other		Non-mutual	
7	IE	614936	Specific code	FBD CORPORATE SERVICE LIMITED	Other		Non-mutual	
8	IE	510146	Specific code	FBD TRUSTEE COMPANY LTD	Institution for occupational retirement provision		Non-mutual	THE PENSIONS AUTHORITY

FBD HOLDINGS PLC

S.32.01.22

Undertakings in the scope of the group

	Criteria of influence						Inclusion in the scope of Group supervision		Group solvency calculation
	% capital share	% used for the establishment of consolidated accounts	% voting rights	Other criteria	Level of influence	Proportional share used for group solvency calculation	Yes/No	Date of decision if art. 214 is applied	Method used and under method 1, treatment of the undertaking
Row	C0180	C0190	C0200	C0210	C0220	C0230	C0240	C0250	C0260
1	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
2	100.00%	100.00%	100.00%		Dominant	100.00%	Included in the scope		Method 1: Full consolidation
3	100.00%	100.00%	100.00%		Dominant	100.00%	Not included in the scope (art. 214 b)		No inclusion in the scope of group supervision as defined in Art. 214 Directive 2009/138/EC
4	100.00%	100.00%	100.00%		Dominant	100.00%	Not included in the scope (art. 214 b)		No inclusion in the scope of group supervision as defined in Art. 214 Directive 2009/138/EC
5	100.00%	100.00%	100.00%		Dominant	100.00%	Not included in the scope (art. 214 b)		No inclusion in the scope of group supervision as defined in Art. 214 Directive 2009/138/EC
6	100.00%	100.00%	100.00%		Dominant	100.00%	Not included in the scope (art. 214 b)		No inclusion in the scope of group supervision as defined in Art. 214 Directive 2009/138/EC
7	100.00%	100.00%	100.00%		Dominant	100.00%	Not included in the scope (art. 214 b)		No inclusion in the scope of group supervision as defined in Art. 214 Directive 2009/138/EC
8	100.00%	100.00%	100.00%		Dominant	100.00%	Not included in the scope (art. 214 b)		No inclusion in the scope of group supervision as defined in Art. 214 Directive 2009/138/EC

FBD INSURANCE PLC

General Information

Undertaking name	FBD Insurance Plc
Undertaking identification code	635400HQZXKIXB5YCS61
Type of code of undertaking	LEI
Type of undertaking	Non-Life insurance undertakings
Country of authorisation	IE
Language of reporting	en
Reporting reference date	31 December 2024
Currency used for reporting	EUR
Accounting standards	IFRS
Method of Calculation of the SCR	Standard formula
Matching adjustment	No use of matching adjustment
Volatility adjustment	No use of volatility adjustment
Transitional measure on the risk-free interest rate	No use of transitional measure on the risk-free interest rate
Transitional measure on technical provisions	No use of transitional measure on technical provisions

List of reported templates

S.02.01.02 - Balance sheet

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

S.17.01.02 - Non-Life Technical Provisions

S.19.01.21 - Non-Life insurance claims

S.23.01.01 - Own Funds

S.25.01.21 - Solvency Capital Requirement - for undertakings on Standard Formula

S.28.01.01 - Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

FBD INSURANCE PLC

S.02.01.02

Balance sheet

		Solvency II value
	Assets	C0010
R0030	Intangible assets	
R0040	Deferred tax assets	6,875
R0050	Pension benefit surplus	
R0060	Property, plant & equipment held for own use	19,916
R0070	Investments (other than assets held for index-linked and unit-linked contracts)	1,159,309
R0080	*Property (other than for own use)*	16,374
R0090	*Holdings in related undertakings, including participations*	0
R0100	*Equities*	1,148
R0110	*Equities - listed*	
R0120	*Equities - unlisted*	1,148
R0130	*Bonds*	899,735
R0140	*Government Bonds*	251,920
R0150	*Corporate Bonds*	647,814
R0160	*Structured notes*	0
R0170	*Collateralised securities*	0
R0180	*Collective Investments Undertakings*	187,504
R0190	*Derivatives*	
R0200	*Deposits other than cash equivalents*	54,548
R0210	*Other investments*	0
R0220	Assets held for index-linked and unit-linked contracts	
R0230	Loans and mortgages	47
R0240	*Loans on policies*	
R0250	*Loans and mortgages to individuals*	47
R0260	*Other loans and mortgages*	
R0270	Reinsurance recoverables from:	111,882
R0280	*Non-life and health similar to non-life*	111,882
R0290	*Non-life excluding health*	111,882
R0300	*Health similar to non-life*	0
R0310	*Life and health similar to life, excluding index-linked and unit-linked*	0
R0320	*Health similar to life*	
R0330	*Life excluding health and index-linked and unit-linked*	
R0340	*Life index-linked and unit-linked*	
R0350	Deposits to cedants	0
R0360	Insurance and intermediaries receivables	
R0370	Reinsurance receivables	2,577
R0380	Receivables (trade, not insurance)	9,543
R0390	Own shares (held directly)	
R0400	Amounts due in respect of own fund items or initial fund called up but not yet paid in	0
R0410	Cash and cash equivalents	17,043
R0420	Any other assets, not elsewhere shown	5,075
R0500	**Total assets**	1,332,267

		Solvency II value
	Liabilities	C0010
R0510	Technical provisions - non-life	788,759
R0520	*Technical provisions - non-life (excluding health)*	779,776
R0530	*TP calculated as a whole*	0
R0540	*Best Estimate*	746,422
R0550	*Risk margin*	33,354
R0560	*Technical provisions - health (similar to non-life)*	8,983
R0570	*TP calculated as a whole*	0
R0580	*Best Estimate*	8,473
R0590	*Risk margin*	510
R0600	Technical provisions - life (excluding index-linked and unit-linked)	0
R0610	*Technical provisions - health (similar to life)*	0
R0620	*TP calculated as a whole*	
R0630	*Best Estimate*	
R0640	*Risk margin*	
R0650	*Technical provisions - life (excluding health and index-linked and unit-linked)*	0
R0660	*TP calculated as a whole*	
R0670	*Best Estimate*	
R0680	*Risk margin*	
R0690	Technical provisions - index-linked and unit-linked	0
R0700	*TP calculated as a whole*	
R0710	*Best Estimate*	
R0720	*Risk margin*	
R0740	Contingent liabilities	
R0750	Provisions other than technical provisions	14,328
R0760	Pension benefit obligations	
R0770	Deposits from reinsurers	
R0780	Deferred tax liabilities	3,188
R0790	Derivatives	
R0800	Debts owed to credit institutions	0
R0810	Financial liabilities other than debts owed to credit institutions	0
R0820	Insurance & intermediaries payables	
R0830	Reinsurance payables	
R0840	Payables (trade, not insurance)	48,332
R0850	Subordinated liabilities	50,000
R0860	*Subordinated liabilities not in BOF*	
R0870	*Subordinated liabilities in BOF*	50,000
R0880	Any other liabilities, not elsewhere shown	
R0900	**Total liabilities**	904,608
R1000	**Excess of assets over liabilities**	427,658

FBD INSURANCE PLC

S.05.01.02

Premiums, claims and expenses by line of business

Non-life

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)						Total
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	
		C0020	C0040	C0050	C0060	C0070	C0080	C0200
	Premiums written							
R0110	Gross - Direct Business	6,001	130,414	82,763	17	157,600	83,424	460,219
R0120	Gross - Proportional reinsurance accepted							0
R0130	Gross - Non-proportional reinsurance accepted							0
R0140	Reinsurers' share	316	10,811	1,645	0	17,880	4,578	35,231
R0200	Net	5,685	119,602	81,118	17	139,720	78,846	424,988
	Premiums earned							
R0210	Gross - Direct Business	5,799	124,737	77,834	18	146,387	81,215	435,991
R0220	Gross - Proportional reinsurance accepted							0
R0230	Gross - Non-proportional reinsurance accepted							0
R0240	Reinsurers' share	316	12,013	1,645	0	18,640	4,578	37,193
R0300	Net	5,482	112,725	76,189	18	127,747	76,637	398,798
	Claims incurred							
R0310	Gross - Direct Business	3,729	36,324	46,484	-30	60,258	40,606	187,370
R0320	Gross - Proportional reinsurance accepted							0
R0330	Gross - Non-proportional reinsurance accepted							0
R0340	Reinsurers' share	0	-13,150	0	-22	-7,758	3,778	-17,152
R0400	Net	3,729	49,474	46,484	-8	68,016	36,827	204,522
R0550	**Expenses incurred**	1,728	46,466	29,602	5	46,682	25,309	149,790
R1210	**Balance - other technical expenses/income**							-12,998
R1300	**Total technical expenses**							136,792

FBD INSURANCE PLC

S.17.01.02

Non-Life Technical Provisions

		Direct business and accepted proportional reinsurance						
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Total Non-Life obligation
		C0030	C0050	C0060	C0070	C0080	C0090	C0180
R0010	**Technical provisions calculated as a whole**	0	0	0	0	0	0	0
R0050	Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole							0
	Technical provisions calculated as a sum of BE and RM							
	Best estimate							
	Premium provisions							
R0060	Gross	2,722	26,717	21,802	0	118,448	17,350	187,039
R0140	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default		-3,021			49,846	-2,385	44,439
R0150	**Net Best Estimate of Premium Provisions**	2,722	29,738	21,802	0	68,602	19,735	142,600
	Claims provisions							
R0160	Gross	5,751	261,376	10,847	0	48,752	241,130	567,856
R0240	Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	0	45,358			7,532	14,552	67,442
R0250	**Net Best Estimate of Claims Provisions**	5,751	216,018	10,847	0	41,219	226,578	500,413
R0260	**Total best estimate - gross**	8,473	288,094	32,649	0	167,199	258,480	754,895
R0270	**Total best estimate - net**	8,473	245,757	32,649	0	109,822	246,313	643,013
R0280	**Risk margin**	510	11,452	3,135	1	5,339	13,427	33,865

		Direct business and accepted proportional reinsurance						
		Income protection insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Total Non-Life obligation
		C0030	C0050	C0060	C0070	C0080	C0090	C0180
R0320	**Technical provisions - total**	8,983	299,546	35,784	2	172,539	271,907	788,759
R0330	**Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total**	0	42,337	0	0	57,378	12,167	111,882
R0340	**Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total**	8,983	257,209	35,784	2	115,161	259,740	676,878

FBD INSURANCE PLC

S.19.01.21

Non-Life insurance claims

Total Non-life business

Z0020	Accident year/underwriting year	Accident Year

Gross Claims Paid (non-cumulative)
(absolute amount)

		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110		C0170	C0180
	Year	Development year												In Current year	Sum of years (cumulative)
		0	1	2	3	4	5	6	7	8	9	10 & +			
R0100	Prior											5,564		5,564	5,564
R0160	-9	71,898	51,885	27,103	19,448	24,658	13,761	6,956	9,897	4,469	7,527			7,527	237,603
R0170	-8	64,393	34,644	19,270	15,659	11,307	7,303	5,227	5,011	4,298				4,298	167,113
R0180	-7	59,730	38,034	16,636	10,942	9,888	7,894	4,908	4,257					4,257	152,289
R0190	-6	67,651	35,742	14,020	10,050	10,304	9,783	6,259						6,259	153,809
R0200	-5	56,231	24,454	11,649	8,918	10,894	8,950							8,950	121,097
R0210	-4	67,706	62,772	23,603	21,584	15,211								15,211	190,876
R0220	-3	65,366	40,778	7,235	10,276									10,276	123,655
R0230	-2	71,545	40,903	10,596										10,596	123,045
R0240	-1	89,204	41,004											41,004	130,208
R0250	0	99,909												99,909	99,909
R0260													Total	213,851	1,505,166

Gross Undiscounted Best Estimate Claims Provisions
(absolute amount)

		C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300		C0360
	Year	**Development year**												**Year end (discounted data)**
		0	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10 & +**		
R0100	Prior											29,734		28,198
R0160	-9	0	167,912	161,153	132,607	81,860	63,646	53,506	35,650	23,556	13,734			13,009
R0170	-8	163,399	122,928	90,673	63,039	44,297	35,198	27,848	20,355	12,495				11,831
R0180	-7	156,049	111,452	79,258	67,573	53,244	37,791	28,194	21,196					20,099
R0190	-6	164,638	117,130	91,970	73,879	55,602	35,226	25,590						24,232
R0200	-5	143,809	114,022	74,590	59,711	46,859	33,559							31,802
R0210	-4	282,268	230,242	182,102	89,232	59,886								57,094
R0220	-3	152,826	92,274	93,435	80,429									76,276
R0230	-2	145,661	97,802	71,598										67,950
R0240	-1	142,611	90,949											86,370
R0250	0	157,199												150,996
R0260													**Total**	567,856

FBD INSURANCE PLC

S.23.01.01

Own Funds

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
		C0010	C0020	C0030	C0040	C0050
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35					
R0010	Ordinary share capital (gross of own shares)	74,187	74,187		0	
R0030	Share premium account related to ordinary share capital	0	0		0	
R0040	Initial funds, members' contributions or the equivalent basic own-fund item for mutual and mutual-type undertakings	0	0		0	
R0050	Subordinated mutual member accounts	0		0	0	0
R0070	Surplus funds	0	0			
R0090	Preference shares	635		0	635	0
R0110	Share premium account related to preference shares	0		0	0	0
R0130	Reconciliation reserve	312,970	312,970			
R0140	Subordinated liabilities	50,000		0	50,000	0
R0160	An amount equal to the value of net deferred tax assets	3,687				3,687
R0180	Other own fund items approved by the supervisory authority as basic own funds not specified above	0	0	0	0	0
R0220	**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**	0				
R0230	**Deductions for participations in financial and credit institutions**	0				
R0290	**Total basic own funds after deductions**	441,479	387,157	0	50,635	3,687
	Ancillary own funds					
R0300	Unpaid and uncalled ordinary share capital callable on demand	0				
R0310	Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand	0				
R0320	Unpaid and uncalled preference shares callable on demand	0				
R0330	A legally binding commitment to subscribe and pay for subordinated liabilities on demand	0				
R0340	Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC	0				
R0350	Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC	0				
R0360	Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0370	Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC	0				
R0390	Other ancillary own funds	0				
R0400	**Total ancillary own funds**	0			0	0

		Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
	Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35	C0010	C0020	C0030	C0040	C0050
	Available and eligible own funds					
R0500	Total available own funds to meet the SCR	441,479	387,157	0	50,635	3,687
R0510	Total available own funds to meet the MCR	437,792	387,157	0	50,635	
R0540	Total eligible own funds to meet the SCR	441,479	387,157	0	50,635	3,687
R0550	Total eligible own funds to meet the MCR	406,909	387,157	0	19,752	
R0580	**SCR**	234,564				
R0600	**MCR**	98,761				
R0620	**Ratio of Eligible own funds to SCR**	188.21%				
R0640	**Ratio of Eligible own funds to MCR**	412.01%				

		C0060
	Reconciliation reserve	
R0700	Excess of assets over liabilities	427,658
R0710	Own shares (held directly and indirectly)	0
R0720	Foreseeable dividends, distributions and charges	36,179
R0730	Other basic own fund items	78,509
R0740	Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	0
R0760	**Reconciliation reserve**	312,970
	Expected profits	
R0770	Expected profits included in future premiums (EPIFP) - Life business	
R0780	Expected profits included in future premiums (EPIFP) - Non- life business	-4,071
R0790	**Total Expected profits included in future premiums (EPIFP)**	-4,071

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S.25.01.21

Solvency Capital Requirement - for undertakings on Standard Formula

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
R0010	Market risk	94,490		
R0020	Counterparty default risk	8,728		
R0030	Life underwriting risk	0		
R0040	Health underwriting risk	3,437		
R0050	Non-life underwriting risk	187,833		
R0060	Diversification	-59,114		
R0070	Intangible asset risk	0		
R0100	**Basic Solvency Capital Requirement**	235,374		

	Calculation of Solvency Capital Requirement	C0100
R0130	Operational risk	22,647
R0140	Loss-absorbing capacity of technical provisions	0
R0150	Loss-absorbing capacity of deferred taxes	-23,457
R0160	Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	0
R0200	**Solvency Capital Requirement excluding capital add-on**	234,564
R0210	Capital add-ons already set	0
R0211	*of which, capital add-ons already set - Article 37 (1) Type a*	0
R0212	*of which, capital add-ons already set - Article 37 (1) Type b*	0
R0213	*of which, capital add-ons already set - Article 37 (1) Type c*	0
R0214	*of which, capital add-ons already set - Article 37 (1) Type d*	0
R0220	**Solvency capital requirement**	234,564

USP Key

For life underwriting risk:
1 - Increase in the amount of annuity benefits
9 - None

For health underwriting risk:
1 - Increase in the amount of annuity benefits
2 - Standard deviation for NSLT health premium risk
3 - Standard deviation for NSLT health gross premium risk
4 - Adjustment factor for non-proportional reinsurance
5 - Standard deviation for NSLT health reserve risk
9 - None

For non-life underwriting risk:
4 - Adjustment factor for non-proportional reinsurance
6 - Standard deviation for non-life premium risk
7 - Standard deviation for non-life gross premium risk
8 - Standard deviation for non-life reserve risk
9 - None

		Gross solvency capital requirement	USP	Simplifications
		C0110	C0090	C0120
	Other information on SCR			
R0400	Capital requirement for duration-based equity risk sub-module	0		
R0410	Total amount of Notional Solvency Capital Requirements for remaining part	0		
R0420	Total amount of Notional Solvency Capital Requirements for ring fenced funds	0		
R0430	Total amount of Notional Solvency Capital Requirements for matching adjustment portfolios	0		
R0440	Diversification effects due to RFF nSCR aggregation for article 304	0		

		Yes/No
	Approach to tax rate	C0109
R0590	Approach based on average tax rate	No

		LAC DT
	Calculation of loss absorbing capacity of deferred taxes	C0130
R0640	LAC DT	-23,457
R0650	LAC DT justified by reversion of deferred tax liabilities	-7,935
R0660	LAC DT justified by reference to probable future taxable economic profit	-15,522
R0670	LAC DT justified by carry back, current year	0
R0680	LAC DT justified by carry back, future years	0
R0690	Maximum LAC DT	-31,965

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Minimum Capital Requirement - Only life or only non-life insurance or reinsurance activity

	Linear formula component for non-life insurance and reinsurance obligations	C0010
R0010	MCR_{NL} Result	98,761

		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0020	C0030
R0020	Medical expense insurance and proportional reinsurance	0	
R0030	Income protection insurance and proportional reinsurance	8,473	5,685
R0040	Workers' compensation insurance and proportional reinsurance	0	
R0050	Motor vehicle liability insurance and proportional reinsurance	245,757	119,602
R0060	Other motor insurance and proportional reinsurance	32,649	81,118
R0070	Marine, aviation and transport insurance and proportional reinsurance	0	17
R0080	Fire and other damage to property insurance and proportional reinsurance	109,822	139,720
R0090	General liability insurance and proportional reinsurance	246,313	78,846
R0100	Credit and suretyship insurance and proportional reinsurance	0	
R0110	Legal expenses insurance and proportional reinsurance	0	
R0120	Assistance and proportional reinsurance	0	
R0130	Miscellaneous financial loss insurance and proportional reinsurance	0	
R0140	Non-proportional health reinsurance	0	
R0150	Non-proportional casualty reinsurance	0	
R0160	Non-proportional marine, aviation and transport reinsurance	0	
R0170	Non-proportional property reinsurance	0	

	Linear formula component for life insurance and reinsurance obligations	C0040
R0200	MCR_{L} Result	0

		Net (of reinsurance/ SPV) best estimate and TP calculated as a whole	Net (of reinsurance/ SPV) total capital at risk
		C0050	C0060
R0210	Obligations with profit participation - guaranteed benefits		
R0220	Obligations with profit participation - future discretionary benefits		
R0230	Index-linked and unit-linked insurance obligations		
R0240	Other life (re)insurance and health (re)insurance obligations		
R0250	Total capital at risk for all life (re)insurance obligations		

	Overall MCR calculation	C0070
R0300	Linear MCR	98,761
R0310	SCR	234,564
R0320	MCR cap	105,554
R0330	MCR floor	58,641
R0340	Combined MCR	98,761
R0350	Absolute floor of the MCR	2,700
R0400	**Minimum Capital Requirement**	98,761

FBD HOLDINGS PLC
FBD House
Bluebell
Dublin 12
www.fbd.ie

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