

NN Insurance Belgium 2016

Solvency and Financial Condition Report

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Summary

NN Insurance Belgium's approach to the Solvency and Financial Condition Report

This Solvency and Financial Condition Report (SFCR) provides public quantitative and qualitative disclosures on Solvency II as required by the Solvency II legislation. In order to ensure the most transparent and user-friendly approach, the information that is already included in the Annual accounts (including the annexes, the report of the board of directors and the social balance reporting) is in general not duplicated in this SFCR. Therefore, this SFCR is prepared as a supplement to NN Insurance Belgium's Annual Report. It includes all information required to be disclosed in the SFCR, either through a specific reference to the Annual Report or as supplemental information.

As required by the Solvency II legislation, this SFCR follows the required standard chapter layout.

The amounts disclosed in this SFCR are in millions of euros unless stated otherwise.

NN Insurance Belgium is required to submit so-called Quantitative Reporting Templates ('QRTs') to its supervisor, namely, National Bank of Belgium (NBB). A subset of these QRTs, which are required to be publicly disclosed and which provide quantitative information in accordance with Solvency II as at 31 December 2016, are included in the appendix to this SFCR. To comply with the Solvency II legislation, the amounts in these QRTs are in thousands of euros.

The Solvency ratios, as well as the amount of own funds and Solvency Capital Requirement disclosed in the SFCR are not final until filed with the regulators.

Reference is made to :

Annual Accounts: <https://www.nn.be/nl/file/2638/download?token=ZAWgm836>

Annual Report: <https://www.nn.be/nl/file/2639/download?token=NKkwavyf>

Material changes in 2016

Since January 1st 2016 NN Insurance Belgium must comply with the Solvency II regulations.

No other material changes occurred in the business and performance, system of governance, risk profile, valuation for solvency purposes and capital management over the reporting period.

A. Business and Performance

Introduction

This chapter of the SFCR contains general information and the Financial performance over 2016 on NN Insurance Belgium.

NN Insurance Belgium is an insurance company under Belgian law. NN Insurance Belgium has the legal form of a public limited company and is listed in the Register of Company under the number 0890.270.057.

NN Insurance Belgium's history dates back to 1913. In 2001, ING merged the insurance companies De Vaderlandsche, RVS and BBL Insurance (which were each acquired by ING in the past) to form ING Insurance Belgium. In 2007, the broker and employee benefit business was sold, after which NN Belgium took its current form. In 2015, NN Belgium was the thirteenth largest provider of life insurance products measured by GWP in Belgium (source: Assuralia). In 2016, NN Belgium's premium income amounted EUR 444 million, of which EUR 422 million for branch 21 and 23 activities and 22 million related to Health and Income Protection insurance products.

The corporate purpose of NN Insurance Belgium is the practice, conclusion and handling, both in Belgium and abroad, of all types of insurance, reinsurance and co-insurance business and policies to cover all types of risks which, in accordance with the relevant insurance legislation, belong to the branches of activity that form part of the "Life" group of activities, as well as capitalization operations.

NN Insurance Belgium may manage, purchase or divest insurance portfolios or reinsurance portfolios which, in accordance with the relevant insurance legislation, belong to the branches that form part of the group of "Life" activities.

NN Insurance Belgium may, for its own account or on behalf of third parties, act as an intermediary in insurance, co-insurance and reinsurance.

NN Insurance Belgium may carry out any actions in respect of movable and immovable property, as well as industrial, commercial and financial transactions that could contribute to the accomplishment, promotion or expansion of the corporate purpose.

NN Insurance Belgium is accredited by the NBB under code number 2550 to operate on the Belgian market in the following branches: 1, 2, 21, 22, 23, 25 and 26.

A.1. Business

A.1.1. General

NN Insurance Belgium's registered office and operational headquarters are located at:
Leonardo Da Vincilaan 19
1831 Diegem
BE0890270057
Insurancenummer 2550

The supervisory authority responsible for financial supervision of NN Insurance Belgium:
National Bank of Belgium (NBB)
de Berlaimontlaan 14
1000 Brussels
Belgium

The contact details of NN Insurance Belgium's external auditor are:
Mr. Karel Tanghe
KPMG Bedrijfsrevisoren
Av. du Bourgetlaan 40
1130 Brussels
Belgium

The supervisory authority responsible for financial supervision of NN Group:
Dutch Central Bank (DNB)
Westeinde 1
1017 ZN Amsterdam
The Netherlands

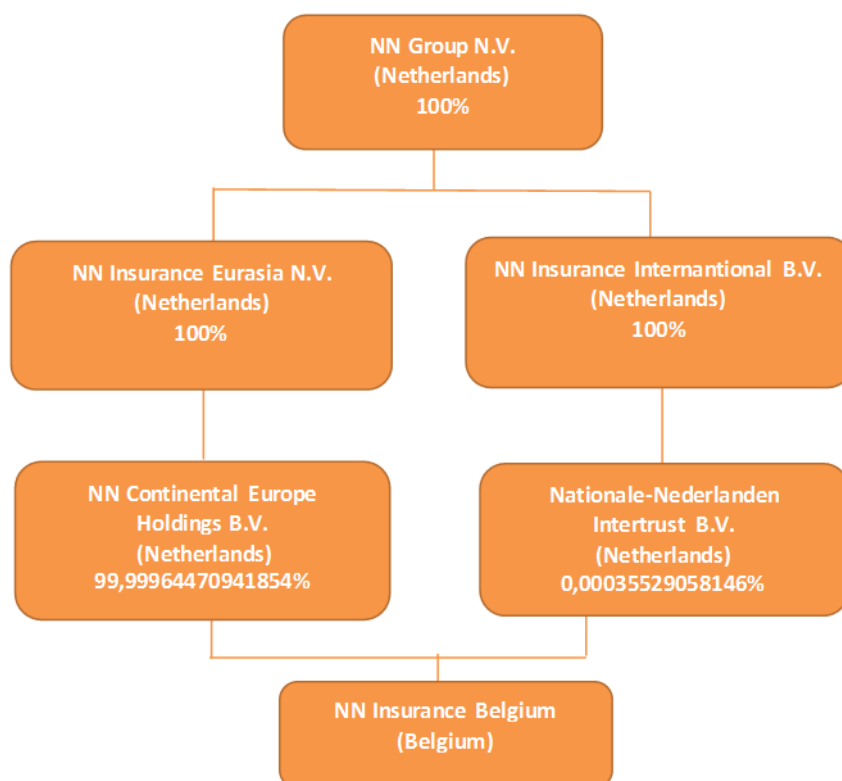
The contact details of NN Group's external auditor are:
Mr. P.A.M. (Peti) de Wit RA
KPMG Accountants N.V.
Laan van Langerhuize 1
1186 DS Amstelveen
The Netherlands

A.1.2. Qualifying holdings

NN Insurance Belgium does not own any participations above the threshold of 10% as indicated in article 13 (21) Directive 2009/138.
NN Insurance Belgium is part of the NN Group NV.

A.1.3. Simplified shareholders structure of NN Insurance Belgium

NN Insurance Belgium holds no shares in another company. NN Insurance Belgium is a subsidiary of the NN Group. NN Insurance Belgium is part of NN Continental Europe Holdings, itself part of NN Insurance Eurasia. The simplified NN group structure as at 31 December 2016 is as follows:



NN Insurance Belgium offers a range of life insurance products to retail customers and self-employed persons with a focus on the following insurance products:

- Traditional policies: single and recurring premium saving plans and saving plans for pensions and pension products for self-employed persons and single premium investment products and mortality riders linked to saving plans.
- Unit-linked policies: single premium annuity products with a minimum guarantee, offering a guaranteed minimum lifelong benefit.
- Protection policies: single and recurring premium term life insurances, mostly linked to mortgages and personal loans, and recurring premium personal accident and disability policies and disability riders.

In addition, and to a lesser extent, NN Insurance Belgium also offers non-life insurance products (Personal Accident and Health) to retail customers.

NN Insurance Belgium's insurance products are sold mainly through bancassurance, predominantly by ING Bank Belgium (with 709 branches, serving approximately 2.4 million retail customers) under the ING Bank brand and, to a lesser extent by Record Bank (a subsidiary of ING Bank Belgium) and Deutsche Bank. Other distributors of the NN Lifelong income product are Aquilae.

A.2. Underwriting Performance

NN Insurance Belgium's operating result is analyzed through a margin analysis, which includes the investment margin (investment performance), fees and premium-based revenues and the technical margin (underwriting performance). For information on underwriting and investment performance per material line of business, reference is made to the Financial developments section in the 2016 Financial Report, Note 10 "informations regarding the technical accounts" in the 2016 annual accounts of NN Insurance Belgium and the underwriting performance in the QRT S.05.01.01 'Premiums, claims and expenses by line of business'.

NN Insurance Belgium's **BE GAAP result before tax for 2016** is solid with an aggregated result of 83,4 million composed as follows:

- The technical result Life amount to 84,8 million and is positively impacted by the realized gains of 74,2 million on the sale of fixed income instruments.
- The technical result Non-life amount to 2,1 million. It is related to the products Personal Accident and Health but is in 2016 negatively impacted by the terrorist attacks in Brussels.
- The Non-technical Result (-3,6 million) is negatively impacted by project costs related to the planned decommissioning of various legacy systems and the disentanglement from ING for a total of 9,6 million.

| BE-GAAP FY 2016 | Technical Result | | Non-technical |
|-----------------------------------|------------------|-------------|---------------|
| | Life | Non-Life | Result |
| Earned/Written premiums | 415,9 | 18,8 | 0,0 |
| Allocated investment income | 252,8 | 0,1 | 5,9 |
| Total income | 668,7 | 18,9 | 5,9 |
| Claims | 941,6 | 3,8 | 0,0 |
| Change in technical provisions | -463,0 | 2,7 | 0,0 |
| Other technical result | 7,5 | 0,8 | 0,0 |
| Acquisition costs | 64,5 | 4,2 | 0,0 |
| Administration & other costs | 33,3 | 5,3 | 9,5 |
| Total expenses | 583,8 | 16,7 | 9,5 |
| Total NN Insurance Belgium | 84,8 | 2,1 | -3,6 |

NN Insurance Belgium's **BE GAAP result before tax for 2015** equals 2,4 million and is composed as follows:

- Technical results life: 4,8 million
- Technical results Non-life: 5,1 million
- The Non-technical Result (-7,6 million) is negatively affected by the impairment on legacy projects.

The products “Term Life” (Risk protection) and Personal Accident are the main contributors to the Technical Result in 2015 and 2016. Universal life business is adversely affected by the continuing low interest rate environment in both reporting years.

| BE-GAAP FY 2015 | Technical Result | | Non-technical |
|-----------------------------------|------------------|-------------|---------------|
| | Life | Non-Life | Result |
| Earned/Written premiums | 370,0 | 19,7 | 0,0 |
| Allocated investment income | 213,7 | 0,2 | 7,4 |
| Total income | 583,7 | 19,8 | 7,4 |
| Claims | 1101,8 | 4,2 | 0,0 |
| Change in technical provisions | -632,2 | 1,1 | 0,0 |
| Other technical result | 8,6 | 0,6 | 0,0 |
| Acquisition costs | 66,3 | 4,4 | 0,0 |
| Administration & other costs | 34,4 | 4,4 | 15,0 |
| Total expenses | 578,9 | 14,7 | 15,0 |
| Total NN Insurance Belgium | 4,8 | 5,1 | -7,6 |

A.3. Investment performance

NN Insurance Belgium’s BE GAAP investment income over 2016 is mainly driven by the bond portfolio and to a lesser extent by equity and real estate assets. Derivatives are used to hedge the floating rates in the bond portfolio. Investment expenses are charged by the asset manager (NN Investment Partners).

| Investment income BE GAAP | 2016 |
|-----------------------------------|--------------|
| Bonds | 202,5 |
| Equity | 11,9 |
| Loans & Mortgages | 4,7 |
| Derivatives | 11,7 |
| Other (incl. Unit linked) | 34,1 |
| Investment expenses | -6,1 |
| Total NN Insurance Belgium | 258,8 |

The BE GAAP investment income has been positively impacted by gains & losses of EUR 105 million mainly linked to fixed income instruments.

A.4. Performance of other activities

No material other income and expenses to report during the period. NN Insurance Belgium is not active in financial lease activities. NN Insurance Belgium makes limited use of operational lease agreements, more precisely for the leasing of cars and the office building.

A.5. Any other information

Reference is made to the Risks and uncertainties in the 2016 Financial Report of NN Insurance Belgium for any other material information regarding the business and performance of NN Insurance Belgium.

B. System of Governance

Introduction

This chapter of the SFCR contains information on the system of Governance of NN Insurance Belgium.

The main responsibilities within NN Insurance Belgium are held at the following levels:

- The General Meeting of Shareholders.
- The Board of Directors.
- The Executive Committee (or effective management): CEO, CFO, CRO and CCO.
- The Senior Managers, not being executive directors, who are responsible for the day-to-day management within the domains entrusted to them by the Executive Committee. They are members of the Management Team.
- The Managers of the business units and the corporate and support functions, who report to a member of the Executive Committee or to a Senior Manager.
- The Team Leaders of the business units who report to a Manager.
- The employees.

NN Insurance Belgium ensures that duties and responsibilities are assigned, divided and coordinated in accordance with company policy, and that they are set out in the descriptions of duties and responsibilities. NN Insurance Belgium ensures that all important duties are fulfilled, and that unnecessary overlaps are avoided. NN Insurance Belgium encourages effective cooperation between its employees.

B.1. Structure of Governance

B.1.1. Board of Directors

The Board of Directors is the highest decision-making body in the company. The Board of Directors acts as a collegial body. Under Article 18 of the company's Articles of Association, the Board of Directors is authorised to carry out any actions that are necessary or conducive to the accomplishment of the company's purpose, with the exception of any actions that only the General Meeting of Shareholders is legally authorised to carry out.

The Board of Directors bears the ultimate responsibility for the company.

The Board of Directors determines the company's general strategy and objectives and its risk policy, including the general risk tolerance limits. The Board of Directors supervises the company's activities and regularly evaluates the effectiveness of the governance system.

The Board of Directors appoints the CEO and the members of the Executive Committee and monitors their performance.

Upon proposal by the CEO, the Board of Directors also approves the appointment of the Senior Managers, who are tasked by the Executive Committee with the effective management of specific domains.

The Board of Directors also bears the sole authority to remove responsibility for the independent control functions from its remit.

B.1.2. Executive Committee (or effective management)

The effective management of the company is entrusted to an Executive Committee within the meaning of Article 524bis of the Belgian Company Code.

The Executive Committee may entrust the effective management of particular domains to a number of Senior Managers, who are not executive directors. These Senior Managers are not members of the Executive Committee, and carry out their duties under the supervision of either the CEO or one of the other managing directors. They may be invited to meetings of the Executive Committee for the discussion of agenda items that fall within the scope of their domain.

- The CEO

The CEO holds the following special responsibilities:

- The CEO is tasked with the day-to-day management of the company, together with the other executive directors on the Executive Committee.
- The CEO is the company's most important spokesperson and articulates its mission, objectives and values.
- The CEO is the chair of the Executive Committee.
- The CEO initiates the assignment of responsibilities among the members of the Executive Committee.
- The CEO leads and supports the members of the Executive Committee, and advises them on the fulfilment of their individual operational responsibilities.
- The CEO specifies the objectives of the Senior Managers and evaluates their performance.
- The CEO proposes the main strategic options to the Board of Directors and ensures that all decisions made by the Board of Directors are implemented in practice. The CEO also regularly reports to the Board of Directors on the actions undertaken by the Executive Committee, and is held accountable for its performance.
- The CEO enables the Board of Directors to fulfil its responsibilities and provides it with all relevant information.
- The CEO maintains a constant close relationship with the chair of the Board of Directors.
- The CEO works with the chair of the Board of Directors to prepare the agenda for meetings of the Board of Directors.

- The Executive Committee

The effective management and the day-to-day running of the company have been entrusted to an Executive Committee since 27 June 2013.

The membership of the Executive Committee comprises all of the executive directors, and must consist of at least three executive directors, including the CEO, the CFO and the CRO.

The Executive Committee is a collegial body.

The Executive Committee is responsible for the actual management of the company's activities, the implementation of the risk management system, and the establishment of an organisational and operational structure.

The tasks & duties may be divided among the members of the Executive Committee, but this division does not detract from the Committee members' collegial responsibility. The NBB shall be informed of any division of duties among the members of the Executive Committee.

Each member of the Executive Committee has been assigned responsibility for a particular domain.

B.1.3. The Senior Managers

The Senior Managers are high-level managers whom the Executive Committee has entrusted with the effective management of particular domains. The Senior Managers are not executive directors. They perform their duties under the supervision of either the CEO or one of the other executive directors.

B.1.4. Specialised committees established by the Board of Directors

The Board of Directors may establish the necessary specialised committees in order to discharge its duties and responsibilities more efficiently. These committees are charged with preparing the decisions made by the Board of Directors, and play an advisory role only. The Board of Directors remains responsible for the actual decision-making.

The Board of Directors formulates the rules that apply to each committee and determines their composition, powers and functioning, taking into account both the company's Articles of Association and the relevant legal provisions that apply to committees of this kind.

The Board of Directors appoints the members of the committees. The Board of Directors must pay particular attention to the composition of each committee, and must ensure that it takes into account the needs and qualifications required for the optimal functioning of the committee in question when appointing its members.

The Board of Directors establishes a set of internal rules (known as a Charter) for each committee, setting out its duties, composition and functioning - including minute-taking.

The Board of Directors receives a report on the findings and recommendations of every committee meeting.

At present there is only an Audit Committee, which is responsible for the specific duties of the Audit Committee as well as the specific duties of the Risk Committee.

- The Auditcommittee / Risk Committee

The Board of Directors of NN Insurance Belgium established an Audit Committee on 17 October 2007 in order to ensure the appropriate exercise of its supervisory function.

The Board of Directors of NN Insurance Belgium has decided not to establish a separate Risk Committee. The Audit Committee will be responsible for both the specific duties of the Audit Committee and the duties of the Risk Committee. On 30 November 2016, the NBB permitted NN Insurance Belgium to combine the Audit Committee and the Risk Committee into a single committee.

The most important duties of the Audit Committee are:

- To monitor and supervise the financial reporting process and the integrity of financial reporting;
- To supervise the effectiveness of company's internal control and risk management systems;
- To monitor the activities of the internal audit function;
- To supervise the statutory audit of the annual accounts and the consolidated financial statements, including following up on questions and recommendations raised by the statutory auditor pursuant to their statutory audit duties;
- To discuss audit-related matters with the recognised statutory auditor and to take note of any important questions that come to light during the discharge of their statutory audit duties;
- To evaluate and monitor the impartiality of the recognised statutory auditor, paying particular attention to the provision of additional services to the entity being monitored;
- To make recommendations to the Board of Directors regarding the appointment and reappointment of the statutory auditor, as well as their impartiality and remuneration.

The duties of the Audit Committee in its function as a Risk Committee are to advise the Board of Directors on all matters relating to the company's current and future risk tolerance and risk strategy. In this regard, the Audit Committee supports the Board of Directors in its supervision of the implementation of this strategy by the Executive Committee.

- Remuneration committee

There is currently no formal Remuneration and Appointment Committee within NN Insurance Belgium. On 30 November 2016, the NBB granted NN Insurance Belgium a derogation from the obligation to establish a remuneration committee. NN Insurance Belgium has a framework in place that outlines the general policy on the remuneration of directors, persons charged by the Board of Directors with the effective management and day-to-day running of the company, and the independent control functions.

B.1.5. Other committees

In order to discharge its duties and responsibilities more efficiently, the Executive Committee may, on the initiative of the CEO, establish the necessary specialised committees whose remit is to examine specific questions and provide advice on them. Committees of this kind play an advisory role only. Decision-making on such matters remains the collegial competency of the Executive Committee.

This description does not refer to the specialised committees that can be established by the Board of Directors.

The Executive Committee draws up the rules that apply to each committee and determines their composition, powers and functioning, taking into account both the company's Articles of Association and the relevant statutory provisions that apply to committees of this kind.

- The Management Team (MT)

The Executive Committee is assisted by a separate advisory body called the Management Team (MT).

The MT acts as an advisory body to the Executive Committee and has an advisory role. The MT's main duties are to prepare the dossiers that need to be discussed by the Executive Committee, to take part in the discussion, and to formulate an advisory opinion for the Executive Committee in order to facilitate its decision-making.

The MT also handles all risks at both the strategic and tactical levels, as well as the monitoring of these risks (both financial and non-financial). The management of these risks is the responsibility of the Executive Committee (the effective management). Strategic risks are defined as possible events that threaten the (financial) continuity of the organisation or impede the implementation of its strategy. Tactical risks relate to the achievement of the organisation's MTP objectives.

- Assets & Liabilities Committee (ALCO) / Investment Committee

An Assets & Liabilities Committee (ALCO) has been organised within NN Insurance Belgium.

The purpose of the ALCO is to support and advise the CRO in the fulfilment of their responsibilities relating to the management of risks (Insurance Risk, Market Risk and Investment Risk). The ALCO is a forum in which business managers and asset managers come together. All financial and investment risks associated with insurance activities are discussed and evaluated, together with the specific responsibilities, with the aim of managing these risks effectively. The ALCO specifies the Strategic Asset Allocation within the limits of the company's risk appetite. This is translated into the investment mandate. The ALCO defines the limits and approves any deviations from this.

The ALCO monitors investment performance and decides on investment strategy, investment mandates as well as investment proposals within risk limits as set by ALCO on Head Office level. The local Portfolio manager informs the ALCO on the investment transactions done on the portfolio of NN Insurance Belgium.

- Operational Risk Committee (ORC/IRC)

The Operational Risk Committee (ORC) is a periodic consultation between management and the (non-financial) independent control functions.

The ORC monitors non-financial risks throughout the entire chain of operational and reporting processes. It focuses on threats to the effectiveness and efficiency of regular operations and projects, reporting, and compliance with internal and external regulations. These risks are managed from day-to-day by managers within the organisation.

Alongside the ORC, there is a specific committee that manages the risks associated with IT and project governance (the Information Risk Committee or IRC).

- Product Risk Committee (PRC)

A Product Risk Committee (PRC) has been organised within NN Insurance Belgium.

The main purpose of the PRC is product risk management, including product approval and planning. The primary responsibility of the PRC is to supervise the product approval governance of NN Insurance Belgium, which includes product planning and product approval. The PRC also ensures proper implementation of the PARP (Product and Review Procedure) process, both in its practical governance aspects and in the monitoring of compliance with customer suitability rules, whenever a new product is developed or an existing product is updated. The PRC also assesses trends and product risks for the entirety of NN Insurance Belgium, and keeps the Executive Committee and the ALCO informed of these.

The PRC was called into being in order to advise the Executive Committee, the ALCO and the ORC on risks that NN Insurance Belgium is exposed to in the context of insurance. This includes (but is not limited to) risks relating to pricing, reserves, profit participation, reinsurance, profitability, solvency and economic capital. Operational Risk, Business Risk and Legal/Compliance Risk also fall under the scope of this committee.

The PRC is additionally responsible for approving changes to models and assumptions. These functions have been delegated to the PRC by the ALCO.

- Model Committee (MoC)

The Model Committee (MoC) advises the Product Risk Committee (PRC) on the approval of methodologies, models and parameters used to measure risk, determine economic capital and make market-based valuations that are used within NN Insurance Belgium. The MoC is a committee of insurance risk managers.

The committee holds discussions, makes decisions and – where necessary – provides the PRC with recommendations on everything relating to the following items:

- The approval of risk, economic capital and market valuation methodologies, models, parameters, and amendments to models or parameters
- Monitoring the implementation of the approved models and amendments, strategies, policy and parameters
- Monitoring the suitability of parameters and economic and actuarial assumptions
- The identification of problems and shortcomings in models, parameters etc. and deliberation on how far it is desirable to correct these
- The setting of priorities and the monitoring of the model validation processes (in conjunction with model validation)

- Project Board Committees

The Project Board Committees play an essential role in NN Insurance Belgium's project operations:

- the Project Portfolio Board (PPB) is a central control body that oversees project governance.
- a separate steering group is established for large projects or programmes, which usually meets on a monthly basis.

B.1.6.Roles and responsibilities of key functions

NN Insurance Belgium is of the view that all the Solvency II key functions are organized in accordance with the applicable Solvency II regulations. All key function holders within NN Insurance Belgium have passed the NBB fit and proper test. All the Solvency II key functions are able to carry out their duties objectively and free from undue influence and can report relevant findings directly to the relevant Board(s). For a description of the roles and responsibilities of the key functions, reference is made to chapters 3.4 (Risk Management Function), 3.6 (Compliance Function), 3.7 (Internal Audit Function) and 3.8 (Actuarial Function) of this SFCR report.

B.1.7.Remuneration

NN Insurance Belgium has a framework in place that provides the policy regarding to the remuneration and performance management of Employees, including Identified Staff, staff in Control Functions (including the independent Control Functions), Key Functions and Employees who are identified as “Risk Takers”.

B.1.8.Transactions with related parties

- In the normal course of business, NN Insurance Belgium enters into various transactions with related parties which are mainly NN entities that are delivering services towards NN Insurance Belgium.

These transactions take place on an arm’s length basis and are mainly related to Investments, Reinsurance and Group Head Office and IT services. Furthermore, NN Insurance Belgium is shareholder of NN REI (Real Estate).

Reference is made to Note 17, 18 and 24 of the annual accounts for more information on the related amounts.

- During the reporting period, no material transactions (loans, credits or guarantees) were carried out or permitted in conjunction with directors, members of the Executive Committee or senior managers of NN Insurance Belgium.

B.1.9.Adequacy of system of governance

The assessment of the adequacy of the system of governance of NN Group to the nature, scale and complexity of the risks inherent in its business is disclosed in chapter 3.3 and 3.4 of this SFCR report.

B.1.10. Consistent use of risk management, internal control systems and reporting procedures

Reference is made to chapter 3.3 and 3.4 of this SFCR report for a description of how the risk management and internal control systems and reporting procedures are implemented consistently within NN Insurance Belgium.

B.2. Fit and proper requirements

B.2.1. General

NN Group overall, and NN Insurance Belgium specifically, pay an important attention to ensuring that their employees and contractors have the necessary skills, knowledge and experience to adequately fulfill their duties and responsibilities in addition to demonstrating the highest professional behavior and integrity. This is even more critical for senior management, and holders of one of the independent control-functions (CRO, Actuarial Function, Audit Function and Compliance Function) whether executive or not.

With respect to Fit & Proper requirements, NN Insurance Belgium follows the rules laid down by NN Group.

The following elements are key and applicable for Senior Managers and the independent control functions:

- Where required, notification of suggested appointment to the NBB (including regarding the Fit & Proper test) is included in the detailed process, as well as when any of the persons have been replaced because they no longer fulfil the Fit and Proper requirements.
- In addition to being approved by the Management Committee, all recruitment and appointments for key positions are to be done in close cooperation between the local Hiring Manager, the relevant local Human Resources Business Partner and the NN Group Head of Leadership, Talent and Organizational Development.
- In case of Top-50 appointments:
 - The involvement of the NN Group Management Board, and of the NN Group Chief of Change and Organization (CCO) is required.
 - Both the remuneration proposal and the appointment itself will be discussed in the NN Group Management Board and NN Group Compensation Committee (CompCo).
 - The composition of the Top-50 positions will be reviewed by NN Group Management Board on at least an annual basis
- In the event that the candidate becomes identified staff, both the NN Group Management Board and NN Group Supervisory Board will need to give their approval (in accordance with the NN Group Remuneration Framework), in addition to the Management Committee, of course.

Furthermore, NN Group has specific regulations in place regarding to the pre- and in-employment screening process to support adequate management of conduct risk. These rules specifically address the “Propriety” dimension of the Solvency II Fit and Proper requirements.

Screening of staff is needed to ensure the integrity of NN Group’s & NN Insurance Belgium’s business and to minimize the risk of fraud, theft, reputation damage and other security risks.

All internal and external candidates, including interns, are subject to pre-employment screening. Whilst for employees Human Resources is responsible for performing this, Procurement will ensure requirements are adhered to by the consultancy agencies who places their consultants on NN missions and/or on specific roles. ORM is responsible for monitoring effective implementation of the screening requirements.

All candidates for integrity sensitive positions need to be screened by CSI or on behalf of CSI, prior and during employment.

The key requirements are as follows:

- **Identity check:** the identity of a candidate must be verified prior to employment
- **References check:** references, provided by the candidate, must be checked prior to employment
- **Criminal background check:** A check for criminal background must be performed;
- **Name screening:** the name of a candidate needs to be screened against the mandatory lists in accordance with the FEC (Financial Economic Crime) policy prior to employment;
- **Social media/open sources background checks** are a mandatory part of the Pre- and In-Employment Screening processes and apply to:
 - all candidates, defined as all potential internal employees who will have access to NN Group / NN Insurance Belgium information, systems and / or premises.
 - all existing and future external staff who hold, or will hold, Integrity Sensitive Positions (identified staff, independent control functions and/or statutory roles but also other functions with an integrity risk as listed annually by local management).

In-employment screening is performed if the nature of the job and/or that of a different job to be taken so requires. This procedure applies to both internal and external staff, under the form of a 5- yearly administrative investigation or, in case of sensitive positions, under the form of enhanced security investigation.

A negative screening advice prior to employment will automatically lead to rejection of the candidate. With regards to a negative in-employment screening result senior management and the Head of HR of NN Group shall jointly decide on appropriate measures.

Furthermore, screening activities must be appropriately recorded. For employee documents must be included in the employee file. For security of personal information reasons, documents must be recorded in accordance with applicable policies and standards.

Next to these policies, NN Group and NN Insurance Belgium has a framework in place that explicitly conditions compensation to not only the achievements of specific objectives (including regarding developmental objectives - skills acquisition) but also to the way these are met, among others the professional behavior. Furthermore, this framework facilitates the embedment of effective Risk Management principles across the organization.

B.2.2. Board of Directors

Competency requirements - Selection criteria

With respect to the exercise of a director's mandate, NN Insurance Belgium has no formal exclusion criteria other than those provided by law or by circulars issued by the supervisory authorities.

The composition of the Board of Directors must guarantee that decisions are made in the interests of the company. The composition is determined on the basis of the required diversity and complementarity with regard to knowledge, competencies and experience.

The proposed candidate members of the company's Board of Directors are thoroughly screened for their "Fit & Proper" character in accordance with Circular NBB 2013-02 "Fit & Proper" of 17 June 2013.

Directors are chosen based on their impeccable integrity; their competencies, expertise and knowledge of the insurance industry; and their knowledge, experience and expertise in the areas of life and non-life insurance, of Belgian law and regulations concerning insurance, of the marketing and sale of insurance products, of planning and control, of audits in the field of insurance, of investment management, of financial management, of risk management, of financial and accounting regulations of insurance companies, of ICT, of human resource management, etc.

When appointing directors and when renewing their mandates, a balance is maintained on the the Board of Directors between experience in and knowledge of these different areas.

When a mandate becomes available, the Board of Directors will prepare a specific profile which the candidate directors must meet.

Candidates must also undertake to devote the necessary time to exercising their mandate as a director of the company. In view of that purpose, the Board of Directors will take into account the number of mandates that candidates exercise in other companies and the other important obligations they have entered into.

Required knowledge

The newly appointed directors are informed about the general policy and the strategic objectives of NN Insurance Belgium. They are also informed about the evolution of the company's activities, the organisational structure and the risk management procedures.

Directors are expected to update and improve their competencies and their knowledge of the company on a permanent basis. They may seek clarification whenever they deem this necessary.

B.2.3. Executive Committee

Competency requirements

The proposed candidate members of the Executive Committee are thoroughly screened for their "Fit & Proper" character in accordance with the guidelines set out in Circular NBB 2013-02 "Fit & Proper" of 17 June 2013.

The proposed candidate members of the Executive Committee must have the right profile to manage the company. They must demonstrate the required integrity, commitment, reliability, experience and expertise regarding the duties assigned to them.

The members of the Executive Committee have an impeccable track record and the necessary integrity. They have experience in the management of companies and in supervisory duties, and they have suitable knowledge of and experience in all important operating domains of the company, particularly in those domains for which they are directly responsible.

Integrity

Members of the Executive Committee demonstrate the highest personal integrity and, in terms of integrity and ethics, must subscribe to the policies of the NN Group as set out in the "NN Statement of Living our Values" (Reference is made to the website of NN Group). This contains NN's core values and rules of conduct, which apply to all NN employees worldwide.

Each member of the Executive Committee formulates an objective and independent opinion in the interest of the company, based on knowledge of the facts and independently of any external influences.

Conflict of interest

In the event of a potential conflict of interest, the members of the Executive Committee must immediately inform the CEO and the other members of the Executive Committee. To the extent legally required under the Belgian Company Code, the decision will then be referred to the Board of Directors.

B.2.4.Independent control functions

Persons who exercise an independent control function must have the required professional integrity and appropriate expertise in order to exercise their function at all times.

Proposals to appoint persons tasked with an independent control function require prior approval by the NBB, and the guidelines and procedure set out in Circular NBB 2013-02 "Fit & Proper" of 17 June 2013 must be followed.

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

B.3.1. Description of NN Insurance Belgium's risk management system

General

NN Group's and subsequently NN Insurance Belgium's risk management system takes into account the relevant elements of risk management, including its integration into NN Group's / NN Insurance Belgium's strategic planning cycle, the management information generated and a granular risk assessment. This includes a comprehensive set of risk management policies, standards and processes. These are updated regularly to align with market leading practices, applicable laws and regulations and to changes in NN Group's / NN Insurance Belgium's business and risk profile. These risk management policies, standards and processes apply throughout NN Group and are used by NN Group to establish, define and evaluate NN Group's risk tolerance levels and risk control processes and to ensure that the tolerance levels and policies are communicated throughout the organizational structure.

The risk management system is not a serial process but a dynamic and integrated system. The system is structured around three elements, which need to be in place:

- A risk control cycle, embedded in
- An appropriate organization, following
- The business strategy and (risk) objectives, set in alignment with the environment

NN Insurance Belgium's business environment exposes NN Insurance Belgium to inherent risks and obligations. As such, the environment determines the playing field and rules on which to calibrate all risk management activities. These activities are carried out within an internal environment reflected by NN Insurance Belgium's (and NN Group's) risk philosophy (or: risk culture), called Active Risk Management.

We assess the effectiveness of this philosophy twice yearly through Risk Culture Dashboards.



In this philosophy, every employee has a role in identifying risk in their domain and the role of management is to decide how to manage them. It is paramount to know which risks we take and why, have our eyes wide open for both the biggest risks and everyday risks and ensure an adequate return for risk.

With risk management, NN Insurance Belgium does not try to predict the future but manage possibilities. It encompasses all our risks to all key business objectives.

When assessing and managing risks, NN Insurance Belgium works systematically, aim for completeness and document what we do. Each risk analysis performed shall be focused and relevant. It thus becomes clear and transparent throughout the organization for the benefit of management and stakeholders alike.

Risk control cycle

NN's risk control cycle consists of four steps executed in a sound risk culture. The risk control cycle starts with business processes that support business and risk objectives setting (the latter resulting in a risk strategy: risk appetite, policies and standards), followed by business processes aimed at realization of those objectives, leading to risks which need to be managed by identifying/assessing them, effective mitigation through controls and continuous monitoring effectiveness of controls, including reporting of risk levels. The risk control cycle, combined with the Business Plan / financial control cycle and performance management / HR cycle, enables realization of business objectives through ensuring NN Insurance Belgium and NN Group operate within the risk appetite.



B.3.2. Integration in the organisational structure

The Board of Directors is responsible for defining, installing and monitoring the risk management organisation in order to ensure its control systems are effective.

The Board of Directors, or its (sub) committees, approves all risk management policies as well as the quantitative and qualitative elements of NN Insurance Belgium's risk appetite. The Board of Directors reports and discusses these topics with the Audit Committee in its function as Risk Committee on a regular basis.

The Board of Directors is responsible for determining the risk appetite of NN Insurance Belgium in accordance with the approved strategy and mission and the available capital. The Board of Directors regularly evaluates

whether the company has an adequate risk management function that ensures that risk management within NN Insurance Belgium is tailored to the risk appetite approved by the Board of Directors.

While the Board of Directors retains responsibility for NN Insurance Belgium's risk management, it has entrusted the day-to-day management and the overall strategic direction of the company, including the structure and operation of NN Insurance Belgium's risk management and control systems, to the Executive Committee.

The chief executive officer (the CEO), the chairman of the Executive Committee, bears responsibility for NN Insurance Belgium's risk management, including the following tasks:

- Setting risk policies
- Formulating NN Insurance Belgium's risk management strategy and ensuring that it is implemented throughout the company
- Monitoring compliance with NN Insurance Belgium's overall risk policies
- Supervising the operation of NN Insurance Belgium's risk management and business control systems
- Reporting of NN Insurance Belgium's risks and the processes and internal business controls
- Making risk management decisions with regards to matters which may have an impact on the financial results of NN Insurance Belgium or its reputation, without limiting the responsibility of each individual member of the Executive Committee in relation to risk management.

The CEO is also primarily responsible for the communication of risk-related topics to the Board of Directors.

The Board of Directors appoints a chief risk officer (the CRO) from among the members of the Executive Committee, who is entrusted with the day-to-day execution of these tasks.

In order to ensure that the risk management function is involved in making decisions that impact the risk profile of NN Insurance Belgium, a number of committees have been established.

Reference is made to chapter 3.2 of this SFCR report for a detailed description on the responsibilities of the Executive Committee and the specialized committees established by the Board of Directors. An overview and summary of these committees, their purpose and their powers is given in the table below.

| Body | Chair | Purpose | Powers |
|---------------------|-----------------------------|---|---|
| Board of Directors | Chair of Board of Directors | | Risk appetite (approval of Risk Appetite Framework). |
| Executive Committee | CEO | Decision-making body tasked with the day-to-day policy of NN Insurance Belgium. | <ul style="list-style-type: none"> • Approving strategic asset allocation (SAA). • Approving new product launches (PARP). • Approving changes to product design (PARP or addendum). • Approving reinsurance policy. |

System of Governance

| |
|---------------------------------|
| Business and performance |
| System of governance |
| Risk profile |
| Valuation for Solvency purposes |
| Capital management |

| Body | Chair | Purpose | Powers |
|-----------------------------|--|---|---|
| ALCO / Investment Committee | CRO | Supporting and advising the CEO in the fulfilment of their responsibilities relating to the management of financial risks. | <ul style="list-style-type: none"> SAA proposals. Approval of Investment Mandate. Specifying the tactical asset allocation. Monitoring the key risk indicators. Making decisions or formulating proposals to the Executive Committee in order to remain within the limits of the Risk Framework. All proposals approved by the ALCO that do not fall under the authority of the CRO must be submitted to the Executive Committee for approval. |
| PRC | CRO | <ul style="list-style-type: none"> Product risk management Advising the ALCO and the Executive Committee on risks to which NN Insurance Belgium is exposed in the context of insurance. | <ul style="list-style-type: none"> Product risk management, i.e. product approval and planning. Ensuring proper implementation of the PARP process (both governance and compliance with customer suitability rules) when developing new products or updating existing products. Assessing trends and product risks for NN Insurance Belgium. Formulating advice on risks to which NN Insurance Belgium is exposed in the context of insurance. (This includes – but is not limited to – risks relating to pricing, reserves, profit participation, reinsurance, profitability, solvency and economic capital). Approving model and assumption changes. |
| Model Committee | CRO | Advising the PRC on model and assumption changes. | <ul style="list-style-type: none"> Preparing the planning for model changes. Validating model and assumption changes and submitting them to the PRC for approval. |
| ORC | Effective manager (director or Senior manager) | Monitoring non-financial risks. Periodic consultation between management (non-financial) & independent control functions | Focus on threats to the effectiveness & efficiency of regular operations & projects, reporting and compliance with internal & external regulations |
| IRC | Effective manager responsible for Change & IT | Managing the risks associated with IT and project governance | |

If the Executive Committee makes decisions that are not in line with the risk profile of the company, the CRO has a right of veto within NN Insurance Belgium and the issue is escalated to the next hierarchical level within the NN Group. This is also reported to the Board of Directors through the Annual Risk Management Report. The CRO has the option to inform the chairman of the Board of Directors and/or the Audit Committee directly, on his own initiative, of all issues relating to the risk management function.

Furthermore, the Risk Management activities are fully embedded in the organisational structure of NN Group. NN has a matrix organisational structure that consists of a decentralised business organisation and a functional risk line (the IRM Functional Network). The governance of this functional network is described in and governed by the “Risk Management & Internal Control General Principles” of NN Group which has the objective to:

- clarify the scope of Risk Management,
- clarify what an Internal Control Framework to manage risks entails,
- provide requirements for one common architecture, and
- define one common language across NN Group on “control”.

Within NN Group, the functional line is organised across 2 levels: Corporate and Business Unit with a Chief Insurance Risk Officer (CRO) at each level. As a member of the Executive Committee, the CRO reports to the Executive Committee and reports functionally to the CRO of NN Insurance International. This organisational structure with functional lines guarantees the independence of the risk management function within NN.

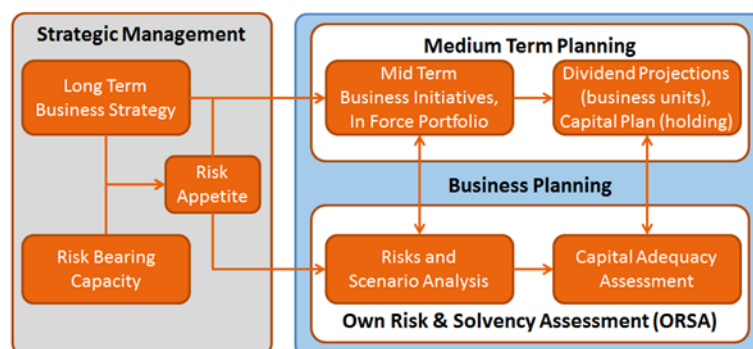
B.3.3. Own Risk and Solvency Assessment (ORSA)

General

Business strategy and objectives, key risk appetite statements, risk and capital management are aligned in the ORSA in synchronization with the yearly medium term business plan. The ORSA report supports the Board of Directors and the Management Team in assessing the overall risk and capital profile of the business under a wide range of scenarios.

The ORSA is defined as the entirety of the processes and procedures employed to identify, assess, monitor, manage and report the short and long term risks a (re)insurance legal entity faces or may face and to determine the own funds necessary to ensure that the entity’s overall solvency needs are met at all times. In particular, ORSA:

- Is a specific instrument within NN’s risk management system: it is a high level forward looking analysis on capital adequacy under a wide range of scenarios based on the current and emerging risk profile of an entity, given its strategy and risk appetite
- Does not serve to calculate the capital requirement, although capital add-ons can be considered as a result of ORSA
- Shall be an integral part of business planning. As such, ORSA is linked to the strategic management process and related decision-making framework as pictured below



Regular frequency

NN Group and subsequently NN Insurance Belgium prepares an ORSA at least once a year. In the ORSA, NN Insurance Belgium

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

Stress testing examines the effect of exceptional but plausible scenarios on the capital position of NN Insurance Belgium. Stress testing can also be initiated outside ORSA, either internally or by external parties such as NBB and European Insurance and Occupational Pensions Authority ('EIOPA'). The ORSA includes a forward looking overall assessment of NN Insurance Belgium's solvency position in light of the risks it holds.

Triggers

To the extent necessary, the outcomes of ORSA are translated in ad-hoc ORSA triggers (i.e. events that lead to a significant shock in the risk profile and/or capital position), relevant metrics and/or indicators and management actions for identified material risks. Monitoring of the same is part of the regular (Finance & Risk) control cycle. Developments are documented in internal Finance & Risk reports and discussed during board and/or delegated committee meetings. The CRO is responsible for identifying the need of a (partial) ad-hoc ORSA. Head Office will be informed as soon as possible when the decision for a (partial) ad-hoc ORSA is made in a business unit ('BU'). In such cases, the local supervisory authority (NBB) is also informed.

The ORSA Process

The ORSA of NN Insurance Belgium is conducted based on the expected regulatory (reporting) frameworks of his businesses for the related year onwards. Own Funds are calculated and projected on a Solvency II basis and the solvency capital requirements (SCR) are calculated based on the Standard Formula.

The regular ORSA process as undertaken within NN Insurance Belgium (and within NN Group) contains the following steps:

- **Strategy and risk appetite**

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

- **Risk Assessment**

Key to ORSA is the identification of potentially solvency threatening risks for legal entities by management boards, given their strategy and risk appetite. Basis for this risk assessment is NN Group's risk taxonomy. Modelled risks are subject to an appropriateness test (see below) and additional statistical stress testing (see below), both contributing to adequate capitalisation of these risks. Focus is therefore on non-modelled risks.

- **Appropriateness test of regulatory capital calculation**

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

- **Capital and capital projections**

The recognition and valuation bases for internal capital projections are the same as those used for regulatory solvency reporting and consistent with the best-estimate assumptions and parameters used for the Business Plan best estimate financial forecasts, among others the yearly updated Macro Economic Scenario.

The Actuarial Function is to confirm that the base-case and projected technical provisions represent a true and fair view of future liabilities. The Actuarial Function also provides input concerning the risks arising from the calculation of technical provisions.

Regulatory solvency is at the heart of ORSA: NN Insurance Belgium must ensure that it is able to meet regulatory required solvency ratios at all times. In addition, NN Insurance Belgium assesses:

- The quantity and quality of Own Funds over the Business Plan period
- The composition of Own Funds across tiers and how this composition may change as a result of redemption, repayment and maturity dates during the Business Plan period

Note that the process steps as described above are not meant to be followed consecutively, but iteratively, as this will foster the proper discussions on the trade-off between risk, return and capital.

Stress testing and overall assessment of capital adequacy

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

Scenario testing, as well as (reverse) stress testing are required for each ORSA. At the same time, the group-wide ORSA will assess any local stress scenario that significantly impacts NN Group overall and perform statistical stress tests (based on 1-in-20 shocks) on modelled risks. When the outcomes of performed stress tests show solvency ratios dropping below 100%, realistic strategies for recovering solvency ratios will be considered and documented in the ORSA report. For NN business units, a capital downstream can only be considered if there is no other feasible management option left.

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

Management Actions

Based on the results of the former steps management has to consider its response, both risk and capital response, and reach a conclusion. The process step results in an advice from support functions to management which are to be discussed during a Board meeting. Responses that lead to management actions shall be documented, including the person accountable for that action, in the ORSA Internal Report. Those actions are limited to:

- accept risks, when they are within the BU's risk appetite;
- mitigate risks: e.g. de-risking, improve key internal controls, develop a plan of action in case certain events emerge (contingency and/or recovery plans) or adjust the business plan;
- share or transfer risks through e.g. reinsurance, co-insurance and/or hedging;
- terminate the risk generating activity (divesting).

B.4. The Internal control system

B.4.1. Description

The three lines of defence model, on which NN Insurance Belgium's (and NN Group's) risk management structure and governance is based, defines three risk management levels, each with distinct roles, decision authorities, execution responsibilities and oversight responsibilities. This framework ensures that risk is managed in line with the risk appetite as defined by the Executive Committee, ratified by the Board of Directors and cascaded throughout NN Insurance Belgium.

First line of defence

Overall, the First Line of Defence includes the CEO of NN Insurance Belgium as well as the Management Team. They have primary accountability for the performance of the business, operations, compliance and effective control of risks affecting their businesses. They underwrite the (insurance) products that reflect local needs and thus know their customers and are well-positioned to act in both the customers' and NN Insurance Belgium's best interests.

Second line of defence

The Second Line of Defence includes independent oversight functions with a major role for the risk management organisation, corporate legal and Compliance function. The CEO and CRO steer a functional, independent risk organisation, which supports the commercial departments in their decision-making, but which also has sufficient countervailing power to prevent risk concentrations and other forms of unwanted or excessive risks. These oversight functions include:

- Developing the policies and guidance for their specific risk and control area
- Encouraging and objectively challenging/monitoring sound risk management throughout the organisation and coordinate the reporting of risks
- Supporting the first line of defence in making proper risk-return trade-offs
- Escalation power in relation to business activities that are judged to present unacceptable risks to NN Group

Third line of defence

The Third Line of Defence concerns Corporate audit services (CAS). CAS provides an independent assessment of the standard of internal control with respect to NN Insurance Belgium's business and support processes, including governance, risk management and internal controls.

B.4.2. Compliance function

As an independent control function, the Compliance function forms part of the second line within NN Insurance Belgium. The purpose of this function is to supervise compliance with applicable laws and regulations in order to safeguard NN Insurance Belgium against any negative impacts resulting from a failure to abide by these provisions or codes of ethics. The protection of the integrity of the company and its personnel plays a central role in this regard.

The Compliance function and its activities are governed by a Charter and Framework approved by the Board of Directors of NN Insurance Belgium.

The Compliance Officer's responsibilities specifically consist in proactively

- identifying, evaluating, monitoring and reporting on the compliance risks facing NN Insurance Belgium;
- assisting, supporting and advising the Executive Committee and management in the fulfilment of their responsibilities relating to integrity and compliance;
- providing advice to all employees with regard to their (personal) integrity and compliance obligations.

The activities of the Compliance function are described annually in an action plan. This action plan is approved by the Executive Committee and certified by the Audit and Risk Committee (acting on behalf of the Board of Directors).

B.5. Internal Audit Function

Corporate Audit Services (CAS), the internal audit department within NN, is an independent assurance function and its responsibilities are established by the Management Board and approved by the Supervisory Board/ Audit Committee. CAS provides an independent assessment of the standard of internal control with respect to NN entities and support processes, including governance, risk management and internal controls. CAS is an essential part of the corporate governance structure of NN Belgium. CAS NN Belgium operates in a so called co-operation model with CAS NN Group with shared specialist audit services and central oversight from CAS NN Group. This model is chosen to safeguard specialist expertise and efficiency for NN Belgium.

In compliance with local corporate governance and Solvency II, the Audit Manager of CAS NN Belgium is accountable to the CEO as well as the General Manager of CAS NN Group and furthermore has a reporting line to the chair of the Audit Committee of NN Belgium. This reporting set-up is an important element in maintaining independence for CAS NN Belgium.

CAS is responsible for executing the internal Audit function in a NN entity provided NN has 100% ownership, has a majority stake and management control or has no majority stake but effectively has management control. The area of work (Audit universes) is defined as every activity, departments and offices of a NN entity, including branches, subsidiaries as well as outsourced activities (with a "right-to-audit" clause). CAS performs its assignment on its own initiative. CAS is maintaining its objectivity by not participating in any activity or relationship that may impair or be presumed to impair its unbiased assessment.

CAS performs its work in accordance with the International Standards for the Professional Practice of Internal Auditing Standards and Code of Ethics set by the Institute of Internal Auditors (IIA), and with other relevant authorities or professional associations. These professional standards are incorporated in the CAS Audit Manual. Compliance to the audit manual is embedded at various levels in the audit process and includes review by the independent positioned Professional Practices Management team within CAS NN Group. On a periodic basis CAS globally is subject to an independent external assessment.

B.6. Actuarial Function

In accordance with statutory and regulatory provisions, NN Insurance Belgium has established an actuarial position and has designated a person who has the required actuarial knowledge to fulfil this position.

The proposal to appoint this person requires prior approval by the NBB, and the guidelines and the procedure contained in the NBB 2013-02 "Fit & Proper" Circular of 17 June 2013 must be followed.

If the appointment of this person changes or if this person's appointment is discontinued, the NBB must be notified accordingly and the guidelines and the procedure contained in the NBB 2013-02 "Fit & Proper" Circular of 17 June 2013 must be followed.

To guarantee the independence of the actuary, an appointment as actuary is incompatible with an appointment as:

- member of the executive management;
- approved auditor of the same company;
- director in the same company in which he exercises his mandate;
- Internal Auditor.

The Actuarial Function is responsible for the duties and activities set out in the NBB Circular 2016-31 of 5 July 2016 regarding the governance system requirements for the insurance sector. It regards the following activities, as also stated in the S II law:

- controlling/supervision of the calculations of the technical provisions;
- ensuring the appropriateness of the methodologies and underlying models used as well as the assumptions;
- assessment of the sufficiency and quality of data;
- comparing best estimates against experience;
- assessing sufficiency of technical provisions and consistency of calculation with legal requirements;
- informing the Management Team of NN Insurance Belgium and the Board of Directors on the key components of the Solvency II technical provisions such as data quality, assumption setting, models and methods.
- provide an opinion on the underwriting policy and the appropriateness of reinsurance arrangements considering the risk appetite of the insurance entity.
- contribution to the risk management system in the following domains: the modelling of the risks and the assessment made in the context of the ORSA.

Furthermore, the Actuarial Function has the following tasks related to the Annual Accounts (BE GAAP):

- assess whether calculation and level of TP as mentioned in the statutory accounts are compliant with Accounting Royal Decree (RD 17,11,1994);
- validate the calculation of the "Flashing Light provision" in case no exemption is granted by NBB. The Actuarial Function Holder (AFH) must check if the "Flashing Light provision" is calculated according to the RD of 17/11/1994.

- perform an annual analysis of the profitability of the products based on the statutory accounts.

The AFH produces a written report with an opinion on the above matters and submits it to the Management Team of NN Insurance Belgium, the Board of Directors and, where appropriate, to the local regulator (NBB) at least annually.

At least once a year, the Actuarial Function Holder presents a written activity report to the Board of Directors (or Audit/Risk Committee) and for information to the Executive Committee. The report describes all the material tasks performed by the actuary and the corresponding results, and clearly identifies any shortcomings and makes recommendations on how these shortcomings can be remedied.

Furthermore, the AF reports periodical to the Board (or Audit/Risk Committee), e.g. in case of the following events:

- Launch or modification of a product with significant impact on the profitability of the undertaking;
- introduction of new reinsurance arrangements
- actuarial opinion on underwriting, reinsurance or profit sharing policies
- all other events where intervention or validation of the AF is required

The AF should in any case inform the Executive Committee and the Board of Directors (or Audit/Risk Committee) when specific risk developments have or could have a negative impact or could be harmful to the reputation of the undertaking.

B.7. Outsourcing

In the event of outsourcing, the principles of the NBB Circular 2016-31 and the rules issued by NN Group must be followed at all times. The guidelines that must be followed in this regard are listed in a specific policy of NN Insurance Belgium which is approved by the Board of Directors.

When outsourcing specific functions, activities or operational duties, NN Insurance Belgium takes into account the following points (among others):

- prior approval by the Executive Committee for the function, activity or operational duty being outsourced, based on in-depth analysis of the exact description of the outsourced function, activity or operational duty, as well as a cost/benefit analysis and an analysis of the financial and operational risks.
- maintaining full control in respect of monitoring the functioning and quality of the outsourced function, activity or operational duty, in order to allow any future adjustments to be made that may be required.
- verifying the reputation and the capacities of the service provider(s), as well as the risks relating to continuity and to the level of dependence on the service provider(s).

When outsourcing operational duties, the Executive Committee guards against:

- the quality of the company's governance system being materially compromised during outsourcing;
- unnecessary increases in operational risk;
- any impediment to the ability of the NBB and the FSMA to assess whether NN Insurance Belgium is meeting its statutory obligations;

- the continuity and adequacy of the service provided to policyholders, insured individuals and beneficiaries of insurance agreements being undermined.

Whenever an intermediary who is not an employee of NN Insurance Belgium is authorised to conclude insurance agreements and/or claims payments, the Executive Committee must ensure that the activities carried out by that intermediary meet the outsourcing requirements.

The outsourced function, activity or operational duty is the subject of a contract that is signed between NN Insurance Belgium and the service providers. NN Insurance Belgium ensures that the service providers particularly abide by the rules concerning the confidentiality of the information they have access to while carrying out the outsourced activity.

The Executive Committee notifies the NBB in advance and in a timely manner of the outsourcing of any functions, activities or operational duties that are important or critical, and of any later significant developments relating to these outsourced duties.

The outsourced activities and services fall under the purview of both the Internal Audit and the Compliance function. The recognised statutory auditor may access the outsourced activity or service at any time in order to carry out their audit.

The following services are currently outsourced externally:

- The administrative management of salaries
- Investment Management - Asset management
- IT infrastructure
- Use of Sales Force (Cloud)
- Use of O365 (Cloud)

B.8. Any other information

The previous sections contain all the material information regarding to the system of governance of NN Insurance Belgium.

C. Risk profile

Introduction

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

General information on the risk governance used within NN Insurance Belgium is available in section B.3. and B.4..

NN Group and subsequently, NN Insurance Belgium has defined and categorized its generic risk landscape in a mutually exclusive and collectively exhaustive risk taxonomy that consists of approximately 50 main risk types clustered in six risk classes.

| Risk Class | Description | Main mitigation technique |
|---------------------------|--|---|
| Emerging Risks | Risk related to future external uncertainties that could pose a threat to the business of NN Group / NNIB | Scenario analysis and contingency planning |
| Strategic Risks | Risks related to unexpected changes to the business profile and the general business cycle as envisaged during strategic decision making | Scenario analysis and business planning |
| Market Risk | Risks related to (the volatility of) financial and real estate markets. This includes liquidity risk | New Investment Class Approval and Review Process, Asset Liability Management studies, Strategic Asset Allocations, Limit structure, Derivatives |
| Counterparty Default Risk | Risk related to the failure to meet contractual debt obligations | Limit structure |
| Non-Market Risk | Risks related to the products NN Group / NNIB markets | Product Approval & Review process, Limit structure, reinsurance |
| Non-Financial Risk | Risks related to people, inadequate or failed internal processes, including information technology and communication systems and/or external events. | Business and Key Controls, Control Testing, Incident Management |

➤ Non-Market risk

- **Insurance risk:** Insurance risks are the risks related to the events insured by NN Insurance Belgium and comprise actuarial and underwriting risks such as mortality, longevity, morbidity and non-life insurance risks, which result from the pricing and acceptance of insurance contracts.
- **Business risk:** Business risks are the risks related to the management and development of the insurance portfolio but exclude risks directly connected to insured events. Business risk includes policyholder behavior risks and expense risks. Business risks occur because of internal, industry, regulatory/political, or wider market factors.

➤ Market and Counterparty Default Risk

- **Market and credit risk:** Market risk is the risk of potential losses due to adverse movements in financial market variables. Counterparty default risk (credit risk) is the risk of potential losses due to default by counterparties. Market and credit risks include (i) equity risk; (ii) real estate risk; (iii) interest rate risk; (iv) credit spread risk; (v) counterparty default risk and (vi) foreign exchange risk. In relation to market and credit risk, a distinction is made between own account business and separate account business.

- **Own account business:** in the case of own account business, NN Insurance Belgium directly bears the market and credit risk of its invested assets and liabilities. Own account business includes NN Insurance Belgium's life insurance and non-life insurance business, as well as other invested assets and direct liabilities.
- **Separate account business:** in the case of separate account business, the policyholder bears the market and credit risk. NN Insurance Belgium's earnings from the separate account businesses are primarily driven by fee income. However, in the case of variable annuities and in some Unit-Linked products, NN Insurance Belgium retains risk associated with the guarantees provided to its policyholders. Businesses in this category are (i) the variable annuities (VA) portfolio, and (iii) other separate account business, primarily the unit-linked business.
- **Liquidity risk:** Liquidity risk is the risk that NN Insurance Belgium does not have sufficient liquid assets to meet its financial obligations when they become due and payable, at reasonable cost and in a timely manner.

➤ Non-Financial Risk

- **Operational risk:** Operational risk is a non-financial risk that includes direct or indirect losses resulting from inadequate or failed internal processes (including as a result of fraud and other misconduct), systems failure (including information technology and communications systems), human error and certain external events.
- **Compliance risk:** Compliance risk is the risk of impairment of NN Insurance Belgium's integrity. It is a failure (or perceived failure) to comply with NN Group Statement of Living our Values and the Compliance Risk-related laws, regulations and standards that are relevant to the specific financial services offered by a business or its ensuing activities, which could damage NN Insurance Belgium's and hence NN Group's reputation and lead to legal or regulatory sanctions and financial loss.

NN Insurance Belgium manages the level of risk exposures by measuring and limiting the impact of a 1-in-200 year adverse scenario on the Solvency II Own Funds. The loss of Own Funds in a 1-in-200 year scenario is referred to as the Solvency Capital Requirement ('SCR'), the metric used to describe the risk profile throughout the remaining section.

Within this section, the SCR is used to elaborate on the risk profile of NN Insurance Belgium. The table below provides an overview of the SCR per major risk category.

| Capital Requirement per risk type | 2016 |
|---|------------|
| Life underwriting risk | 76 |
| Market risk | 205 |
| Counterparty default risk | 19 |
| Health underwriting risk | 14 |
| Diversification | -68 |
| Basic Solvency Capital Requirement | 247 |
| Operational Risk | 21 |
| Solvency Capital Requirement (SCR) | 268 |
| LAC DT | -39 |
| SCR Post Tax | 230 |

C.1. Underwriting risk

Underwriting risks are the risks related to the events insured by NN Insurance Belgium ('Insurance Risk') and the risks related to the management and development of the insurance portfolio ('Business Risk').

Insurance Risks comprise actuarial and underwriting risks such as mortality, longevity, morbidity, and non-life insurance risks, which result from the pricing and acceptance of insurance contracts.

Business Risks includes policyholder behavior risks and expense risks. Business risks occur because of internal, industry, regulatory/political, or wider market factors.

C.1.1. Insurance risk

- Risk profile

Mortality risk occurs when claims are higher due to higher mortality experience (for instance in relation to Term insurance). Longevity risk is the risk that insured persons live longer than expected due to mortality improvements. Changes in mortality tables impact the future expected benefits to be paid and the present value of these future impacts is reflected directly in measures like Own Funds. Longevity risk exposes NN Insurance Belgium primarily to mortality improvements and the present value impact is larger when interest rates are low.

NN Insurance Belgium's morbidity risk lies in Health insurance which pays out a fixed amount.

- Risk mitigation

Proper pricing, underwriting, claims management, and diversification are the main risk mitigating actions for insurance risks.

Management of the insurance risks is done by ensuring that the terms and conditions of the insurance policies that NN Insurance Belgium underwrites are correctly aligned with the intended policyholder benefits to mitigate the risk that unintended benefits are covered. This is achieved through NN Insurance Belgium's underwriting standards, product design requirements, and product approval and review processes.

Additionally, Insurance Risk is managed through concentration and exposure limits and through reinsurance:

- Tolerance limits for life insurance risks are set per insured life and significant mortality events affecting multiple lives such as pandemics.
- Reinsurance is used to manage risk levels (such as the mortality risk on the risk protection business of NN Insurance Belgium).
- Reinsurance creates credit risk which is managed in line with the reinsurance credit risk policy of NN Group.

C.1.2. Business risk – Policyholder behaviour risk

- Risk profile

Policyholder behavior risk is the risk that policyholders use options available in the insurance contracts in a way that is different from that expected by NN Insurance Belgium. Depending on the terms and conditions of the insurance policy, and the laws and regulations applicable to the policy, policyholders could have the option to surrender, change premiums, extend their contracts and take out policy loans, or even change

contract details. Policyholder behavior therefore affects the profitability of the insurance contracts. The risk that policyholders maintain their contracts longer than NN Insurance Belgium has assumed is specific to the variable annuity business when guarantees are higher than the value of the underlying policyholder funds and the higher interest rate guaranteed savings business. The risk that policyholders hold their contracts for a shorter period than NN Insurance Belgium has assumed relates to the risk protection business.

Changes in tax laws and regulations can affect policyholder behavior, particularly when the tax treatment of their products affects the attractiveness of these products for customers. For instance, changes in tax treatment may affect the tax efficiency of the savings products.

The SCR calculations for policyholder behavior risk take into account the present value impact of changes in policyholder behavior assumptions.

- Risk mitigation

Policyholder behavior risks – such as persistency and premium risk – are managed through the product development, product approval and review processes and by ensuring that appropriate advice is given to the customer, not only at the point of sale but also during the lifetime of the product. The policyholder behavior experience of in-force policies is assessed at least annually.

As part of its strategy, NN Insurance Belgium has put several programs in place to own and improve the customer experience. These programs improve the match between customer needs and the benefits and options provided by NN Insurance Belgium's products. Over time, NN Insurance Belgium's understanding and anticipation of the choices policyholders are likely to make, will improve, thereby decreasing the risk of a mismatch between actual and assumed policyholder behavior.

C.1.3. Business risk – Expense risk

- Risk profile

Part of the total administrative expenses are variable, depending on the size of the business and sales volumes, and parts are fixed and cannot immediately be adjusted to reflect changes in the size of the business. Expense risk relates primarily to the fixed part of NN Insurance Belgium's expenses, and is the risk that future actual expenses per policy exceed the expenses assumed per policy. NN Insurance Belgium is exposed to the risk that the overheads relating to IT administration systems will remain constant, or even increase, while the number of policies in the in-force book gradually decreases, leading to a per policy expense increase.

- Risk mitigation

Ongoing initiatives are in place to manage expense risk, company targets are in place to reduce expenses, thus, lowering expense risk going forward. These initiatives seek to variabilise expenses to the underlying contracts in place.

C.1.4. Risk measurement

The total life underwriting capital requirement for NN Insurance Belgium amounts to EUR 76 million and is mainly driven by expense risk and policyholder behavior risk (early cancellation rights).

C.2. Market & Counterparty Default Risk – own account business

Market risk is the risk of potential losses due to adverse movements in financial market variables. Through counter party default risk it also recognizes potential losses due to default by NN Insurance Belgium's debtors (including bond issuers), trading counterparties or mortgage holders.

Market risks include (i) equity risk; (ii) real estate risk; (iii) interest rate risk; (iv) credit spread risk; (v) counterparty default risk and (vi) foreign exchange risk. In relation to market risk, NN Insurance Belgium distinguishes between own account business and separate account business. In the case of own account business, NN Insurance Belgium directly bears the market risk of its invested assets and liabilities. In the case of separate account business, the policyholder bears the market risk.

Own account business includes NN Insurance Belgium's life insurance, as well as other invested assets and direct liabilities. NN Insurance Belgium takes on market and credit risk for its Own account business in pursuit of returns. These returns are used to fulfil policyholder obligations with any surplus return benefitting the Group and its shareholders. Accordingly, optimization within the risk appetite is paramount to generating returns for both policyholder and shareholder.

Within NN Insurance Belgium's own account, market risks are driven by the fixed income portfolio that generates spread risk and interest rate risk for duration mismatches. While it constitutes a smaller asset allocation, equity investments also generate risks as these risks cannot be directly offset by the liabilities.

The SCR for most fixed income bonds is calculated within spread risk and SCR for the fixed income loans including mortgages within counterparty default risk. SCR for non-fixed income assets such as equity and real estate are addressed in the respective risk categories.

NN Insurance Belgium holds a diversified asset portfolio for its own account business. Reference is made to section D.1. Assets containing a description of the asset class values of NN Insurance Belgium as at 31 December 2016.

C.2.1. Equity risk

- Risk profile

Equity plays a role in the Own account business by providing diversification and up-side return potential. This does present a risk which is measured as the impact of changes in prices of directly held equities and equity derivatives such as futures and options.

- Risk mitigation

Exposure to equities provides for additional diversification and up-side return potential in the asset portfolio of an insurance company with long-term illiquid liabilities. The concentration risk on individual issuers is mitigated under relevant investment mandates. As mentioned, there is no natural hedge for equity risk on the liability side of the balance sheet, but from time to time NN Insurance Belgium protects the downside risk of the equity portfolio by buying put options and other hedge instruments.

C.2.2. Real estate risk

With the long-term nature of the liabilities of NN Insurance Belgium's Own account, illiquid assets such as real estate can play an important role in the strategic allocation. Real estate risk is the risk of loss of market value of real estate assets. Market values are driven by a change in rental prices, required investor yield, and/or other factors.

- Risk profile

NN Insurance Belgium's real estate exposure mostly originates from the investment in associates which concerns our investment in the shareholders capital of the real estate entity within the group. The total investment in associates amounts to EUR 207 million at 31 December 2016. The real estate position held by NN Insurance Belgium can include leverage, and therefore the actual real estate exposure is larger than NN Insurance Belgium's actual real estate assets.

The real estate portfolio is held for the long-term and is illiquid. Furthermore there are no hedge instruments available in the market to effectively reduce the impact of market volatility.

- Risk mitigation

Exposure to real estate provides for additional diversification for the asset portfolio. The concentration risk on individual issuers is mitigated under relevant investment mandates.

C.2.3. Interest rate risk

Interest rate risk is the impact of interest rate changes on Own Funds as a result of the associated change in the value of the assets and liabilities.

- Risk profile

NN Insurance Belgium's liabilities have a material amount of long-term liability cash flows, which related primarily to the pension and long term savings business.

- Risk mitigation

NN Insurance Belgium hedges its economic interest rate exposure by investing in long-term bonds and swaps matching liability maturities. The remaining interest rate gap may be, from time to time, further reduced through purchases of receiver swaps and swaptions. Interest rate risk management focuses on matching asset and liability cash flows as much as possible.

- Risk measurement

For purposes of discounting liabilities under Solvency II, NN Insurance Belgium uses a swap curve less Credit Risk Adjustment plus Volatility Adjustment. In line with Solvency II, NN Insurance Belgium extrapolates the EUR swap curve from the 20 year point onwards to the Ultimate Forward Rate (UFR) – as defined under Solvency II. The SCR for interest rate risk primarily depends on the level of cash flow matching between assets and liabilities up to the 20 year point, and the difference between the swap curve and the curve extrapolated to the UFR for longer cash flows.

C.2.4. Credit Spread Risk

Credit spread risk reflects the impact of credit spreads widening (or narrowing) due to changes in expectation of default, illiquidity and any other risk premiums priced into the market value of bonds.

- Risk profile

NN Insurance Belgium invests mainly in Belgium government bonds. These long-term government bonds are sensitive to sovereign credit spread movements versus EUR swap rates. In the Solvency II risk measurement, government bonds do not contribute to credit spread risk.

- Risk mitigation

NN Insurance Belgium aims to maintain a low-risk, well diversified fixed income portfolio. NN Insurance Belgium has a policy of maintaining a high quality investment grade portfolio while avoiding large risk concentrations. The concentration risk on individual issuers is managed using rating-based issuer limits on one (group of related) single name(s), effectively managing the default risk of the issuers.

- Risk measurement

The SCR for credit spread risk reflects, with 99.5% level of confidence, the risk of Own Funds to spread movements – impacting fixed income assets held in the Own account. Fixed income assets are shocked with severity linked to a 1-in-200 year event (or 99.5% level of confidence) and depending on the investment type, rating and duration.

C.2.5. Counterparty Default risk

Counterparty default risk is the risk of loss of investments due to unexpected default, or deterioration in the credit standing, of the counterparties and debtors (including reinsurers) of NN Insurance Belgium. The SCR for counterparty default risk is primarily based on the associated issuer's probability of default (PD) and the estimated loss-given-default (LGD) on each individual asset combined with diversification across assets.

The Counterparty Default Risk module covers any credit exposures which are not covered in the spread risk sub-module. For each counterparty, the Counterparty Default Risk module takes account of the overall counterparty risk exposure pertaining to that counterparty.

The Counterparty Default Risk Exposure is split in Type I and Type II exposures. The class of Type I exposures covers the exposures which may not be diversified and where the counterparty is likely to be (externally) rated, e.g. reinsurance contracts, derivatives and money market exposures. The class of Type II exposures attempts to cover the exposures which are usually diversified and where the counterparty is likely to be unrated, predominantly residential mortgages, but also other forms of term lending not covered in Type I. These two classes form the basis for the respective capital treatment in the Counterparty Default Risk module.

- Risk profile

NN Insurance Belgium's Counterparty Default Risk exposure is the highest in Type II assets. Other sources of Counterparty Default Risk include other loans (like policy loans), reinsurance and the claims on counterparties from over-the-counter derivatives.

- Risk mitigation

NN Insurance Belgium uses different credit risk mitigation techniques. For retail lending portfolios, pledges of insurance policies, or retaining the investment accounts of clients are all important elements of credit risk mitigation. For OTC derivatives, the use of International Swaps and Derivatives Associations master agreements accompanied with credit support annexes is an important example of risk mitigation. Other forms of credit risk mitigation include reinsurance collateral. For cash and money market funds, limits per counterparty are put in place.

For its mortgage portfolio, NN Insurance Belgium insures to invest in high quality portfolios and closely monitors the performance of the book. Both the Loan-to-Value (LTV) for residential mortgages, which is based on the net average loan to indexed value, as the credit performance are followed up regularly. This way, troubled assets are identified early and managed properly. The loan is categorized as a non-performing loan (NPL) if the arrear still exists after 90 days. A loan is re-categorized as a performing loan again when the amount past due has been paid. All loans not classified at initial recognition as being either (1) assets at market value through profit-and-loss, (2) assets held for trading, or (3) assets available-for-sale are measured against amortized cost and are subject to impairment review.

- Risk measurement

The Counterparty Default module comprises two sub-modules:

- CDR Type I: applicable to exposures which might not be diversified and where the counterparty is likely to be (externally) rated. The underlying model is the Ter Berg model (basis for Standard Formula under Solvency II).
- CDR Type II: applicable to exposures that are usually (well) diversified and where the counterparty is likely to be unrated. The underlying model is based on the Basel regulatory model.
- The capital charges for CDR Type I and CDR Type II exposures are calculated separately and aggregated using a diversification effect.

Note that fixed income bonds are also subject to counterparty default risk, but this risk is included in credit spread risk.

C.2.5.1. Foreign exchange risk

Foreign exchange ('FX') risk measures the impact of losses related to changes in currency exchange rates.

- Risk profile

NN Insurance Belgium holds no material direct exposure to foreign exchange risk.

C.3. Market & Counterparty Default risk - Separate account business

In the case of separate account business, the policyholder bears the market and credit risk. NN Insurance Belgium's earnings from the separate account businesses are primarily driven by fee income.

C.3.1. Variable annuity portfolio

- Risk profile

NN Insurance Belgium has been selling variable annuity ('VA') products since 2009. The products have minimum guaranteed living benefits such as survival benefit or withdrawal benefits.

- Risk mitigation

NN Insurance Belgium has a reinsurance agreement with NN RE in place for its VA business. This agreement targets both market and underwriting risk.

C.3.2. Other separate account business

- Risk profile

The other separate account business consists of unit-linked insurance policies, which provide policyholders with fund selection combined with an insurance cover. In a unit-linked policy, the investment risk is borne by the policyholder, although there are some unit-linked products where NN Insurance Belgium has provided guarantees on the performance of specific underlying funds. Unit-linked products without guarantees do not expose NN Insurance Belgium to market risk, except to the extent that the present value of future fees is affected by market movements of the underlying policyholder funds.

- Risk mitigation

The market risks of the unit-linked and other separate account business are managed at the design of the product. Currently NN Insurance Belgium does not hedge the market risks related to the present value of future fee income derived from this business.

C.3.3. Risk measurement

NN Insurance Belgium determines SCR for the market and credit risks of the separate account business through modelling the risks of the fee income and the guarantees.

C.4. Liquidity risk

Liquidity risk is the risk that NN Insurance Belgium does not have sufficient liquid assets to meet its financial obligations when they become due and payable, at reasonable cost and in a timely manner. Liquidity in this context is the availability of funds, or certainty that funds will be available without significant losses, to honour all commitments when due. NN Insurance Belgium manages liquidity risk via a liquidity risk framework: ensuring that – even after shock – NN Insurance Belgium can meet immediate obligations.

C.4.1. Risk profile

NN Insurance Belgium identifies two related liquidity risks: funding liquidity risks and market liquidity risks. Funding liquidity risk is the risk that a company will not have the funds to meet its financial obligations when due. Market liquidity risk is the risk that an asset cannot be sold without significant losses. The connection between market and funding liquidity stems from the fact that when payments are due, and not enough cash is available, investment positions need to be converted into cash. When market liquidity is low, this would lead to a loss.

C.4.2. Risk mitigation

NN Liquidity Management Principles include the following:

- Interbank funding markets should be used to provide liquidity for day-to-day cash management purposes.
- A portion of assets must be invested in unencumbered marketable securities that can be used for collateralized borrowing or asset sales.
- Strategic asset allocation should reflect the expected and contingent liquidity needs of liabilities.
- Adequate and up-to-date contingency liquidity plans should be in place to enable management to act effectively and efficiently in times of crisis.

NN Insurance Belgium defines three levels of Liquidity Management:

- Short-term liquidity or cash management covers the day-to-day cash requirements under normal business conditions and targets funding liquidity risk.
- Long-term liquidity management considers business conditions, in which market liquidity risk materializes.
- Stress liquidity management looks at the company's ability to respond to a potential crisis situation.

Two types of liquidity crisis events can be distinguished: a market event and an NN Insurance Belgium specific event. These events can be short-term or long-term and can both occur on a local, regional or global scale. The Treasury function at NN Insurance Belgium is responsible for Liquidity Management.

Liquidity limits are in place at NN Insurance Belgium.

C.4.3. Risk measurement

Liquidity risk is measured through several metrics including ratios and cash flow scenario analysis, in the base case and under several stressed scenarios. The liquidity risk metrics indicate that liquidity resources would be sufficient to meet expected liquidity uses under the scenarios tested. NN Insurance Belgium manages liquidity risk via a liquidity risk framework ensuring that – even after shock – NN Insurance Belgium can meet immediate

obligations. Accordingly, NN Insurance Belgium does not calculate a specific SCR for liquidity risk as liquidity is sufficiently available in the insurance business units.

In the valuation the Own Funds for NN Insurance Belgium, EUR 111 million of expected profit included in future premiums as calculated.

C.5. Operational risk

Operational risk is a non-financial risk that includes direct or indirect losses resulting from inadequate or failed internal processes (including as a result of fraud and other misconduct), systems failure (including information technology and communications systems), human error, and certain external events.

The operational risk management areas can be defined as given below:

- Control and processing risk: the risk of financial or reputational loss due to non-adherence with business policies or guidelines as well as the risk of loss due to unintentional human error during (transaction) processing.
- Fraud risk: the risk of financial or reputational loss due to abuse of procedures, systems, assets, products or services of NN Insurance Belgium by those who intend to unlawfully benefit themselves or others.
- Information (technology) risk: the risk of financial or reputational loss due to inadequate information security, resulting in a loss of data confidentiality, integrity and availability.
- Continuity and security risk: the risk of threats that might endanger the continuity of business operations and the security of our employees.
- Unauthorized activity risk: the risk of misuse of procedures, systems, assets, products and services.
- Employment practice risk: the risk of financial or reputational loss due to acts inconsistent with employment, health or safety laws, agreements and from payment of personal injury claims or diversity/discrimination events.

C.5.1. Risk mitigation

For operational risk NN Insurance Belgium has developed a framework governing the process of identifying, assessing, mitigating, monitoring and reporting operational risks.

Operational risk assessments are done based on historic data as well as on a forward looking basis in order to capture future risks. Once mitigating measures have been implemented and proven to be effective through monitoring and testing, the residual risk becomes the managed risk.

Mitigation of operational risks can be preventive in nature (e.g. training and education of employees, preventive controls, etc.) or can be implemented upon discovery of a risk (e.g. enforcement of controls, disciplinary measures against employees). Risk mitigating actions or controls are based on a balance between the expected cost of implementation and the expected benefits.

NN Insurance Belgium conducts regular operational risk and control monitoring to measure and evaluate the effectiveness of key controls. It determines whether the risks are within the norms for risk appetite and in line with the ambition levels and policies and standards. Operational risks are monitored through the Non-Financial Risk Dashboard ('NFRD') process at all levels in the organization. The NFRD is one tool which provides management at all organizational levels with information about key operational, compliance and legal risks and

incidents. The exposure of NN Insurance Belgium to non-financial risks is regularly assessed through risk assessments and monitoring. After identification of the risks, each risk is assessed as to its likelihood of occurrence as well its potential impact, should it occur. Actions required to mitigate the risks are identified and tracked until the risk is either reduced, if such a reduction is possible, or accepted as a residual risk if the risk cannot be mitigated.

The business process owners are responsible for the actual execution of the controls and for assessing the adequacy of their internal controls. Operational risk management, as part of the second line of defense, is responsible for providing management with an objective assessment of the effectiveness and efficiency of NN Insurance Belgium risks and controls.

C.5.2. Risk measurement

NN Insurance Belgium's SCR for operational risk was EUR 21 million as at 31 December 2016. As it is additive to the modelled SCR, it should be considered as net of diversification with other NN Insurance Belgium risks.

C.6. Other material risks

C.6.1. Compliance risk

Compliance risk is the risk of impairment of NN Insurance Belgium's integrity. It is a failure (or perceived failure) to comply with NN Group Statement of Living our Values and the Compliance Risk-related laws, regulations and standards that are relevant to the specific financial services offered by a business or its ensuing activities, which could damage NN Group's reputation and lead to legal or regulatory sanctions and financial loss.

- Risk profile

Through NN Insurance Belgium's insurance and investments products, NN Insurance Belgium is committed to helping our customers secure their financial future. To fulfil this purpose, we base our work on three core values: care, clear, commit. Our Values set the standard for conduct and provide a compass for decision making. Further, NN Insurance Belgium is committed to the preservation of its reputation and integrity through compliance with applicable laws, regulations and ethical standards in each of the markets in which it operates ('Compliance Risk').

All employees are expected to adhere to these laws, regulations and ethical standards, and management is responsible for embedding the compliance related rules. Compliance is therefore an essential ingredient of good corporate governance. NN Insurance Belgium continuously enhances its compliance risk management program to ensure that NN Insurance Belgium complies with international standards and laws.

- Risk mitigation

NN Insurance Belgium separates compliance risk into four risk areas: client conduct, personal conduct, organizational conduct and financial services conduct. In addition to effective reporting systems, NN Insurance Belgium has also a whistle blower procedure which protects and encourages staff to 'speak up' if they know of or suspect a breach of external regulations, internal policies or our values. NN Insurance Belgium also has policies and procedures regarding anti-money laundering, sanctions and anti-terrorist financing, gifts and entertainment, anti-bribery, customer suitability, conflicts of interest, and confidential and inside information, as well as a code of conduct for its personnel. Furthermore, NN Insurance Belgium designates specific countries as 'ultra-high risk'

and prohibits client engagements and transactions (including payments or facilitation) involving those countries. NN Insurance Belgium performs a product review process when developing products and continuously invests in the maintenance of risk management, legal and compliance procedures to monitor current sales practices. Customer protection regulations as well as changes in interpretation and perception of acceptable market practices by both the public at large and governmental authorities might influence customer expectations. The risk of potential reputational and financial impact from products and sales practices exists because of the market situation, customer expectations, and regulatory activity. The compliance function and the business work closely together with the aim to anticipate changing customers' needs.

- Risk measurement

There is no specific compliance risk capital calculated for SCR, however, it is considered to be part of the Operational Risk SCR.

C.6.2. Concentration risks

NN Insurance Belgium does not have an appetite for risk concentration and manages concentration risk with a limit structure. During the year no limit breaches occurred. More information on the mitigation of several types of concentration risk is included in the relevant risk types.

C.6.3. Investing assets in accordance with the 'Prudent person principle'

- Acceptable investments

NN Group maintains a Global Asset List, which contains all asset classes in which the subsidiaries, like NN Insurance Belgium are allowed to invest. Before an asset class is approved for this list, a New Investment Class Approval & Review Procedure ('NICARP') must be followed.

The NICARP should describe all relevant considerations on return, risk and operational consequences that are relevant to the decision whether NN Insurance Belgium should invest in the proposed investment class.

The NICARP request does not describe a specific transaction, but is a proposal for the potential investment in an investment class. The NICARP should nevertheless address the quantitative impact of potential future investments and include proposed portfolio limits for the product. This should always be in line with NN Group internal policies as well as external constraints (such as regulatory limits).

- Investment decisions: GITA

The intention of a Global Investment Transaction Approval ('GITA') request is to obtain approval for a specific investment (transaction or program). The GITA should always be combined with the locally approved investment approval. The GITA request itself is an overlay form on this investment proposal that should allow Group to validate that the proposed investment is in line with NN Group risk appetite and BU strategic asset allocation.

- Governance of investments

Within the Three Lines-of-Defense model, investments are managed in the first line through a dedicated Local Portfolio manager, reporting directly to the CFO. The second line function Financial Risk Management reports to CRO. Both lines of defense meet regularly in several risk and finance committees, notably the Asset and Liability Committee ('ALCO') and the Risk & Finance Committee (RFC) for the most material issues. Operational activities regarding investments are performed by NN Group's business unit NN Investment Partners, who also provides (unsolicited) advice on proposed or current investments.

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

- Asset-Liability Management-Strategic Asset Allocation (ALM-SAA) Policy
- NICARP, GITA and Global Asset List
- Investment Mandate Policy
- Concentration Risk Policy
- Hedging Policy

- Local Portfolio Manager

Based on market views, local Business Unit requirements, input from its assets managers, the Local Portfolio Manager:

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

NN Investment Partners prepares a market view, proposes investment ideas based on market developments and BU requirements and makes investment decisions within allocated limits/thresholds. NN Investment Partners executes the Performance Measurement Guidelines as prepared by the Chief Investment Officer.

C.6.4. Own Funds sensitivity analysis

NN Insurance Belgium prepares an 'own risk and solvency assessment' ('ORSA') at least once a year. In the ORSA, NN Insurance Belgium articulates its strategy and risk appetite; describes its key risks and how they are managed; analyses whether or not its risks and capital are appropriately modelled; and evaluates how susceptible the capital position is to shocks through stress and scenario testing. Stress testing examines the effect of exceptional but plausible scenarios on the capital position of NN Insurance Belgium. Stress testing can also be initiated outside ORSA, either internally or by external parties such as the local regulator ('NBB') and the European Insurance and Occupational Pensions Authority (EIOPA). The ORSA includes a forward looking overall assessment of NN Insurance Belgium's solvency position in light of the risks it holds.

Reference is made to the EIOPA Stress Test report delivered towards the NBB as in accordance with the EIOPA regulation.

C.6.5. Risk exposure from off-balance sheet positions and transfer of risk to special purpose vehicles

NN Insurance Belgium has off balance sheet positions regarding the Securities lending positions, the notional amounts of de Interest rate Swaps and the property rights on the underlying assets from the mortgage portfolio. No other off-balance sheet positions or transferred risk to special purpose vehicles are identified.

C.7. Any other information relevant to the risk profile of NN Insurance Belgium

Risk mitigating techniques used at NN Insurance Belgium are described in above sections. No other material information is relevant to the risk profile of NN Insurance Belgium.

D. Valuation for Solvency Purposes

Introduction

This chapter of the SFCR contains information on the valuation for solvency purposes of assets, insurance liabilities and other liabilities of NN Insurance Belgium and explains the differences with their valuations in the NN Insurance Belgium 2016 BE GAAP annual accounts.

Accounting principles, methods and main assumptions used

In general, Solvency II valuation requires a market consistent approach to the valuation of assets and liabilities. Within NN Group the default reference framework for valuing assets and liabilities, other than technical provisions, is IFRS as endorsed by the European Union ('IFRS-EU'). As such NN Insurance Belgium produces a full set of accounting figures under IFRS. Nevertheless, for prudential and local reporting purposes the reference framework is Belgian GAAP. The exception is that the BE GAAP valuation principle does not reflect a market consistent valuation (e.g. amortized cost). For main assumptions used in fair valuing assets, reference is made to Note 3 'Fair value of the investments' in the 2016 annual accounts of NN Insurance Belgium.

Reconciliation BE GAAP Balance sheet to Solvency II Balance sheet

Reference is made to the 2016 annual accounts of NN Insurance Belgium for more detailed information on the BE GAAP Balance sheet and to QRT SE.02.01 'Balance sheet'.

The valuation and presentation differences between BE GAAP and Solvency II are resulting from differences in accounting principles and differences in the presentation of these. Main differences are the clean versus dirty market valuation and the classification of the shares in Real estate. These differences are explained in the sections below. For items where no valuation difference occurred, reference is made to Note 20 'Accounting policies' in the annual accounts.

Valuation for Solvency Purposes

| |
|---------------------------------|
| Business and performance |
| System of governance |
| Risk profile |
| Valuation for Solvency purposes |
| Capital management |

| As at 31 December 2016 | BE GAAP | Valuation differences | Presentation differences | Solvency II |
|--|--------------|-----------------------|--------------------------|--------------|
| Assets | | | | |
| Cash and cash equivalents | 136 | 0 | 0 | 136 |
| Financial assets at fair value through profit or loss and Available-for-sale investments | 4.989 | 492 | -113 | 5.368 |
| Loans | 308 | 16 | 1 | 325 |
| Reinsurance contracts | 60 | -7 | 0 | 53 |
| Associates and joint ventures | 0 | 0 | 207 | 207 |
| Real estate investments | 0 | 0 | 0 | 0 |
| Property and equipment | 1 | 0 | 0 | 1 |
| Intangible assets | 4 | -4 | 0 | 0 |
| Deferred acquisition costs | 0 | 0 | 0 | 0 |
| Other assets | 104 | 0 | -81 | 23 |
| Total assets | 5.602 | 497 | 14 | 6.113 |
| Equity | | | | |
| Shareholders' equity (parent) | 340 | 319 | 15 | 675 |
| Minority interests | 0 | 0 | 0 | 0 |
| Undated subordinated notes | 0 | 0 | 0 | 0 |
| Total equity | 340 | 319 | 15 | 675 |
| Liabilities | | | | |
| Subordinated debt | 0 | 0 | 0 | 0 |
| Debt securities issued | 0 | 0 | 0 | 0 |
| Other borrowed funds | 0 | 0 | 0 | 0 |
| Insurance and investment contracts | 5.167 | 69 | -43 | 5.193 |
| Customer deposits and other funds on deposit | 44 | 0 | 0 | 44 |
| – non-trading derivatives | 0 | 0 | 0 | 0 |
| Other liabilities | 51 | 109 | 41 | 201 |
| Total liabilities | 5.262 | 178 | -2 | 5.438 |
| Total equity and liabilities | 5.602 | 497 | 14 | 6.113 |

D.1. Assets

D.1.1. Cash and cash equivalents

In the BE GAAP balance sheet, cash and cash equivalents are reported at the notional amount. In the Solvency II balance sheet, cash and cash equivalents are reported at market value. There are no valuation differences between BE GAAP and Solvency II for cash and cash equivalents as the market value is not different from the notional value.

D.1.2. Financial assets at FV through P&L and Available-for-sale investments

In the Solvency II balance sheet, investments are reported at market value which represents a valuation difference of EUR 492 million, the main differences are explained as follows:

- Under BE GAAP bonds are valued at amortized cost (reimbursement value at maturity date). Indications for a more permanent decrease in value of the investments will lead to an impairment, under SII the valuation is at market value.
- Shares are valued at cost, indications for a more permanent decrease of value will be evaluated and can lead to an impairment whilst the valuation under SII is market value based.
- Perpetual loans are valued at Locom under BE GAAP against market value under Solvency II.
- Loans and mortgages are generally valued on their nominal value minus the reimbursements, taken into account the decreases of reimbursements and corrections for the doubtful and uncertain debtors. There are no differences between BE GAAP and IFRS.

Reference is made to the detailed valuation rules in Note 20 of the NN Insurance Belgium annual accounts.

Presentation differences of EUR 113 million as at 31 December 2016 are caused by:

- Classification difference of the investment in real estate. Given the fact that NN Insurance Belgium does not succeed the threshold of 10% of the shareholders equity, the investment has been classified as “other investment” whilst this is for SII purposes seen as an investment in associates.
- Presentation of accrued interest as part of the investments, instead of a separate presentation as accrual under IFRS. Solvency II requires accrued interest to be presented as part of the investments (‘dirty market value’) and not separately as other assets as in the annual accounts of NN Insurance Belgium (‘clean market value’).

D.1.3. Loans

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

Valuation differences between IFRS and Solvency II for loans represents the difference between amortized cost and market value of EUR 16 million as at 31 December 2016.

Presentation differences of EUR 1 million as at 31 December 2016 are caused by the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the loans (‘dirty market value’) and not separately as other assets as in the annual accounts of NN Insurance Belgium (‘clean market value’).

D.1.4. Reinsurance contracts

Reference is made to section D2 ‘Technical provisions’.

D.1.5. Associates and joint ventures (Holdings in related undertakings)

The investment in associates concerns our investment in the shareholders capital of the real estate entity within the group. This investment is booked in the BE GAAP balance sheet at acquisition values, under Solvency II this is recognized as investment in associates according the equity valuation method.

D.1.6. Property and equipment

In the BE GAAP balance sheet, equipment is reported at cost less depreciation. In the Solvency II balance sheet, equipment is reported at market value. There are no significant valuation differences between BE GAAP and Solvency II for equipment, as market value is generally not significantly different from depreciated cost.

D.1.7. Intangible assets

Other intangibles including software can be recognized and measured at a value other than nil if they can be sold separately and if there is a quoted market price in an active market for the same or similar intangible assets. As there is no quoted market price for NN Insurance Belgium's other intangible assets, it is valued at nil for Solvency purposes.

D.1.8. Other assets

In the BE GAAP balance sheet, other assets are reported at their notional amounts. In the Solvency II balance sheet, other assets (with the exclusion of deferred taxes) are reported at market value. There are no significant valuation differences between IFRS and Solvency II for other assets as the market value is not significantly different from the notional value.

Presentation differences of EUR 81 million as at 31 December 2016 consist of the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the interest bearing investments ('dirty market value') and not separately as other assets as in the BE GAAP annual accounts of NN Insurance Belgium ('clean market value').

No deferred tax assets are recognized under Belgian GAAP. Reference is made to Note 15 'Taxation' of the 2016 annual accounts of NN Insurance Belgium for more information on the origin of the recognition of deferred tax assets and the amount of deductible temporary differences, unused tax losses and unused tax credits for which no deferred tax asset is recognized in the BE GAAP balance sheet.

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

D.1.9. Changes in valuation bases

During 2016, no material changes were made to the recognition and valuation bases, or estimations used, in the measurement of assets on the Solvency II balance sheet.

D.2. Technical provisions

D.2.1. Value of the technical provisions

The value of technical provisions, including the amount of the Best Estimate of Liabilities ('BEL') and the Risk Margin ('RM') is disclosed below separately for each material line of business as at 31 December 2016.

| Technical provisions per line of Business | BEL | Risk margin | Technical provisions |
|---|--------------|-------------|----------------------|
| 1. Health similar to Non Life | 8 | 1 | 9 |
| 2. Life | 4.350 | 45 | 4.396 |
| 3. Health similar to Life | 13 | 2 | 15 |
| 4. Index-linked and Unit-linked | 769 | 4 | 773 |
| Total | 5.139 | 53 | 5.193 |

D.2.2. Bases, methods and main assumptions used for solvency valuation

Technical Provisions are measured for Solvency II purposes as the sum of the BEL and RM. The BEL is equal to the probability-weighted average of the present value of the future liability cash flows. The RM is defined as the amount that an empty (re)insurance entity is expected to require in excess of the BEL in order to take over and meet the (re)insurance obligations.

Best estimate of liabilities (BEL)

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

Solvency II contract boundaries specify to which extend cash flows should be recognized in the Solvency II technical basis. Overall, cash flows where NN Insurance Belgium has the unilateral right to adapt the conditions of the agreement (by repricing for example) are not to be considered under Solvency II. This means that NN Insurance Belgium does not recognize the profits of its yearly renewal risk protection business, or the obligations arising from future premiums on its savings business, for as far as these are subject to dynamic pricing in future time periods.

Cash flows are projected along a sufficiently large number of future risk-free interest rate scenarios to allow for one-sided financial options and guarantees. This is typical for traditional business with a fixed interest rate guarantee. The best estimate risk-free interest rate term structure (with CRA and VOLA, if applicable) is used in those instances where there are no embedded options or guarantees.

The cash flow projections consider future management actions that can be taken to mitigate the loss to NN Insurance Belgium, management policy covering the distribution of future discretionary benefits and the predictability and profit sharing of liability cash flows. The cash flow projections used in the calculation of the BEL are based on the best estimate assumptions. The cash flow projection reflects the expected realistic

future demographic, legal, medical, technological, social, environmental and economic developments that will have a material impact on the BEL.

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

For each material line of business, a quantitative and qualitative explanation of material differences between the bases, methods and main assumptions used for the valuation for solvency purposes and those used for valuation in financial statements are included in the Actuarial Function Report ('AFR') prepared by the local Actuarial Function Holder ('AFH').

NN Insurance Belgium reports a relatively small portion of unmodelled Technical Provisions. For unmodelled business, Technical Provisions are estimated either by scaling of modelled business or by setting Solvency II Technical Provisions equal to IFRS provisions. Where these approaches are taken, the AFH has provided an opinion that the approaches are acceptable given the materiality of the Technical Provisions.

Reinsurance and other recoverables

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

Risk margin

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

With the driver approach, the relevant sub-risk SCRs are projected using appropriate risk drivers, multiplied by the cost of capital of 6%, then discounted at the relevant risk free rate term structure. The sub-risk market value margins are aggregated at each future point in time.

Non-financial assumptions

Best estimate assumptions are set for expenses, mortality, morbidity and other relevant insurance risks using historical experience of the insurance portfolio. Assumptions are reviewed at least annually and submitted to the Chief Actuary Office of NN Group ('CAO') for review and submitted to the Group Model Committee ('MoC') for approval or for information, depending on materiality, following NN Insurance Belgium's model governance.

Policyholder behavior regarding lapses, partial and full surrenders and paid-ups are taken into account for individual life business for traditional and unit-linked portfolios subject to the boundaries of the contracts.

Management actions are reflected in the cash flow projections. These are mostly current management actions related to dynamic decision rules in the asset liability models. Future management actions are assumed for portfolios including discretionary benefits.

Boundaries of insurance contracts are set by the business units based on a detailed investigation of terms and conditions of their portfolios. These assessments were reviewed and acknowledged at Head Office without comparing the different practices.

Financial assumptions

NN Insurance Belgium follows EIOPA requirements in determining the basic risk-free rates and the volatility adjustment ('VOLA') to determine the relevant currency specific risk free rate term structure for valuation of Technical Provisions. Because EIOPA curves are not available in time for NN Insurance Belgium to start its valuation, NN Group follows the EIOPA methodology to independently produce the curves. These are then compared to the published EIOPA curves when these are made available to ensure consistency between the EIOPA and the NN Group manufactured curves. At year-end 2016, the EIOPA and NN Group curves were consistent.

Changes in assumptions

During 2016, NN Insurance Belgium reviewed its best estimate assumptions and updated them where necessary.

Options and guarantees

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

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

A stochastic model is required to determine the time value of options and guarantees ('TVoG') where cash flows vary asymmetrically with market returns. The stochastic model uses a number of Monte Carlo simulations (typically, 1,000 to 3,500) to project future cash flows under various economic scenarios. The number of scenarios is set in order to reduce the simulation error to within the tolerance level. Currently, such error should be less than 1% of the best estimate liabilities, as determined by taking 80% confidence interval of the mean standard error of the simulations. NN Insurance Belgium performs a test to ensure the simulation error is within the established limits and increase number of scenarios used if the test does not satisfy the requirements. The TVoG for NN Insurance Belgium at 31 December 2016 is immaterial.

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

The actuarial function holder has assessed the allowances made in respect of options and guarantees in the technical provisions and the underlying assumptions, and came to the conclusion that such allowances are appropriate.

D.2.3. Level of Uncertainty

For the level of uncertainty associated with the value of the technical provision, reference is made to section 4.2.

D.2.4. Main differences between BE GAAP and Solvency II valuation of technical provisions

| Technical provisions per line of Business | BE GAAP | Valuation differences | Solvency II |
|---|--------------|-----------------------|--------------|
| 1. Health similar to Non Life | 8 | 2 | 9 |
| 2. Life | 4.338 | 58 | 4.396 |
| 3. Health similar to Life | 18 | -3 | 15 |
| 4. Index-linked and Unit-linked | 803 | -30 | 773 |
| Total | 5.167 | 26 | 5.193 |

At 31 December 2016, the valuation differences between the insurance and investment contracts recognized in the BE GAAP balance sheet and the technical provisions recognized in the Solvency II balance sheet of NN Insurance Belgium amounted to EUR 26 million. Methods and models used in calculating Solvency II technical provisions and BE GAAP reserves differ substantially. Main valuation differences between BE GAAP and Solvency II are outlined below:

- NN Insurance Belgium applies accounting standards generally accepted in Belgium (Belgium GAAP, Accounting Royal Decree (RD 17,11,1994)) for their provisions for liabilities under insurance contracts.
- The BEL in Solvency II are calculated for all entities as the expected present value of future liability cash flows using best estimate assumptions
- A RM for non-hedgeable risks is added to the BEL to establish the Solvency II technical provisions
- For Solvency II a risk-free interest rate curve with credit risk and volatility adjustment where applicable is used. NN Insurance Belgium does not apply a matching adjustment.
- The present value of future profits is recognized in Solvency technical provisions but not in BE GAAP reserves
- The difference between BE GAAP and Solvency II provisions is primarily reflected in the Life line of Business, where BE GAAP provisions largely reflect accrued benefits for the customer, where for Solvency II the discounted expected future cash flows are taken into account.
- For index-linked and unit-linked insurance the BE GAAP provisions are equal to the fund value of these contracts. For Solvency II Technical Provisions, the present value of the margins is deducted from the fund value
- The valuation differences between BE GAAP reserves and Solvency II technical provisions described in the above paragraph also apply to reinsurance contracts.

D.2.5. Matching and volatility adjustment, transitional measures, and transitional risk-free interest rate-term structure

As of the first quarter of 2016, NN Insurance Belgium applied transitional measures on Technical Provisions, contributing EUR 246 million to Basic Own Funds as at 31 December 2016.

NN Insurance Belgium applied the volatility adjustment (VOLA) and did not apply a matching adjustment or transitional deduction in its insurance portfolio.

The quantification of the impact of a change to zero of the volatility is included in QRT S.22.01 'Impact of long term guarantees and transitional measures'.

D.3. Other liabilities

| As at 31 December 2016 | BE GAAP | Valuation differences | Presentation differences | Solvency II |
|--|-----------|-----------------------|--------------------------|-------------|
| Provisions other than technical provisions | 1 | 9 | 0 | 9 |
| Deferred tax liabilities | 0 | 105 | 0 | 105 |
| Insurance, reinsurance & intermediaries payables | 11 | 0 | 43 | 54 |
| Payables (trade, not insurance) | 20 | 0 | -0 | 20 |
| Any other liab., not elsew here shown | 20 | -5 | -2 | 14 |
| Total other liabilities | 51 | 109 | 41 | 201 |

D.3.1. Pension benefit obligations

The employees of NN Insurance Belgium have been granted pension plans under the form of Defined Benefit and defined contribution. For these Pension plans the future liability in accordance with the interest assumptions are taken up in the BE GAAP figures. On top of this, for SII purposes additional liabilities are calculated based on a broader set of assumptions such as increase of future wages.

Pension benefit obligations are part of the line "Provisions other than technical provisions" in the above table.

D.3.2. Deferred tax liabilities

Part of the other liabilities are the deferred tax liabilities. Under Solvency II, deferred tax assets and liabilities are recognized, valued and reported in the section other liabilities.

In the BE GAAP balance sheet, other liabilities are reported at the notional amount. In the Solvency II balance sheet, other liabilities (with the exclusion of deferred taxes) are reported at market value. There are no significant valuation differences between BE GAAP and Solvency II for other liabilities as the market value is not significantly different from the notional value.

Presentation differences include the different presentation of accrued interest. Solvency II requires accrued interest to be presented as part of the interest bearing liability ('dirty market value') and not separately as other liabilities as in the annual accounts of NN Insurance Belgium.

In the BE GAAP Balance sheet claims to pay are reported as part of the claims – technical provisions whilst under SII these are presented as part of the other liabilities.

D.3.3. Any other liabilities

Differences in the presentation of the other liabilities are linked to the corporate tax and the unpaid claims which are presented as Insurance liabilities under BE GAAP.

D.3.4. Leasing

NN Insurance Belgium makes limited use of operational lease agreements, more precisely for the leasing of cars and the office building. There are no financial lease arrangements within NN Insurance Belgium.

D.3.5. Expected profits in future premiums

For existing business, expected profits included in future premiums are reflected in the technical provisions and therefore contribute to the Own Funds. For more information on the expected profits in future premiums, reference is made to QRT S.23.01.01.02 'Own Funds'.

D.3.6. Changes during 2016

No significant changes were made to the recognition and valuation bases nor on estimations of the other liabilities during the reporting period.

D.4. Alternative methods for valuation

Alternative valuation methods (models) are used by NN Insurance Belgium to determine the fair value of assets and liabilities if quoted market prices in active markets are unavailable. Reference is made to Note 3 "Fair value of financial assets" of the annual accounts of NN Insurance Belgium.

D.5. Any other information

D.5.1. Estimation uncertainties

Reference is made to 'risks and uncertainties' in the 2016 Annual Report of NN Insurance Belgium for assumptions and judgments used including those about the future.

D.5.2. Other information

No other material information regarding the valuation of assets and liabilities for Solvency II purposes is relevant.

E. Capital Management

Introduction

This chapter of the SFCR contains information on the capital management of NN Insurance Belgium, including the reconciliation of BE GAAP equity to Solvency II Own Funds and NN Insurance Belgium's Minimum Capital Requirement.

Objective

The goal is to adequately capitalize NN Insurance Belgium at all times to meet the interests of our stakeholders, including our customers and shareholders. The balance sheet is managed in line with the capital management framework which is based on regulatory, economic and rating agency requirements. NN Insurance Belgium closely monitors and manages the following metrics: Own Funds/SCR, cash capital, financial leverage, fixed cost coverage, capital generation and liquidity.

Governance

Reference is made to chapter 3 of this SFCR report.

Capital management and framework

The capital framework takes into account regulatory, economic and rating agency requirements.

As a first principle, NN Insurance Belgium aims to be capitalized adequately at all times. To ensure adequate capitalization, NN Insurance Belgium is managed to a commercial capital level in accordance with the risk associated with the business activities. Capital adequacy is ensured through the capital planning process which starts with the annual budgeting process in which a capital plan is prepared for NN Insurance Belgium. NN Insurance Belgium's risk appetite statements, Capital positions are closely monitored and, if necessary, measures are taken to ensure capital adequacy.

NN Insurance Belgium did not have ancillary own funds during 2016 or as at 31 December 2016.

E.1. Own funds

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

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

E.1.1. Impact of long term guarantees and transitional measures

The quantification of the impact of a change to zero of the volatility adjustment and transitional risk-free interest rate-term structure on NN Insurance Belgium's financial position, represented by an adjustment on the amount of technical provisions, the SCR, the basic own funds and the amounts of own funds eligible to cover the SCR is included in QRT S.22.01 'Impact of long term guarantees and transitional measures' ([link to website](#)).

E.1.2. Items deducted from own funds

Own Funds in Solvency II are to be reduced by 'foreseeable dividends, distributions and charges' as this is also the case under BE GAAP.

E.1.3. Additional ratios

No additional ratios are disclosed in the Solvency and Financial Condition Report other than the ratios included in QRT S.23.01.01. 'Own funds'.

E.1.4. Analysis of significant changes in own funds

In June 2016, NN Insurance Belgium paid a dividend of EUR 43 million to its shareholders.

In September 2016, NN Insurance Belgium initiated a capital reduction of 46 million. The capital was paid back in December 2016.

E.1.5. The principal loss-absorbency mechanism

During 2016, NN Insurance Belgium had no principal loss-absorbency mechanism in place.

E.1.6. Reconciliation reserve

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

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

The reconciliation reserve is included in QRT S.23.01.01. 'Own funds'.

NN Insurance Belgium did not include any foreseeable dividends, distributions and charges in the Solvency II balance sheet as at 31 December 2016.

E.1.7. Reconciliation BE GAAP equity to Solvency II Basic Own Funds

| As at 31 December 2016. (Basic Own Funds) | 2016 |
|--|------------|
| Ordinary share capital | 200 |
| Reconciliation reserve: Legal Reserves | 19 |
| Reconciliation reserve: Other Surplus Reserves | 113 |
| Other | 8 |
| BE-GAAP | 340 |
| Reconciliation reserve: Other Surplus Reserves | 143 |
| IFRS | 483 |
| Reconciliation reserve: Other Surplus Reserves | -55 |
| Transitional Measures | 246 |
| Solvency II Available Own Funds | 675 |

The differences between BE GAAP Shareholders' Equity in NN Insurance Belgium's 2016 annual accounts and Solvency II Basic Own Funds at 31 December 2016 are mainly caused by the following valuation differences:

- Intangible assets such as software are not recognized under Solvency II
- Deferred acquisition costs are not recognized under Solvency II as separate balance sheet item
- Loans and advances are measured differently on the BE GAAP and Solvency II balance sheets
- Reinsurance contracts are measured differently
- Insurance and investment contract liabilities are measured differently
- The other adjustments mainly consist of the recognition of net Deferred Tax Assets or Deferred Tax Liabilities caused by using different valuations for some Solvency II balance sheet items whilst the tax base of these items remained the same

Eligibility, transferability and fungibility of Own Funds

For the share capital reference is made to Note 5 of the annual report of NN Insurance Belgium. Under Belgian law, 5% of the profit of the period is reserved towards a "legal reserve" (non-eligible) until the latter amounts to 10% of the subscribed capital. The available reserves are eligible as long as they are in accordance with the different tests as described in the Belgian company law. As at 31 December 2016, NN Insurance Belgium considered 19 million of own funds not available because of local regulation.

Differences in Solvency valuation further trigger Own Funds to be considered non available.

E.2. Solvency Capital Requirement and Minimum Capital Requirement

E.2.1. SCR

Reference is made to QRT S.25.01.01. and section C. Risk Profile for the amount of the SCR split by risk categories.

NN Insurance Belgium determined the SCR including:

- Loss-absorbing capacity of technical provisions ('LAC TP'). LAC TP is the part of the technical provisions that can be used to absorb some of the SCR shock losses, as the expected future profit sharing to policyholders will be reduced if actual losses would arise. LAC TP is applicable to insurance policies with discretionary profit sharing. NN Insurance Belgium estimated the LAC TP to be 0 at 31 December 2016.
- Loss-absorbing capacity of deferred taxes ('LAC DT'). NN Insurance Belgium's total loss in a 1-in-200 event would be offset by tax recoveries and these are recognized to the extent to be expected to be recoverable. The determination of LACDT is significantly dependent on various assumptions, such as capitalization assumptions, the assumed investment returns and the projection period. Note that the NBB does not allow Belgian insurance companies to recognize an LAC DT above the amount of DTL included on the Solvency II balance sheet.

E.2.2. Deferred tax under Solvency II

The total deferred tax amount in Solvency II arises from:

- Taxable or deductible temporary differences because the carrying amount of assets or liabilities in the Solvency II balance sheet differs from the tax base of those assets or liabilities. These differences multiplied by the tax rate are recognized as a net deferred tax liability or a net deferred tax asset (per legal entity) in the balance sheet. Reference is made to section D.2 'Technical Provisions' for the deferred tax liability recognized in the Solvency II balance sheet.
- The LAC DT on the SCR.
- Unused tax losses that are available for carry forward for tax purposes.

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

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

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

- = deferred tax asset/liability in the Solvency II balance sheet (deferred tax for Own Funds)
- + deferred tax on SCR (LAC DT on the SCR) (except for non-taxable items)
- = total deferred tax amount for Solvency II

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

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

Deferred tax assets are recoverable when:

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

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

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

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

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

Due to the strong balance sheet of NN Insurance Belgium, it is reasonable to assume that NN Insurance Belgium can continue as a going concern after the shock, without a need to generate external additional capital and without a need to de-risk. The tax recoverability test of NN Insurance Belgium is performed on this basis.

The total recoverable deferred tax amount in a Solvency II environment may come from various sources and includes both recoverability from items that never impact taxable profits and reverse over time as well as sources of profits and losses that would emerge in a Solvency II environment or a Solvency II environment after a SCR-

type shock would have occurred. The recoverability is therefore based on an estimation of the total taxable results (including both income and expenses) that is expected to arise in a Solvency II environment after the shock. The sources of recoverability include all components of the estimated future taxable results, irrespective whether these are income ('profit') or expense ('loss').

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

- Reversal of the amount of the risk margin in the technical provision
- Reversal of other valuation differences
- Taxable return on capital directly after the shock for one year
- Taxable return on capital after recovery to 100% SCR within one year for a certain period
- Investment return on assets backing insurance liabilities in excess of interest on technical provisions
- Investment return on assets backing interest bearing liabilities in excess of funding cost
- Holding results (funding, expenses, result from non-Solvency II entities)

NN Insurance Belgium has sufficient recoverable amounts to support the total deferred tax position recognized.

E.2.3. MCR

The following table reports on the MCR for NN Insurance Belgium.

| | 2016 |
|--|------------|
| Eligible Own Funds to cover Minimum Capital Requirements | 675 |
| of which Tier 1 unrestricted | 675 |
| of which Tier 1 Restricted | - |
| of which Tier 2 | - |
| of which non-solvency II regulated entities | - |
| Minimum Capital Requirements (or The sum of the Minimum Capital Requirements of the related undertakings) | 103 |
| NN Insurance Belgium MCR ratio | 653% |

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

NN Insurance Belgium has not used the duration-based equity risk sub-module during the reporting period.

E.4. Differences between the standard formula and any internal model used

NN Insurance Belgium does not use an internal model.

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

NN Insurance Belgium complied with the MCR and the SCR during the reporting period.

E.6. Any other information

Reference is made to the 2016 annual accounts of NN Insurance Belgium for any other material information regarding the capital management of NN Insurance Belgium.