



VIENNA INSURANCE GROUP

BTA Baltic Insurance Company AAS

Annual report

For the year ended
31 december 2021



2021



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Information about the Company

Name of the company	BTA Baltic Insurance Company
Legal status of the company	Joint Stock Insurance Company
Number, place and date of registration	40103840140, registered in Riga, Latvia on 28 October 2014
Address	Sporta 11, Riga, Latvia, LV-1013
Management Board members and their positions	Wolfgang Kurt Wilhelm Stockmeyer - Chairman of the Management Board Oskars Hartmanis - Deputy Chairman of the Management Board Evija Matveja - Member of the Management Board Tadeuš Podvorski - Member of the Management Board
Supervisory Board members and their positions	Harald Riener - Chairman of the Supervisory Board (from 08.07.2021) Gabor Lehel - Deputy Chairman of the Supervisory Board (from 08.07.2021) Franz Fuchs - Deputy Chairman of the Supervisory Board Peter Franz Höfinger - Chairman of the Supervisory Board (until 08.07.2021); Member of the Supervisory Board (from 08.07.2021) Jan Bogutyn - Member of the Supervisory Board Artur Borowinski - Member of the Supervisory Board Elisabeth Stadler - Deputy Chairlady of the Supervisory Board (until 06.06.2021)
Reporting period	01.01.2021 – 31.12.2021
Auditors	KPMG Baltics SIA Vesetas iela 7, Riga, Latvia, LV-1013 Licence No 55



Management report

BTA Baltic Insurance Company AAS (BTA or the Company) maintains a leading role as one of the most important providers of insurance services in the Baltic States with a stable and positive development outlook. BTA offers the broadest range of non-life insurance services in the Baltic States – Latvia, Lithuania and Estonia. The sole shareholder of the Company is Vienna Insurance Group AG Wiener Versicherung Gruppe (VIG) with close to 200 years of experience in the insurance business. VIG has more than 25,000 employees in 50 insurance companies and is represented in 30 countries. VIG is a clear market leader in its Central and Eastern European markets, and takes care of more than 22 million customers. VIG has an A+ rating with stable outlook from the well-known rating agency Standard & Poor's. The Vienna Insurance Group is listed in both Vienna and Prague. Wiener Städtische Versicherungsverein – a stable core shareholder with a long-term focus – owns around 70% of VIG's shares. The remaining shares are in free float.

About BTA

Although 2021 brought us Covid-19 vaccines, for the insurance market this year was challenging from many other perspectives. Switching between remote and on-site work, fluctuations in energy resource prices and changing weather conditions were some of the main challenges this year not only for insurance industry but for nearly all companies in Baltics.

Despite the restrictions to limit the spread of coronavirus which has resulted in lockdowns for entrepreneurs and citizens, the Company continued to make a number of changes in its internal processes and services to customers in order to implement the goal of its strategy to be the most recognizable insurer to its customers and business partners. In 2021, the Company repeatedly emphasized that, despite the external impact caused by the spread of the pandemic in the world and also in the Baltic States, the initiated projects will be continued and new ones will be developed, which will contribute to the Company's long-term development.

Nowadays sustainability takes big role in our everyday lives. Insurance is not an exception – in 2021 BTA kept sustainability at its focus in every action. BTA has been a paperless company for more than five years and all documents are signed only electronically. Moreover, at the end of last year, we were the first insurance company in Latvia which received the Green Office certificate from the World Wildlife Fund.

One of our biggest innovative sustainability projects is BTA Velomaster. We care for the safety of the young cyclists, therefore the initiative of BTA Corporate Social Innovation strategy "BTA Velomaster" helped the young cyclists to improve their cycling skills for the second year in a row. This project not only helps to prepare children for different situations that may appear during their cycling trips, but also helps to pay more attention to more sustainable mobility opportunities. BTA Velomaster won't stop here – next year we are planning to expand this project in all Baltic countries.

Although 2021 was challenging year BTA dared to innovate and offered clients several new and innovative solutions. For instance, BTA eMed remote medical visits and DriveX - artificial intelligence-based solution for insurance policy procurement process. Both of these solutions help to save our clients' time, are convenient and help to get preferred result faster. Covid-19 pandemic showed us that new innovations in technology are here to stay, that is why we are paying a lot of attention in this field. We would like to make purchasing insurance as easy and intuitive as possible so that all clients could do it with just a few taps in their mobile phones.

In 2021 we once again experienced that BTA employees are the main Company's asset. The demonstrated ability of the Company's employees to perform under extreme stress and volatility last year, still managing to generate ideas and solutions to sustain the Company's development, meanwhile adhering to accessibility, humanity and credibility, which are the Company's core values, was highly appreciated.

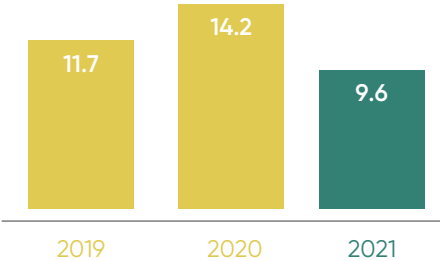
Financial Information

After the initial shock of the Covid-19 pandemic and adaptation to the new reality in year 2020, year 2021 became the year of recovery for the Company as it was for many other enterprises throughout the world. Hopes of the prompt end of the imposed restrictions that many put on mass vaccination for year 2021 failed to materialize, and the Company continued operating in the hybrid mode with employees switching between office and home-office work during the year.

The home-office work mode and increased reliance on electronic means of communication – both interacting with customers and between employees – was not just a trial for the Company's information technology solutions and internal processes, but also a serious test of abilities of the Company's management to keep its team members motivated and focused on achieving the business targets set for year 2021 – the tests that the Company passed with excellence.

Despite all the challenges facing the Company during the reporting year, the Company was successful in reaching its financial goals. The total profit before tax reached EUR 9.6 million while net profit in the year 2021 amounted to EUR 8.3 million, which was 34% less compared to extraordinarily good financial result reported in year 2020.

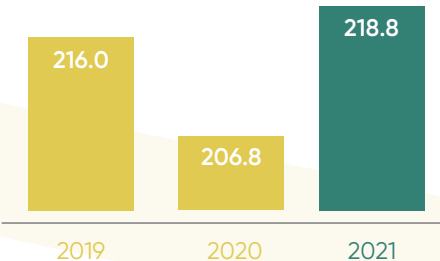
Financial result (PBT), mEUR



During year 2021, following softening of the pandemic-imposed restrictions, the social and economic activity increased, and so did consumer and corporate demand for insurance products. On the other hand, the price competition that intensified in year 2020 after the introduction of restrictive measures 2020 in the Baltic States, persisted in the reporting year, most notably in Motor insurance business. Nonetheless, the Company managed to retain its premium volumes in Motor insurance lines and to underwrite significantly higher premium volume in such lines of business products as Health insurance and Property insurance.

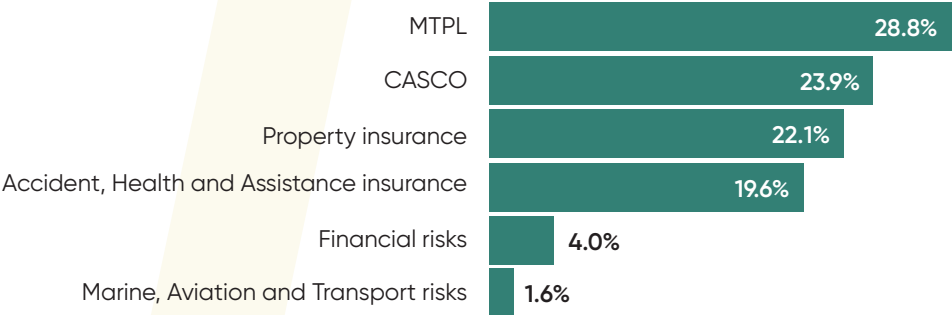
The Company's gross written insurance premiums (after mandatory fees) amounted to EUR 219 million in the Baltic States, constituting growth by 6% compared to the results of year 2020. Acute price competition

Gross written premiums, mEUR

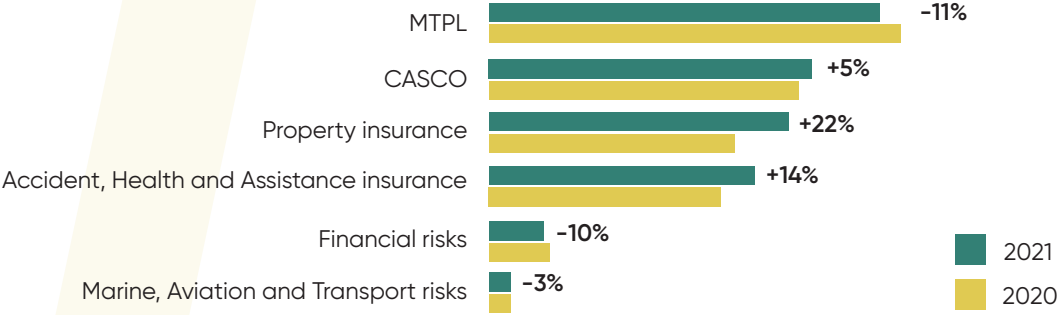


contributed to no changes in premium volumes in Motor insurance lines (total): premium growth in CASCO insurance premiums by 5% almost compensated for the lower premiums in motor third party liability insurance (MTPL) by 5% in the reporting year compared to 2020. The Company showed excellent growth of premium volumes in other key insurance lines of business, particularly in Property insurance (+20%), Accident insurance (+14%), and Health insurance (+10%). Thanks to cautious recovery of tourism in year 2021, Assistance insurance saw a revival and demonstrated a growth of 45% compared to 2020.

Premium share by line of business

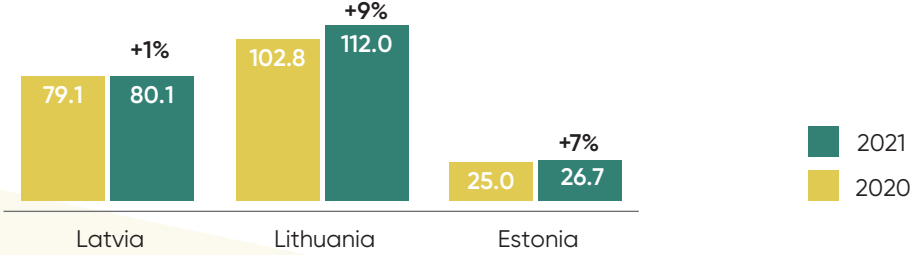


Premium growth by line of business



Business recovery was quickest in Lithuania, and the Company achieved the premium volume of EUR 112.0 million there, a strong growth of 9% compared to year 2020 premiums. Premium development in Estonia was similarly active, with the Company underwriting EUR 26.7 million (+7% compared to year 2020 volume), while in Latvia adverse market conditions allowed the Company to increase its premiums only by 1% compared to the previous year and to achieve the premium volume of EUR 80.1 million.

Gross written premium



Overall, the Company performed in line with the Baltic insurance market development in 2021, retaining its market position in main insurance lines and even increasing its market share in such a key line of business as

Property insurance. The Company firmly reestablished its position as the second biggest property and casualty insurance company in Latvia and Lithuania with market shares of 19% and 16%, respectively. On the highly segmented Estonian insurance market the Company ranked on sixth position with the market share of 7%.

In year 2021 the Company strengthened its position as a leading insurance company on the Baltic insurance market and proved that it is a key market player in the main market segments – Motor insurance lines in Lithuania and Latvia, Health insurance and other Personal risk insurance in Latvia, Financial risk insurance in Latvia and Lithuania, General third-party liability insurance in Lithuania. In the reporting year the Company established itself as the market leader in new segment of voluntary Health insurance in Estonia.

Year 2021 clearly demonstrated that shortages of qualified labor supply and disruptions in supply chains may cause significant economic damage on the national and even global scale. The second half of the reporting year saw steeply rising rates of both consumer and producer price inflation, with the Baltic states being among the most affected countries of the European Union. For the Company such developments resulted in higher prices for car spare parts and rising prices for car repair works and medical services. The increase of economic activity of private and corporate customers, higher mobility of the population and transport, closer attention on personal health also led to higher number of insurance claims in the reporting year.

The Company expected that the increased price inflation for goods and services and higher claims frequency would most certainly remain among the long-term trends in claims development. In order to mitigate the impact of those factors and to be able to offer its customers prices that adequately reflect the risks, the Company continued its work on analysis and improvement of pricing for insurance products.

In total, the volume of insurance claims paid out by the Company followed the increase of the insurance premium volume and reached EUR 134.1 million EUR in year 2021, an increase of 5% compared to the previous year. However, higher cost of insurance claims resulted in growth of the volume of insurance claims paid by 17% in Health insurance, 16% in CASCO insurance, and 4% in MTPL insurance.

Overall, the Company paid out about EUR 542 thousand on average during every business day in 2021, which was approximately EUR 68 thousand every business hour.

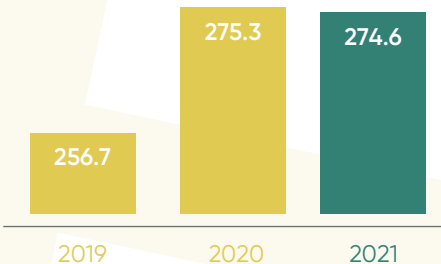
In the reporting year, the Company continued to execute a conservative approach towards the investment policy based on careful selection of assets with low investment risk.

The total size of investment assets under management of the Company – investments in bonds, equities, loans, fund certificates, real estate, and cash – increased to EUR 274.6 million by the end of 2021. Investments into debt securities of sovereign governments and government agencies of European Union member states constituted 46% of all investment asset value as of 31 December 2021.

The share of investments into government and corporate debt securities with high investment rating (between A and AAA according to international rating agency Standard & Poor's classification) was 58% of the total volume of the Company's investments at 31 December 2021.

During the reporting year the Company continued to diversify its investment portfolio with carefully evaluated investments into other investment classes.

Investment assets under management, mEUR



As a part of its real estate investment strategy, the Company participated in acquisition of a portfolio of rental residential real estate in Riga together with other VIG companies in January 2021, investing EUR 1.7 million into equity of property holding subsidiaries. In September 2021 the Company signed a breakthrough agreement with YIT, a major Nordic real estate developer and construction company, for joint development of rental residential real estate portfolio in the Baltic capital cities. At the end of 2021 the Company invested EUR 15.1 million into equity of the joint venture. The share of the Company's total investments into real estate through direct holding and participation in equity of property holding subsidiaries as at 31 December 2021 amounted to 9%.



Insurance Market Profile

Baltic insurance market in 2021 continued fierce competition in all types of insurance, but despite that insurance market stabilized and showed positive trend almost in all lines of business. In 2021, MTPL and CASCO continue to be the largest types of insurance in the Baltic non-life insurance market in terms of premiums, but their total share continues previous trends and decreased to 51% of the total premium volume in the market.

According to the Company's estimates, gross written premiums in Property insurance increased by 11% compared to the previous year. The Company expects that this type of insurance will continue increase in importance in the coming years as the purchasing power of the population and a better understanding of the importance of insurance increase.

In the reporting year, high growth rates were also achieved in personal risk insurance lines of business – especially Health insurance, which increased by 17% compared to 2020. Travel insurance started to recovery and increased by 9% compared to 2020.

Health insurance showing that employers continue more frequently complement motivation and social guarantee program packages for their employees with health insurance coverage even in such unstable and uncertain conditions as they were in 2020 and 2021 due to Covid-19. In 2021, particularly active Health insurance developed in the Lithuanian and Estonian markets. Among other types, liability insurance also showed significant growth rates: + 15% compared to the premium volume in 2020.



Major events and development

Making insurance attractive

Nowadays younger generations are born with technology "in their hands" and expect to receive excellent user experience. Studies show that by year 2025, Millennials will make up 75% of the global workforce. Most of them expect instant result with just few taps on their smartphone. That is why companies need to think of new ways how to adapt their products for younger generations. Insurance is not an exception and therefore BTA innovators are inventing new customer-friendly apps and processes.

In 2021 introduced new and market-unique service - **eMed** remote medical visits. This service is available for all BTA health insurance clients in the BTA health insurance app. BTA eMed is an opportunity for BTA customers to book an online visit with a doctor without any queue or long waiting. It means that customers can have a virtual call with a doctor and receive the help they need. This option is especially convenient during pandemic.

BTA in cooperation with an Estonian start-up **DriveX** this year launched an innovative, artificial intelligence-based solution to its customers in the Baltic States, which will allow the customers to record their vehicle's condition during the insurance policy procurement process faster, in a more comfortable and safer way. Previously we requested our customers to come to BTA Customer Business Centers or arranged a certain place and time for our specialists to come and register the actual condition of a vehicle. But now – BTA specialist will only send a link and the customer will be able to capture images at a convenient time and place, just following steps prompted by the system, which will then automatically imported into BTA's system and added to the policy of the respective customer! Just as simple, and responsible at the same time, as we can thus take care of the safety and health of our customers and our specialists, making no concessions regarding the high quality and speed of our customer service.



Sustainability at every step

For BTA sustainability isn't just a fashion trend. We care about environment, social and governance areas, that is why BTA invests resources and develops new projects in these areas. For instance, already 2 years children in many cities in Latvia have the opportunity to improve their cycling skills in BTA Velomaster cycling tracks. According to statistics, cyclists get into accidents more and more often due to insufficient cycling skills. We care for the safety of the young cyclists, therefore the initiative of BTA Corporate Social Innovation strategy "BTA Velomaster" helped the young cyclists to improve their cycling skills for the second year in a row. So far, 21 BTA Velomaster tracks have been opened in Latvia, and we are happy for the first track in Lithuania, Jonava. In 2021,

BTA Velomaster tracks were built in 10 Latvian towns where the young cyclists are able to check and improve their cycling skills. But our goals don't stop here – in the year 2022 we are planning to expand BTA Velomaster tracks in all Baltics!

BTA sustainability and social responsibility projects BTA Velomaster and "Do good for nature" have received prestigious **"Günter Geyer Silver Award 2021 for Social Awareness"** which is an initiative of the Vienna Association of Insurers. BTA have received this award in the silver category, which means that BTA will receive EUR 30 000 money prize. We will donate this prize to support other socially responsible and sustainable organizations.

Stress is a normal part of everyday life. However too much stress can cause mental and physical health problems, that is why BTA Lithuania already for the third year have "Be Stresso" initiative. "Be Stresso" in Lithuanian means "no stress" and the name itself highlights the main idea of the initiative – reduce stress. The main project activities include lectures from psychologists, coaches and sports trainers, healthy lifestyle challenges (for instance step challenge for BTA Baltic employees), anti-stress map of the most relaxing places to visit and many more. In December 2021, BTA was awarded by Lithuanian Business Confederation as the most communal company (Social responsibility awards).



Taking care of sustainability and reducing negative climate change, was one of the main drivers for BTA Sustainability Forest initiative. In 2022 BTA plans to plant 15 000 trees on an area of 7,5 hectares. This forest will help mitigate negative climate change, as trees are one of the most important sources of CO₂ sequestration. In addition to this project BTA Latvia in 2021 received "Green Office" certificate from the World Wildlife Fund. We are paperless office for more than 5 years and we keep sustainability in mind on every step.



The main company's asset – our employees

In 2021 we once again experienced that BTA employees are the main Company's asset, that is why we invested in employees' development and well-being. During all year we created many interesting events (mostly online), offered a bunch of trainings for development and tried to improve the well-being of our employees.

BTA employees value these activities and in annual employee satisfaction survey BTA NPS score was 61. Our colleagues also know the importance of gaining new knowledge and therefore are happy about trainings we provide.

Last year BTA also created new employer branding strategy and guidelines. This strategy helps us to reach new goals, clearly define our bonuses and innovate in new recruitment tools.



BTA - dare to challenge

Business development in the Baltics

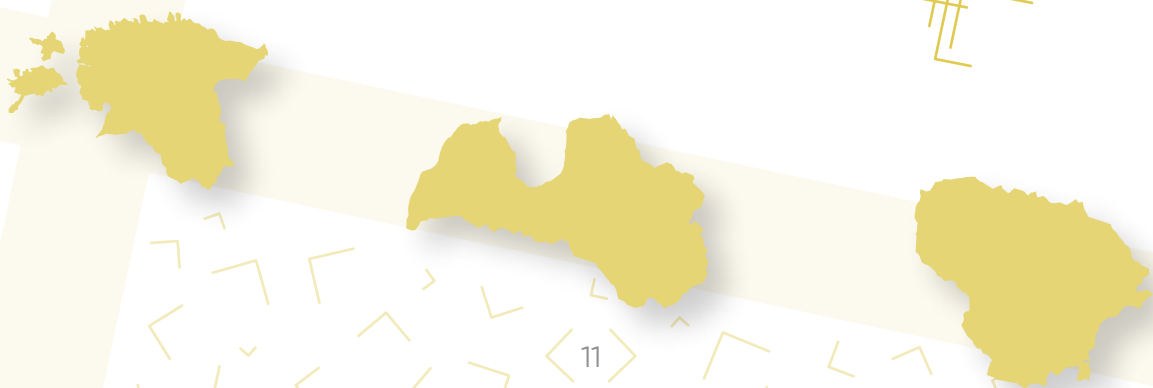
The Company's gross written premiums (after mandatory fees) amounted to EUR 219 million in the reporting year, an increase of 6% compared to year 2020. Strong price competition was the key factor for premium development in Motor insurance lines, which saw no changes in premium volumes (total): CASCO insurance premiums grew by 5%, while motor third party liability insurance (MTPL) volumes decreased by 5% in year 2021 compared to the previous year. On the other hand, Property insurance lines demonstrated an excellent growth rate of 20% in 2021 and reached the premium volume of EUR 37 million. Health insurance and other Personal risk insurance lines (Accident and Assistance insurance) also showed high rate of premium growth, reaching EUR 43 million of premiums combined, 14% more than in year 2020.



Premium development in Latvia in the reporting year was significantly affected by the decrease of business volumes in MTPL and Health insurance, fourth largest and the largest line of business respectively. Gross written premium volume in MTPL insurance reached EUR 10.4 million, which was 11% less than a year earlier, while gross written premiums in Health insurance in year 2020 decreased by 6% to EUR 21.8 million. High premium growth in Property insurance lines, which remained the second largest business line for the Company in Latvia with EUR 19.7 million in gross written premiums (+22% compared to year 2020), as well as premium recovery in CASCO insurance (+4%) helped compensate the lost business volumes in other lines of business.

In Lithuania, MTPL insurance, the biggest line of business, also saw a decrease of gross written premiums by 2% in year 2021 compared to 2020 and reached EUR 47.8 million. In the second largest line of business in Lithuania – CASCO insurance – the volume of gross written premiums was EUR 26.9 million in 2021, a healthy growth of 6% compared to the previous year. The Company also significantly increased its premium volumes in Property insurance lines, the third biggest line of business, by 21.35% to EUR 13.5 million. Personal risk insurance – Health, Accident and Assistance insurance – demonstrated impressive growth rate of 42% and reached the total volume EUR 12.6 million in year 2021.

In Estonia, gross written premium volumes in MTPL decreased by 16% in year 2021 due to strong price competition and reached only EUR 6.2 million. Business volume in CASCO increased to EUR 9.0 million, a growth of 2% compared to the previous year. Similarly, to Latvia and Lithuania, the Company put its focus in Estonia on increasing premium volumes in Property insurance and Personal risk insurance. As a result, premiums in Property insurance grew by 9% and reached EUR 4.4 million. Personal risk insurance achieved an outstanding growth rate of 127% in 2021 compared to 2020, reaching combined premium volumes of EUR 4.5 million. Health insurance, a new business line on the Estonian market, contributed the most to this growth, by reaching EUR 3.1 million in premium volumes in year 2021 (+279% compared to year 2020).



Risk management

The essence of the insurance business is the deliberate taking and management of diverse risks in order to make a profit. One of the primary responsibilities of the Company's risk management is to ensure that the commitments made in its insurance policies are always met.

The Company's risk management system is tailored to the scale and complexity of its operations and includes effective risk identification, measurement and assessment of risks, as well as monitoring and control to ensure the Company's sustainability and the achievement of its strategic goals. In developing the risk management framework, the Company complies with the requirements set out in the policies and guidelines of the VIG Group.

Risks related to the investments made by the Company are controlled in accordance with the Company's Investment and Risk Strategy, which sets limitations on transactions with a single business partner, as well as thresholds on credit ratings of debt securities obtained by the Company.

In addition to the above-mentioned risks, BTA is exposed to a number of other risks, including operational risk. Risk control measures are used to avoid, reduce, diversify, transfer and accept risks.

Transparent and verifiable decisions are essential to ensuring an effective risk management system. The Company pays special attention to developing and strengthening the risk awareness culture among its employees.

Compliance with solvency requirements

In accordance with the Company's risk strategy the target solvency ratio level should range above 125%. The solvency ratio was steadily above this level in 2021 and was 127.76% (unaudited) as at 31 December 2021.

Proposal on distribution of profits

To ensure prudent capital planning, in conditions of uncertainty caused by the Covid-19 pandemic and the current geopolitical situation, before the proposal of dividend distribution, BTA performed additional scenario analysis and stress tests taking into account the recent economic forecasts and market trends and their potential impact on solvency and financial position. Given the overall environment of rising interest rates the Management Board initiated an active discussion with the Supervisory Board and the Shareholder regarding measures to strengthen the Company's solvency position

Taking into account the Company's planned development path and the active planning and monitoring of the solvency position, the Management Board recommends to pay out a dividend of EUR 996 per share, that is a total amount of EUR 4 144 296.24 equal to rounded down 50% of the net profit for the financial year 2021. The remaining part of the net profit in the amount of EUR 4 141 212.69 is proposed to be accumulated for increase of the Company's equity.

Subsequent events

During the preparation of these financial statements the war in Ukraine broke out. The Russian military aggression was met with unanimous condemnation by the European Union and the United States, as well as many other countries and international institutions, and was followed by a series of sanctions targeting companies and individuals connected with the governments of Russia and Belarus.

It will undoubtedly make a profound impact on the world's political and economic development in the years to come. As the events are changing dynamically, the Management Board continuously monitors the development of the situation and assesses the potential impact of both the hostilities and the sanctions imposed on Russia

and Belarus on the insurance business and investment activities of BTA. Based on the preliminary evaluation, the direct impact of the conflict – primarily from disruption of business related to the movement of goods and services between the European Union and Russia or Belarus – is estimated to be rather small and marginal to the Company's turnover in year 2022. Neither at the last day of the reporting period nor at the date of signing these financial statements the Company was exposed to any investment risks related to Ukraine, Russia or Belarus.

During the second half of the reporting year, interest rates have generally increased and have decreased the market value of the Company's fixed income investment assets. Since the last day of the reporting period until the date of signing these financial statements this development continued, with political risks driving an additional effect. The Management Board is actively monitoring the situation and initiated the discussion with the Supervisory Board and the Shareholder about strengthening the Company's solvency position.

As of the last day of the reporting period until the date of signing these separate financial statements there have been no other events requiring adjustment of or disclosure in the financial statements or notes thereto, except of the ones mentioned above.

The Company does not see any going concern risks.

Further development

The Management of the Company hopes that the hostilities in Ukraine and the suffering of its people will be put to an end as soon as possible and that it will be promptly followed by rebuilding of the country and lives of all those who have been affected. In that case the Management Board expects that in year 2022 the Baltic economies will continue to move along the path of gradual recovery that started in year 2021 and that the Baltic insurance market will follow this positive development.

The rate of recovery will be affected by how quickly the European economies are adapting to the structural changes in international trade and supply of commodities, as well as how quickly the pandemic inflicted restrictions are going to be lifted.

Considering the pressure from price inflation on the cost of claims in the reporting period, year 2022 may see premium growth potential in Motor lines of business – MTPL and CASCO insurance. An increase in economic activity will likely result in growth of Property insurance, as well as Financial risk insurance and General third party liability insurance. Revival of the tourism industry should boost the recovery of Assistance insurance.

Proceeding with improvement of its insurance products and customer service, the Company plans to increase its business volume in 2022 in the Baltic States and achieve around 6% growth in gross written insurance premiums total for the Baltic region overall. The Company plans to strengthen its insurance portfolio with its further diversification and to increase the share of voluntary lines of business.

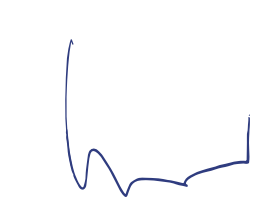
At the same time the Company will be continuing with its initiatives on improvement of operational processes and management efficiency in all areas of operations, with particular focus on improvement of private and corporate customer service standards and developing online sales.

The Covid-19 pandemic acted as a catalyst for many changes in internal and external processes, which the Company initiated in the prior years. The Company's employees are likely to continue working in hybrid mode, seamlessly switching between office and home office, even when the pandemic restrictions are fully lifted. The restrictions that remained in place during year 2021 tested the operational excellence of the Company and helped hone its flexibility and readiness to respond to changes in the market.

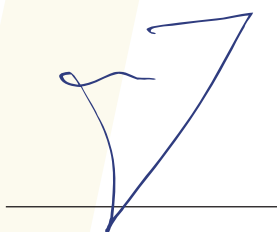
The Management of the Company expects that the customers will continue choosing the most convenient solutions for receiving insurance services, and the Company will focus on further development of remote communication and service channels, while maintaining high level of service quality for face-to-face interaction in customer service centers.

The Management Board will continue to monitor the ever-changing environment and act to firmly navigate the Company through the challenging times, ensuring that the interests of the Company's clients, its shareholders, employees and other stakeholders are well protected.

The Management always considered the Company's ability to make the right business decisions quickly as one of its key competitive advantages, and it will work to maintain this quick and high-quality decision-making ability. The Company's Management will continue with the professional development of the Company's employees, improvement of its insurance products and its service quality, thus maintaining and improving the sustainability of the Company's business and its long-term capacity to operate at profit.



Wolfgang Stockmeyer
Chairman of the
Management Board



Oskars Hartmanis
Deputy Chairman of
the Management Board



Evija Matveja
Member of
Management Board



Tadeuš Podvorski
Member of
Management Board

23 March 2022



PART OF VIENNA INSURANCE GROUP

COMPANY PROFILE

“We focus on providing our customers in CEE with custom products and services tailored to their needs. Our strategy is geared towards long-term profitability and steady earnings growth, making us a reliable partner in rapidly changing times.”

Over 25,000 employees work for Vienna Insurance Group, at around 50 companies in 30 countries. We develop insurance solutions in line with personal and local needs, which has made us the leader in the insurance industry in Central and Eastern Europe (CEE).

EXPERTISE AND STABILITY

Vienna Insurance Group is an international insurance group headquartered in the Austrian capital. After the fall of the Iron Curtain in 1989, the Group expanded rapidly from a purely Austrian business into an international group. Vienna Insurance Group is synonymous with stability and expertise in providing financial protection against risks. Experience coupled with a focus on our core competence of providing insurance coverage, forms a solid and secure basis for the Group's 22 million-plus customers.

FOCUS ON CENTRAL AND EASTERN EUROPE

Vienna Insurance Group places an emphasis on Central and Eastern Europe as its home market and pursues a long-term strategy in the markets where it is represented. The Group generates more than half of its total business volume in CEE and still sees scope for considerable growth in this region. The economic growth in CEE was on average twice as high as in Western Europe and the insurance density is still far below the EU average.

LOCAL MARKET PRESENCE

For Vienna Insurance Group, protecting customers financially against risk is a responsibility. The Group pursues a local multi-brand strategy based on established local brands as well as local management. Ultimately, the Group's success and closeness to its customers is down to the strengths of each individual brand and local know-how.

STRONG FINANCES AND CREDIT RATING

Vienna Insurance Group has an A+ rating with stable outlook from the well-known rating agency Standard & Poor's. The Vienna Insurance Group is listed in both Vienna and Prague. Wiener Städtische Versicherungsverein – a stable core shareholder with a long-term focus – owns around 70% of VIG's shares. The remaining shares are in free float.

<p>ALBANIA</p> <p>SIGMA INTERALBANIAN VIENNA INSURANCE GROUP</p> <p>INTERSIG VIENNA INSURANCE GROUP</p>	<p>DENMARK</p> <p>VIG VIENNA INSURANCE GROUP</p>	<p>LIECHTENSTEIN</p> <p>VIENNA-LIFE VIENNA INSURANCE GROUP</p>	<p>ROMANIA</p> <p>OMNIASIG VIENNA INSURANCE GROUP</p> <p>Asirom VIENNA INSURANCE GROUP</p> <p>DE VIATA BCR ASIGURARI VIENNA INSURANCE GROUP</p>
<p>AUSTRIA</p> <p>VIG VIENNA INSURANCE GROUP</p> <p>WIENER STÄDTISCHE VIENNA INSURANCE GROUP</p> <p>Ionau VIENNA INSURANCE GROUP</p>	<p>ESTONIA</p> <p>bta VIENNA INSURANCE GROUP</p> <p>COMPENSA VIENNA INSURANCE GROUP</p> <p>Seesam VIENNA INSURANCE GROUP</p>	<p>LITHUANIA</p> <p>bta VIENNA INSURANCE GROUP</p> <p>COMPENSA VIENNA INSURANCE GROUP</p>	<p>SERBIA</p> <p>WIENER STÄDTISCHE VIENNA INSURANCE GROUP</p> <p>WIENER RE Beograd VIENNA INSURANCE GROUP</p>
<p>BELARUS</p> <p>КУПАЛА VIENNA INSURANCE GROUP</p>	<p>FRANCE</p> <p>VIG Re</p>	<p>MOLDOVA</p> <p>DONARIS VIENNA INSURANCE GROUP</p>	<p>SLOVAKIA</p> <p>Kooperativa VIENNA INSURANCE GROUP</p> <p>KOMUNÁLNA POISTOVŇA VIENNA INSURANCE GROUP</p>
<p>BOSNIA-HERZEGOVINA</p> <p>WIENER OSIGURANJE VIENNA INSURANCE GROUP</p> <p>vienna osiguranje VIENNA INSURANCE GROUP</p>	<p>GEORGIA</p> <p>GPI VIENNA INSURANCE GROUP</p> <p>IRAO VIENNA INSURANCE GROUP</p>	<p>MONTENEGRO</p> <p>Život WIENER STÄDTISCHE VIENNA INSURANCE GROUP</p>	<p>SLOVENIA</p> <p>WIENER STÄDTISCHE VIENNA INSURANCE GROUP</p>
<p>BULGARIA</p> <p>BULSTRAD VIENNA INSURANCE GROUP</p> <p>Life BULSTRAD VIENNA INSURANCE GROUP</p> <p>DOVERIE VIENNA INSURANCE GROUP</p>	<p>GERMANY</p> <p>InterRisk VIENNA INSURANCE GROUP</p> <p>VIG Re</p>	<p>NORTH MACEDONIA</p> <p>WINNER VIENNA INSURANCE GROUP</p> <p>Life WINNER VIENNA INSURANCE GROUP</p> <p>МАКЕДОНИЈА ОСИГУРУВАЊЕ VIENNA INSURANCE GROUP</p>	<p>SWEDEN</p> <p>VIG VIENNA INSURANCE GROUP</p>
<p>CROATIA</p> <p>WIENER OSIGURANJE VIENNA INSURANCE GROUP</p>	<p>HUNGARY</p> <p>UNION VIENNA INSURANCE GROUP</p>	<p>NORWAY</p> <p>VIG VIENNA INSURANCE GROUP</p>	<p>TURKEY</p> <p>RAYSIGORTA VIENNA INSURANCE GROUP</p>
<p>CZECH REPUBLIC</p> <p>Kooperativa VIENNA INSURANCE GROUP</p> <p>ČPP VIENNA INSURANCE GROUP</p> <p>VIG Re</p>	<p>ITALY</p> <p>WIENER STÄDTISCHE VIENNA INSURANCE GROUP</p>	<p>POLAND</p> <p>COMPENSA VIENNA INSURANCE GROUP</p> <p>InterRisk VIENNA INSURANCE GROUP</p> <p>Vienna Life VIENNA INSURANCE GROUP</p> <p>wiener VIENNA INSURANCE GROUP</p>	<p>UKRAINE</p> <p>КНЯЖА VIENNA INSURANCE GROUP</p> <p>life КНЯЖА VIENNA INSURANCE GROUP</p> <p>USG VIENNA INSURANCE GROUP</p>
<p>LATVIA</p> <p>bta VIENNA INSURANCE GROUP</p> <p>COMPENSA VIENNA INSURANCE GROUP</p>	<p>KOSOVO</p> <p>SIGMA VIENNA INSURANCE GROUP</p>	<td> </td>	

Status: January 2022

WE ARE **NUMBER 1**
IN CENTRAL AND EASTERN EUROPE.

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VIENNA INSURANCE GROUP
Protecting what matters.

Statement of management responsibility



In 2021 the Management Board of BTA Baltic Insurance Company AAS (the Company) was responsible for the management of the Company. The Management regularly informed the Supervisory Board about key developments in the Company and provided necessary explanations.

The Management assumes responsibility for the preparation of the accounting records, compliance in the process of recording transactions under the regulative norms applicable to accounting, safekeeping of the assets of the Company as well as the prevention of fraud and other dishonest activities.

The Company's Management assumes responsibility for the preparation of the Company's separate financial statements (hereinafter – financial statements) for the year ended 31 December 2021 prepared in accordance with IFRS as adopted by the European Union to reflect fairly the activities and cash flows of BTA Baltic Insurance Company AAS for the year ended 31 December 2021, as well as its financial position as at 31 December 2021.

The Company's Management confirms that the Company's financial statements for the year ended 31 December 2021 have been prepared in accordance with the effective requirements of legislation and the Financial and Capital Market Commission of the Republic of Latvia, and IFRS as adopted by the European Union.

The Company's financial statements for the year ended 31 December 2021 have been prepared on the basis of prudent decisions and assumptions of the Management.

The Company uses exemption rules from the obligation to prepare non-financial statements according to the Regulations of the Financial and Capital Market Commission No. 114 "Statutory provisions for the preparation of the annual report and the consolidated annual report of insurance and reinsurance companies and non-member country insurers' branches" (paragraph No 16 of the above Regulation) as "Vienna Insurance Group AG" is publishing a separate consolidated non-financial report for financial year 2021.

The Management confirms that the requirements of Latvian legislation and applicable legislation in other European Union countries have been met and that the financial statements have been prepared on a going concern basis.

The Management is not aware of any significant events after the year-end, which are not reflected in these financial statements and that might have a material impact on activities of the insurance company and the assessment of the financial statements.

Wolfgang Stockmeyer
Chairman of the
Management Board

Oskars Hartmanis
Deputy Chairman of
the Management Board

Evija Matveja
Member of
Management Board

Tadeuš Podvorski
Member of
Management Board

23 March 2022

Separate financial statements

Separate Statement of Comprehensive Income

	Note	2021 EUR'000	2020 EUR'000
Earned premiums			
Written premiums			
Gross written premiums	5	218 804	206 814
Reinsurers' share in written premiums	5,19	(52 347)	(51 405)
Net written premiums	5	166 457	155 409
Change in unearned premium and unexpired risk reserves			
Gross change	7	(10 645)	(2 173)
Reinsurers' share	7,19	2 328	997
Change in net unearned premium and unexpired risk reserves	7	(8 317)	(1 176)
Net earned premiums	6	158 140	154 233
Other technical income, net	8	574	792
Paid claims, net			
Paid claims	9	(133 464)	(131 375)
Loss adjustment expenses	9	(9 248)	(7 625)
Recovered losses	9	8 599	11 229
Gross claims paid	9	(134 113)	(127 771)
Reinsurers' share of claims paid	9,19	27 271	28 692
Net paid claims	9	(106 842)	(99 079)
Change in outstanding claim reserve			
Change in gross outstanding claim reserve	10	(8 913)	(1 857)
Reinsurers' share	10,19	4 163	691
Change in net outstanding claim reserve	10	(4 750)	(1 166)
Net incurred claims	11	(111 592)	(100 245)
Operating (expenses)/income			
Client acquisition costs	12	(41 268)	(37 483)
Change in deferred client acquisition costs	12	1 114	108
Administrative expenses	13	(15 211)	(15 570)
Depreciation and amortisation	20,21a,22	(4 151)	(3 338)
Reinsurance commission income, net	14,19	20 018	14 703
Change in unearned reinsurance commission	14,19	(478)	(602)
Net operating expenses		(39 976)	(42 182)

Continued table

	Note	2021 EUR'000	2020 EUR'000
Other technical expenses, net	15	(272)	(219)
Investment management charges		(1 241)	(292)
Depreciation of investment property	21b	(87)	(84)
Interest income	16	2 629	2 374
Interest expense	17	(418)	(452)
Gain from financial assets and liabilities measured at fair value, net	45	701	76
Gain/(loss) on foreign currency fluctuation		215	(278)
Other income		1 899	1 635
Other expenses		(991)	(1 180)
Profit before tax		9 581	14 178
Income tax expense	18	(1 295)	(1 575)
Net profit for the period		8 286	12 603
Items that are or may be reclassified to profit or loss			
Available-for-sale financial assets – net change in fair value	45	(4 412)	1 744
Other comprehensive income for the period		(4 412)	1 744
Total comprehensive income for the period		3 874	14 347

Separate financial statements

Separate Statement of Financial Position

Assets	Note	31.12.2021 EUR'000	31.12.2020 EUR'000
Property and equipment	20	2 563	2 798
Land and buildings			
Land and buildings for own use	21a	4 621	5 784
Investment property	21b	1 121	1 017
Total land and buildings		5 742	6 801
Assets held for sale		-	10
Intangible assets	22	4 198	3 001
Investment in subsidiaries and an associate	23	17 341	614
Financial investments			
Financial instruments at fair value through profit or loss	45	1 375	1 386
Available-for-sale instruments	45	228 411	227 428
Held-to-maturity financial instruments	45	1 767	1 771
Total financial investments	24	231 553	230 585
Inventory		61	101
Loans and Receivables			
Loans	25,41	14 761	10 555
Receivables from direct insurance activities			
Due from policy holders		49 897	46 290
Due from intermediaries		308	222
Total receivables from direct insurance activities	26	50 205	46 512
Receivables from reinsurance activities		3 929	3 094
Other receivables	27	494	490
Total loans and receivables		69 389	60 551
Accrued income and deferred expenses			
Deferred client acquisition costs	12	11 629	10 515
Other accrued income and deferred expenses		1 792	1 128
Total accrued income and deferred expenses		13 241	11 643
Deferred tax asset	33	250	222
Reinsurers' share of insurance contract liabilities			
Reinsurers' share in unearned premium reserves	7,42	24 315	21 987
Reinsurers' share in outstanding claim reserve	10,42	55 589	51 426
Total reinsurers' share of insurance contract liabilities	42	79 904	73 413
Cash and cash equivalents	28	9 831	31 397
Total assets		434 253	421 236

Equity and liabilities	Note	31.12.2021 EUR'000	31.12.2020 EUR'000
Equity			
Share capital	30	41 609	41 609
Revaluation reserves	30	3 745	8 157
Other reserves		(1 605)	(1 605)
Retained earnings		13 732	11 133
Profit for the period		8 286	12 603
Total equity		65 767	71 897
Liabilities			
Insurance contract liabilities			
Gross unearned premium and unexpired risk reserves	7,42	117 456	106 811
Gross outstanding claim reserves	10,42	149 616	140 703
Total insurance contract liabilities		267 072	247 514
Reinsurers' deposit	31,41	43 229	41 704
Subordinated loan	41	7 000	7 000
Lease liabilities	32	4 084	4 974
Payables from direct insurance activities			
Due to policy holders		7 673	10 046
Due to intermediaries		1 425	1 362
Total direct insurance creditors		9 098	11 408
Payables from reinsurance activities	35	5 396	5 315
Other creditors	36	24 038	22 789
Provisions	37	2 109	2 161
Taxes and social insurance contributions	34	845	935
Accrued liabilities	37	2 163	2 565
Unearned reinsurance commission income	14	3 452	2 974
Total liabilities		368 486	349 339
Total equity and liabilities		434 253	421 236

Separate financial statements

Separate Statement of Cash Flows

	Note	2021 EUR'000	2020 EUR'000
Cash flows from operating activities			
Premiums received in direct insurance		211 189	213 907
Claims paid in direct insurance		(133 464)	(131 375)
Payments received from reinsurers		6 920	4 531
Payments made to reinsurers		(9 991)	(10 936)
Income tax paid in Latvia and Lithuania	34	(1 651)	(1 206)
Obligatory payments	29	(1 997)	(2 229)
Payments to employees		(17 506)	(15 340)
Payments to intermediaries		(15 164)	(13 929)
Other payments made:		(24 865)	(23 980)
<i>Other tax paid</i>	34	(13 550)	(12 282)
<i>Payments to other suppliers</i>		(10 851)	(11 486)
<i>Other payment made</i>		(464)	(212)
Other payments received		4 136	9 358
Total cash flows from operating activities		17 607	28 801
Cash flows from/(used in) investing activities			
Purchase of property and equipment and intangible assets	20,21,22	(4 243)	(4 060)
Acquisition of investments		(49 514)	(25 453)
Investments in subsidiaries and associates and funds		(19 094)	(108)
Disposal of investments		41 714	11 670
Investment income received		3 864	3 556
Total cash flows (used in) investing activities		(27 273)	(14 395)
Cash flows from/(used in) financing activities			
Paid dividends	30	(10 004)	(7 985)
Payment of lease liabilities	43	(1 896)	(1 849)
Total cash flows (used in) financing activities		(11 900)	(9 834)
Cash and cash equivalents net increase/(decrease)		(21 566)	4 572
Cash and cash equivalents at the beginning of the period		31 397	26 825
Cash and cash equivalents at the end of the period	28	9 831	31 397

Separate financial statements

Separate Statement of Changes in Shareholder's Equity

	Share capital EUR'000	Other reserves EUR'000	Revaluation reserve EUR'000	Retained earnings EUR'000	Total Equity EUR'000
31.12.2019	41 609	(1 605)	6 796	18 735	65 535
Total comprehensive income					
Profit for the period	-	-	-	12 603	12 603
Other comprehensive income	-	-	1 744	-	1 744
Other reclassification*	-	-	(383)	383	-
Transactions with shareholder recorded directly in equity					
Dividends paid	-	-	-	(7 985)	(7 985)
31.12.2020	41 609	(1 605)	8 157	23 736	71 897
Total comprehensive income					
Profit for the period	-	-	-	8 286	8 286
Other comprehensive income	-	-	(4 412)	-	(4 412)
Transactions with shareholder recorded directly in equity					
Dividends paid	-	-	-	(10 004)	(10 004)
31.12.2021	41 609	(1 605)	3 745	22 018	65 767

*see Note 30

Notes to the Separate Financial Statements

(1) General information

(a) Principal activities

BTA Baltic Insurance Company AAS (BTA or the Company) is a company domiciled in the Republic of Latvia (Latvia). The Company was registered on 28 October 2014 in Riga, Latvia as a Joint Stock Insurance Company. The headquarter is located in Riga, Sporta Street 11, Republic of Latvia.

On 10 June 2015 the Company obtained the following insurance licenses in Latvia:

- accident insurance;
- health insurance (insurance against illnesses);
- motor transport (except railway transport) insurance (CASCO);
- railway rolling stock insurance;
- aircraft insurance;
- marine vessel insurance;
- freight insurance;
- property insurance against damage by fire and natural disasters (damages caused to property, except for motor transport, railway rolling stock, aircraft, marine vessel and freight, by fire, explosion, nuclear power, subsiding of land and other disasters);
- property insurance against other damage (damages caused to property, except for motor transport, railway rolling stock, aircraft, marine vessel and freight, by hail, frost, theft and other accidents, except fire, explosion, nuclear power, subsiding of land and other disasters);
- motor vehicle owner third party liability insurance (MTPL);
- aircraft owner third party liability insurance;
- ship owner liability third party insurance;
- general third party liability insurance (TPL);
- credit insurance;
- surety insurance;
- miscellaneous financial loss insurance;
- legal expenses insurance;
- assistance insurance.

The Company operates in Latvia, Lithuania and Estonia, and it offers a wide range of non-life insurance products to legal entities and individuals in the abovementioned insurance lines.

Insurance services are offered through the network of branches, intermediaries and client customer centres in Latvia, Lithuania and Estonia.

(b) Branches

A branch is an economical entity established for offering services on behalf of a company. A branch is not an independent legal person. The company is liable for the obligations arising from the activities of a branch. The accounts of foreign branches are maintained separately. Branches prepare their financial information for the

same periods and using the same accounting policies, see Note 2 for additional information. Any balances, income, expenses, gains and losses arising from intra-company transactions are eliminated in full.

The Company has two foreign branches – in Estonia and Lithuania. Business is conducted through permanent establishments (branches) within the European Union. The registered address of the branch in Estonia – Lõõtsa 2B, Tallinn 11415; in Lithuania – Viršuliškių skg. 34, LT-05132 Vilnius.

(c) Subsidiaries

The Company has not consolidated the financial information of the subsidiaries SIA Urban Space and SIA LiveOn, as they are consolidated at the Company's parent company's – Vienna Insurance Group AG Wiener Versicherung Gruppe – level. Subsidiaries investments are accounted at cost less impairment, if any.

(d) Associates

The Company has not consolidated the financial information of the associate SIA Global Assistance, SIA Ģertrūdes 121, SIA Alauksta 13/15, SIA Artilerijas 35 because the associate's revenue and assets account for an immaterial share of the Company's respective figures. SIA Global Space, SIA Ģertrūdes 121, SIA Alauksta 13/15, SIA Artilerijas 35 is consolidated at the Company's parent company's – Vienna Insurance Group AG Wiener Versicherung Gruppe – level. Associates investments are accounted at cost less impairment, if any.

(e) Shareholder

Information on the shareholder:

	31.12.2021	
	Number of shares	Shareholding
Vienna Insurance Group AG Wiener Versicherung Gruppe	416 094	100%
	<u>416 094</u>	<u>100%</u>

	31.12.2020	
	Number of shares	Shareholding
Vienna Insurance Group AG Wiener Versicherung Gruppe	416 094	100%
	<u>416 094</u>	<u>100%</u>

(2) Basis of preparation

(a) Statement of compliance

The accompanying separate financial statements (hereinafter – financial statements) have been prepared in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union, and regulations of the Financial and Capital Market Commission of the Republic of Latvia (FCMC) in force as at the reporting date.

The financial statements were authorised for issue by the Management Board on 23 March 2022. The shareholder have the right to reject the financial statements and request that new financial statements are prepared and issued.

(b) Functional and Presentation Currency

These financial statements are presented in thousands of euro (EUR'000), unless stated otherwise.

The functional currency of the Company and its branches in Estonia and Lithuania is Euro.

(c) Reporting period

The reporting period comprises the 12 months from 1 January 2021 to 31 December 2021. The comparative period is from 1 January 2020 to 31 December 2020.

(d) Basis of measurement

The financial statements have been prepared on the historical cost basis except for the following items, which are carried at fair value:

- derivatives,
- other financial assets and liabilities designated at fair value through profit or loss,
- available-for-sale assets.

(e) Changes in accounting policies

Except for IFRS 16 amendments, the Company has no transactions that are affected by the newly effective standards or its accounting policies are already consistent with the new requirements.

Company has applied 30 June 2021 IFRS 16 amendments. All rent concession is in the form of a one-off reduction in rent, is accounted as a variable lease payment and recognised in profit or loss.

Standards and interpretations effective in the reporting period

(i) Amendments to IFRS 4: Applying IFRS 9 Financial Instruments with IFRS 4 Insurance Contracts (effective for annual periods beginning on or after 1 January 2023; to be applied prospectively)

The amendments address concerns arising from implementing IFRS 9 before implementing the replacement standard (IFRS 17) for IFRS 4. The amendments introduce two optional solutions. One solution is a temporary exemption from IFRS 9, effectively deferring its application for some insurers. The other is an overlay approach to presentation to alleviate the volatility that may arise when applying IFRS 9 before the IFRS 17.

The Company, as an insurance provider, has applied the temporary exemption from adopting IFRS 9,

(ii) IFRS 9 Financial Instruments (2014) (effective for annual periods beginning on or after 1 January 2018; to be applied retrospectively with some exemptions. The restatement of prior periods is not required, and is permitted only if information is available without the use of hindsight. Early application is permitted. The IASB implemented an amendment to IFRS 4 Insurance contracts that permits insurance companies to apply IAS 39 instead of IFRS 9 until IFRS 17 is implemented in 2023.)

This Standard replaces IAS 39 Financial Instruments: Recognition and Measurement, except that the IAS 39 exception for a fair value hedge of an interest rate exposure of a portfolio of financial assets or financial liabilities continues to apply, and entities have an accounting policy choice between applying the hedge accounting requirements of IFRS 9 or continuing to apply the existing hedge accounting requirements in IAS 39 for all hedge accounting.

Although the permissible measurement bases for financial assets – amortised cost, fair value through other comprehensive income (FVOCI) and fair value through profit or loss (FVTPL) – are similar to IAS 39, the criteria for classification into the appropriate measurement category are significantly different.

A financial asset is measured at amortised cost if the following two conditions are met:

- the assets is held within a business model whose objective is to hold assets in order to collect contractual cash flows; and,
- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal outstanding.

In addition, for a non-trading equity instrument, a company may elect to irrevocably present subsequent changes in fair value (including foreign exchange gains and losses) in OCI. These are not reclassified to profit or loss under any circumstances.

For debt instruments measured at FVOCI, interest revenue, expected credit losses and foreign exchange gains and losses are recognised in profit or loss in the same manner as for amortised cost assets. Other gains and losses are recognised in OCI and are reclassified to profit or loss on derecognition.

The impairment model in IFRS 9 replaces the 'incurred loss' model in IAS 39 with an 'expected credit loss' model, which means that a loss event will no longer need to occur before an impairment allowance is recognised.

IFRS 9 includes a new general hedge accounting model, which aligns hedge accounting more closely with risk management. The types of hedging relationships – fair value, cash flow and foreign operation net investment – remain unchanged, but additional judgment will be required.

The standard contains new requirements to achieve, continue and discontinue hedge accounting and allows additional exposures to be designated as hedged items.

Extensive additional disclosures regarding an entity's risk management and hedging activities are required.

It is expected that the new Standard, when initially applied, may have an impact on the financial statements, since the classification and the measurement of some of the Company's financial instruments are expected to change.

Based on its preliminary assessment the Company expects that substantially all of financial assets classified as loans and receivables under IAS 39 will continue to be measured at amortised cost under IFRS 9.

Company has decided that all bonds will be calculated at FVOCI. Investment funds and equity investments will be calculated at FVTPL.

Following the decision of Vienna Insurance Group as a group to make use of the temporary exemption and postpone application of IFRS 9, the Company does not plan to adopt this standard until adoption of IFRS 17. Therefore, the Company has provided additional disclosures which are obligatory, when exercising the temporary exemption until the date of initial application of IFRS 9:

Fair Value Analysis of the financial assets:

	31.12.2021			31.12.2020		
	SPPI* EUR'000	Other** EUR'000	Total EUR'000	SPPI* EUR'000	Other** EUR'000	Total EUR'000
Loans	14 761	-	14 761	10 555	-	10 555
Other securities						
Bonds	183 325	1 375	184 700	200 177	1 386	201 563
Shares	-	5 205	5 205	-	2 818	2 818
Investment funds	-	41 648	41 648	-	26 204	26 204
Total other securities	183 325	48 228	231 553	200 177	30 408	230 585
Cash and cash equivalents	9 831	-	9 831	31 397	-	31 397
	207 917	48 228	256 145	242 129	30 408	272 537

* Financial instruments with contractual cash flows that are solely payments of principal and interest on the principal amount outstanding except for those reported under "Other". The SPPI assessment is preliminary.

** Financial instruments that do not meet SPPI criteria or are held for trading or managed on a fair value basis are reported under "Other". The SPPI assessment is preliminary.

New Standards and Interpretations not yet adopted.

A number of new standards, amendments to standards and interpretations are effective for annual periods beginning after 1 January 2021, and have not been applied in preparing these financial statements. Those which may be relevant to the Company are set out below.

(i) *IFRS 17 Insurance Contracts and amendments to IFRS 17 Insurance Contracts (effective for annual periods beginning on or after 1 January 2023, not yet adopted by the EU)*

IFRS 17 replaces IFRS 4, which was brought in as an interim Standard in 2004. IFRS 4 has given companies dispensation to carry on accounting for insurance contracts using national accounting standards, resulting in a multitude of different approaches.

IFRS 17 solves the comparison problems created by IFRS 4 by requiring all insurance contracts to be accounted

for in a consistent manner, benefiting both investors and insurance companies. Insurance obligations will be accounted for using current values, instead of historical cost.

The Company is planning to implement IFRS 17 for statutory statements and group consolidation starting from 1 January 2023 based on Vienna Insurance Group guidance. The Company expects that this new standard, when initially applied, will have a material impact on the financial statements of the Company as the Company concludes insurance contracts, however, the Company management, although has started the assessment of the quantitative impact, precise numbers cannot be provided yet. Extensive training sessions organized by the group have been completed by all employees involved in IFRS17 implementation project. Company has approved IFRS17 methodology and accounting principles. New systems and procedures are already in place and have been tested by the Company and the Group during 2021. Company has performed dry run for transition data and one comparative period data, results were provided to the Group. Company will be transitioning to IFRS17 starting with the application date of 1 January 2022. During 2022 IFRS 17 and IFRS 4 set of accounts will be run in parallel. First comparative period for internal purposes will be Q1-Q2 2022.

The following amended standards and interpretations are not expected to have a significant impact on the Company's financial statements.

- (ii) Onerous contracts – Cost of Fulfilling a Contract (Amendments to IAS 37)*
- (iii) Property, Plant and Equipment: Proceeds before Intended Use (Amendments to IAS 16).*
- (iv) Reference to Conceptual Framework (Amendments to IFRS 3).*
- (v) Classification of Liabilities as Current or Non-current (Amendments to IAS 1).*
- (vi) Definition of Accounting Estimate (Amendments to IAS 8).*
- (vii) Disclosure of Accounting Policies (Amendments to IAS 1 and IFRS Practice Statement 2).*
- (viii) Deferred Tax Related to Assets and Liabilities Arising from a Single Transaction – Amendments to IAS 12 Income Taxes.*

(3) Significant accounting policies

3.1 Foreign currency

Foreign exchange transactions are translated to the functional currency of the Company in accordance with the exchange rate set by the European Central Bank on the date of the respective transaction.

Monetary assets and liabilities, including commitments and contingencies denominated in foreign currencies are retranslated into functional currency in accordance with the exchange rate set by the European Central Bank on the last date of the reporting period.

Non-monetary assets and liabilities denominated in foreign currency that are measured at fair value or cost are translated at the exchange rate as at the date fair value or cost was determined.

Foreign exchange rates at the end of the reporting period are as follows:

	31.12.2021	31.12.2020
USD	1.1326	1.2271
PLN	4.5969	4.5597
GBP	0.84028	0.89903
DKK	7.43640	7.4409

Profit or loss relating to fluctuations in the exchange rate on assets and liabilities denominated in a foreign currency is recognised in the profit or loss.

3.2 Insurance contracts

(a) Classification of insurance contracts

An insurance contract signed by the insurer is classified as an insurance contract only if it transfers a significant insurance risk from the policyholder to the insurer. All contracts concluded by the Company are classified as non-life insurance contracts and the Company does not conclude any investment contracts.

Non-life insurance includes contracts:

- in which the insurer assumes substantial insurance risk on behalf of the other contracting party – the policyholder, by agreeing to compensate losses to the policyholders if a certain unexpected future event (insured occurrence) has been previously agreed, which adversely impacts the policyholder. An unexpected future event is considered to be a situation when at the time of signing the insurance contract is not known:
 1. whether the insured occurrence will occur;
 2. when it will occur;
 3. how much the insurer will have to pay if it occurs.
- in which the insured event is the discovery of a loss during the term of the contract, even if the loss arises from an event that occurred before the inception of the contract;
- in which the insured event is an event that occurred during the term of the contract, even if the resulting loss is discovered after the end of the contract term;
- which comprise events, which have already occurred, but whose financial impact is not yet fixed. For example, reinsurance contracts that protect direct insurer from the adverse development of claims already reported by the policy holder;
- which require or permit payment in kind, e.g., the insurer directly replaces a stolen object rather than compensates the claim to the policy holder in money;
- which stipulate a fixed charge service, in which the service level depends on an unexpected event. Fixed charge services are based on the number of expected equipment malfunctions, but it cannot be determined on whether some specific equipment will not function;
- in which one insurer (reinsurer) compensates the losses of one or several contracts closed with other insurers (assignor).

Recognition and evaluation of insurance contracts

A contract, which is deemed to be an insurance contract, remains an insurance contract, until all rights and liabilities are paid off or their validity period has expired. A contract, if in form and substance an insurance contract, may not be reclassified to another contract.

When classifying insurance contracts for accounting purposes, the basis is the substance of transfer of insurance risk and common signs of possible risk. For example:

- accident insurance;
- assistance insurance;
- insurance against property damage or thefts;
- motor vehicle insurance;
- general third party liability insurance.

Each of these contract groups may be divided in more detail by taking into account the substance of the transferred insurance risk.

(b) Insurance premium and premium income

Written premiums are insurance premiums for the insurance contracts signed during the reporting period, that have come into force in the reporting period irrespective whether these premiums have become due or not. Premiums written are decreased by premiums cancelled and terminated during the reporting period. Premiums are disclosed gross of commission payable to intermediaries and exclude taxes and levies based on premiums. The earned portion of premiums received is recognised as revenue. Premiums are recognised as earned according to the assumed risk exposure over the term of the related policy coverage and are reported as earned premiums.

The unearned portion of premiums is recognised as unearned premium reserves.

Ceded reinsurance premiums are recognised as an expense in accordance with the pattern of reinsurance service received and the portion of reinsurance premiums attributable for future periods are recognised as assets under the reinsurance part of the unearned premium reserve.

(c) Unearned premium and unexpired risk reserves

Unearned premium reserves (UPR)

Unearned premium reserves represent the proportion of premiums written which relate to the period of risk subsequent to the reporting period. Reserves are calculated for each insurance policy under the 365 – day Pro Rata Temporis method based on the period in force for a particular policy, except for insurance of warranties and performance bonds within surety insurance line of business. UPR for these policies are calculated based on exponential trend approach which is typical for this insurance type because claims are reported and paid at the end of policy term.

Unexpired risk reserve (URR)

Unexpired risk reserve (URR) is set aside for unexpired risks arising from general insurance contracts where the expected value of claims and expenses attributable to the unexpired periods of policies in force at the reporting period end date exceeds the unearned premiums reserve in relation to such policies.

(d) Claims incurred

Claims incurred from insurance activities are claims attributable to the reporting period and consist of claims paid in the financial period, the corresponding claim handling expenses (loss adjustment expenses) and changes in the claim reserves. Claims paid are decreased by the amount of losses recovered through cession, sales of salvage or subrogation. Recovered losses are recognised on a cash basis when they are recovered.

Claim amounts recoverable under reinsurance contracts are assessed on each reporting period end date. The value of those assets decrease if due to an event subsequent to initial recognition there is objective evidence that the Company will not be able to recover all amounts, and this event has a reasonable measurable impact on the amounts receivable by the Company from the reinsurer.

(e) Outstanding claim reserves

Outstanding claim reserves comprise reserves for the Company's estimate of the ultimate cost of settling all claims incurred but unpaid at the period end date whether reported or not, and the related internal and external claims handling expenses. Reserves outstanding are not discounted, with the exception of annuities which may arise from third part liability insurance.

Reported but not settled claims reserve (RBNS)

The RBNS claims reserve is calculated on a case-by-case basis by the Company's loss adjusters for claims reported and not yet settled (including loss adjustment expenses) as at the reporting date.

Incurred but not reported claims reserve (IBNR and IBNER)

Both, gross and net IBNR reserves are calculated for whole Company's portfolio, except for MTPL where InterRisk Vienna Insurance Group AAS portfolio, which arises from merger in 2019, which is calculated separately and later counted together with the rest of Company's portfolio.

The chain-ladder method is used in the calculation of the IBNR reserve for following lines of business:

- accident insurance;
- motor transport (except railway transport) insurance (CASCO);
- property insurance against other risks;
- general third party liability insurance;
- credit insurance;
- surety insurance;
- motor vehicle owner third party liability insurance (MTPL).

Where available statistics are considered to be insufficient, e.g. lack of historical data, IBNR reserve is calculated as a maximum from a percentage of premiums (5%) written during the last 12 months in the respective line of business or at least initial reserve or from triangle in the following lines of business:

- health insurance in Lithuania and Estonia;
- railway rolling stock insurance;
- aircraft insurance;
- marine vessel insurance;
- freight insurance;
- property insurance against damage by fire and natural disasters;
- aircraft owner third party liability insurance;
- ship owners' third party liability insurance;
- miscellaneous financial losses insurance;
- legal expenses insurance;
- assistance insurance.

In order to calculate IBNR reserve for Latvian health insurance line of business, the Company analyses claims that are reported late for every month within the last two years before the respective reporting period end. Based on this analysis IBNR reserve is set.

(f) Ceded reinsurance

The Company cedes risks to reinsurance limiting its potential net loss through the diversification of the risks. Assets, liabilities, income, and expense arising from ceded reinsurance contracts are presented separately from the related assets, liabilities, income and expense from the related insurance contracts because the reinsurance arrangements do not relieve the Company from its direct obligations to its policyholders.

Reinsurance assets include the recoveries due from (re)insurance companies in respect of claims paid and the reinsurance share in the insurance contract liabilities.

Reinsurance commissions and profit participations include commissions received or receivables from reinsurers and profit participations based on the reinsurance contracts. Reinsurance commissions are deferred in a manner consistent with the deferred client acquisition costs.

(g) Client acquisition costs

Client acquisition costs include commissions paid to intermediaries and other expenses related to the acquisition of insurance policies.

Deferred client acquisition (DAC) costs, primarily consisting of intermediary commissions are deferred to the extent that they are recoverable out of future premiums and are recognised as expenses over the life of the insurance policies, except for insurance of warranties and performance bonds within surety insurance line of business. DAC for these policies are calculated based on the same principles as UPR, see Note 3.2(c).

(h) Allocation of administration expenses among cost centres and insurance types

The allocation of administrative expenses to loss adjustment expenses, client acquisition costs and investment management expenses is based on the expenses incurred in different cost centres.

Administration expenses, which are not directly referred to in a specific type of insurance, are distributed among types of insurance mainly in proportion to the volume of the gross premiums written.

(i) Outstanding claim reserves

Forecast inflation and discount rates are one of the key assumptions used in the estimates of the outstanding claim reserves for annuities. Every year the Company evaluates the adequacy of its previous year provisions by preparing run-off tests. Additionally sensitivity of main assumptions is checked. Below are the gross results of sensitivity analysis as at 31 December 2021 for inflation:

EUR'000	Projected annual inflation increased by 1%	Projected annual inflation decreased by 1%
Increase/ (decrease) in outstanding claim reserves (including annuities)	2 983	(2 542)

(j) Insurance receivables and payables

Amounts due to and from policyholders, intermediaries and reinsurers are financial instruments and are included in receivables and payables from direct insurance activities and reinsurance activities, and not in insurance contract liabilities or reinsurers' share of insurance contract liabilities.

3.3 Financial instruments

(a) Classification

At inception, all financial instruments are classified into one of the following categories:

Financial instruments at fair value through profit or loss are financial assets or liabilities that are acquired or incurred principally for the purpose of selling or repurchasing in the near term; or that are part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking; or that are a derivative (except for a derivative that is a designated and effective hedging instrument); or that are upon initial recognition, designated by the entity as at fair value through the profit or loss. These include groups of financial assets designated at fair value through profit and loss, which are managed, and performance evaluated on a fair value basis, in accordance with the Company's documented investment strategy and information about the Company internally on that basis is provided to key management personnel.

Held-to-maturity instruments are non-derivative financial assets with fixed or determinable payments and fixed maturity that the Company has the positive intention and ability to hold to maturity, and which are not designated at fair value through profit or loss, or available for sale.

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. Loans and receivables include loans, term deposits with banks and debtors in the statement of financial position.

Available-for-sale instruments are those financial assets that are designated as available-for-sale or are not classified as loans and receivables, held-to-maturity instruments or financial instruments at fair value through profit or loss.

Financial liabilities carried at amortised cost represent financial liabilities of the Company other than financial instruments designated at fair value through profit or loss. This category includes due to creditors balances.

Derivative financial instruments

Derivative financial instruments are initially recognised in the statement of financial position at their fair value. Fair values are obtained from quoted market prices or discounted cash flow models as appropriate. All derivatives are carried as assets when their fair value is positive and as liabilities when negative.

Changes in the fair value of derivatives are included in net gains and losses on financial instruments designated at fair value through profit or loss.

(b) Recognition and derecognition

Financial instruments are recognised when the Company becomes a party to the contractual rights of the instrument. All regular way purchase and sales of financial assets are recognised in the statement of financial position on the transaction date representing the date when the financial asset is delivered. In the period between the dates of transaction and settlement, the Company accounts for the changes in the fair value of the received or transferred asset based on the same principles used for any other acquired asset of the respective category.

Financial assets are derecognised when the rights to receive cash flows from the financial asset have expired or where the Company has transferred substantially all risks and rewards of ownership. Financial liabilities are derecognised when they are extinguished – that is, when the obligation is discharged, cancelled or expires.

(c) Initial and subsequent measurement

Financial instruments are initially measured at fair value and except for financial instruments at fair value through profit or loss include directly attributable transaction costs.

Subsequent to initial measurement, all financial assets and liabilities designated at fair value through profit or loss and all available for sale financial assets are measured at fair value except those instruments for which no reliable fair value measurement is possible. In this case, such instruments are carried at cost less transaction expenses and impairment.

All financial liabilities other than financial liabilities designated through profit or loss and all loans and receivables are measured at amortised cost using the effective interest rate method.

The effective interest rate is the rate that exactly discounts the estimated future cash payments and receipts through the expected life of the financial asset or liability. When calculating the effective interest rate, the Company estimates future cash flows considering all contractual terms of the financial instruments, but not future credit losses.

All instruments, excluding investments at fair value through profit and loss, are subject to revaluation when impaired.

Profit or loss arising from changes to the fair value of financial instruments designated through profit or loss is recognised in the profit or loss. Differences arising from changes to the fair value of available for sale financial instruments are recognised through other comprehensive income, except for impairment, which is recognised in profit or loss. For financial assets and liabilities carried at amortised cost, a gain or loss is recognized in the profit or loss when the financial asset or liability is derecognized.

3.4 Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal, or in its absence, the most advantageous market to which the Company has access at that date. The fair value of a liability reflects its non-performance risk.

A number of the Company's accounting policies and disclosures require the measurement of fair values, for both financial and non-financial assets and liabilities.

The Company has an established control framework with respect to the measurement of fair values. This includes a valuation team that has overall responsibility for overseeing all significant fair value measurements, including Level 3 fair values

Specific controls include:

- Verification of observable pricing;
- Regular re-performance of model valuations;
- A review and approval process for new models against observed market transactions;
- Analysis and investigation of significant daily valuation movements;
- Review of significant unobservable inputs, valuation adjustments and significant changes to the fair value measurement of Level 3 instruments compared to previous month.

The methods described below have been used for the determination of fair values.

The best evidence of the fair value of a financial instrument at initial recognition is the transaction price, i.e., the fair value of the consideration given or received, unless the fair value of that instrument is evidenced by comparison with other observable current market transactions with the same instrument (i.e., without modification or repackaging) or based on a valuation technique whose variables include only data from observable markets. When the transaction price provides the best evidence of fair value at initial recognition, the financial instrument is initially measured at the transaction price and any difference between this price and the value initially obtained from a valuation model is subsequently recognized in the statement of comprehensive income depending on the individual facts and circumstances of the transaction but not later

than when the valuation is supported wholly by observable market data or the transaction is closed out.

When applicable, the Company measures the fair value of an instrument using quoted price in an active market for that instrument. A market is regarded as active if transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis.

Valuation techniques include recent arm's length transactions between knowledgeable, willing parties (if available), reference to the current fair value of other instruments that are substantially the same, discounted cash flow analyses and option pricing models. The chosen valuation technique makes maximum use of market inputs, relies as little as possible on estimates specific to the Company, incorporates all factors that market participants would consider in setting a price, and is consistent with accepted economic methodologies for pricing financial instruments. Inputs to valuation techniques reasonably represent market expectations and measures of the risk-return factors inherent in the financial instrument. The Company calibrates valuation techniques and tests them for validity using prices from observable current market transactions in the same instrument or based on other available observable market data. Where third-party information, such as broker quotes or pricing services, are used to measure fair value, the Company assesses and documents the evidence obtained from the third parties to support the conclusion that such valuations meet the requirements of IFRS as adopted by EU. This includes:

- Verifying that equity broker or pricing service is approved by the Company for use in pricing the relevant type of financial instrument;
- Understanding how the fair value has been arrived at and the extent to which it represents actual market transactions;
- When prices for similar instruments are used to measure fair value, how these prices have been adjusted to reflect the characteristics of the instrument subject to measurement;

Further analysis of basis for fair value and fair value determination principles are disclosed in Notes 21 and 45.

When measuring the fair value of an asset or a liability, the Company uses market observable data as far as possible. Fair values are categorized into different levels in a fair value hierarchy based on the inputs used in the valuation techniques as follows:

Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities.

Level 2: inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).

Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

If the inputs used to measure the fair value of an asset or a liability might be categorized in different levels of the fair value hierarchy, the fair value measurement is categorized in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement.

The Company recognises transfers between levels of the fair value hierarchy as of the end of the reporting period during which the change has occurred.

3.5 Impairment

(a) Financial assets

At each reporting period end date the Company assesses whether there is objective evidence that the financial assets not carried at fair value through profit or loss are impaired. Financial assets are impaired when objective evidence demonstrates that a loss event has occurred after the initial recognition of the asset, and that the loss event has an impact on the future cash flows of the asset that can be estimated reliably.

Insurance receivables that are overdue are reversed against premium income once the policy is cancelled. No impairment allowances are recognised in respect of amounts that have not yet become due if no portion of the premium is taken to income. Receivables are disclosed net of impairment allowance. The amount of allowance represents the difference between the gross and recoverable amount of receivables.

Other debtors are stated at the recoverable amount. Impairment allowances are recognised on doubtful receivables.

Impairment of loans and receivables

Loans and receivables, or those amounts that are overdue, or for which there are indications of impairment are assessed for objective evidence of impairment individually. The Company assesses probability of the debtor fulfilling its obligations in the future and timing of fulfilment of those obligations, to be able to assess recoverable amount of the assets.

Loans and receivables for which no individual impairment loss is measured are assessed on collective level using statistical modelling of historical trends of the probability of default, timing of recoveries and the amount of loss incurred. These are then adjusted for management's judgement as to whether current economic and credit conditions are such that the actual losses are likely to be greater or less than suggested by historical modelling. Default rates, loss rates and the expected timing of future recoveries are regularly benchmarked against actual outcomes to ensure that they remain appropriate. They will, however, always include uncertainty and may change depending on financial position of customers or general economic environment.

(b) Impairment of insurance receivables

Insurance receivables, or those amounts that are overdue, or for which there are indications of impairment are assessed for objective evidence of impairment individually. The Company assesses probability of the debtor fulfilling its obligations in the future and timing of fulfilment of those obligations, to be able to assess recoverable amount of the assets. Insurance receivables for which no individual impairment loss is measured are assessed on collective level using statistical modelling of historical trends of the probability of default, timing of recoveries and the amount of loss incurred. These are then adjusted for management's judgement as to whether current economic and credit conditions are such that the actual losses are likely to be greater or less than suggested by historical modelling. Default rates, loss rates and the expected timing of future recoveries are regularly benchmarked against actual outcomes to ensure that they remain appropriate. They will, however, always include uncertainty and may change depending on financial position of customers or general economic environment.

(c) Non-financial assets

Non-financial assets, other than deferred taxes and deferred acquisition costs, are assessed at each reporting date for any indications of impairment. In the presence of such evidence, the Company estimates the recoverable amount of the related asset. The recoverable amount of non-financial assets is the greater of their fair value less costs to sell and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset. For an asset that does not generate cash inflows largely independent of those from other assets, the recoverable amount is determined for the cash-generating unit to which the asset belongs. An impairment loss is recognised when the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount.

All impairment losses in respect of non-financial assets are recognised in the profit or loss and reversed only if there has been a change in the estimates used to determine the recoverable amount. Any impairment loss reversed is only reversed to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised.

3.6 Property and equipment

Property and equipment are disclosed at cost less accumulated depreciation and impairment. Depreciation is calculated using a linear method over the entire useful life of the respective asset in order to write their value down to the residual value at the end of the useful life based on the following rates:

Office equipment	20% per year
Computers, electrical equipment	33% per year
Vehicles	20% per year
Buildings for own use	5% per year

Land and buildings used for the Company's operating activities are initially stated at cost. Subsequently buildings for own use are carried at cost less accumulated depreciation and any accumulated impairment losses. Land is not depreciated and is carried at a cost less any accumulated impairment losses.

Maintenance costs of property and equipment are recognised in the profit or loss as incurred. Costs of capital repairs of property and equipment (leasehold improvements) are added to the value of the respective asset and written off over the useful lifetime of the asset. Capital repair costs on leased property and equipment are written off on a straight-line basis during the shorter of the useful lifetime of the capital repairs and the period of lease.

Profit or loss from disposal of property and equipment is calculated as the difference between the carrying amount of the asset and income generated from sale, and reflected as profit or loss in the profit or loss when disposed.

When revalued fixed assets are disposed, the related revaluation reserve is transferred to retained earnings.

Depreciation methods, useful lives and residual values are reviewed annually.

3.7 Intangible assets

Software licences

Software licences are capitalised. Software licences are recorded at cost including acquisition and implementation costs less accumulated amortisation and impairment. Amortisation is calculated using the linear method over the entire useful life of the respective asset in order to write their value down to the estimated residual value at the end of the useful life based on a 20% per year rate.

3.8 Investment property

Land and buildings held either to earn rental income or for capital appreciation or both are classified as investment property and are measured at cost less accumulated depreciation and impairment.

Depreciation is calculated using a linear method over the entire useful life of the respective asset in order to write their value down to the residual value at the end of the useful life based on the following rates:

Buildings	5% per year
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Land is not depreciated and is carried at a cost less any accumulated impairment losses.

Transfers to or from investment property are made when there is a change in use.

When an item of land and buildings is transferred to investment property following a change in its use, any differences arising at the date of transfer between the carrying amount of the item immediately prior to transfer and its fair value is recognised directly in gain or losses.

If an investment property becomes owner-occupied, it is reclassified as property and equipment and its fair value at the date of reclassification becomes its deemed cost for subsequent accounting, any differences arising are recognised directly in gain or losses.

3.9 Assets held for sale

Non-current assets are classified as held-for-sale if it is highly probable that their carrying value will be recovered through sale rather than through continuing use and if they meet the following two classification criteria:

- these items, in their current state, are available for immediate sale and subject only to the normal conditions of sale of such items;
- their sale is reliable (based on the management's decision to sell these items, the sale process has been initiated and there is assurance that it will be completed within one year of the date of commencement of this process).

Such assets are generally measured at the lower of their carrying amount and fair value less costs to sell. If the facts or events indicate a decrease in the value of non-current assets held for sale, the assets are tested for impairment and the resulting losses are assessed and recognized in the profit or loss.

Once classified as held-for-sale, intangible assets and property, plant and equipment are no longer amortised or depreciated.

3.10 Leases

The Company has applied IFRS 16 for accounting lease contracts.

At inception of a contract, the Company assesses whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company uses the definition of a lease in IFRS 16.

As a lessee

The Company recognises a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset or the site on which it is located, less any lease incentives received.

The right-of-use asset is subsequently depreciated using the straight-line method from the commencement date to the end of the lease term. In addition, the right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Company's incremental borrowing rate. Generally, the Company uses its incremental borrowing rate as the discount rate.

The incremental borrowing rates are determined by the Vienna Insurance Group AG Wiener Versicherung Gruppe Group's accounting department based on interest rates from various external financing sources and making certain adjustments to reflect the terms of the lease and type of the asset leased.

After the commencement date, the lessee shall measure the lease liability by increasing the carrying amount to reflect interest on the lease liability, reducing the carrying amount to reflect the lease payments made, and remeasuring the carrying amount to reflect any reassessment or lease modifications, or to reflect revised in-substance fixed lease payments.

The amount of the remeasurement of the lease liability shall be recognised as an adjustment to the right-of-use asset. However, if the carrying amount of the right-of-use asset is reduced to zero and there is a further reduction in the measurement of the lease liability, any remaining amount of the remeasurement shall be recognised in profit or loss.

The Company presents right-of-use assets that meet definition of land and buildings in "Land and Building for own use" while those assets that do not – in "Property and equipment" and lease liabilities in 'Lease liabilities' in the statement of financial position.

Short-term leases and leases of low-value assets

The Company has elected not to recognise right-of-use assets and lease liabilities for leases of low-value assets and short-term leases. The Company recognises the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

As a lessor

When the Company acts as a lessor, it determines at lease inception whether each lease is a finance lease or an operating lease.

To classify each lease, the Company makes an overall assessment of whether the lease transfers substantially all of the risks and rewards incidental to ownership of the underlying asset. If this is the case, then the lease is a finance lease; if not, then it is an operating lease. As part of this assessment, the Company considers certain indicators such as whether the lease is for the major part of the economic life of the asset. In the reporting period the Company has only operating lease agreements.

Rental income from an investment property leased out under an operating lease is recognised on a straight-line basis over each lease term.

The accounting policies applicable to the Company as a lessor in the comparative period were not different from IFRS 16 apart from Covid-19 related changes in rent concessions. Company applies permission to account concession is in the form of a one-off reduction in rent, and it is accounted for as a variable lease payment and is recognised in profit or loss.

The Company as a lessor

Rental income from an investment property leased out under an operating lease is recognised on a straight-line basis over each lease term.

3.11 Corporate income tax

(a) Payable tax

Based on the Law on Corporate Income Tax of the Republic of Latvia the tax rate is 20%, the taxation period is one month and the taxable base, determined by dividing the value of the taxable item by a factor of 0.8, includes:

- distributed profit (dividends calculated, payments equivalent to dividends, conditional dividends) and
- conditionally or theoretically distributed profit (non-operating expenses, doubtful debts, excessive interest payments, loans to related parties, decrease of income or excessive expenses which are incurred by entering into transactions at prices other than those on the market that should be calculated using the methodology determined by the Cabinet of Ministers, benefits bestowed by the non-resident upon its staff or Management board and Supervisory Board members regardless of whether the receiving party is a resident or a non-resident, if they relate to the operation of a permanent establishment in Latvia, liquidation quota).

The use of tax losses carried forward from previous periods is limited: it is possible to utilise these losses to decrease the amount of tax calculated on dividends in the reporting period by no more than 50%. It is possible to carry forward unused tax losses and utilise them in the previously described manner only until 2022.

(b) Deferred tax

Lithuania

Deferred tax is recognised providing for temporary differences between the carrying value of assets and liabilities in the financial statements (financial reporting purposes) and the amounts used for tax purposes.

Deferred tax is measured at the tax rates that are expected to be applied to temporary differences when they reverse, based on the laws that have been enacted or substantively enacted by the reporting date. Deferred tax assets and liabilities are offset if there is a legally enforceable right to offset current tax liabilities and assets, and they relate to income taxes levied by the same tax authority on the same taxable entity, or on different tax entities, but they intend to settle current tax liabilities and assets on a net basis or their tax assets and liabilities will be realised simultaneously.

The carrying amount of deferred tax asset was reviewed at 31 December 2021 and changes were charged to profit or loss in the reporting period.

Latvia

IAS 12 Income taxes requires that, if there is a difference between the tax rate applicable to distributed profit and undistributed profit, deferred tax assets and liabilities shall be recognized at the tax rate applied to retained earnings.

The Law on Corporate Income Tax of the Republic of Latvia applies 20% tax rate to distributed profit while the applicable tax rate for profit that is added to retained earnings is 0%. Consequently, the deferred tax asset and liabilities are to be recognized in zero amount.

Estonia

Company does not recognize deferred tax asset or liability in Estonia's part of business, because Company controls the dividend policy of its branches. In Estonia all undistributed corporate profits are tax exempt and Company does not expect to pay out dividends from Estonian branch in the foreseeable future, and, therefore no deferred tax liability in relation to these profits has been recognised.

(c) Contingent assets that derive from the calculation of the Company's Corporate Income Tax for periods prior to 31 December 2017

The Company has tax losses brought forward from reorganisation which happened in 2018, when InterRisk Vienna Insurance Group AAS was merged with Company in the amount of EUR 1.28 million as at 31 December 2021. In accordance with the new Corporate Income Tax Law referred to above, the Company will be able to utilise these losses to decrease up to 50% of corporate income tax calculated on dividends payable exclusively from profit for 2018-2021 and distributed as dividends by the end of 2022, as well as from profit for 2022 which will be distributed as extraordinary dividends in 2022.

The potential benefits described above as at 31 December 2021 that may arise from the potential possibility to decrease the amount of tax in the future are treated as contingent assets and are not recognised on the balance sheet.

(d) Tax relief

A corporate income tax relief has been applied due to amounts donated to budget institutions, and public, cultural, science, sports, charity, health and environment protection organisations registered in Latvia, as well foundations and religious organisations which are permitted to accept donations in accordance with Article 8 and 12 of the Corporate Income Tax Law.

3.12 Cash and cash equivalents

In the statement of cash flows, cash and cash equivalents comprise cash in hand, demand deposits, overnight deposits and term deposits with banks with the initial maturity term of less than three months. In the statement of cash flows, cash flows are presented using the direct method.

3.13 Dividends

Dividends are reflected as an appropriation of retained earnings in the period in which they are declared.

3.14 Employee benefits

Short-term employee benefits, including salaries and social security contributions, bonuses and vacation benefits are included in net operating expenses on an accrual basis as the services are provided. The Company pays fixed social security contributions to State Social Fund on behalf of its employees during the employment period in accordance with local legal requirements and will have no obligations to pay further contributions relating to employee services in respect of retired employees.

3.15 Provisions

A provision is recognised if, as a result of a past event, the Company has a present legal or constructive obligation that can be estimated reliably, and it is probable that an outflow of economic benefits will be required to settle the obligation.

3.16 Related parties

Related parties represent both legal entities and private individuals related to the company in accordance with the following rules.

- a) A person or a close member of that person's family is related to a reporting entity if that person:
 - i) has control or joint control over the reporting entity;
 - ii) has significant influence over the reporting entity;
 - iii) is a member of the key management personnel of the reporting entity or of a parent of the reporting entity.

b) An entity is related to a reporting entity if any of the following conditions applies:

- i) The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others).
- ii) One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member).
- iii) Both entities are joint ventures of the same third party.
- iv) One entity is a joint venture of a third entity and the other entity is an associate of the third entity.
- v) The entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity.
- vi) The entity is controlled, or jointly controlled by a person identified in (a).
- vii) A person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).
- viii) The entity, or any member of a group to which the entity belongs provides management personnel services to the entity or to the parent of the entity.

Related party transaction – a transfer of resources, services or obligations between a reporting entity and a related party, regardless of whether a consideration is determined.

3.17 Significant accounting estimates and judgement in applying accounting policies

The preparation of financial statements in conformity with IFRS as adopted by the EU requires management to make judgements, estimates and assumptions that affect the application of policies and reported amounts of assets and liabilities, income and expenses. Although these estimates are based on management's best knowledge of current events and actions, the actual results ultimately may differ from those estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to the accounting estimates are recognised in the period, in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

Key sources of estimation uncertainty:

Outstanding claim reserves

The nature of the business makes it difficult to predict with certainty the likely outcome of any particular claim and the ultimate cost of notified claims. Each notified claim is assessed on a separate, case-by-case basis with due regard to the claim circumstances, information available from loss adjusters and the historical evidence of the size of similar claims. Case estimates are reviewed regularly and are updated as and when new information arises. The reserves are based on information currently available. However, the ultimate liabilities may vary as a result of subsequent developments. The reserve estimation difficulties also differ by class of business due to claim complexity, the volume of claims and the individual severity of claims, determining the occurrence date of a claim and reporting lags.

The most judgemental estimation is related to incurred-but-not-reported (IBNR) reserves. The key assumptions in respect of sufficiency of outstanding claim reserves are monitored regularly through claims reserves run-off analyses and liability adequacy testing, performed for each line of business.

The key methods, which are used and have remained unchanged from prior year, are:

- Chain Ladder methods, which use historical data to estimate potential claims incurred in future;
- frequency-severity method;
- or analysed premium trend.

The Company is calculating IBNER (incurred but not enough reported) reserve for large claims incurred but not enough reported for each country separately in MTPL line of business on a net basis, totaling 1 200 thousand EUR (31.12.2020: 1 200 thousand EUR). Calculation assumptions among others include frequency, net premium amount and reinsurance retention for each country separately. Starting from 2020 pandemic reserve IBNER is set aside for financial lines which is calculated by applying publicly available default rates (Lursoft, SIA), stock indexes of leisure sectors and exposure (sum insured). Majority share of reserve is for fulfilment of the travel agency obligations insurance product. IBNER reserve is included under IBNR reserve position in the financial statements. IBNER gross amount as at 31.12.2021 was EUR 7 747 thousand (31.12.2020: EUR 8 211 thousand).

In addition, IBNR reserve volume for MTPL and Property line of business is reviewed by using stochastic methods – Bootstrapping Chain Ladder, Mack Chain Ladder.

The actual method or mix of methods used varies by line of business and observed historical claims development.

To the extent that these methods use historical claims development information, they assume that the historical claims development pattern will occur again in the future. There are reasons why this may not be the case, which, insofar as they can be identified, have been allowed for by modifying the methods. Such reasons include:

- changes in processes that affect the development/ recording of claims paid and incurred (such as changes in claim reserving procedures);
- economic, legal, political and social trends (resulting in different than expected levels of inflation);
- changes in mix of business;
- random fluctuations, including the impact of large losses.

For claim reserve assumptions, please refer to Note 4.

Measurement of fair values

More detailed description of fair value measurement is disclosed in Note 3.4.

(4) Risk management

4.1 General principles

The Company's risk management is an integral part of the governance and decision-making system, and a systematic set of measures – ensuring risk identification, assessment, monitoring and control of the individual exposure level.

The risk management system ensures three levels of defence:

- the first level of defence is based on management controls and internal control measures within responsibility of the process/risk owner (following "four eyes" principle; documentation of critical processes etc.);
- the second level of defence is ensured by the functions that oversee risks – risk management function, compliance function, actuarial function which have a direct access to the Company's Management Board to report any concerns. These functions ensure the first line of defence is properly designed, in place, and operating as intended. Each of these functions has some degree of independence from the first line of defence. They may intervene directly in modifying and developing the internal control and risk systems. Therefore, the second line of defence serves a vital purpose but cannot offer truly independent analyses to governing bodies regarding risk management and internal controls;
- the third level is carried out by Internal Audit activities providing independent assurance on risk management system and control processes and having a direct access to Company's Management Board, Audit Committee and the Supervisory Board.

The business of insurance represents the transfer of risk from the policyholder to the insurer and management of this risk. Consequently, the largest risks result from:

- accepting insurance risk, choosing the reinsurance cover and fulfilling obligations with respect to signed insurance contracts;
- the financial risks arising from investment activities;
- operational risk – losses that may occur in the course of day-to-day operations due to employee errors, process inconsistencies, information system failures or external influences.

The Company monitors its risk profile regularly. The calculation of the required solvency capital is carried out once per quarter, as well as regular stress tests, sensitivity tests are performed to check if the actual indicators differ from the own risks and solvency assessment forecast. The use of the standard formula corresponds to the Company's risk profile, which is assessed in the own risk and solvency assessment.

The results of the own risk and solvency evaluation are used in strategic and operational planning, budgeting

process. If significant changes are planned in the Company's activities or unexpected changes are observed in financial data, add-hoc own risk and solvency evaluation will be performed.

In order to ensure the reliability of the risk management system, the Company separates Risk measurement, analysis and control functions from business functions, e.g. the Company ensures that those who affect the risk profile are not simultaneously assigned risk monitoring and risk control. Additionally, the Company educates its employees regularly and systematically in order to raise their awareness of the risks.

4.2 Insurance risks

Insurance risk is the most significant risk faced by the Company in day-to-day activities. The main components of the insurance risk are premium and reserve risk, lapse risk and catastrophe risk.

In order to manage insurance risk, the Company has developed different control and management tools. For all insurance types, insurance terms and conditions have been developed and are binding both for the Company, as well as for the customers. Product methodologies have been developed for all insurance types and should be followed when assessing and accepting the risk assumed by the Company. The Company has established Baltic Risk Underwriting Department which employees are responsible for development of insurance products, insurance terms and conditions and risk assessment methods. In addition, limits have been fixed, up to which each of the employees is allowed to make a decision on risk underwriting. When fixing limits, the hierarchy principle is observed; employee with higher the level of responsibility has higher risk underwriting authority.

Complementary to Tariff Committee, established in the end of 2018, the Tariffication Division was created in the beginning of 2020 to support pricing activities in the Company.

(a) Underwriting strategy

Underwriting risk means the risk of loss or adverse change in the value of insurance liabilities, due to inadequate pricing and provisioning assumptions. To mitigate underwriting risk, the Company's underwriting strategy seeks diversity to ensure a balanced portfolio and is based on a large portfolio of similar risks over a number of years and, as such, it is believed that this reduces the variability of the outcome. The underwriting strategy is set out in an annual business plan.

This strategy is cascaded down to individual underwriters through detailed underwriting authorities that set out the limits that any one underwriter can write by insurance line, class of business and industry in order to enforce appropriate risk selection within the portfolio.

Risk diversification is assumed as highly important through the same risk underwriting process across all Baltic countries.

Stress tests and analysis of the critical situation are used for underwriting strategy assessment.

The calculation of the tariffs and prices on insurance products reflects current market conditions and covers the most probable assumptions necessary for the adjustment of future results, aiming to significantly mitigate financial risks.

Adherence to the underwriting authorities is being monitored by management on an on-going basis. Those transactions requiring special authorisation are subject to the special attention of the Company's Management Board.

(b) Basic products

The terms and conditions of insurance contracts that have a material effect on the amount, timing and uncertainty of future cash flows arising from insurance contracts are set out below. In addition, the following gives an assessment of the Company's main products and the ways in which it manages the associated risks.

Motor transport (except railway transport) insurance (CASCO)

Product features

The insurance indemnifies for losses, which arise from damage to, destruction, or loss of vehicle. Several

additional insurance covers may also be purchased which are related to the insured vehicle. The largest losses arise from theft or total loss.

Management of risks

The key risks associated with this product are underwriting risk and claims development risk.

CASCO premiums are determined on the basis of the bonus-malus system, driver's driving experience period, insurance territory and other criteria, which decreases the insurance premium upon the absence of losses and increases the insurance premium upon the occurrence of losses. The sums insured rarely exceed EUR 70 000. Insurance premiums are set in line with applicable insurance methodology. Vehicles are divided into four risk groups with different insurance premiums. CASCO usually contains a retention element by the policyholder.

Motor vehicle owner third party liability insurance (MTPL)

Product features

This insurance is a compulsory insurance which policy conditions and indemnification rules are prescribed by the respective regulations on Motor Vehicle Owner Third Party Liability Insurance. MTPL insurance covers physical injury claims and property claims in countries where the policies has been issued as well as claims caused abroad by insured motorists under the Green Card system. Most of the motor vehicle owner third party liability insurance indemnities are for property damage and lump sum personal injuries, mostly medical treatment costs, and temporary absence from work. However, long-term indemnities may also be possible, such as pensions and permanent inability to work which may be paid out over a long term as annuities.

Even if according to previous statistics the claims have been notified promptly and can be settled without delay, the situation can change and claims arising from motor vehicle owner third party liability insurance are classified as 'long-tail' classes where the ultimate claim cost takes longer to determine.

Management of risks

The key risks associated with this product are underwriting risk and claims development risk. The Company therefore monitors and reacts to changes in the general economic and commercial environment in which it operates. For determining the premiums of motor vehicle owner third party liability insurance, a bonus-malus system is used which reduces the insurance premium upon the absence of losses created by the insured persons and increases the insurance premium upon the existence of losses created by the insured persons.

Health insurance

Product features

The health insurance product is offered to companies that purchase health insurance for their employees. Health insurance indemnifies against expenses such as doctor visits, laboratory and diagnostic tests and hospital treatment.

Management of risks

The Company monitors and reacts to changes in the prices for medical services, monitors the claim ratios on employer's bases and adjusts insurance premiums accordingly each year when renewal takes place.

Property insurance

Product features

Property insurance indemnifies, subject to any specified limits or deductibles, the insured against loss or damage of property. The risks covered by property insurance include fire risk, pipe leakage, explosion, third party illegal activities, and natural disasters. The most frequently occurring risks for property include pipe leakages and fire. Most often larger losses result from fire.

Generally, claims in the property insurance line are notified promptly and can be settled without delay. Property business is therefore classified as 'short-tail', contrasted with the 'long-tail' classes where the ultimate claim cost takes longer to determine.

In addition to property insurance, customer can get the indemnity of business interruption arising from insured property damage, as well as to purchase liability insurance with insuring real estate assets.

Business interruption insurance covers lost business profits and fixed costs incurred that arise from the realisation of any risk covered by the property insurance of the Company. Upon the sale of that insurance type, it is considered to be particularly important to take into account the transparency of the financial statements.

Management of risks

The key risks associated with this product are underwriting risk and claims development risk.

In order to charge appropriate premiums different specifics of properties are assessed. For private property insurance, it is expected that there will be large numbers of properties with similar risk profiles. However, for commercial business this may not be the case. Many commercial property proposals comprise a unique combination of location, type of business, and safety measures in place. Calculating a premium commensurate with the risk for these policies will be more complex.

Insurance risk is managed primarily through pricing, independent assessment of property under international standards, product design, risk selection and reinsurance. Therefore, the Company monitors and reacts to changes in the general economic and business by changing pricing or product conditions.

(c) Insurance risk concentration

Within the insurance process, concentrations of risk may arise where a particular event or series of events could impact heavily upon the Company's liabilities. Such concentrations may arise from a single insurance contract or through a small number of related contracts, and relate to circumstances where significant liabilities could arise.

Risk concentration may occur as a result of different coincidences and regularities. In property insurance, risk concentration might occur if one densely populated area experiences any of the exposures (e.g. fire), which may easily transfer from one property to another one and this action cannot be avoided.

In addition, the management is aware that the possible risk concentration can be in one company or an industry in total, for which several risks are insured. When insuring such risks, a precondition is the assessment of the company's financial position and capacity, as well as identifying how large financial liabilities can arise, how large the liabilities are that are already held by the Company and what it can afford. When evaluating financial risks, the trends of economic growth and the risks that might impact this area are studied.

In order to minimise losses that could occur because of risk concentration, the Company uses reinsurance effectively – by protecting risks proportionally and non-proportionally. Placing reinsurance, the Company's net retention for one risk is defined per one object and per one event, when losses happen simultaneously for several objects. The Company follows the Reinsurance policy, which has been approved by the Management Board.

The Company's key methods in managing these risks are two-fold. Firstly, the risk is managed through appropriate underwriting. Underwriters are not permitted to accept the risks unless the expected profits are commensurating with the risks assumed. Secondly, the risk is managed through the use of reinsurance. The Company purchases reinsurance coverage for various insurance lines of business. The Company assesses the costs and benefits associated with the reinsurance programme on an ongoing basis.

The Company sets out the total aggregate exposure that it is prepared to accept in relation to the concentrations of risk. It monitors these exposures both at the time of underwriting a risk, and on a monthly basis by reviewing reports, which show the key aggregations to which the Company is exposed. The Company uses a number of modelling tools to monitor risk accumulation in order to measure the effectiveness of the reinsurance programme and the Company's net retention.

Concentration risk is tested and evaluated within different scenario tests. Stress test results are used for decision making to understand what concentration risk the Company may undertake.

Geographic concentration of risks

To reduce the concentration risk in one country, the Company continues to develop operations in all Baltic

countries. As a result, in the reporting period, 38.5% of all business (by net earned premiums) was conducted in Latvia, 49% in Lithuania and 12.5% in Estonia.

Concentration of risks by industry

The concentration of insurance risks by industry does not exceed 20% for an industry, therefore the Company's management considers that the risk concentration is at an acceptable level.

(d) Catastrophes

The Company's management is aware that catastrophe risks are possible. In the Company's geographic position these risks are mostly connected with meteorological phenomena: storms, floods, hail, snow, freezing, etc. Large fires and earthquakes are unlikely, but they may occur. The most characteristic catastrophes in Baltics are floods and storms while the largest claims usually are because of a fire. In order to minimise the impact of catastrophe risk on the Company, reinsurance is arranged – both proportionally and non-proportionally. In addition, facultative reinsurance is purchased for large risks. The retention is specified and reviewed in accordance with business needs, involving the Management Board and Actuarial Department, and taking into account maximum allowed net Retention of 3% of the Company's equity. According to the management, the measures taken sufficiently reduce the impact of catastrophe risk on the Company.

(e) Liability adequacy test

A liability adequacy test is carried out by line of business in Latvia, Lithuania and Estonia at each reporting date and assesses whether the insurance liabilities recognized during the reporting year for valid policies are adequate by comparing the insurance reserves established to the present value of the estimated future cash flows arising on existing insurance policies. The test takes into account potential decrease of claims paid due to regress and it is performed after the deduction of any deferred acquisition and administration costs from unearned premium reserve. However, it does not take into account reinsurance. If the assessment indicates a deficiency in the carrying amount of liabilities, the deficiency is recognised in the profit or loss by set up of additional unexpired risk reserve.

Liability adequacy test as at 31 December 2021 identify deficiency that would require setting of unexpired risk reserve for CASCO in Latvia and Estonia.

Claims development

Information on the claims development has been provided in order to illustrate the insurance risk to which the Company is subject. The claim table discloses a comparison of cumulative payments to date and the development of claim reserves made for these insurance claims by accident year.

The following table shows how the Company estimates total claims for each accident year have developed over time and reconciles the cumulative claims to the amount included in the Statement of the Financial position.

Claim development analysis, EUR'000

	Year of insured occurrence							Total
	2015 year and before	2016	2017	2018	2019	2020	2021	
	EUR'000	EUR'000	EUR'000	EUR'000	EUR'000	EUR'000	EUR'000	EUR'000
Gross claim provision at the end of the reporting period								
At the end of accident year	55 700	27 996	41 344	56 159	55 283	58 748	72 885	-
-one year later	31 326	14 390	17 692	20 160	15 649	13 364	-	-
-two years later	45 617	9 881	12 049	13 284	7 551	-	-	-
-three years later	45 835	8 652	10 145	8 040	-	-	-	-
-four years later	42 703	5 523	6 053	-	-	-	-	-
-five years later	37 354	5 224	-	-	-	-	-	-
Gross claims paid in subsequent years								
-one year later	20 903	16 765	28 415	37 089	28 610	22 538	-	-
-two years later	5 494	5 017	2 687	4 526	2 573	-	-	-
-three years later	4 720	1 802	1 508	2 860	-	-	-	-
-four years later	4 277	1 010	1 052	-	-	-	-	-
-five years later	2 847	517	-	-	-	-	-	-
Gross claims paid	38 241	25 111	33 662	44 475	31 183	22 538	-	195 210
Current year (deficiency)/ redundancy	2 502	(218)	3 040	2 384	5 525	22 846	-	36 079

(f) Sensitivity analysis assumptions

The estimated amount of IBNR reserve could be influenced by inflation, the risk that significantly large claims will be reported with delay, seasonality of the reporting of claims and other risks.

As at 31 December 2021 84% of IBNR reserve (excluding IBNER - large claim, pandemic reserve) consists of the following lines of business: MTPL and general third party liability insurance. Considering the current market situation, the Company believes that the most volatile assumption, which stands in one line with average claim amount, is inflation.

The table below presents the change in IBNR reserve as at 31 December 2021 – if the annual inflation used in the IBNR reserve estimation would change as a result of a 1 percentage point (p.p.) change in projected annual inflation, the IBNR reserve would change respectively:

EUR'000	IBNR, as at	IBNR if projected annual	IBNR without using
Line of business	31.12.2021	inflation increased by 1 p.p.	inflation
MTPL	23 354	23 851	22 411
General TPL	3 836	3 944	3 632
EUR'000	IBNR, as at	IBNR if projected annual	IBNR without using
Line of business	31.12.2020	inflation increased by 1 p.p.	inflation
MTPL	23 967	24 339	23 603
General TPL	4 207	4 298	4 118

Assumptions used for estimation of MTPL insurance claim reserves

IBNR reserve estimation for MTPL insurance claims is performed for the main part of claims incurred excluding annuities and another bodily injury claims for which a separate calculation is performed. Chain coefficients are calculated separately for material claims incurred triangle for each Baltic state.

RBNS reserves for annuities are calculated based on mathematical formulas used in life insurance. The main assumptions in these calculations are mortality tables, inflation and discount rates. General Latvian mortality tables are used for RBNS reserve calculations. Special disabled person mortality tables are used for first or second group disabled persons. Cash flows are calculated until the end of life or until age of retirement. EIOPA (The European Insurance and Occupational Pensions Authority) given discount rates are used for discounting cash flows. In addition, RBNS reserve for cases involving government social insurance agencies and private persons are calculated using specific indexation inflation coefficients set by each country separately.

4.3 Financial risk management

The Company is exposed to financial risks due to operations with financial instruments. Financial risks include market risk, credit risk and liquidity risk. Below is a description of each of these financial risks and a summary of the methods used by the Company to manage these risks. Exposure to those risks arises in the normal course of the Company's business.

The Company's financial assets and liabilities, including investments, deposits with banks, loans, insurance receivables and receivables from reinsurance activities, are exposed to financial risk as follows:

- Market risk: risk of loss or of adverse change in the financial situation resulting, directly or indirectly, from fluctuations in the level and in the volatility of market prices of assets, liabilities and financial instruments, including interest rate risk, price risk and currency risk;
- Credit risk: risk of loss or of adverse change in the financial situation, resulting from fluctuations in the credit standing of issuers of securities, counterparties and any debtors to which Company is exposed, in the form of counterparty default risk, or spread risk, or market risk concentrations;
- Liquidity risk: risk that Company is unable to realise investments and other assets in order to settle its financial obligations when they fall due.

Market risk

All financial instruments and positions are subject to market risk, the risk that future changes in market conditions may make an instrument more or less valuable. The Company is subject to potential market risks and can incur losses from financial assets and financial liabilities as the result of changes in interest rates, currency exchange rates and changes in price of equity instruments.

In order to limit investment risk, investments are made in different financial instruments. When choosing financial instruments, the requirements of the insurance company and solvency capital requirements are observed.

When carrying out investing activities, the employees of Financial Department are guided according to the approved Investment and risk strategy, which regulates issues related to control and the minimisation of investments risk.

The reduction of investments risk is carried out in two ways – firstly, by diversifying the investments portfolio, and secondly, by analysing the specific asset before the purchase of this asset and following the available information on this asset. On quarterly basis, the Company performs mismatch analysis of asset and liabilities' currencies, duration and cash flows during solvency capital requirement calculations.

(a) Currency (foreign exchange rate) risk

Currency risk is the sensitivity of the values of assets, liabilities and financial instruments to changes in the level r in the volatility of currency exchange rates.

Some insurance liabilities are denominated in foreign currencies. The Company's policy is to restrict the currency risk with respect to known and expected transactions in foreign currencies. Currency risk management is based on investments in the respective currencies. The Company is not engaged in any speculative transactions that may increase the currency risk.

The Company held an open currency position in DKK in the equivalent of EUR 21 867 thousand, primarily invested into covered fixed income securities. Taking into account that DKK is pegged to EUR, the Company believes that the underlying currency risk is insignificant and acceptable, and does not require any risk mitigation measures.

An analysis of sensitivity of the Company's net income for the period and equity to changes in the foreign currency exchange rates based on currency positions from assets and liabilities denominated in foreign currency existing as at 31 December 2021 and 2020 and a simplified scenario of a 10% change in PLN, GBP, USD to EUR exchange rate is as follows:

EUR'000	2021 Net income	2020 Net income
10% depreciation of PLN against EUR	57	86
10% appreciation of PLN against EUR	(57)	(86)
10% depreciation of GBP against EUR	(36)	30
10% appreciation of GBP against EUR	36	(30)
10% depreciation of USD against EUR	114	73
10% appreciation of USD against EUR	(114)	(73)

The split of financial assets and liabilities and insurance contract liabilities by currencies in EUR equivalent as at period end were as follows:

31 December 2021	EUR EUR'000	USD EUR'000	DKK EUR'000	PLN EUR'000	GBP EUR'000	Other EUR'000	Total EUR'000
Financial and insurance related assets							
Debt securities and other fixed income securities	158 367	-	22 090	2 349	1 697	197	184 700
Non-fixed income securities	46 853	-	-	-	-	-	46 853
Loans	14 761	-	-	-	-	-	14 761
Insurance Receivables and Receivables	54 628	-	-	-	-	-	54 628
Cash and cash equivalents	8 009	1 702	-	1	11	108	9 831
Total financial assets	282 618	1 702	22 090	2 350	1 708	306	310 773
Insurance contract liabilities, net and financial liabilities							
Unearned premium and unexpired risk reserves, net	92 676	465	-	-	-	-	93 141
Outstanding claim reserves, net	88 872	102	223	2 924	1 344	562	94 027
Financial liabilities	50 406	-	-	-	-	-	50 406
Reinsurers' deposit	43 229	-	-	-	-	-	43 229
Total insurance contract liabilities, net and financial liabilities	275 183	567	223	2 924	1 344	563	280 803
Open currency position	7 390	1 135	21 867	(574)	364	(257)	299 270

31 December 2020	EUR EUR'000	USD EUR'000	DKK EUR'000	PLN EUR'000	GBP EUR'000	Other EUR'000	Total EUR'000
Financial and insurance related assets							
Debt securities and other fixed income securities	183 842	-	16 718	1 003	-	-	201 563
Non-fixed income securities	29 022	-	-	-	-	-	29 022
Loans	10 555	-	-	-	-	-	10 555
Insurance Receivables and Receivables	50 096	-	-	-	-	-	50 096
Cash and cash equivalents	27 423	1 287	11	790	1 687	199	31 397
Total financial assets	300 938	1 287	16 729	1 793	1 687	199	322 633
Insurance contract liabilities, net and financial liabilities							
Unearned premium and unexpired risk reserves, net	87 304	494	-	-	-	-	87 798
Outstanding claim reserves, net	83 024	64	258	2 649	1 989	293	88 277
Financial liabilities	34 197	-	-	-	-	-	34 197
Reinsurers' deposit	41 704	-	-	-	-	-	41 704
Total insurance contract liabilities, net and financial liabilities	246 229	558	258	2 649	1 989	293	251 976
Open currency position	54 709	729	16 471	(856)	(302)	(94)	70 657

(b) Price risk

Price risk is the risk that the value of a financial instrument will fluctuate as a result of changes in market prices, whether those changes are caused by factors specific to the individual instrument or factors affecting all instruments traded in the market. Price risk arises when the Company takes a long or short position in a financial instrument.

A significant share of the Company's financial investments was accounted for as available-for-sale instruments. Changes in securities prices for available-for-sale instruments is reported through other comprehensive income for the period. A simplified scenario of 5% change in investment funds' prices would result in the following effect on the other comprehensive income as at 31 December 2021 and 2020:

	2021 EUR'000	2020 EUR'000
5% increase in non-fixed income securities prices	2 343	1 310
5% decrease in non-fixed income securities prices	(2 343)	(1 310)

An analysis of the sensitivity of the Company's profit or loss to changes in securities prices based on positions existing as at 31 December 2021 and 2020 and a simplified scenario of a 5% change in all fair value through profit and loss instruments prices is as follows:

	2021 EUR'000	2020 EUR'000
5% increase in securities prices	69	69
5% decrease in securities prices	(69)	(69)

(c) Interest rate risk

Interest rate risk is defined as the loss in value resulting from a change in interest rates and is viewed both from the asset-only perspective and in relation to the interest-rate sensitivity of the liabilities.

Measures for management of the interest rate risk in the Company are based on the assessment of the impact of the interest rate risk on the Company's financial indices. The Company is using ELOPA given discount rates for long-term liabilities (annuities).

The Company is exposed to a moderate interest rate risk. The duration matching of assets and liabilities is analysed quarterly.

EUR'000	31.12.2021		31.12.2020	
	Profit or loss	OCI	Profit or loss	OCI
100 bp parallel increase	(1 830)	(9 740)	(2 680)	(10 650)
100 bp parallel decrease	1 870	9 740	2 740	10 650

Fluctuations in fair value that results from changes of interest rate of financial assets with fixed interest rate are reflected in price risk sensitivity analysis.

The following table present the Company's financial assets analysed according to repricing periods determined as the earlier of the remaining contractual maturity and the contractual repricing. The interest rate repricing profile of the Company's assets as at end of the period:

31 December 2021

	Up to 12 months EUR'000	1-5 years EUR'000	Over 5 years EUR'000	Non- interest bearing EUR'000	Total EUR'000	Of which
						subject to fixed rates EUR'000
Financial assets						
Investments at fair value through profit or loss	1 375	-	-	-	1 375	1 360
Available-for-sale instruments	10 629	95 475	75 454	46 853	228 411	180 618
Held-to-maturity instruments	30	-	1 738	-	1 767	1 738
Loans	5	-	14 756	-	14 761	14 756
Insurance Receivables and Receivables	-	-	-	54 628	54 628	-
Cash and cash equivalents	-	-	-	9 831	9 831	-
Total financial assets	12 038	95 475	91 948	111 312	310 773	198 472

31 December 2020

	Up to 12 months EUR'000	1-5 years EUR'000	Over 5 years EUR'000	Non- interest bearing EUR'000	Total EUR'000	Of which
						subject to fixed rates EUR'000
Financial assets						
Investments at fair value through profit or loss	15	1 371	-	-	1 386	1 386
Available-for-sale instruments	14 988	71 038	112 380	29 022	227 428	183 843
Held-to-maturity instruments	30	-	1 741	-	1 771	1 741
Loan	-	-	10 555	-	10 555	10 555
Insurance Receivables and Receivables	-	-	-	50 096	50 096	-
Cash and cash equivalents	-	-	-	31 397	31 397	-
Total financial assets	15 033	72 409	124 676	110 515	322 633	197 525

Liquidity risk

The Company understands liquidity as the ability to meet its current liabilities in timely and comprehensive manner.

In order to mitigate any short-term liquidity risks, the Company carries out regular cash flow planning and continuously maintains a minimal cash position. As a long-term liquidity risk mitigation, the Company invests primarily into highly liquid investments.

Highly liquid investments are deemed to be the following assets:

- 1) claims on demand to credit institutions;
- 2) other claims to solvent credit institutions (term deposits, etc.) whose remaining repayment term does not exceed 30 days, and deposits with another term if the agreement stipulates an option to withdraw money before the due date (less the amount of contractual penalty for preterm withdrawal of deposits if such is provided);
- 3) investments in securities if they have a constant, unrestricted market, i.e., they can be sold in a short time without considerable losses or can be used as a collateral for receipt of loan.

The tables below shows the allocation of the Company's assets and liabilities to maturity groups based on the time remaining from the reporting period end date to the maturity dates or expected dates of settlement. While the tables below reflect the liquidity risk, it is based on time to contractual maturity. Investments classified as financial instruments at fair value through profit and loss and available for sale instruments, are considered as highly liquid financial assets and management has the ability to sell them earlier than the contractual date, thereby helping to manage its liquidity gap, if needed.

31 December 2021	Up to 12 months EUR'000	From 1 to 5 years EUR'000	Over 5 years EUR'000	No fixed maturity EUR'000	Total EUR'000
Financial and insurance related assets					
Financial instruments at fair value through profit or loss	1 375	-	-	-	1 375
Available-for-sale instruments	10 628	95 475	75 455	46 853	228 411
Held-to-maturity instruments	30	-	1 737	-	1 767
Loans	4	-	14 757	-	14 761
Receivables from direct insurance activities	50 205	-	-	-	50 205
Receivables from reinsurance activities	3 929	-	-	-	3 929
Other receivables	494	-	-	-	494
Cash and cash equivalents	9 831	-	-	-	9 831
Total financial assets taking into account maturity	76 497	95 475	91 948	46 853	310 773
Insurance contract liabilities, net and financial liabilities					
Insurance contract liabilities, net	148 030	17 240	33 788	-	199 058
Financial liabilities	41 076	2 273	7 057	-	50 406
Reinsurers' deposit	43 229	-	-	-	43 229
Total insurance contract liabilities, net and financial liabilities	232 335	19 513	40 845	-	292 693
Maturity gap	(155 838)	75 962	51 103	46 583	18 080
31 December 2020	Up to 12 months EUR'000	From 1 to 5 years EUR'000	Over 5 years EUR'000	No fixed maturity EUR'000	Total EUR'000
Financial and insurance related assets					
Financial instruments at fair value through profit or loss	15	1 371	-	-	1 386
Available-for-sale instruments	14 988	71 038	112 380	29 022	227 428
Held-to-maturity instruments	30	-	1 741	-	1 771
Loan	-	-	10 555	-	10 555
Receivables from direct insurance activities	46 512	-	-	-	46 512
Receivables from reinsurance activities	3 094	-	-	-	3 094
Other receivables	490	-	-	-	490
Cash and cash equivalents	31 397	-	-	-	31 397
Total financial assets taking into account maturity	96 526	72 409	124 676	29 022	322 633
Insurance contract liabilities, net and financial liabilities					
Insurance contract liabilities, net	135 807	16 278	22 015	-	174 100
Financial liabilities	34 450	-	-	-	34 450
Reinsurers' deposit	37 297	-	-	-	37 297
Total insurance contract liabilities, net and financial liabilities	207 554	16 278	22 015	-	245 847
Maturity gap	(111 028)	56 131	102 661	29 022	76 786

The Company carries out regular analysis of maturity structure of assets and liabilities, including evaluation of potential effect of mismatches in the maturity structure of such assets and liabilities on the Company's financial results and financial position. Effects of investments on maturity structure of assets are evaluated prior to investments.

Credit risk

The Company takes on exposure to credit risk which is the risk that a counterparty will be unable to pay amounts in full when due. The Company structures the levels of credit risk it undertakes by placing limits on the amount of risk accepted in relation to one issuer of securities, debtor, borrower, or group of the above. Such risks are monitored regularly.

Credit risk mainly arising from direct insurance debtors, intermediaries and reinsurance debtors in case the counterparty fails to fulfil its payment obligations.

Maximum credit risk	2021 EUR'000		2020 EUR'000	
	Gross	Net	Gross	Net
Government bonds	128 188	128 188	150 695	150 695
Corporate bonds	34 225	34 225	34 151	34 151
Mortgage bonds	22 287	22 287	16 718	16 718
Loans	14 761	14 761	10 555	10 555
Due from policy holders	50 458	49 897	46 752	46 291
Due from intermediaries	314	308	294	221
Receivables from reinsurance activities	3 929	3 929	3 472	3 094
Other debtors	494	494	789	490
Cash	9 831	9 831	31 397	31 397
	264 487	263 920	294 823	293 612

Credit risk arises on the financial investments, direct insurance amounts receivable and the reinsurance amounts receivable and is the risk the counterparty defaults on the payment of the amount due. Except for due from policy holders, intermediaries and other debtors, no financial assets are overdue or with impairment allowances.

Management of Financial investments

The Company manages credit risks by investing most of the investments in markets and investments with high ratings. Deposits are invested in Latvian, Lithuanian and Estonian commercial banks that are subsidiaries of foreign banks and that do not have separate ratings.

Investment analysis by ratings:

2021	Rating	Government bonds EUR'000	Listed debt securities EUR'000	Mortgage bonds EUR'000	Total EUR'000
Agency: S&P, Fitch, Moody's					
	AAA	-	-	22 287	22 287
	AA	2 750	1 296	-	4 046
	A	121 797	11 099	-	132 896
	BBB	3 641	15 498	-	19 139
	BB and lower	-	4 593	-	4 593
	No rating	-	1 739	-	1 739
		128 188	34 225	22 287	184 700

2020	Rating	Government bonds EUR'000	Listed debt securities EUR'000	Mortgage bonds EUR'000	Total EUR'000
Agency: S&P, Fitch, Moody's					
	AAA	-	-	16 718	16 718
	AA	7 302	3 605	-	10 907
	A	141 529	10 946	-	152 475
	BBB	1 864	17 594	-	19 458
	BB and lower	-	1 486	-	1 486
	No rating	-	520	-	520
		150 695	34 151	16 718	201 564

Insurance receivables

Direct insurance amounts receivable are monitored by management on a periodic basis and policies are cancelled if appropriate notification has been provided to the policy holder and the amounts due are not paid.

Reinsurance

The Company reinsures a part of the risk portfolio in order to increase its underwriting capabilities, to control its exposure to losses and to protect own capital. It purchases the obligatory and facultative reinsurance coverage to underwrite a larger quantity and/or volume of risk, to reduce the net exposure and to keep the solvency ratio in favourable range. The Company also buys reinsurance treaties for the main lines of its business that protect the Company from any cumulative losses that may arise from multiple claims resulting from the same event, including natural catastrophes. By covering against accumulated individual commitments, reinsurance gives the Company more security for its equity and solvency by increasing its ability to withstand the financial burden when unusual and major events occur.

Ceded reinsurance contains credit risk, and such reinsurance recoverable is reported after deductions for known counterparty insolvencies and uncollectible items. The Company monitors the financial condition of reinsurers on an ongoing basis and reviews its reinsurance arrangements periodically.

Risks are ceded to the (re)insurance companies with a sound reputation taking into account internal and VIG Reinsurance Security guidelines. The decision of choosing a cooperation partner with a rating below A- level by Standard and Poor's, Moody, Reuters, A.M. Best and Fitch, upon evaluating all risks, is coordinated with the Management Board and VIG Security Committee.

Reinsurance companies settle their obligations in the time period of 30 days. Reinsurance agreements also stipulate the reinsurer's obligation to pay the insurance indemnity immediately when the amount of the indemnity exceeds a certain amount.

During the reporting period, all reinsurance companies fulfilled their obligations to the Company in accordance with the applicable agreements.

Rating	31 December 2021	
	Reinsurance debtors EUR'000	Reinsurers' share of insurance contract liabilities EUR'000
AA	300	14 560
A	3 501	62 713
BBB	3	849
No rating	125	1 782
	3 929	79 904

Rating	31 December 2020	
	Reinsurance debtors EUR'000	Reinsurers' share of insurance contract liabilities EUR'000
AA	1 995	25 812
A	1 091	42 208
No rating	8	5 393
	3 094	73 413

Taking into account the reinsurance agreements the Company's liability for each insurance risk per event for the main business lines is as follows:

	31 December 2021	31 December 2020
	EUR'000	EUR'000
Accident insurance	100	100
Health insurance	Retained on net	Retained on net
CASCO	Retained on net	Retained on net
Railway rolling stock insurance	100	100
Aircraft insurance	100	100
Marine vessel insurance	805	805
Freight insurance	100	100
Property insurance	500	500
MTPL	600	600
Aircraft owner third party liability insurance	100	100
Ship owner third party liability insurance	805	805
General third party liability insurance	400	400
Credit insurance	800	800
Surety insurance	750	750
Miscellaneous financial losses insurance	500	500
Legal expense insurance	Retained on net	Retained on net
Assistance insurance	Retained on net	Retained on net

4.4 Operational risk management

Operational risk is the risk of financial loss, resulting from inadequate or failed processes, people, systems or external events. The Company has a framework to identify, assess, manage, monitor, and report operational risk.

The Company considers internal control to be key for managing operational risk. The objectives of the internal control system are:

- to provide reasonable assurance financial statements and disclosures are materially correct;
- to support reliable operations,
- to ensure legal and regulatory compliance.

The internal control system is designed to mitigate rather than eliminate the risk that business objectives might not be met. To ensure consistency of processes and reliability of operations, the Company develops internal regulatory documents for essential processes.

The Company collects and registers the data on operational risk events, their causes, consequences and measures taken to prevent their recurrence. Key controls are assessed for their design and operating effectiveness. The risk awareness and understanding of controls are promoted through communication and employee training.

Due to the corona virus pandemic, business continuity was one of the key focus areas in 2021. An excellent level of digitization and an effective management and control system ensured that the Company did not interrupt the provision of services for any day due to emergencies and restrictions.

4.5 Capital adequacy requirements and Capital management

According to the requirements of the "Insurance and Reinsurance Law" of the Republic of Latvia, Directive 2009/138/EC of the European Parliament and of the Council and Commission Delegated Regulation 2015/35 which are in force for the reporting period, the Company should constantly have at its disposal eligible own funds, which should equal or be higher than a determined solvency capital requirement.

The Company has developed a capital management policy to be sure:

- (a) that eligible own fund items, both at issue and subsequently, are classified according to the features in Articles 71, 73, 75 and 77 of Commission Delegated Regulation 2015/35.
- (b) before issuance of any own fund items that it can satisfy the criteria for the appropriate tier on a continuous basis;
- (c) that own funds items are not encumbered by the existence of any agreements or connected transactions, or as a consequence of a group structure, which would undermine their efficacy as capital;
- (d) that the actions required or permitted under the contractual, statutory or legal provisions governing an own fund item are initiated and completed in a timely manner;

- (e) that the contractual terms governing own fund items are clear and unambiguous in relation to the criteria for classification into tiers;
- (f) that any policy or statement in respect of ordinary share dividends is fully taken into account in consideration of the capital position and the assessment of the foreseeable dividends;
- (g) that the manner in which items included in own funds under the transitional measures operate in times of stress, and in particular how the items absorb losses is assessed and taken into account in the ORSA (own risk solvency assessment).

Capital management

The Company has adopted the Solvency II regulation, which entered into force on 1 January 2016 and served as the main model for capital risk management in the reporting period. When developing capital management policies and capital management plans, the Company's management uses the methods for calculating the Solvency Capital Requirement in order to determine the capital requirements of the Company, taking into account the Company's existing financial situation, liabilities and future development plans. The management of the company evaluates the level of capitalization desired and determines the measures that are necessary to achieve it in the future taking into account the Company's risk profile and market conditions. Such measures may include limiting and reducing the risks taken, additional capital attraction, and adjusting the Company's development strategy.

Capital management policies and capital management plans are developed by the Management Board of the Company together with the Finance Department, the actuarial function and risk management function and approved by the Supervisory Board of the Company.

(5) Gross written premiums

	2021 EUR'000			2020 EUR'000		
	Gross written premiums	Reinsurers' share in premiums	Net written premiums	Gross written premiums	Reinsurers' share in premiums	Net written premiums
Accident insurance	6 071	(3 064)	3 007	5 331	(2 696)	2 635
Health insurance	30 574	-	30 574	27 876	-	27 876
CASCO	52 356	(8)	52 348	50 023	(6)	50 017
Railway rolling stock insurance	274	(50)	224	287	(31)	256
Aircraft insurance	203	(34)	169	150	(23)	127
Marine vessel insurance	1 158	(791)	367	1 791	(1 507)	284
Freight insurance	1 311	(142)	1 169	930	(116)	814
Property insurance	37 320	(8 883)	28 437	31 121	(6 495)	24 626
MTPL*	63 119	(32 023)	31 096	66 414	(33 710)	32 704
Aircraft owner third party liability insurance	232	(60)	172	176	(49)	127
Ship owner third party liability insurance	216	(140)	76	165	(134)	31
General third party liability insurance	10 399	(1 833)	8 566	8 023	(1 195)	6 828
Credit insurance	417	(251)	166	344	(208)	136
Surety insurance	8 346	(4 630)	3 716	9 373	(4 994)	4 379
Miscellaneous financial losses insurance	587	(247)	340	523	(156)	367
Legal expenses insurance	17	-	17	17	-	17
Assistance insurance	6 204	(191)	6 013	4 270	(85)	4 185
Total	218 804	(52 347)	166 457	206 814	(51 405)	155 409

* The Company makes obligatory deductions in accordance with the law "On compulsory motor third party liability" and the related Cabinet of Ministers regulations of the Republic of Latvia. Gross written premiums on motor third party liabilities insurance are shown net of the obligatory deductions EUR 457 thousand (2020: EUR 469 thousand).

The Company makes obligatory deductions to the Motor Bureaus of Lithuania and Estonia in accordance with the statutory requirements. Gross written premiums on motor third party liabilities insurance are shown net of the obligatory deductions to the transport insurance offices of Lithuania and Estonia in the amount of EUR 1 052 thousand (2020: EUR 1 195 thousand).

According to the law "On Motor Vehicles Third Party Liability Obligatory Insurance" and the related Cabinet Regulations of the Republic of Latvia, during the reporting period the Company made the following obligatory deductions from gross premiums written in this insurance type:

- Co-financing of the activities of the Motor Insurers' Bureau of Latvia: EUR 0.41 (2020: EUR 0.39) per contract and additionally EUR 3 314 (2020: EUR 3 214) per month;
- For the MTPL Guarantee Fund: payments are made in accordance to special calculation by taking into account the period of contract and the type of insured motor vehicle;
- For the Road Traffic Accidents Fund in Latvia: 2% from gross written premium.

Breakdown of gross written premiums by country:

	2021 EUR'000	2020 EUR'000
Latvia	80 144	79 080
Lithuania	111 974	102 783
Estonia	26 686	24 951
	<u>218 804</u>	<u>206 814</u>

(6) Net earned premiums

	2021 EUR'000			2020 EUR'000		
	Gross earned premiums	Reinsurers' share in premiums	Net earned premiums	Gross earned premiums	Reinsurers' share in premiums	Net earned premiums
Accident insurance	5 716	(2 891)	2 825	5 066	(2 588)	2 478
Health insurance	29 183	-	29 183	27 317	-	27 317
CASCO	50 375	(8)	50 367	50 964	(4)	50 960
Railway rolling stock insurance	274	(50)	224	310	(31)	279
Aircraft insurance	177	(34)	143	130	(23)	107
Marine vessel insurance	1 287	(956)	331	2 563	(2 273)	290
Freight insurance	1 161	(143)	1 018	952	(114)	838
Property insurance	33 155	(7 713)	25 442	28 996	(6 135)	22 861
MTPL	62 747	(31 859)	30 888	67 970	(34 455)	33 515
Aircraft owner third party liability insurance	214	(63)	151	166	(46)	120
Ship owner third party liability insurance	202	(136)	66	150	(130)	20
General third party liability insurance	9 221	(1 756)	7 465	7 850	(1 146)	6 704
Credit insurance	351	(211)	140	331	(200)	131
Surety insurance	7 635	(3 789)	3 846	6 827	(3 027)	3 800
Miscellaneous financial losses insurance	577	(229)	348	419	(154)	265
Legal expenses insurance	17	-	17	16	-	16
Assistance insurance	5 867	(181)	5 686	4 614	(82)	4 532
Total	<u>208 159</u>	<u>(50 019)</u>	<u>158 140</u>	<u>204 641</u>	<u>(50 408)</u>	<u>154 233</u>

(7) Unearned premium and unexpired risk reserves

	Gross EUR'000	Reinsurers' share EUR'000	Net EUR'000
Balance at 31.12.2019	<u>104 638</u>	<u>(19 840)</u>	<u>84 798</u>
Written premiums	206 814	(51 405)	155 409
Premiums earned	(204 641)	50 408	(154 233)
<i>Changes during period</i>	<i>2 173</i>	<i>(997)</i>	<i>1 176</i>
<i>Reinsurers deposit</i>	<i>-</i>	<i>(1 150)</i>	<i>(1 150)</i>
Balance at 31.12.2020	<u>106 811</u>	<u>(21 987)</u>	<u>84 824</u>
Written premiums	218 804	(52 347)	166 457
Premiums earned	(208 159)	50 019	(158 140)
<i>Changes during period</i>	<i>10 645</i>	<i>(2 328)</i>	<i>8 317</i>
Balance at 31.12.2021	<u>117 456</u>	<u>(24 315)</u>	<u>93 141</u>

	31.12.2021 EUR'000		31.12.2020 EUR'000	
	Gross	Net	Gross	Net
Unearned premium reserve	116 585	92 270	106 811	84 824
Unexpired risk reserve	871	871	-	-
	117 456	93 141	106 811	84 824

(8) Other technical income, net

	2021 EUR'000	2020 EUR'000
Fee for policy amendments and cancellation	206	318
Change in impairment allowance for receivables from direct insurance and reinsurance operations	66	281
Other technical income	302	193
	574	792

The Company acts as an agent when paying out insurance claims on behalf of other non-resident companies. The Company does not accept insurance risks and receives full reimbursement of claims paid on behalf of other insurance companies. The Company receives an agent fee for the services and it is included under "Other technical income" above.

(9) Gross claims paid

	2021 EUR'000			2020 EUR'000		
	Gross claims paid	Reinsurers' share in claim	Net claims paid	Gross claims paid	Reinsurers' share in claim	Net claims paid
Accident insurance	(2 547)	1 151	(1 396)	(2 286)	922	(1 364)
Health insurance	(24 471)	-	(24 471)	(20 917)	-	(20 917)
CASCO	(36 971)	-	(36 971)	(31 771)	(1)	(31 772)
Railway rolling stock insurance	(2)	-	(2)	(1 026)	171	(855)
Aircraft insurance	(172)	34	(138)	(158)	-	(158)
Marine vessel insurance	(2 129)	1 840	(289)	(3 588)	3 210	(378)
Freight insurance	(177)	-	(177)	(966)	625	(341)
Property insurance	(16 343)	2 321	(14 022)	(17 178)	3 464	(13 714)
MTPL	(46 271)	21 587	(24 684)	(44 326)	19 965	(24 361)
Aircraft owner third party liability insurance	(17)	-	(17)	(11)	-	(11)
Ship owner third party liability insurance	(22)	14	(8)	(33)	27	(6)
General third party liability insurance	(2 237)	130	(2 107)	(2 622)	181	(2 441)
Credit insurance	(159)	95	(64)	(315)	279	(36)
Surety insurance	21	(9)	12	(374)	(210)	(584)
Miscellaneous financial losses insurance	(468)	16	(452)	(57)	-	(57)
Legal expenses insurance	-	-	-	-	-	-
Assistance insurance	(2 148)	92	(2 056)	(2 143)	59	(2 084)
	(134 113)	27 271	(106 842)	(127 771)	28 692	(99 079)

Gross claims paid include:

	2021 EUR'000	2020 EUR'000
Paid claims	(133 464)	(131 375)
Loss adjustment expenses*	(9 248)	(7 625)
Recovered losses	8 599	11 229
	(134 113)	(127 771)

* Loss adjustment expenses in the reporting period include EUR 4 162 thousand (2020: EUR 4 600 thousand) salaries and social contributions for employees dealing with claims handling and allocation of salaries and social contributions for back office employees.

(10) Outstanding claim reserve

	Gross EUR'000	Reinsurers' share EUR'000	Net EUR'000
Balance at 31.12.2019	138 846	(50 735)	88 111
Claims incurred during the period	129 628	(29 383)	100 245
Claims paid	(127 771)	28 692	(99 079)
<i>Changes during period</i>	<i>1 857</i>	<i>(691)</i>	<i>1 166</i>
Balance at 31.12.2020	140 703	(51 426)	89 277
Claims incurred during the period	143 026	(31 434)	111 592
Claims paid	(134 113)	27 271	(106 842)
<i>Changes during period</i>	<i>8 913</i>	<i>(4 163)</i>	<i>4 750</i>
Balance at 31.12.2021	149 616	(55 589)	94 027

	31.12.2021 EUR'000			31.12.2020 EUR'000		
	Gross	Reinsurance	Net	Gross	Reinsurance	Net
RBNS	107 759	(41 096)	66 663	97 587	(36 989)	60 598
IBNR	41 857	(14 493)	27 364	43 116	(14 437)	28 679
	149 616	(55 589)	94 027	140 703	(51 426)	89 277

(11) Net incurred claims

	2021 EUR'000			2020 EUR'000		
	Gross claims incurred	Reinsurers' share in claims incurred	Net claims incurred	Gross claims incurred	Reinsurers' share in claims incurred	Net claims incurred
Accident insurance	(2 559)	1 183	(1 376)	(2 394)	1 231	(1 163)
Health insurance	(24 489)	-	(24 489)	(20 865)	-	(20 865)
CASCO	(39 882)	23	(39 859)	(32 261)	(3)	(32 264)
Railway rolling stock insurance	8	-	8	13	(54)	(41)
Aircraft insurance	(244)	26	(218)	(201)	5	(196)
Marine vessel insurance	(1 991)	1 827	(164)	(2 552)	1 878	(674)
Freight insurance	(124)	1	(123)	(10)	545	535
Property insurance	(21 121)	3 860	(17 261)	(15 744)	3 527	(12 217)
MTPPL	(48 116)	23 516	(24 600)	(46 166)	19 341	(26 825)
Aircraft owner third party liability insurance	(84)	-	(84)	(87)	-	(87)
Ship owner third party liability insurance	(272)	160	(112)	(68)	-	(68)
General third party liability insurance	(1 579)	280	(1 299)	(2 137)	(317)	(2 454)
Credit insurance	(117)	79	(38)	(105)	97	(8)
Surety insurance	737	(133)	604	(5 015)	3 018	(1 997)
Miscellaneous financial losses insurance	(930)	506	(424)	2	23	25
Legal expenses insurance	-	-	-	2	-	2
Assistance insurance	(2 263)	106	(2 157)	(2 040)	92	(1 948)
	(143 026)	31 434	(111 592)	(129 628)	29 383	(100 245)

(12) Deferred client acquisition costs

	EUR'000
Balance at 31.12.2019	10 407
Direct client acquisition costs	20 816
Deferred commissions allocated to the profit or loss	(20 708)
<i>Changes during period</i>	<i>108</i>
Balance at 31.12.2020	10 515
Direct client acquisition costs	22 123
Deferred commissions allocated to the profit or loss	(21 009)
<i>Changes during period</i>	<i>1 114</i>
Balance at 31.12.2021	11 629

Client acquisition costs:

	2021 EUR'000	2020 EUR'000
<i>Direct client acquisition costs</i>		
Intermediaries' commissions payable	21 506	19 655
Agents' commissions payable	536	594
Other payable to intermediaries	81	567
<i>Total direct client acquisition costs</i>	22 123	20 816
<i>Indirect client acquisition costs</i>		
Salaries and social contributions of front office employees	15 513	13 451
Allocated salaries and social contributions of back office employees	575	387
Front office administrative expenses	3 057	2 829
<i>Total indirect client acquisition costs</i>	19 145	16 667
	41 268	37 483

(13) Administrative expenses

	2021 EUR'000	2020 EUR'000
Salaries and social contribution expenses	9 118	8 551
Computer programs rent and maintenance	2 740	3 599
Advertising expenses	761	701
Business related costs	400	487
Audit and consultant service expenses**	291	486
Other personnel expenses	594	255
Presentation expenses	164	247
Car maintenance costs	190	199
Telecommunication costs	205	185
Utility expenses (electricity, heating, water)	180	151
Computer maintenance	56	135
Rent payments*	122	116
Public relations expenses	102	102
Legal expenses	52	87
Cleaning expenses	64	57
Typographic costs	15	32
Obligatory payments	8	14
Other administrative expenses	149	166
	15 211	15 570

* Rent payments in 2021 consists of expenses relating to short-term leases and leases of low-value assets, as well as VAT part of lease payments that are directly expensed and are not taken into account when assessing right-of-use asset and lease liability.

** Audit and consultancy service expenses include other services received from auditor and other professional service companies. Total amount of services received is below EUR 1 thousand in both 2021 and 2020.

Administrative expenses allocated by insurance types*:

	2021 EUR'000	2020 EUR'000
Accident insurance	369	344
Health insurance	1 787	1 793
CASCO	3 801	3 751
Railway rolling stock insurance	26	24
Aircraft insurance	9	8
Marine vessel insurance	168	230
Freight insurance	65	69
Property insurance	2 069	1 912
MTPL	5 360	5 714
Aircraft owner third party liability insurance	10	10
Ship owner third party liability insurance	8	8
General third party liability insurance	587	612
Credit insurance	20	20
Surety insurance	556	460
Miscellaneous financial losses insurance	32	30
Legal expenses insurance	1	1
Assistance insurance	343	584
	15 211	15 570

* See Note 3.2(h) for allocation principles.

(14) Unearned reinsurance commission income

	EUR'000
Balance at 31.12.2019	2 372
Written commissions	(14 703)
Deferred commissions allocated to the profit or loss	14 101
<i>Changes during period</i>	<i>602</i>
Balance at 31.12.2020	2 974
Written commissions	(20 018)
Deferred commissions allocated to the profit or loss	19 540
<i>Changes during period</i>	<i>478</i>
Balance at 31 December 2021	3 452

(15) Other technical expenses

	2021 EUR'000	2020 EUR'000
Impairment allowance for receivables from direct insurance and reinsurance operations	100	-
Expenses related to distribution of policies	-	165
Other	172	54
	272	219

(16) Interest income

	2021 EUR'000	2020 EUR'000
Interest income from financial assets at fair value through profit or loss	18	24
Interest income from held to maturity financial investments	35	35
Interest income from available for sale financial investments	1 391	1 414
Dividend income from available for sale financial investments	866	636
Interest income from deposits with credit institutions	-	1
Interest on loans	319	264
	2 629	2 374

(17) Interest expense

	2021 EUR'000	2020 EUR'000
Interest expense on subordinated loans	378	378
Interest expense on reinsurers' deposit	-	15
Interest expense on lease liabilities	40	59
	<u>418</u>	<u>452</u>

(18) Income tax expense

	2021 EUR'000	2020 EUR'000
Current corporate income tax	(1 323)	(1 553)
Deferred tax	28	(22)
	<u>(1 295)</u>	<u>(1 575)</u>

Effective tax rate reconciliation

	2021 EUR'000			
	Latvia	Lithuania	Estonia	Total
Profit before tax	4 489	8 341	(3 249)	9 581
Theoretical tax using the 15% or 20% rate*	898	1 251	-	2 149
Non-deductible expenses	-	32	-	32
Profit taxation on distribution impact	(898)	-	-	(898)
Donations	-	12	-	12
Tax expenses	-	1 295	-	1 295

	2020 EUR'000			
	Latvia	Lithuania	Estonia	Total
Profit before tax	2 156	9 771	2 251	14 178
Theoretical tax using the 15% or 20% rate*	431	1 466	338	2 235
Non-deductible expenses	14	107	-	121
Profit taxation on distribution	(431)	-	(338)	(769)
Donations	-	(12)	-	(12)
Tax expenses	14	1 561	-	1 575

* Theoretical tax rate in 2021 and 2020 for Latvia is 20%, for Lithuania – 15%, for Estonia – 20%.

According to the double taxation treaty between Latvia and Estonia income declared by the Estonian branch is taxable in Latvia. According to the treaty, the Company applies the credit method in order to avoid double taxation.

According to the double taxation treaty between Latvia and Lithuania income declared by the Lithuanian branch is taxable in Lithuania. According to the treaty, the Company applies the release method in order to avoid double taxation. When determining taxable income, income generated by the Company's branch in Lithuania is not taken into account. Taxable income is reduced by the Company's income for the taxation period that was generated in Lithuania and included in the profit or loss of the Company and the taxable amount has been increased by the amount of expenses that are connected with generating the above income and included in the profit or loss of the Company.

(19) Reinsurance cession result

	2021 EUR'000	2021 EUR'000
Reinsurance premiums	(52 347)	(51 405)
Changes in reinsurers' share in unearned premiums reserve	2 328	997
Reinsurers' share in claims paid	27 271	28 692
Changes in reinsurers' share in reserve for outstanding claims	4 163	691
Reinsurance commissions and profit participation	20 018	14 703
Change in unearned reinsurance commissions	(478)	(602)
	<u>955</u>	<u>(6 924)</u>

(20) Property and equipment

	Vehicles EUR'000	Art in BTA EUR'000	Other property and equipment EUR'000	Prepayments for fixed assets EUR'000	Right-of- use assets EUR'000	Total EUR'000
Cost						
31.12.2019	<u>1 849</u>	<u>161</u>	<u>3 571</u>	<u>590</u>	<u>296</u>	<u>6 467</u>
Purchased	832	-	780	-	75	1 687
Disposals	(734)	-	(788)	-	(3)	(1 525)
Reclassified to intangibles	-	-	-	(590)	-	(590)
31.12.2020	<u>1 947</u>	<u>161</u>	<u>3 563</u>	<u>-</u>	<u>368</u>	<u>6 039</u>
Purchased	440	3	518	-	76	1 037
Disposals	(305)	-	(530)	-	(64)	(899)
31.12.2021	<u>2 082</u>	<u>16</u>	<u>3 551</u>	<u>-</u>	<u>380</u>	<u>6 117</u>
Accumulated depreciation						
31.12.2019	<u>(1 178)</u>	<u>-</u>	<u>(2 552)</u>	<u>-</u>	<u>(88)</u>	<u>(3 818)</u>
Depreciation for the period	(305)	-	(501)	-	(96)	(902)
Depreciation on disposed assets	691	-	785	-	3	1 479
31.12.2020	<u>(792)</u>	<u>-</u>	<u>(2 268)</u>	<u>-</u>	<u>(181)</u>	<u>(3 241)</u>
Depreciation for the period	(375)	-	(768)	-	(99)	(1 242)
Depreciation on disposed assets	281	-	524	-	64	869
31.12.2021	<u>(886)</u>	<u>-</u>	<u>(2 512)</u>	<u>-</u>	<u>(216)</u>	<u>(3 614)</u>
Balance at 31.12.2020	<u>1 155</u>	<u>161</u>	<u>1 295</u>	<u>-</u>	<u>187</u>	<u>2 798</u>
Balance at 31.12.2021	<u>1 196</u>	<u>164</u>	<u>1 039</u>	<u>-</u>	<u>164</u>	<u>2 563</u>

Depreciation for the period is presented in the profit or loss under Depreciation and amortisation caption.

(21) Land and buildings and Investment property

(a) Land and buildings

	Land and buildings EUR'000	Right-of-use assets EUR'000	Total EUR'000
Cost			
31.12.2019	2 385	7 214	9 599
Additions	-	871	871
Disposals	(156)	(219)	(375)
Reclassification to Investment Property	(161)	-	(161)
Reclassification from Investment Property	67	-	67
31.12.2020	2 135	7 866	10 001
Additions	11	902	913
Disposals	-	(427)	(427)
Reclassification to Investment Property	(259)	-	(259)
31.12.2021	1 887	8 341	10 228
Accumulated depreciation			
31.12.2019	(1 028)	(1 626)	(2 654)
Depreciation for the period	(93)	(1 753)	(1 846)
Depreciation on disposed assets	64	219	283
31.12.2020	(1 057)	(3 160)	(4 217)
Depreciation for the period	(89)	(1 769)	(1 858)
Depreciation on disposed assets	-	428	428
Reclassification to Investment Property	40	-	40
31.12.2021	(1 106)	(4 501)	(5 607)
Balance at 31.12.2020	1 078	4 706	5 784
Balance at 31.12.2021	781	3 840	4 621

Depreciation for the period is presented in the profit or loss under Depreciation and amortisation caption.

Transfer to investment property

During 2020 and 2021, part of a building and land located in Riga were transferred to investment property (see Note 21(b)), because they were no longer used by the Company and it was decided that the respective part of the building and land would be leased to third parties.

(b) Investment property

	Investment property EUR'000
Balance at 31.12.2019	1 007
Reclassification from Land and Buildings	161
Reclassification to Land and Buildings	(67)
Depreciation for the period	(84)
Balance at 31.12.2020	1 017
Reclassification from Land and Buildings	219
Disposals	(28)
Depreciation for the period	(87)
Balance at 31.12.2021	1 121

Investment property comprises a number of commercial properties that are leased to third parties.

Rental income and operating expenses are recognized in the profit or loss under Other income amounting to EUR 119 thousand (2020: EUR 110 thousand).

All investment properties represent Level 3 fair value hierarchy.

The following table shows the valuation technique used in measuring the fair value of investment property, as well as the significant unobservable inputs used for 2021 and 2020 in brackets:

Type	Fair value, EUR'000 (year 2020)	Valuation technique	Significant unobservable inputs (year 2020)	Inter-relation between significant unobservable inputs and fair value measurement
Building and land located in Tukums	160 (160)	Discounted cash flows technique*	Rental income of EUR 4.67 per m ² Discount rate 10% (Rental income of EUR 3.50 per m ² Discount rate 10.30%)	The estimated fair value would increase/ (decrease) if rental income per m ² was higher/ (lower). The estimated fair value would increase/ (decrease) if discount rate was lower/ (higher)
Building and land located in Talsi	57 (57)	Discounted cash flows technique*	Rental income of EUR 2.99 per m ² Discount rate 10% (Rental income of EUR 2.3-3.7 per m ² Discount rate 11%)	The estimated fair value would increase/ (decrease) if rental income per m ² was higher/ (lower). The estimated fair value would increase/ (decrease) if discount rate was lower (higher)
Building located in Tallinn	269 (269)	The income capitalization and sales comparison approach	Rental income of EUR 10 per m ² Discount rate 10% (Rental income of EUR 10 per m ² Discount rate 10%)	The estimated fair value would increase/ (decrease) if rental income per m ² was higher/ (lower). The estimated fair value would increase/ (decrease) if discount rate was lower (higher)
Buildings and land located in Riga	139 (139)	Discounted cash flows technique*	Rental income of EUR 7.8 per m ² Discount rate 8% (Rental income of EUR 8.62 per m ² Discount rate 9%)	The estimated fair value would increase/ (decrease) if rental income per m ² was higher/ (lower). The estimated fair value would increase/ (decrease) if discount rate was lower (higher)
Buildings and land located in Daugavpils	210 (210)	Discounted cash flows technique*	Rental income of EUR 2.48 to 3.98 per m ² Discount rate 11% (Rental income of EUR 2.48 per m ² Discount rate 11%)	The estimated fair value would increase/ (decrease) if rental income per m ² was higher/ (lower). The estimated fair value would increase/ (decrease) if discount rate was lower (higher)
Building and land located in Riga	1 021 (702)	Discounted cash flows technique*	Rental income range EUR 4.5-7 per m ² Discount rate 9% (Rental income of EUR 6.33 per m ² Discount rate 9%)	The estimated fair value would increase/ (decrease) if rental income per m ² was higher/ (lower). The estimated fair value would increase/ (decrease) if discount rate was lower (higher)

	2021	2020
	EUR'000	EUR'000
Total fair value	1 856	1 537

* Discounted cash flows technique is a model based on discounted cash flows from rental income.

All assets held for sale represent Level 3 fair value hierarchy. Increase in fair value is due to change in proportion between self-used and third-party leased properties. No external valuations were performed during 2021. Based on managements' fair value assessment, there were no significant changes in fair value.

(22) Intangible assets

	Software EUR'000	Unfinished long term intangible assets EUR'000	Total EUR'000
Cost			
31.12.2019	3 777	173	3 950
Purchased	1 503	-	1 503
Disposals	(413)	-	(413)
Reclassification from prepayments under property and equipment	763	(173)	590
31.12.2020	5 630	-	5 630
Purchased	2 293	-	2 293
Disposals	(51)	-	(51)
31.12.2021	7 872	-	7 872
Accumulated amortisation			
31.12.2019	(2 412)	-	(2 412)
Amortisation for the period	(590)	-	(590)
Amortisation on disposed assets	373	-	373
31.12.2020	(2 629)	-	(2 629)
Amortisation for the period	(1 051)	-	(1 051)
Amortisation on disposed assets	6	-	6
31.12.2021	(3 674)	-	(3 674)
Balance at 31.12.2020	3 001	-	3 001
Balance at 31.12.2021	4 198	-	4 198

Amortisation for the period is presented in the profit or loss under Depreciation and amortisation caption.

(23) Investment in subsidiaries and associate companies

On 18 June 2019 BTA Baltic Insurance Company AAS acquired 100% share capital of and complete control over Urban Space SIA for EUR 406 thousand. Consequently the Company's investment in Urban Space SIA increased to EUR 506 thousand.

In 2020 three new subsidiaries were established Ģertrūdes 121 SIA, Artilērijas 35 SIA and Alauksta 13/15 SIA with share capital of EUR 2 800. Reason of establishing these companies is real estate acquisition. In 2021 Company increased its share capital to EUR 1 059 thousand for Ģertrūdes 121 SIA, 320 thousand EUR for Artilērijas 35 SIA and 304 thousand EUR for Alauksta 13/15 SIA. Purpose was of subsidiaries was to purchase real estate assets.

In 2021 new subsidiary was established LiveOn SIA. The Company in 2021 in total invested EUR 15 052 thousand in share capital of LiveOn SIA. Purpose is to increase the Company's real estate investment portfolio.

During 2020 BTA Baltic Insurance Company AAS acquired 33.33% shares of SIA Global Assistance. The Company will be involved in providing assistance services in motor, travel and housing insurance to the customers of VIG Group companies in the Baltics. As at 31 December 2021 the subsidiaries and associate companies are accounted using the cost method. Based on impairment analysis performed by management as at 31.12.2021, no impairment has been identified.

Name of the Company	Participation	Investment amount 31.12.2021 EUR'000	Investment amount 31.12.2020 EUR'000	Net asset value 31.12.2021 (unaudited) EUR'000	Net asset value 31.12.2020 (unaudited) EUR'000
Urban Space SIA	100%	506	506	440	497
Ģertrūdes 121 SIA	33.33%	1 059	3	3 289	3
Artilērijas 35 SIA	33.33%	320	3	918	3
Alauksta 13/15 SIA	33.33%	304	3	924	3
Global Assistance SIA	33.33%	100	100	277	300
LiveOn SIA	70%	15 052	-	21 535	-

(24) Financial instruments

	31.12.2021 EUR'000	31.12.2020 EUR'000
Fixed income securities	184 700	201 563
Investment funds	41 648	26 204
Investment in share capital of VIG Fund, a.s. (see Note 41)*	4 671	2 312
Equity securities	534	506
	<u>231 553</u>	<u>230 585</u>

* The portfolio of available-for-sale securities also includes shares held at cost of EUR 4 671 thousand (2020: EUR 2 312 thousand). These are unlisted equity securities in VIG group company – VIG Fund, a.s. – for which fair value could not be measured reliably due to the existence of significant transactions between the Company and this investee. The Company's investment strategy is to hold these securities for a long-term period. When sold, the carrying value of these assets will be charged to profit or loss.

Fixed income securities:

	31.12.2021 EUR'000		31.12.2020 EUR'000	
	Purchase cost	Fair value	Purchase cost	Fair value
Debt securities issued or guaranteed by central governments or municipalities	128 170	128 188	150 083	150 695
Debt securities and other securities with fixed income, which are listed in a regulated market	56 180	<u>56 512</u>	49 097	<u>50 868</u>
		<u>184 700</u>		<u>201 563</u>

Investment portfolio of fixed income securities by geographic split:

	31.12.2021 EUR'000	31.12.2020 EUR'000
Latvia, Lithuania, Estonia	120 284	134 702
Poland	12 249	14 378
Other European Union countries	40 221	39 877
Other	11 946	12 606
	<u>184 700</u>	<u>201 563</u>

(25) Loans

Loan maturity structure:

	31.12.2021 EUR'000	31.12.2020 EUR'000
With maturity up to 12 months	321	109
With maturity in more than 5 years	14 440	10 446
	<u>14 761</u>	<u>10 555</u>

Loan structure by geographical split:

	31.12.2021 EUR'000	31.12.2020 EUR'000
Latvia	8 769	5 899
Poland	5 855	1 350
Czech Republic	137	3 306
	<u>14 761</u>	<u>10 555</u>

All issued loans are to related parties. For more detailed information please refer to Note 41.

(26) Receivables from direct insurance activities

	31.12.2021 EUR'000	31.12.2020 EUR'000
Due from policy holders	50 458	46 751
Due from intermediaries	314	294
Impairment allowance for bad debtors	(567)	(533)
	<u>50 205</u>	<u>46 512</u>

	Allowance for policy holders EUR'000	Allowance for intermediaries EUR'000	Total allowance for insurance debtors EUR'000
Allowance at 31.12.2019	<u>(735)</u>	<u>(79)</u>	<u>(814)</u>
Recovered debts	274	7	281
Impairment loss charge	-	-	-
Allowance at 31.12.2020	<u>(461)</u>	<u>(72)</u>	<u>(533)</u>
Recovered debts (see Note 8)	-	66	66
Impairment loss charge	(100)	-	(100)
Allowance at 31.12.2021	<u>(561)</u>	<u>(6)</u>	<u>(567)</u>

	31.12.2021 EUR'000	31.12.2020 EUR'000
Other intermediaries	314	294
Allowances for doubtful debts	(6)	(72)
Intermediaries	<u>308</u>	<u>222</u>
<i>More than 3 months overdue</i>	99	351
<i>Less than 3 months overdue</i>	3 116	3 789
Overdue receivables	3 215	4 140
Outstanding receivables not yet due	47 243	42 611
Allowances for doubtful debts	(561)	(461)
Policyholders	<u>49 897</u>	<u>46 290</u>
Total direct insurance debtors	<u>50 205</u>	<u>46 512</u>

(27) Other receivables

	31.12.2021 EUR'000	31.12.2020 EUR'000
<i>Financial assets</i>		
Receivables for claims handling services provided	333	55
Other debtors	496	600
Impairment allowance	(418)	(299)
<i>Total financial assets</i>	<u>411</u>	<u>356</u>
<i>Non-financial assets</i>		
Advance payments	36	62
Tax prepayments	47	72
<i>Total non-financial assets</i>	<u>83</u>	<u>134</u>
	<u>494</u>	<u>490</u>

(28) Cash and cash equivalents

	31.12.2021 EUR'000	31.12.2020 EUR'000
Cash on hand	6	7
Current accounts with credit institutions	9 825	31 390
Cash and cash equivalents	9 831	31 397
Cash and cash equivalents as disclosed in the statement of cash flows	9 831	31 397

Credit institutions:

	31.12.2021 EUR'000	31.12.2020 EUR'000
Latvian credit institutions	6 120	23 085
Lithuanian credit institutions	2 756	6 983
Estonian credit institutions	950	1 322
	9 825	31 390

Current account analysis by ratings:

	31.12.2021 EUR'000	31.12.2020 EUR'000
A	1	13
BBB	1 521	2 876
BB and lower	1 010	945
Not rated	7 293	27 556
	9 825	31 390

(29) Obligatory payments disclosed in statement of cash flows

Payments made to:

	31.12.2021 EUR'000	31.12.2020 EUR'000
Latvian Transport Insurance Bureau	457	469
Estonian and Lithuanian Transport Insurance Bureaus	1 052	1 195
FCMC commission	465	537
Estonian and Lithuanian insurance supervisory institutions	23	28
	1 997	2 229

(30) Capital and reserves

Share capital

The authorized and issued share capital of the Company at 31 December 2021 is EUR 41 609 400 (2020: EUR 41 609 400) comprised of 416 094 ordinary shares and is fully paid. Nominal value of one share is EUR 100.

The holders of ordinary shares are entitled to receive dividends as declared and are entitled to one vote per share at meetings of the Company and rank equally with regard to the Company's residual assets.

Dividends

	2021 EUR'000	2020 EUR'000
Dividends declared	10 004	7 985
Dividends paid	10 004	7 985

	2021 EUR	2020 EUR
Dividends declared per share	24.04	19.19
Dividends paid per share	24.04	19.19

Other reserves

On 19 September 2017, a decision was taken regarding reorganisation of BTA Baltic Insurance Company AAS. The reorganisation is performed as a merger by way of takeover, where BTA Baltic Insurance Company AAS is the acquiring company and InterRisk Vienna Insurance Group AAS, registration number: 40003387032, registered address: Ūdens iela 12 – 115, Riga, LV-1007, is the acquired company. The reorganization was enacted effective on 27 December 2017. Amount arises from reorganization.

Revaluation reserve

The revaluation reserve relates to revaluation on property and equipment used by the Company for its own activities and investment property, and revaluation of available-for-sale instruments, net of deferred tax. Land and buildings revaluation reserve was taken over on 1 July 2015 when the Company took over the business portfolio related to Baltic countries from BTA Insurance Company SE (starting from 1 November 2016 – Balcia Insurance SE), during 2020 the Company wrote off the revaluation reserve due to fact that Group's policy is to account land and buildings at cost and calculate depreciation.

	31.12.2021 EUR'000	31.12.2020 EUR'000
Investment revaluation reserves	3 745	8 157
	3 745	8 157
		EUR'000
Balance at 31.12.2019		6 796
Debt investments at FVOCI – net change in fair value		1 964
Debt investments at FVOCI – reclassified to profit or loss		(220)
Other reclassification		(383)
Balance at 31.12.2020		8 157
Debt investments at FVOCI – net change in fair value		(3 317)
Debt investments at FVOCI – reclassified to profit or loss		(1 095)
Balance at 31.12.2021		3 745

(31) Reinsurers' deposit

The reinsurance deposit is recognized in accordance with the reinsurance contracts for motor vehicle owner third party liability insurance (MTPL) and personal accident (PA) line of business. The basis for calculating the deposit is reinsurers' share of insurance contract liabilities:

- unearned premium reserves (UPR) at the end of the period;
- outstanding claim reserves (RBNS and IBNR) at the end of the period.

The interest on deposit is calculated quarterly based on the deposit balance at the beginning of the respective quarter multiplied by 1/4th of the annual interest rate of 3 month EURIBOR + 0.5% at the beginning of the quarter. Interest expense is recognized in Statement of Comprehensive Income under Interest expense caption.

The Reinsurers' deposit consists of following reinsurers' share of insurance contract liabilities as at 31 December 2021 and 2020:

	31.12.2021 EUR'000	31.12.2020 EUR'000
Unearned premium reserves	13 132	12 790
Outstanding claim reserve	30 097	28 914
	43 229	41 704

(32) Lease liabilities

	31.12.2021 EUR'000	31.12.2020 EUR'000
Less than one year	1 754	1 758
Between one and five years	2 273	3 193
More than five years	57	23
	<u>4 084</u>	<u>4 974</u>

Lease liability movement

	EUR'000
Balance at 31.12.2019	<u>5 839</u>
Additions	372
Modification	638
Payments	(1 849)
Disposals	(26)
Balance at 31.12.2020	<u>4 974</u>
Additions	141
Modification	878
Payments	(1 896)
Disposals	(13)
Balance at 31.12.2021	<u>4 084</u>

(33) Deferred tax assets/(liabilities)

If all retained earnings were paid out as dividends, there would be no changes in payable corporate income tax as only part of retained earnings would be deemed as taxable (profits earned starting from 2018) and due to significant amount of deductible amounts (deductible Lithuanian branch's profit amount from 2019 and 2020, deductible losses from year 2017).

Temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes give rise to net deferred tax assets and liabilities as of 31 December 2021 and 2020. These deferred tax assets have been recognised in these financial statements.

	2021 EUR'000	2020 EUR'000
Deferred tax asset/(liabilities) attributable to:		
Lithuania	250	222

Movement in temporary differences during the year ended 31 December 2021

'000 EUR	Net balance 1 January 2021	Recognised in profit or loss	Net balance 31 December 2021	31 December 2021	
				Deferred tax asset	Deferred tax liability
Provisions	222	28	250	-	
Deferred tax assets/(liabilities) before set-off	<u>222</u>		<u>250</u>	<u>-</u>	
Set off of tax			-	-	
Net deferred tax assets/(liabilities)			<u>250</u>	<u>-</u>	

Movement in temporary differences during the year ended 31 December 2020

'000 EUR	Net balance	Recognised in	Net balance	31 December 2020	
	1 January 2020	profit or loss	31 December 2020	Deferred tax asset	Deferred tax liability
Provisions	244	(22)	222	222	-
Deferred tax assets/(liabilities) before set-off	244			222	-
Set off of tax				-	-
Net deferred tax assets/(liabilities)				222	-

(34) Taxes and social contributions

Tax type	Balance at 31.12.2020 EUR'000	Calculated in reporting period EUR'000	Paid in reporting period EUR'000	Reclassified EUR'000	Balance at 31.12.2021 EUR'000
Social contributions	376	7 555	(7 481)	-	450
Personal income tax	197	4 989	(4 951)	-	235
Value added tax	(9)	1 175	(1 026)	-	140
Real estate tax	-	4	(4)	-	-
Risk Duty	5	90	(88)	-	7
Other taxes	-	-	-	-	-
CIT in Latvia	8	-	(8)	-	-
CIT in Lithuania	286	1 323	(1 643)	-	(34)
	863	15 136	(15 201)	-	798
				31.12.2020 EUR'000	31.12.2021 EUR'000
Prepaid corporate income tax				-	(34)
Other tax prepayment, see Note 27				(72)	(13)
Other tax liabilities				935	845

	Tax payable 31.12.2020 EUR'000	Tax receivable 31.12.2020 EUR'000	Calculated in reporting period EUR'000	Paid in reporting period EUR'000	Tax payable 31.12.2020 EUR'000	Tax receivable 31.12.2021 EUR'000
Latvia	560	-	6 772	(6 643)	689	-
Lithuania	286	(72)	7 282	(7 488)	55	(47)
Estonia	89	-	1 082	(1 070)	101	-
	935	(72)	15 136	(15 201)	845	(47)

(35) Payables from reinsurance activities

	31.12.2021 EUR'000	31.12.2020 EUR'000
Reinsurance companies	5 396	4 027
Reinsurance brokers	-	1 288
	5 396	5 315

Reinsurance creditors by geographic split:

	31.12.2021 EUR'000	31.12.2020 EUR'000
European Union member countries	5 240	5 082
Europe other than EU	37	165
North America	21	61
Other	98	7
	5 396	5 315

(36) Other creditors

	31.12.2021 EUR'000	31.12.2020 EUR'000
<i>Financial liabilities</i>		
Financial pledge	17 347	17 209
Due to employees (remuneration)	238	210
Other creditors	6 027	4 977
<i>Total financial liabilities</i>	23 612	22 396
<i>Non-financial liabilities</i>		
Due to the Motor Insurers' Bureau of Latvia	80	96
Due to the Financial Capital and Market Commission, Latvia	111	94
Due to Motor Insurers' Bureau of Lithuania	235	203
<i>Total non-financial liabilities</i>	426	393
	24 038	22 789

(37) Provisions and accrued liabilities**Provisions**

	31.12.2021 EUR'000	31.12.2020 EUR'000
Accrued staff bonuses	2 109	2 161
	2 109	2 161

Provisions at 31.12.2019

Paid	(1 289)
Increase of provisions	1 598
Provisions at 31.12.2020	2 161
Paid	(1 891)
Increase of provisions	1 839
Provisions at 31.12.2021	2 109

Gross
EUR'000**Accrued liabilities**

	31.12.2021 EUR'000	31.12.2020 EUR'000
Accrued liabilities for unused employee vacations	1 434	1 253
Accrued liabilities for intermediary commissions	520	1 011
Other accrued liabilities	209	301
	2 163	2 565

(38) Number of employees and information on branches

	At 31 December 2021	At 31 December 2020
Employees	1 084	1 076
Insurance agents	443	436
	1 527	1 512

Insurance agents are persons who pursue insurance mediation on behalf of and in the interests of only one insurance company, but are not employees of the Company.

Number of employees as at end of the period:

	At 31 December 2021	At 31 December 2020
Latvia	478	482
Branch in Lithuania	535	535
Branch in Estonia	71	59
	<u>1 084</u>	<u>1 076</u>

Number of client service centres:

	At 31 December 2021	At 31 December 2020
Customer service centres abroad	117	121
Customer service centres in Latvia	57	59

(39) Personnel expenses

	2021 EUR'000	2020 EUR'000
Remuneration	29 066	23 887
Social contribution expenses	3 601	3 198
	<u>32 667</u>	<u>27 085</u>

	2021 EUR'000	2020 EUR'000
Personnel expenses (included in administrative expenses in Note 13)	9 118	8 551
Personnel expenses (included in loss adjustment expenses in Note 9)	4 166	4 600
Personnel expenses (included in indirect client acquisition costs in Note 12)	19 145	13 838
Personnel expenses (included in investment management charges)	238	96
	<u>32 667</u>	<u>27 085</u>

(40) Information on the remuneration of the members of the Management Board and Supervisory Board

	2021 EUR'000	2020 EUR'000
Supervisory Board	62	56
Management Board	777	725
Social contribution expenses	166	171
	<u>1 005</u>	<u>952</u>

Remuneration to the Management Board and Supervisory Board members includes remuneration for their direct responsibilities.

(41) Related parties**Control relationships**

On 29 October, 2020, Vienna Insurance Group AG Wiener Versicherung Gruppe (VIG) became a 100% owner of Company's shares.

Transactions with related parties

Transactions with related parties are conducted on arm's length bases.

The Company has the following related party transactions in 2021 and 2020 and debtors/creditors' balances as at 31 December 2021 and 2020:

Transactions with related parties

Reinsurance

	2021 EUR'000	2020 EUR'000
<i>Vienna Insurance Group AG Wiener Versicherung Gruppe</i>		
Ceded reinsurance premiums	(34 650)	(35 825)
Change in reinsurers' share in unearned premium reserves	341	(636)
Reinsurers' share in claims paid	21 520	20 591
Change in reinsurers' share in outstanding claims reserves	1 183	3 893
Reinsurance commissions and profit participations	15 985	11 361
Interest expense for reinsurance deposit	-	(14)
Total	4 379	(630)
<i>VIG Re zajišť'ovna, a.s.</i>		
Ceded reinsurance premiums	(2 546)	(2 120)
Change in reinsurers' share in unearned premium reserves	130	270
Reinsurers' share in claims paid	513	1 021
Change in reinsurers' share in outstanding claims reserves	67	88
Reinsurance commissions and profit participations	203	241
Change in unearned reinsurance commission	(28)	(80)
Total	(1 661)	(580)
<i>DONAU Versicherung AG Vienna Insurance Group</i>		
Ceded reinsurance premiums	(6)	(2)
Reinsurance commissions and profit participations	1	-
Claim handling expenses	(67)	-
Total	(72)	(2)

	2021 EUR'000	2020 EUR'000
<u>Other transactions</u>		
<i>Vienna Insurance Group AG Wiener Versicherung Gruppe</i>		
Interest expense for subordinated loans	(378)	(378)
Other expenses	(545)	(402)
Total	(923)	(780)
<i>VIG FUND, a.s.</i>		
Interest income from loan	4	4
Dividend income from investment in shares	50	44
Total	54	48
<i>Atrium Tower Sp. z o.o.</i>		
Interest income from loan	34	34
Total	34	34
<i>Alauksta 13/15 SIA</i>		
Interest income from loan	8	-
Other income	4	-
Total	12	-
<i>Artilērijas 35 SIA</i>		
Interest income from loan	8	-
Other income	1	-
Total	9	-
<i>Ģertrūdes 121 SIA</i>		
Interest income from loan	27	-
Other income	7	-
Total	34	-

Continued table

KKB Real Estate SIA		
Interest income from loan	159	155
Total	159	155
NNC Real Estate Sp. Z O.O.		
Interest income from loan	4	-
Total	4	-
Bulstrad Public Ltd. Comp.		
Claim handling costs	(5)	-
Total	(5)	-
Compensa Life insurance SE Lietuvos filialas		
Contributions to Health Insurance	-	(105)
Total	-	(105)
Compensa Vienna Insurance Group UADB (Lithuania)		
Claim handling costs	(225)	(4)
Other income	255	-
Total	30	(4)
Compensa Towarzystwo Ubezpieczeń Spolka Akcyjna Vienna Insurance Group		
Claim handling costs	(346)	(54)
Total	(346)	(54)
Global Assistance Baltic SIA		
Claim handling costs	(392)	-
Other expenses	(165)	-
Other income	284	-
Total	(273)	-
Kooperativa pojišt'ovna, a.s. (SK)		
Claim handling costs	(4)	-
Total	(4)	-
Kooperativa pojišt'ovna, a.s. (CZ)		
Claim handling costs	(22)	-
Total	(22)	-
Union Biztosító Zrt.		
Claim handling costs	(3)	-
Total	(3)	-
Urban Space SIA		
Dividends	16	-
Other income	1	-
Total	17	-
VIG Management Service SRL		
Claim handling costs	(5)	(1)
Total	(5)	(1)
Members of the Board		
Income from insurance premiums	3	3
Paid claims	(4)	-
Total	(1)	3

Balances with related parties

There are following outstanding balances with related parties as at the reporting date:

	31.12.2021 EUR'000	31.12.2020 EUR'000
Assets		
Vienna Insurance Group AG Wiener Versicherung Gruppe		
<i>Reinsurers' share of insurance contract liabilities</i>	43 229	41 704
<i>Receivables from reinsurance activities</i>	2 082	153
Total Vienna Insurance Group AG Wiener Versicherung Gruppe	45 311	41 857
VIG RE zajišt'ovna a.s.		
<i>Reinsurers' share of insurance contract liabilities</i>	664	817
<i>Receivables from reinsurance activities</i>	98	662
Total VIG RE zajišt'ovna a.s	762	1 479
VIG FUND, a.s.	4 809	2 454
Atrium Tower Sp. z o.o.	1 350	1 350
KKB Real Estate SIA	6 755	5 899
Urban Space SIA, see Note 23	506	506
Global Assistance SIA	107	100
Alauksta 13/15 SIA	664	3
Artilērijas 35 SIA	701	3
Ģertrūdes 121 SIA	2 320	3
Hymel Sp.z.o.o.	4 504	-
LiveOn Linkmenu UAB	14	-
	21 730	53 654
Liabilities		
Vienna Insurance Group AG Wiener Versicherung Gruppe		
<i>Reinsurers' deposit</i>	43 229	41 704
<i>Subordinated loan</i>	7 000	7 000
<i>Payables from reinsurance activities</i>	83	164
<i>Other liabilities</i>	95	114
Total Vienna Insurance Group AG Wiener VersicherungGruppess	50 407	48 982
VIG RE zajišt'ovna a.s.		
<i>Payables from reinsurance activities</i>	639	475
	-	-
Total VIG RE zajišt'ovna a.s	639	475
	51 046	49 457

Assets due from VIG FUND, a.s., Atrium Tower Sp. z o.o., KKB Real Estate SIA, Alauksta 13/15 SIA, Artilērijas 35 SIA, Ģertrūdes 121 SIA, Hymel Sp. z o.o., LiveOn Linkmenu UAB includes loans issued to these related parties. 31.12.2021 figures are below and 31.12.2020 below and in brackets

	Loan amount 2021 EUR'000	Loan amount 2020 EUR'000	Accrued interest 2021 EUR'000	Accrued interest 2020 EUR'000	Due date	Interest rate
VIG FUND, a.s.	137	141	-	-	31.12.2030	2.50%
Atrium Tower Sp. z o.o.	1 350	1 350	-	-	31.12.2030	2.50%
KKB Real Estate SIA	5 756	5 899	-	-	31.03.2030	2.55%
	1 000	-	-	-	31.09.2031	2.4%
Alauksta 13/15 SIA	359	-	-	-	31.12.2031	2.25%
Artilērijas 35 SIA	380	-	-	-	31.12.2031	2.25%
Ģertrūdes 121 SIA	1 261	-	-	-	31.12.2031	2.25%
Hymel Sp. z o.o.	4 504	-	4	-	31.12.2031	2.35%
LiveOn Linkmenu UAB	14	-	-	-	27.08.2031	2.50%
Total	14 761	7 390	4	-		

In addition, assets due from VIG FUND, a.s. include investment in the share capital of VIG FUND, a.s. in amount of EUR 4 671 thousand (2020: EUR 2 312 thousand), which is included in the Statement of Financial Position under Available-for-sale instruments caption, see Note 24.

Payables due to Vienna Insurance Group AG Wiener Versicherung Gruppe include:

- Subordinated loan in amount of EUR 1 500 thousand (2020: EUR 1 500 thousand) that has been acquired as a result of reorganisation of InterRisk Vienna Insurance Group AAS. The payment term of this loan is 28 December 2025 and annual interest rate is 5%. Accrued interest expense as at 31 December 2021 amounted to EUR 0 (2020: EUR 0);
- Subordinated loan in amount of EUR 5 500 thousand which was received on 27 December 2018 with annual interest rate of 5.5%. The loan shall be repaid on tenth anniversary of the receipt of the loan. Accrued interest expense as at 31 December 2021 amounted to EUR 3 732 (2020: EUR 3 732).

(42) Remaining maturities of insurance liabilities

	2021 EUR'000			2020 EUR'000		
	Gross liabilities	Reinsu- rance	Net liabilities	Gross liabilities	Reinsu- rance	Net liabilities
Unearned premium and unexpired risk reserves	117 456	(24 315)	93 141	106 811	(21 987)	84 824
Outstanding claim reserves	149 616	(55 589)	94 027	140 703	(51 426)	89 277
Total	267 072	(79 904)	187 168	247 514	(73 413)	174 101

For maturity split, please refer to Note 4.

(43) Leases

(a) Leases as lessee (IFRS 16)

Around 200 customer service centres are located in leased premises, as well as the premises for the Company's headquarters and head offices of branches are leased. The contracts for these leases typically run for a period of 2 to 3 years after which a new contract might be renegotiated or the existing one prolonged, or the lease ends all together; over one third of the lease contracts do not have a set term, for such contracts the Company has elected to set a period of 2 years with review done at the end of each calendar year.

In addition to premises, the Company also leases IT equipment, vehicle and other miscellaneous items.

Information about leases for which the Company is a lessee is presented below.

Right-of-use assets

	Land and buildings for own use (Note 21(a)) EUR'000	Property and equipment (Note 20) EUR'000	Total EUR'000
Balance at 31.12.2019	5 588	208	5 796
Additions	652	72	724
Depreciation charge for the year	(1 534)	(93)	(1 627)
Balance at 31.12.2020	4 706	187	4 893
Additions	475	12	487
Depreciation charge for the year	(1 341)	(35)	(1 376)
Balance at 31.12.2021	3 840	164	4 004

Amounts recognised in profit or loss

	2021 EUR'000
2021 – Leases under IFRS 16	
Interest on lease liabilities	41
Expenses relating to short-term leases	1
	<u>42</u>
	2020 EUR'000
2020 – Leases under IFRS 16	
Interest on lease liabilities	59
Expenses relating to short-term leases	1
	<u>60</u>

Amounts recognised in statement of cash flows

	2021 EUR'000
Total cash outflow for leases	(1896)
	2020 EUR'000
Total cash outflow for leases	(1849)

(b) Leases as lessor (IFRS 16)

The Company leases out its investment properties (see Note 21(b)). All leases are classified as operating leases from a lessor perspective, because they do not transfer substantially all of the risks and rewards incidental to the ownership of the assets.

Rental income recognised by the Company during 2021 was EUR 119 thousand (2020: EUR 110 thousand).

The following table sets out a maturity analysis of lease payments, showing the undiscounted lease payments to be received after the reporting date.

	31.12.2021 EUR'000
2021 – Operating leases under IFRS 16	
Within one year	44
One to two years	31
Two to three years	20
Three to four years	20
Four to five years	7
More than five years	-
	<u>122</u>
	31.12.2020 EUR'000
2020 – Operating leases under IFRS 16	
Within one year	116
One to two years	44
Two to three years	31
Three to four years	20
Four to five years	20
More than five years	7
	<u>238</u>

(44) Contingent liabilities and commitments

General claims

In the normal course of the business the Company receives claims from policyholders. Management has reviewed such claims and believes that no material liabilities will arise from these cases other than already provided for.

(45) Fair value of financial instruments

(a) Fair values

Set below is a comparison, by class, of the carrying amount and fair values of the Company's financial instruments, other than those with carrying amounts that are reasonable approximations of fair values:

	2021		2020	
	Carrying amount EUR'000	Fair value EUR'000	Carrying amount EUR'000	Fair value EUR'000
Financial assets				
Listed equity instruments	534	534	506	506
Non-listed equity instruments	4 671	4 819	2 226	2 312
Quoted debt instruments	184 419	184 552	201 533	201 563
Fund certificates	41 648	41 648	26 204	26 204
	231 272	231 701	230 059	230 585

(b) Financial instruments measured at fair value

The table below analyses financial instruments measured at fair value at the end of the reporting period, by the level in the fair value hierarchy into which the fair value measurement is categorised.

	Level 1 EUR'000	Level 2 EUR'000	Level 3 EUR'000	Total EUR'000
31 December 2021				
Financial assets				
Financial instruments at fair value through profit or loss	-	1 375	-	1 375
Available-for-sale instruments	134 726	66 123	27 562	228 411
	134 726	67 498	27 562	229 786
31 December 2020				
Financial assets				
Financial instruments at fair value through profit or loss	-	1 386	-	1 386
Available-for-sale instruments	136 573	76 910	13 945	227 428
	136 573	78 296	13 945	228 814

(i) Transfers between Levels 1, 2 and 3.

At 31 December 2021, AFS Fund certificate with a carrying amount of EUR 4 531 thousand were transferred from Level 2 to Level 3 because quoted prices in the market for such fund certificates were no longer regularly available. To determine the fair value of such debt securities, management used a net asset value valuation technique.

(ii) Level 3 recurring values

Reconciliation of Level 3 fair values.

The following table shows a reconciliation from the opening balances to the closing balances for Level 3 fair values.

	Bonds EUR'000	Equity securities EUR'000	Fund certificates EUR'000
Balance at 1 January 2020	-	2 312	7 340
Gain included in OCI			
- Net changes in fair value (unrealised)	-	-	(683)
Purchases	-	-	5 093
Disposals	-	-	(117)
Balance at 31 December 2020	-	2 312	11 633
Balance at 1 January 2021	-	2 312	11 633
Transfer from Level 2 to 3	-	-	4 531
Gain/(Loss) included in OCI			
- Net changes in fair value (unrealised)	-	-	1 019
Purchases	1 074	2 359	4 653
Disposals	-	-	(18)
Balance at 31 December 2021	1 074	4 671	21 818

(iii) Sensitivity analysis

For the fair values of equity securities and fund certificates, reasonably possible changes at the reporting date to one of the significant unobservable inputs, holding other inputs constant, would have the following effect

2021	OCI, net of tax	
	Increase EUR'000	Decrease EUR'000
Equity securities		
Changes in RE cash flows by 5% resulting in change of NAV by 5%	234	(234)
Fund certificates		
Changes in RE cash flows by 5% resulting in change of NAV by 5%	1 091	(1 091)
2020		
	OCI, net of tax	
	Increase EUR'000	Decrease EUR'000
Equity securities		
Changes in RE cash flows by 5% resulting in change of NAV by 5%	116	(116)
Fund certificates		
Changes in RE cash flows by 5% resulting in change of NAV by 5%	582	(582)

Total gains or losses for the period of the financial instruments measured at fair value are presented in the statement of comprehensive income as follows:

Financial instruments at fair value	31.12.2021 EUR'000	31.12.2020 EUR'000
Total gains and losses included in profit or loss:		
Net unrealised gain/(loss) on financial instruments at fair value through profit or loss	(3)	(3)
Net realised gain/(loss) on available for sale financial assets	701	76
Interest income	2 629	2 374
Total gains and losses included in other comprehensive income:		
Available-for-sale financial assets – net change in fair value	(4 412)	1 744

(c) Financial instruments not measured at fair value

Financial assets and financial liabilities other than those reflected at their fair value and those classified as held to maturity (see Note 24), are deposits, loans issued, receivables, cash and cash equivalents, payables, lease liabilities, lease liabilities and subordinated loan.

Insurance, reinsurance and other financial debtors and financial liabilities, other than loans issued, lease liabilities and subordinated loan, have their remaining maturities of less than one year and carry no interest, thus, their fair value is deemed not to materially differ from their carrying amounts.

Cash and cash equivalents are short-term financial instruments that have their remaining maturities of less than one year and that carry no or little interest, thus, their fair value is deemed not to materially differ from their carrying amounts.

The loans issued carry interest in line with market circumstances and terms and conditions of the respective loan (see Note 41). As there are no material transactions costs related to these loans, its fair value is deemed not to materially differ from its carrying amount.

The lease liabilities carry interest in line with market circumstances and terms and conditions of the respective lease. As there are no material transactions costs related to this loan, its fair value is deemed not to materially differ from its carrying amount.

The subordinated loans carry interest in line with market circumstances and terms and conditions of the respective loan, including the increased risk due to subordination (see Note 41). As there are no material transactions costs related to this loan, its fair value is deemed not to materially differ from its carrying amount.

Comparison between amortised cost and fair value for issued loans:

	Level 1	Level 2	Level 3	Total fair values	Total carrying amount
	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR
31 December 2021					
Financial assets					
Loans	-	-	15 123	15 123	14 761
Held to maturity instruments	2 019	-	2 019	2 019	1 375
<hr/>					
31 December 2020					
Financial assets					
Loans	-	-	11 140	11 140	10 555
Held to maturity instruments	2 181	-	-	2 181	1 386

(46) Subsequent events

During the preparation of these financial statements the war in Ukraine broke out. The Russian military aggression was met with unanimous condemnation by the European Union and the United States, as well as many other countries and international institutions, and was followed by a series of sanctions targeting companies and individuals connected with the governments of Russia and Belarus.

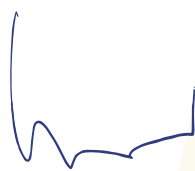
It will undoubtedly make a profound impact on the world's political and economic development in the years to come. As the events are changing dynamically, the Management Board continuously monitors the development of the situation and assesses the potential impact of both the hostilities and the sanctions imposed on Russia and Belarus on the insurance business and investment activities of BTA. Based on the preliminary evaluation, the direct impact of the conflict – primarily from disruption of business related to the movement of goods and services between the European Union and Russia or Belarus – is estimated to be rather small and marginal to the

Company's turnover in year 2022. Neither at the last day of the reporting period nor at the date of signing these financial statements the Company was exposed to any investment risks related to Ukraine, Russia or Belarus.

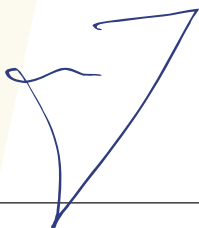
During the second half of the reporting year, interest rates have generally increased and have decreased the market value of the Company's fixed income investment assets. Since of the last day of the reporting period until the date of signing these financial statements this development continued, with political risks driving an additional effect. The Management Board is actively monitoring the situation and initiated the discussion with the Supervisory Board and the Shareholder about strengthening the Company's solvency position.

As of the last day of the reporting period until the date of signing these separate financial statements there have been no other events requiring adjustment of or disclosure in the financial statements or notes thereto, except of the ones mentioned above.

The Company does not see any going concern risks.



Wolfgang Stockmeyer
Chairman of the
Management Board



Oskars Hartmanis
Deputy Chairman of
the Management Board



Evija Matveja
Member of
Management Board



Tadeuš Podvorski
Member of
Management Board

23 March 2022

Independent Auditors' Report





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Independent Auditors' Report

To the shareholder of BTA Baltic Insurance Company AAS

Report on the Audit of the Separate Financial Statements

Our Opinion on the Separate Financial Statements

We have audited the accompanying separate financial statements of BTA Baltic Insurance Company AAS ("the Company") set out on pages 15 to 83 of the accompanying Annual Report, which comprise:

- the separate statement of financial position as at 31 December 2021,
- the separate statement of comprehensive income for the year then ended,
- the separate statement of changes in shareholder's equity for the year then ended,
- the separate statement of cash flows for the year then ended, and
- the notes to the separate financial statements, which include a summary of significant accounting policies and other explanatory notes.

In our opinion, the accompanying separate financial statements give a true and fair view of the separate financial position of BTA Baltic Insurance Company AAS as at 31 December 2021, and of its separate financial performance and its separate cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs) as adopted by the European Union.

Basis for Opinion

In accordance with the 'Law on Audit Services' of the Republic of Latvia we conducted our audit in accordance with International Standards on Auditing adopted in the Republic of Latvia (ISAs). Our responsibilities under those standards are further described in the *Auditors' Responsibility for the Audit of the Separate Financial Statements* section of our report.

We are independent of the Company in accordance with the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) and independence requirements included in the 'Law on Audit Services' of the Republic of Latvia that are relevant to our audit of the separate financial statements in the Republic of Latvia. We have also fulfilled our other professional ethics responsibilities and objectivity requirements in accordance with the IESBA Code and the 'Law on Audit Services' of the Republic of Latvia.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the separate financial statements of the current period. These matters were addressed in the context of our audit of the separate financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

We have determined the matter described below to be the key audit matter to be communicated in our report.



Measurement of claims reserves

The Company's gross outstanding claims reserves as at 31 December 2021 amounted to EUR 149 616 thousand (31 December 2020: EUR 140 703 thousand).

Reference to the separate financial statements: Note 10 "Outstanding claim reserve", Note 42 "Remaining maturities of insurance liabilities" and Note 3 "Significant accounting policies" point 3.2 (e) "Outstanding claim reserves", point 3.2 (i) "Outstanding claim reserves", point 3.17 "Significant accounting estimates and judgement in applying accounting policies", and point 4.2 "Insurance risks".

Key audit matter

Gross outstanding claims reserves ("claim reserves") for the Company, as a non-life insurance provider, constitute the most significant element of insurance contract liabilities presented within liabilities in the statement of financial position. The most significant claims reserves are associated with the mandatory motor third party liability, motor own damage, property and general third party liability insurance.

Management Board uses a range of complex and subjective actuarial methods to determine the best-estimate amounts of those reserves as at the reporting date, whether in respect of reported claims (i.e. RBNS), or those incurred but not reported (i.e. IBNR). The complexity of the models applied may give rise to errors as a result of inaccurate and incomplete data inputs or the design or application of the models. Thus, the completeness and accuracy of the data underlying the actuarial projections was our area of audit focus.

The estimation of the amounts of claims reserves generally involves a significant degree of Management Board's judgment, mainly in respect of the assumptions about future events and developments. Relatively insignificant changes in those assumptions may have a material effect on the estimated amounts of claim reserves. The assumptions most subject to estimation uncertainty are those in respect of loss rates, claim frequency, average claim amounts, court settlements, discount rates, changes in the amount of future annuity payments, and the expected payment period.

Our response

Our audit procedures, performed, where applicable, with the assistance of our actuarial and information technology (IT) specialists, included, among others:

- Testing the design, implementation of controls and operating effectiveness of key controls related to the process of establishing and remeasuring outstanding claims reserves, including the relevant management review controls, accounting and actuarial controls, such as recording premium and claims data, reconciliations of key data underlying the actuarial calculations (including reports on claims paid and incurred, premiums written and earned) as well as testing of general controls in the IT environment regarding data extraction and validation.
- Assessing for reasonableness the actuarial methodologies and assumptions applied by the Company, including in particular the loss ratios, claim frequency and average size of claims, expected outcomes in court settlements, allowance for future claims inflation, and in relation to annuities the discount rates, expected payment dates and payment period, by reference to the methodologies and assumptions applied by the Company in prior period and the prevailing industry practice, also considering the applicable legal and regulatory requirements and the requirements of the relevant financial reporting standards.



Due to the above factors, we considered measurement of the non-life insurance outstanding claims reserves to be our key audit matter.

- For all significant insurance contract portfolios, performing a retrospective analysis of the accuracy and completeness of the Company's gross outstanding claims reserves recognized at the end of prior year, comparing this analysis to the Company's current actuals and seeking Management Board's explanations for any significant differences.
- For all significant insurance contract portfolios, evaluating the adequacy of Company's gross outstanding claims reserves at the end of the reporting period for a sample of claim cases and seeking Management Board's explanations for any significant differences.

Reporting on Other Information

The Company's management is responsible for the other information. The other information comprises:

- Information about the Company, as set out on page 3 of the accompanying Annual Report,
- the Management Report, as set out on page 4 to 12 of the accompanying Annual Report,
- About Vienna Insurance Group, as set out on page 13 of the accompanying Annual Report,
- Statement of management responsibility, as set out on page 14 of the accompanying Annual Report.

Our opinion on the separate financial statements does not cover the other information included in the Annual Report, and we do not express any form of assurance conclusion thereon, except as described in the *Other Reporting Responsibilities in Accordance with the Legislation of the Republic of Latvia Related to Other Information* section of our report.

In connection with our audit of the separate financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the separate financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

If, based on the work we have performed and in light of the knowledge and understanding of the Company and its environment obtained in the course of our audit, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Other Reporting Responsibilities in Accordance with the Legislation of the Republic of Latvia Related to Other Information

In addition, in accordance with the 'Law on Audit Services' of the Republic of Latvia with respect to the Management Report, our responsibility is to consider whether the Management Report is prepared in accordance with the requirements of the Financial and Capital Market Commission of the Republic of Latvia regulations No. 114 – Regulations on the preparation of annual report and



consolidated annual report of insurance and reinsurance undertakings and branches of foreign insurers.

Based solely on the work required to be undertaken in the course of our audit, in our opinion, in all material respects:

- the information given in the Management Report for the financial year for which the separate financial statements are prepared is consistent with the separate financial statements; and
- the Management Report has been prepared in accordance with the requirements of the Financial and Capital Market Commission of the Republic of Latvia regulations No. 114–Regulations on the preparation of annual report and consolidated annual report of insurance and reinsurance undertakings and branches of foreign insurers.

Responsibilities of Management and Those Charged with Governance for the Separate Financial Statements

Management is responsible for the preparation of the separate financial statements that give a true and fair view in accordance with IFRSs as adopted by the European Union and for such internal control as management determines is necessary to enable the preparation of separate financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

Auditors' Responsibility for the Audit of the Separate Financial Statements

Our objectives are to obtain reasonable assurance about whether the separate financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.



- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the separate financial statements, including the disclosures, and whether the separate financial statements represent the underlying transactions and events in a manner that achieves a fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the separate financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

Other Reporting Responsibilities and Confirmations Required by the Legislation of the Republic of Latvia and the European Union when Providing Audit Services to Public Interest Entities

We were appointed by those charged with governance on 29 April 2021 to audit the separate financial statements of BTA Baltic Insurance Company AAS for the year ended 31 December 2021. Our total uninterrupted period of engagement is 7 years, covering the periods ending 31 December 2015 to 31 December 2021.

We confirm that:

- our audit opinion is consistent with the additional report presented to the Audit Committee of the Company;
- as referred to in the paragraph 37.6 of the 'Law on Audit Services' of the Republic of Latvia we have not provided to the Company the prohibited non-audit services (NASs) referred to of EU Regulation (EU) No 537/2014. We also remained independent of the audited entity in conducting the audit.



For the period to which our statutory audit relates, we have not provided any services to the Company in addition to the audit, which have not been disclosed in the Management Report or in the separate financial statements of the Company.

KPMG Baltics SIA
Licence No. 55

Rainers Vilāns
Partner pp. KPMG Baltics SIA
Latvian Sworn Auditor
Certificate No. 200
Riga, Latvia
23 March 2022

THIS DOCUMENT HAS BEEN SIGNED WITH A SECURE ELECTRONIC SIGNATURE AND IT HAS A TIME-STAMP