

RCI Insurance Limited

Annual Report and Financial Statements

for the year ended

31 December 2019

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Directors' Report

The Directors present the annual report and the audited financial statements of RCI Insurance Limited (the "Company") for the year ended 31 December 2019.

Principal activities

The Company's principal activity is that of carrying on business of insurance and reinsurance falling within Classes 1, 2 and 16 of the Insurance Business Act, Cap.403 of the Laws of Malta.

Review of the business

This is the eleventh year of operation of the Company, with the Company writing direct insurance business in Germany, France, Italy and Spain. The Company also writes business of reinsurance in France and Germany.

During the year ended 31 December 2019, the Company wrote a total premium income of €183,085,574 up by 12.14% compared to that written during 2018 at €163,261,008. The increase in business primarily emanated from direct insurance business however, an increase was also registered in reinsurance acceptance business. An increase in premiums written was registered in all countries except Germany and Spain.

The net combined ratio increased to 25.19% from the 23.83% registered in 2018. The increase mainly resulted from premiums earned increasing in line with the technical charges.

The Company's net investment income increased significantly by 1518% to €536,766 (2018: €33,165) in 2019. The increase in investment income is mainly due to the impairment allowance which has been accounted for in 2018 through the application of the new standard IFRS 9. The impairment allowance has decreased to €43,887 from the amount recognized in 2018 €228,790.

The total profit for the year after tax amounted to €66,258,827 (2018: €57,997,268). The increase in profitability is mainly attributable to the factors explained above.

The Shareholders' Funds of the Company at €113,456,275 (2018: €80,567,192) increased by 40.82% resulting from better profit after tax registered during the year under review and a further capital contribution of €24,402,931 made during the year 2019 (2018: €2,282,000).

As of 1 January 2016, the Solvency II Directive (2009/138/EC) came into force with new regulatory requirements that ascertain the level of capital required on the basis of the risks the Company undertakes. Solvency II also outlines how the own funds shall be derived by converting the Statement of Financial Position from an IFRS perspective to one where assets and liabilities are measured in line with their underlying economic value. As from this date, the solvency calculations under Solvency I regime are no longer applicable.

Based on the audited Solvency Capital Requirements ("SCR") calculations as at 31 December 2019, the Company has complied with the capital and solvency requirements as stipulated in the rules issued by the MFSA. Going forward, the Company is also expected to continue meeting the Solvency II requirements, based on the projected SCR calculations included in the 2019 Own Risk and Solvency Assessment ("ORSA") report.

Principal risks

The Company is exposed to a mixed blend of risks and hence operates a risk management strategy with the objective of controlling and minimising their impact on the financial performance and position of the Company.

An established risk governance framework and ownership structure ensures oversight of accountability for the effective management of risk. In line with the Solvency II framework, the Company's risk management framework fosters the continuous monitoring of the risk environment and an integrated evaluation of risks and their interactions.

The Company's risk management framework is designed to provide appropriate risk monitoring and assessment. Specifically, the Company's main risks are insurance risk, credit risk, market risk and liquidity risk. A detailed review of the risk management policies employed by the Company are disclosed in Note 20 to the notes to these financial statements. While disclosures relating to exposures to insurance risk, credit risk, liquidity risk and market risk are included in Note 21 to the notes to these financial statements. These are also supplemented by Note 2.4 relating to significant accounting policies.

Directors' Report- continued

Post balance sheet events

Other than the matter disclosed in Note 26, there were no important events or transactions which took place after the financial reporting date which would require disclosure or adjustment to the financial statements.

Future developments

The Board has considered the Company's operational performance and position as at year end, as well as business plans for the upcoming years. In line with this, the Board has a reasonable expectation that the Company has adequate resources to continue in operational existence for the foreseeable future. For this reason, in preparing the financial statements, the Board continues to adopt the going concern basis in preparing the financial statements.

Results and dividends

The results for the year are set out in the Income Statement on pages 9 and 10. During the year, the Board declared a net dividend of €57,997,268 (2018: €47,849,428). The Directors do not recommend the payment of a final dividend.

Directors

The Directors of the Company who held office during the year were:

Mr Patrick Claude
Mr John Bonett
Mr Bastien Paret
Mr Jean-Philippe Vallée (resigned on 28 January 2019)
Mr Marc Lagrene (appointed on 28 January 2019, resigned on 25 November 2019)
Mr Jean-Louis Labauge (appointed on 25 November 2019)

Auditors

At the 2020 Annual General Meeting a resolution will be presented proposing the appointment of the new group auditors as auditors of the Company as from the financial year ending 31 December 2020. The Directors take the opportunity to express their gratitude to Ernst & Young Malta Limited for their years of services to the Company and the Shareholders.

By order of the Board



Bastien Paret
Director



Jean-Louis Labauge
Director

Registered office
Level 3, Mercury Tower,
The Exchange Financial and Business Centre,
Triq Elia Zammit, St.Julians, STJ 3155
Malta

20 April 2020

Statement of Directors' Responsibilities for the financial statements

The Directors are required by the Companies Act (Cap. 386 of the Laws of Malta) and the Insurance Business Act (Cap. 403 of the Laws of Malta) to prepare financial statements in accordance with International Financial Reporting Standards ("IFRSs") as adopted by the EU, which give a true and fair view of the state of affairs of the Company at the end of each financial year and of the profit or loss of the Company for the year then ended. In preparing the financial statements, the Directors should:

- select suitable accounting policies and apply them consistently;
- make judgements and estimates that are reasonable;
- prepare the financial statements on a going concern basis, unless it is inappropriate to presume that the Company will continue in business as a going concern;
- account for income and charges relating to the accounting year on the accruals basis;
- value separately the components of asset and liability items; and
- report comparative figures corresponding to those of the preceding accounting year.

The Directors are responsible for ensuring that proper accounting records are kept which disclose with reasonable accuracy at any time the financial position of the Company and which enable the Directors to ensure that the financial statements comply with the Companies Act (Cap. 386 of the Laws of Malta) and the Insurance Business Act (Cap. 403 of the Laws of Malta). This responsibility includes designing, implementing and maintaining such internal control as the Directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error. The Directors are also responsible for safeguarding the assets of the Company, and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.



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INDEPENDENT AUDITOR'S REPORT

to the Shareholders of RCI Insurance Limited

Report on the audit of the separate financial statements

Opinion

We have audited the financial statements of RCI Insurance Limited set on pages 11 to 47, which comprise the statement of financial position as at 31 December 2019, and the statement of comprehensive income, the statement of changes in equity and the statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Company as at 31 December 2019 and of its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the EU ("IFRS"), the Companies Act, Cap. 386 of the Laws of Malta (the "Companies Act") and the Insurance Business Act, Cap. 403 (the "Insurance Business Act") of the Laws of Malta.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (SAs) and the Companies Act. Our responsibilities under those standards and under the Companies Act are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company in accordance with the International Code of Ethics for Professional Accountants (including International Independence Standards) as issued by the International Ethics Standards Board of Accountants (IESBA Code) together with the ethical requirements that are relevant to our audit of the financial statements in accordance with the *Accountancy Profession (Code of Ethics for Warrant Holders) Directive issued in terms of the Accountancy Profession Act, Cap. 281 of the Laws of Malta*, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of matter

We draw attention to Note 26 to the financial statements, which describes the effect COVID-19 on the Company's business. Our opinion is not modified in respect of this matter.

Key audit matters incorporating the most significant risks of material misstatements, including assessed risk of material misstatements due to fraud

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

INDEPENDENT AUDITOR'S REPORT

to the Shareholders of RCI Insurance Limited – continued

Report on the audit of the separate financial statements- continued

Key audit matters incorporating the most significant risks of material misstatements, including assessed risk of material misstatements due to fraud – continued

We have fulfilled the responsibilities described in the Auditor's responsibilities for the audit of the financial statements section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying financial statements.

Estimates used in calculation of insurance contract liabilities and liability adequacy test (LAT)

The Company's gross technical provisions (insurance contract liabilities) amount to €152.23 million representing 60.59% of the Company's total liabilities. The measurement of the technical provisions involves significant judgment over uncertain future outcomes, mainly the ultimate total settlement value of the insurance liabilities. Disclosures about the Company's technical provisions are provided in Note 13 and Note 2.4 (n) to the accompanying financial statements.

The liabilities for unpaid claims are estimated using the input of assessment for individual cases reported to the Company and a statistical analysis for the claims incurred but not reported based on an estimate of the expected ultimate cost of more complex claims that may be affected by external factors.

The valuation of the technical provisions requires the application of significant judgment in the setting of assumptions. Due to the significance of the balances and the estimation involved in the assessment of these technical provisions, we have considered the valuation and adequacy of the technical provisions as a key audit matter.

How our audit addressed the key audit matter

Our audit procedures over the gross technical provisions included, amongst others, the evaluation of the design and testing the operating effectiveness of key controls over the settlement of claims, the calculation of the outstanding claims incurred but not yet reported ('IBNR'), the technical provision for outstanding claims reported ('OSLR') and Unearned Premium reserve ('UPR'). We also involved our own actuarial specialists in performing the audit procedures in this area, which included, among others, analysis of the appropriateness of assumptions used in the valuation of the insurance contract liabilities by reference to the Company's data and expectations. In addition, we performed analytical review procedures over the average cost per claim, incurred loss ratios, the claims reserve and the UPR and assessed whether the movements are in line with our understanding of the developments in the business.

Furthermore, we analyzed the Company's LAT results which was a key test performed in respect of the adequacy assessment of the insurance contract liabilities. Our analysis of the Company's LAT focused on assessing the reasonableness and relevance of the projected cash flows as well as of the key assumptions used based on Company's and industry experience data, expected market developments and trends. In addition, we assessed the completeness and adequacy of the disclosures in note 13 and whether the disclosures were in compliance with the requirements of IFRS.



INDEPENDENT AUDITOR'S REPORT

to the Shareholders of RCI Insurance Limited – continued

Report on the audit of the separate financial statements - continued

Other information

The directors are responsible for the other information. The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon other than our reporting on other legal and regulatory requirements.

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

Responsibilities of the Directors and those charged with governance for the financial statements

The directors are responsible for the preparation and fair presentation of the financial statements in accordance with IFRS and the requirements of the Companies Act and the Insurance Business Act and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are 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 the directors either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

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

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's 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.



INDEPENDENT AUDITOR'S REPORT

to the Shareholders of RCI Insurance Limited – continued

Report on the audit of the separate financial statements - continued

Auditor's responsibilities for the audit of the financial statements – continued

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 financial statements.

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

- identify and assess the risks of material misstatement of the 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 internal control.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Directors.
- conclude on the appropriateness of the Directors' 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 ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the 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 auditor's 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 financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves 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.



INDEPENDENT AUDITOR'S REPORT

to the Shareholders of RCI Insurance Limited – continued

Report on the audit of the separate financial statements

Auditor's responsibilities for the audit of the financial statements – continued

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's 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.

Matters on which we are required to report by the Companies Act

Directors' report

We are required to express an opinion as to whether the directors' report has been prepared in accordance with the applicable legal requirements. In our opinion the directors' report has been prepared in accordance with the Companies Act.

In addition, in the light of the knowledge and understanding of the Company and its environment obtained in the course of the audit, we are required to report if we have identified material misstatements in the Directors' report. We have nothing to report in this regard.

Other requirements

We also have responsibilities under the Companies Act to report if in our opinion:

- proper accounting records have not been kept,
- the financial statements are not in agreement with the accounting records,
- we have not received all the information and explanations we require for our audit.

We have nothing to report to you in respect of these responsibilities.

Appointment

We were appointed as the statutory auditor of the Company by the Board of Directors on 2 November 2009. The total uninterrupted engagement period as statutory auditor, including previous renewals and reappointments amounts to 10 years.

Consistency with the additional report to those charged with governance

Our audit opinion on the financial statements expressed herein is consistent with the additional report to those charged with governance of the Company, which was issued on the same date as this report (or any earlier date).



INDEPENDENT AUDITOR'S REPORT
to the Shareholders of RCI Insurance Limited – continued

Matters on which we are required to report by the Companies Act - continued

Non-audit services

No prohibited non-audit services referred to in Article 18A(1) of the Accountancy Profession Act, Cap. 281 of the Laws of Malta were provided by US to the Company and we remain independent of the Company as described in the Basis for opinion section of our report.

No other services besides statutory audit services and services disclosed in the annual report and in the financial statements, were provided by US to the Company and its controlled undertakings.

A handwritten signature in blue ink, appearing to read 'Shawn Falzon', is written over a horizontal line.

*The partner in charge of the audit resulting in this independent auditor's report is
Shawn Falzon for and on behalf of*

Ernst & Young Malta Limited
Certified Public Accountants

20 April 2020

Income Statement – Technical Account - general business

for the year ended 31 December 2019

	Notes	2019 €	2018 €
Earned premiums, net of reinsurance			
Gross premiums written		183,085,574	163,261,008
Premiums ceded to reinsurer		(33,940,110)	(36,999,694)
Net premiums written		149,145,464	126,261,314
Change in the gross provision for unearned premiums		(4,976,500)	(6,353,278)
Change in the provision for unearned premiums, reinsurer's share		(5,400,737)	91,497
		(10,377,237)	(6,261,781)
Earned premiums, net of reinsurance		138,768,227	119,999,533
Allocated investment return transferred from the non-technical account	3	190,527	11,808
Total technical income		138,958,754	120,011,341
Claims incurred, net of reinsurance			
Claims paid			
- gross amount	13	13,680,733	12,830,252
- reinsurer's share	13	(3,313,657)	(3,409,180)
		10,367,076	9,421,072
Change in the provision for claims			
- gross amount		2,781,854	2,239,664
- reinsurer's share		(277,130)	(1,059,918)
		2,504,724	1,179,746
Claims incurred, net of reinsurance		12,871,800	10,600,818
Net operating expenses	4	22,087,392	17,996,751
Total technical charges		34,959,192	28,597,569
Balance on the technical account for general business (page 10)		103,999,562	91,413,772

The accounting policies and explanatory notes on pages 15 to 50 form an integral part of the financial statements.

Income Statement – Non Technical Account

for the year ended 31 December 2019

	Notes	2019 €	2018 €
Balance on the technical account for general business (page 9)		103,999,562	91,413,772
Investment income	3	1,451,124	1,352,626
Investment expenses and charges	3	(914,358)	(1,319,461)
Allocated investment return transferred to the technical account	3	(190,527)	(11,808)
Administration expenses	4,5	(2,409,144)	(2,204,076)
Profit before tax		101,936,657	89,231,053
Income tax expense	7	(35,677,830)	(31,233,785)
Profit for the financial year attributable to ordinary shareholders (page 11)		66,258,827	57,997,268

The accounting policies and explanatory notes on pages 15 to 50 form an integral part of the financial statements.

Statement of Comprehensive Income

for the year ended 31 December 2019

	Notes	2019 €	2018 €
Profit for the financial year (page 10)		66,258,827	57,997,268
Other Comprehensive Income to be reclassified to profit or loss in subsequent period:			
Net profit/loss on available-for-sale financial assets	11, 18	345,528	57,201
Income tax relating to components of Other Comprehensive Income	12	(120,935)	(20,020)
Other Comprehensive Profit/Loss for the year		224,593	37,181
Total Comprehensive Income for the year attributable to ordinary shareholders		66,483,420	58,034,449

The accounting policies and explanatory notes on pages 15 to 50 form an integral part of the financial statements.

Statement of Changes in Equity

for the year ended 31 December 2019

	Share capital €	Capital Contribution	Retained earnings €	Other reserve €	Total equity €
At 1 January 2018	4,000,000	-	63,962,176	137,995	68,100,171
Profit for the year	-	-	57,997,268	-	57,997,268
Other comprehensive Income	-	-	-	37,181	37,181
Total comprehensive income	-	-	57,997,268	37,181	58,034,449
Capital Contribution	-	2,282,000	-	-	2,282,000
Dividend paid	-	-	(47,849,428)	-	(47,849,428)
At 31 December 2018	4,000,000	2,282,000	74,110,016	175,176	80,567,192

	Share capital €	Capital Contribution	Retained earnings €	Other reserve €	Total equity €
At 1 January 2019	4,000,000	2,282,000	74,110,016	175,176	80,567,192
Profit for the year	-	-	66,258,827	-	66,258,827
Other comprehensive Income	-	-	-	224,593	224,593
Total comprehensive income	-	-	66,258,827	224,593	66,483,420
Capital Contribution	-	24,402,931	-	-	24,402,931
Dividend paid	-	-	(57,997,268)	-	(57,997,268)
At 31 December 2019	4,000,000	26,684,931	82,371,575	399,769	113,456,275

The accounting policies and explanatory notes on pages 15 to 50 form an integral part of the financial statements.

Statement of Financial Position

as at 31 December 2019

	Notes	2019 €	2018 €
ASSETS			
Intangible asset	8	-	-
Equipment	9	50,372	25,694
Deferred acquisition costs	14	59,242,128	54,293,854
Loans and receivables	10	87,500,000	61,500,000
Available-for-sale financial assets	11	81,969,798	65,849,596
Deferred tax asset	12	64,715	80,076
Reinsurer's share of technical provisions	13	51,298,020	56,421,627
Insurance and other receivables	15	36,647,489	28,321,797
Cash and cash equivalents	16	47,949,570	54,617,829
Total assets		364,722,092	321,110,473
EQUITY			
Capital and reserves attributable to shareholders			
Share capital	17	4,000,000	4,000,000
Capital Contribution		26,684,931	2,282,000
Other reserve	18	399,769	175,176
Retained earnings		82,371,575	74,110,016
Total equity		113,456,275	80,567,192
LIABILITIES			
Technical provisions	13	152,234,751	144,476,397
Deferred revenue		19,057,210	20,485,900
Deferred tax liability	12	215,402	94,467
Insurance and other payables	19	44,095,768	44,171,906
Income tax payable		35,662,686	31,314,611
Total liabilities		251,265,817	240,543,281
Total equity and liabilities		364,722,092	321,110,473

The accounting policies and explanatory notes on pages 15 to 50 form an integral part of the financial statements.

The financial statements on pages 9 to 46 were authorized for issue by the Board on 20 April 2020 and were signed on its behalf by



Bastien Paret
Director



Jean-Louis Labauge
Director

Statement of Cash Flows

for the year ended 31 December 2019

	Notes	2019 €	2018 €
Operating activities			
Cash generated from operating activities	22	99,651,498	94,244,880
Interest received		1,310,669	1,415,870
Taxation paid		(31,314,395)	(25,762,061)
Net cash generated from operating activities		69,647,772	69,898,689
Investing activities			
Purchase of fixed assets	9	(41,686)	(7,126)
Purchase of financial investments		(70,080,008)	(34,467,978)
Redemption of financial investments on maturity		27,400,000	23,640,000
Net cash used in investing activities		(42,721,694)	(10,835,104)
Financing activities			
Dividends paid	25	(57,997,268)	(47,849,428)
Capital Contribution		24,402,931	2,282,000
Net cash used in financing activities		(33,594,337)	(45,567,428)
Net movement in cash and cash equivalents		(6,668,259)	13,496,157
Cash and cash equivalents at beginning of year		54,617,829	41,121,672
Cash and cash equivalents at end of year	16	47,949,570	54,617,829

The accounting policies and explanatory notes on pages 15 to 50 form an integral part of the financial statements.

Notes to the Financial Statements

1. Corporate information

RCI Insurance Limited is a limited liability company incorporated and domiciled in Malta. The Company's principal activity is that of carrying on business of insurance and reinsurance falling within Classes 1, 2 and 16 of the Insurance Business Act, Cap.403 of the Laws of Malta.

The registered office of the Company is Level 3, Mercury Tower, The Exchange Financial and Business Centre, Triq Elia Zammit, St.Julians, Malta. The financial statements of RCI Insurance Limited for the year ended 31 December 2019 were authorised for issue in accordance with a resolution of the Directors on 20 April 2020.

RCI Insurance Limited is a wholly owned subsidiary of RCI Services Limited which is registered at Level 3, Mercury Tower, The Exchange Financial and Business Centre, Triq Elia Zammit, St.Julians, Malta. The ultimate parent company of RCI Insurance Limited is Renault S.A. which is registered at 13, Quai Alphonse Le Gallo, Boulogne Billancourt, Hauts De Seine, France 92100.

2.1 Basis of preparation

The financial statements have been prepared on a historic cost basis except for available-for-sale investments that have been measured at fair value.

These financial statements have been prepared on a going concern basis, which assumes that the Company will continue in existence for the foreseeable future. As explained in Note 26, the Directors do not anticipate a material impact on the going concern status of the Company stemming from the COVID-19 pandemic.

Statement of compliance

The financial statements of the Company have been prepared in accordance with International Financial Reporting Standards ("IFRSs") as adopted by the European Union, the Insurance Business Act and the Maltese Companies Act, Cap 403 and 386 of the Laws of Malta respectively.

The Company presents its Statement of Financial Position broadly in order of liquidity. An analysis regarding recovery or settlement within twelve months after the reporting date (current) and more than 12 months after the reporting date (non-current) is presented within the notes to the financial statements.

Financial assets and financial liabilities are offset and the net amount is reported in the Statement of Financial Position only when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or to realise the assets and settle the liability simultaneously. Income and expenses will not be offset in the Income Statement unless required or permitted by any accounting standard or interpretation, as specifically disclosed in the accounting policies of the Company.

2.2 Standards, interpretations and amendments to published standards as endorsed by the European Union effective in the current year

The accounting policies are consistent with those of the previous financial year.

Several other new standards, amendments and interpretations to existing standards, apply for the first time in 2019, whose adoption to the requirements of IFRSs as adopted by the EU did not result in substantial changes to the Company's accounting policies and did not impact the financial statements.

IFRS 9 Financial Instruments

Classification and measurement

The classification and measurement of financial assets will depend on how these are managed (the entity's business model) and their contractual cash flow characteristics. If a financial assets is held within a business model other than 'hold to collect' or 'hold to collect and sell' then the financial asset is required to be measured at fair value through profit or loss (FVTPL) without further analysis.

2.2 Standards, interpretations and amendments to published standards as endorsed by the European Union effective in the current year – continued

IFRS 9 Financial Instruments – continued

Classification and measurement - continued

For those financial assets where the contractual cash flows arising on specified dates are solely payments of principal and interest (SPPI) on the principal amount outstanding, classification at amortised cost or fair value through other comprehensive income (FVOCI) will depend on whether the business model is to hold financial assets for the collection of contractual cash flows or whether the objective of the business model is achieved by both collection of contractual cash flows and selling financial assets. If an instrument contains contractual cash flows which do not represent solely payments of principal and interest, then the classification to be used is FVTPL even it is held in a business model that is either hold to collect or hold to collect and sell.

The company's business model is determined by key management personnel and reflects the strategic purpose and intention for the portfolio and how the performance of the portfolio is assessed. Since the business model is set at portfolio level, the classification assessment for this criterion is accordingly performed at that level. Because the key distinction between the two business models identified in IFRS 9 is whether or not 'sales' are intrinsic to achieving the desired objectives, it is important to identify what is meant by 'sales'. For the purposes of the business model assessment, these are transfers which would result in derecognition.

For those assets where the intention of the business model is to hold the financial assets to collect the contractual cash flows or to hold to collect and to sell, the company assesses whether the cash flow characteristics of these assets meet the SPPI requirements of IFRS 9. 'Principal' is the fair value of the financial asset at initial recognition. It is not the amount that is due under the contractual terms of an instrument. 'Interest' is the compensation for the time value of money and credit risk of a basic lending-type return. A basic lending-type return could also include consideration for other basic lending risks (for example, liquidity risk) and consideration for costs associated with holding the financial asset for a particular period of time (for example, servicing or administrative costs) and/or a profit margin.

Unlike the business model assessment, the SPPI assessment is performed for each individual product or portfolio of products. The following considerations are made when assessing consistency with SPPI:

- variable interest rates and modified relationships with the time value of money;
- leverage, being a contractual cash flow characteristic of some financial assets that increases the variability of the contractual cash flows with the result that they do not have economic characteristics of interest;
- contractual terms that allow the issuer to prepay (or the holder to put a debt instrument back to the issuer) before maturity and the prepayment amount substantially represents unpaid amounts of principal and interest, which may include reasonable compensation for early termination of the contract;
- contractual terms that allow the issuer or holder to extend the contractual term and the terms of the extension option result in contractual cash flows during the extension period that are solely payments of principal and interest, which may include reasonable compensation for the extension of the contract;
- contractual cash flows may be caused by an underlying contingent event (a trigger) such as contractual term resetting interest to a higher amount in the event of a missed payment; and
- contractual changes in interest rates.

More specifically, from the assessment that the company conducted, the following classification and measurement matters have been determined:

- term deposits with banks that are classified as loans and receivables under IAS 39 will be measured at amortised cost under IFRS 9;
- debt securities classified as available-for-sale financial assets under IAS 39 will be classified at FVOCI under IFRS 9 given that the objective of the business model is achieved by both the collection of contractual cash flows and selling of the financial assets.

There is no financial impact arising out of these changed classifications as the accounting measurements are principally the same as under IAS 39.

2.2 Standards, interpretations and amendments to published standards as endorsed by the European Union effective in the current year - continued

IFRS 9 Financial Instruments – continued

Impairment

The impairment requirements apply to financial assets measured at amortised cost and FVOCI, and certain loan commitments and financial guarantee contracts. At initial recognition, an impairment allowance (or provision in the case of commitments and guarantees) is required for expected credit losses (ECL) resulting from default events that are possible within the next 12 months (12-month ECL).

In the event of a significant increase in credit risk, an allowance (or provision) is required for ECL resulting from all possible default events over the expected life of the financial instrument (lifetime ECL). Financial assets where 12-month ECL is recognised are considered to be 'stage 1'; financial assets which are considered to have experienced a significant increase in credit risk would be classified as 'stage 2'; and financial assets for which there is objective evidence of impairment, and which considered to be in default or otherwise credit impaired, would be classified as 'stage 3'.

Significant increase in credit risk (SICR)

The general principle of IFRS 9 ECL accounting requires that the credit risk of financial instruments within the scope of impairment to be assessed for significant increase since initial recognition at each balance sheet date. If there is a significant increase in credit risk, the financial instruments are transferred into Stage 2 and lifetime ECL is recognised. The principle of SICR can be achieved by performing an assessment to compare the risk of default occurring at the reporting date with the risk of default occurring at the date of initial recognition.

The exposures are managed on an individual basis for credit purposes by the treasury department who have access to the issuer's financial information and credit rating.

Based on the credit rating of the issues, Probabilities of Default (PDs) are applied for IFRS 9 purposes. Each credit rating is associated with an external credit default swap (CDS) curve which represent the average of issuer-weighted historical default rates.

Definition of default

IFRS 9 requires an assessment of the extent of increase in credit risk of a financial instrument since initial recognition. This assessment is performed by considering the change in the risk of default occurring over the remaining life of the financial instrument. As a result, the definition of default is important.

IFRS 9 does not specifically define default, but requires it to be applied on a consistent basis with internal credit risk management practice for the relevant instruments and requires consideration of qualitative factors where appropriate. In addition, IFRS 9 also introduces a rebuttable presumption that default does not occur later than when a financial asset is 90 days past due unless there is reasonable and supportable information to demonstrate that a more lagging criterion is more appropriate.

In this respect, the company determines that a financial instrument is credit-impaired and in Stage 3 by considering relevant objective evidence, primarily whether:

- contractual payments of either principal or interest are past due for more than 30 days; and
- there are other indications that the counterparty is unlikely to pay such as that a concession has been granted to the counterparty for economic or legal reasons relating to the counterparty's financial condition.

Therefore, the definitions of credit-impaired and default are aligned as far as possible so that Stage 3 represents all debt securities which are considered defaulted or otherwise credit-impaired.

Expected credit loss

In general, the company calculates ECL using three main components: PD, loss given default (LGD), and exposure at default (EAD). The company calculates the ECL for the debt securities portfolio at an instrument level.

2.2 Standards, interpretations and amendments to published standards as endorsed by the European Union effective in the current year - continued

IFRS 9 Financial Instruments – continued

Impairment - continued

The 12-month ECL is calculated by multiplying the 12-month PD, LGD, and EAD. Lifetime ECL is calculated on a similar basis for the residual life of the exposure. The 12-month and lifetime PDs represent the probability of default occurring over the next 12 months and the remaining maturity of the instrument, respectively.

The LGD represents expected losses on the EAD given the event of default. The LGD applied for subordinated debt has been set at 80%, whereas the LGD for senior debt has been set at 60%.

The EAD represents the expected balance at default, taking into account the repayment of principal and interest from the balance sheet date to the default event together with any expected drawdowns of committed facilities.

The ECL is measured from the initial recognition of the financial asset. The maximum period considered when measuring ECL (be it 12-month or lifetime ECL) is the maximum contractual period over which the company is exposed to credit risk.

Presentation of ECL in statement of financial position (SOFP)

For financial assets measured at fair value through other comprehensive income, the loss allowance is presented within other comprehensive income and not against the carrying amount of the assets. The carrying amount of the asset is always the fair value.

Transition

The classification and measurement and impairment requirements are applied retrospectively by adjusting the opening balance sheet at the date of initial application, with no requirement to restate comparative periods. The mandatory application date for the standard as a whole is 1 January 2018. The company has not restated its comparative periods. Accordingly, all adjustments resulting from the transition apply by adjusting the opening balance sheet as at 1 January 2018.

Disclosures

IFRS 9 requires extensive disclosures both on a quarterly and on an annual basis. For this reason, the company which is part of the RCI Banque Group adopts a globally consistent production process providing these disclosures which the company will make use of.

Standards issued but not yet effective and not early adopted

Certain new standards, amendments and interpretations to existing standards have been published by the date of authorisation for issue of these financial statements but are mandatory for the Company's accounting periods beginning after 1 January 2018. The Company has not early adopted these revisions to the requirements of IFRSs as adopted by the EU and the Company's Directors are of the opinion that, with the exception of the below pronouncements, there are no requirements that will have a possible significant impact on the Company's financial statements in the period of initial application.

Standards, interpretations and amendments to published standards not yet effective

IFRS 17 Insurance Contracts

In May 2017, the IASB issued IFRS 17 Insurance Contracts (IFRS 17), a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. Once effective, IFRS 17 will replace IFRS 4 Insurance Contracts (IFRS 4) that was issued in 2005. IFRS 17 applies to all types of insurance contracts (i.e., life, non-life, direct insurance and re-insurance), regardless of the type of entities that issue them, as well as to certain guarantees and financial instruments with discretionary participation features. A few scope exceptions will apply. The overall objective of IFRS 17 is to provide an accounting model for insurance contracts that is more

2.2 Standards, interpretations and amendments to published standards as endorsed by the European Union effective in the current year - continued

Standards, interpretations and amendments to published standards not yet effective – continued

IFRS 17 Insurance Contracts - continued

useful and consistent for insurers. In contrast to the requirements in IFRS 4, which are largely based on grandfathering previous local accounting policies, IFRS 17 provides a comprehensive model for insurance contracts, covering all relevant accounting aspects. The core of IFRS 17 is the general model, supplemented by:

- A specific adaptation for contracts with direct participation features (the variable fee approach)
- A simplified approach (the premium allocation approach) mainly for short-duration contracts

IFRS 17 is effective for reporting periods beginning on or after 1 January 2023, with comparative figures required. Early application is permitted, provided the entity also applies IFRS 9 and IFRS 15 on or before the date it first applies IFRS 17. This standard is not applicable to the Group.

2.3 Significant accounting judgments, estimates and assumptions

The preparation of the Company's financial statements requires management to make judgments, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities and the disclosure of contingent liabilities, at the reporting date. However, uncertainty about these assumptions and estimates could result in outcomes that could require a material adjustment to the carrying amount of the asset or liability affected in the future.

Judgments

In the process of applying the Company's accounting policies, management has made the following judgments apart from those involving estimations and assumptions, which have a significant effect on the amounts recognized in the financial statements.

Estimates and assumptions

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are discussed below.

Valuation of insurance contract liabilities

Ultimate liability arising from claims made under insurance contracts

There are several sources of uncertainty that need to be considered in the estimate of the liability that the Company will ultimately pay for claims.

Estimates have to be made both for the expected ultimate cost of claims reported at the reporting date and for the expected ultimate cost of claims incurred but not yet reported at the reporting date (IBNR). Given the nature of the business of the Company, the ultimate cost of outstanding claims is based on a case-by-case estimate supplemented with additional provisions for IBNR.

The carrying value at the reporting date of insurance contract liabilities gross of reinsurance is €26,247,564 (2018: €23,465,905).

2.4 Summary of significant accounting policies

(a) Product classification

Insurance and reinsurance contracts are those contracts in which the Company (the “insurer”) has accepted significant insurance risk from another party (the “contract holder”) by agreeing to compensate the contract holder if a specified uncertain future event (the “insured event”) adversely affects the contract holder. As a general guideline, the Company defines significant insurance risk as the possibility of having to compensate the contract holder if a specified uncertain future event (the “insured event”) adversely affects the contract holder. The Company issues contracts that transfer significant insurance risk and has defined all its contracts as insurance/reinsurance contracts.

Insurance business contracts

The results for insurance business contracts are determined on an annual basis whereby the incurred cost of claims, commission and related expenses are charged against the earned proportion of premiums, net of reinsurance as follows:

- 1) Premiums written relate to business incepted during the year, less cancellations.
- 2) Unearned premiums represent the proportion of premiums written in the year that relate to unexpired terms of policies in force at the reporting date, calculated on a time apportionment basis.
- 3) Commissions and other acquisition costs that vary with and are related to securing new contracts are deferred over the year in which the related premiums are earned. These are capitalized and shown as deferred acquisition costs (“DAC”) in the Statement of Financial Position. DAC is amortised over the term of the policies as the premium is earned. All other costs are recognized as expenses when incurred.
- 4) Claims incurred comprise claims and related expenses paid in the year and changes in the provisions for outstanding claims, including provisions for claims incurred but not reported (IBNR) and related expenses.
- 5) Provision is made at the reporting date for the estimated cost of claims incurred but not settled at the reporting date, including the cost of claims incurred but not yet reported to the Company. The estimated cost of claims includes expenses to be incurred in settling claims. The Company takes all reasonable steps to ensure that it has appropriate information regarding its claims exposures. The Company does not discount its liabilities for unpaid claims. Liabilities for unpaid claims are estimated using the input of assessments for individual cases reported to the Company and statistical analysis for the claims incurred but not reported.
- 6) Provision in the form of an unexpired risk provision, is made on the basis of claims and administrative expenses likely to arise after the end of the financial year from contracts concluded before the reporting date, in so far as the estimated value exceeds the provision for unearned premiums and any premiums receivable under those contracts.

Reinsurance acceptance contracts

The results for reinsurance contracts are determined on an annual basis whereby, the incurred cost of claims, commission and related expenses are charged against premiums written as follows:

- 1) Premiums written relates to notified business ceded during the year. In addition, due to delayed reporting from the cedant, the Company makes assumptions for business written during those months where notification has not been received. The assumption takes into consideration the original premium estimated to be ceded as per the treaty and assesses whether notifications to date are in line with original estimates.
- 2) Unearned premiums represent the proportion of premiums written in the year that relate to unexpired terms of policies in force at the reporting date, calculated on a time apportionment basis.
- 3) Commissions and other acquisition costs that vary with and are related to securing new contracts are deferred over the year in which the related premiums are earned. These are capitalized and shown as deferred acquisition costs (“DAC”) in the Statement of Financial Position. DAC is amortised over the term of the policies as the premium is earned. All other costs are recognized as expenses when incurred.

2.4 Summary of significant accounting policies- continued

(a) Product classification- continued

- 4) Claims incurred comprise claims and related expenses paid in the year and changes in the provisions for outstanding claims, including provisions for claims incurred but not reported (IBNR) and related expenses.
- 5) Provision is made at the reporting date for the estimated cost of claims incurred but not settled at the reporting date, including the cost of claims incurred but not yet reported to the Company. The estimated cost of claims includes expenses to be incurred in settling claims. The Company takes all reasonable steps to ensure that it has appropriate information regarding its claims exposures. The Company does not discount its liabilities for unpaid claims. Liabilities for unpaid claims are estimated using the input of assessments for individual cases reported to the Company and statistical analysis for the claims incurred but not reported.

Reinsurance contracts held

Contracts entered into by the Company with reinsurers under which the Company is compensated for losses on one or more contracts issued by the Company and that meet the classification requirements for insurance contracts are classified as reinsurance contracts held.

The benefits to which the Company is entitled under its reinsurance contracts held are recognized as reinsurance assets. These assets consist of short-term balances due from reinsurers (classified within insurance and other receivables), as well as longer term receivables (classified within reinsurers' share of technical provisions) that are dependent on the expected claims and benefits arising under the related reinsured insurance contracts.

Amounts recoverable from or due to reinsurers are measured consistently with the amounts associated with the reinsured insurance contracts and in accordance with the terms of each reinsurance contract. Reinsurance liabilities are primarily premiums payable for reinsurance contracts and are recognized as an expense when due.

The Company assesses its reinsurance assets for impairment on a regular basis. If there is objective evidence that the reinsurance asset is impaired, the Company reduces the carrying amount of the reinsurance asset to its recoverable amount and recognizes that impairment loss in the Income Statement. The Company gathers the objective evidence that a reinsurance asset is impaired using the same process adopted for financial assets held at amortised cost. The impairment loss is also calculated following the same method used for these financial assets.

Receivables and payables related to insurance and reinsurance acceptance contracts

Receivables and payables are recognized when due. These include amounts due to and from intermediaries.

If there is objective evidence that an insurance receivable is impaired, the Company reduces the carrying amount of the insurance receivable accordingly and recognizes that impairment loss in the Income Statement. The Company gathers the objective evidence that an insurance receivable is impaired using the same process adopted for financial assets held at amortised cost.

The impairment loss is calculated following the same method used for these financial assets.

Liability adequacy test

At each reporting date, liability adequacy tests are performed to ensure the adequacy of the contract liabilities net of related DAC assets. In performing these tests, current best estimates of future contractual cash flows as well as claims handling and administration expenses are used. Any deficiency is immediately charged to profit or loss initially by writing off DAC and by subsequently establishing a provision for losses arising from liability adequacy tests (the unexpired risk provision as described above). Any DAC written off as a result of this test cannot subsequently be reinstated.

2.4 Summary of significant accounting policies- continued

(b) Intangible assets

Intangible assets acquired separately are measured on initial recognition at cost. Following initial recognition, intangible assets are carried at cost less any accumulated amortisation and any accumulated impairment losses. The useful lives of intangible assets are assessed to be finite.

Intangible assets with finite lives are amortised over the useful economic life and assessed for impairment whenever there is an indication that the intangible asset may be impaired. The amortisation year and the amortisation method for an intangible asset with a finite useful life are reviewed at least at each financial year end. Changes in the expected useful life or the expected pattern of consumption of future economic benefits embodied in the asset is accounted for by changing the amortisation year or method, as appropriate, and are treated as changes in accounting estimates. The amortisation expense on intangible assets with finite lives is recognised in the Income Statement in the expense category consistent with the intangible asset.

Gains or losses arising from derecognition of an intangible asset are measured as the difference between the net disposal proceeds and the carrying amount of the asset and are recognized in the Income Statement when the asset is derecognized.

(c) Taxes

Current income tax

Current income tax assets and liabilities for the current year are measured at the amount expected to be recovered from or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted at the reporting date.

Current income tax relating to items recognised directly in equity is recognised in equity and not in the Income Statement.

Deferred income tax

Deferred income tax is provided using the liability method on temporary differences at the reporting date between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes.

Deferred income tax liabilities are recognised for all taxable temporary differences, except:

- When the deferred income tax liability arises from the initial recognition of goodwill or of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, affects neither the accounting profit nor taxable profit or loss; and
- In respect of taxable temporary differences associated with investments in subsidiaries, associates and interests in joint ventures, when the timing of the reversal of the temporary differences can be controlled and it is probable that the temporary differences will not reverse in the foreseeable future.

Deferred income tax assets are recognised for all deductible temporary differences, carry forward of unused tax credits and unused tax losses, to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilized.

The carrying amount of deferred income tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred income tax asset to be utilised. Unrecognised deferred income tax assets are reassessed at each reporting date and are recognised to the extent that it has become probable that future taxable profit will allow the deferred tax asset to be recovered.

Deferred income tax assets and liabilities are measured at the tax rates that are expected to apply to the year when the asset is realised or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted at the reporting date.

Deferred income tax relating to items recognised directly in Other Comprehensive Income or equity is recognised in Other Comprehensive Income or equity and not in the Income Statement.

2.4 Summary of significant accounting policies- continued

(c) Taxes - continued

Deferred income tax – continued

Deferred income tax assets and deferred income tax liabilities are offset, if a legally enforceable right exists to set off current tax assets against current income tax liabilities and the deferred income taxes relate to the same taxable entity and the same taxation authority.

(d) Financial assets

Initial recognition and subsequent measurement

The Company classifies its financial assets into loans and receivables and available-for-sale financial assets. The classification is dependent on the purpose for which the investments are acquired. The Company determines the classification of its financial assets at initial recognition.

The Company evaluated its available-for-sale financial assets whether the ability and intention to sell them in the near term is still appropriate. All “regular way” purchases and sales of financial assets are recognized at the trade date, that is, the date that the Company commits to purchase or sell the asset. Regular way purchases or sales are purchases or sales of financial assets that require delivery of assets within the time frame generally established by regulation or convention in the market place.

Financial assets are recognised initially at fair value plus, in the case of investments not at fair value through profit or loss, directly attributable transaction costs. The Company’s financial assets include cash and short-term deposits, trade and other receivables, loan and other receivables and quoted financial instruments.

Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. These investments are initially recognised at cost, being the fair value of the consideration paid for the acquisition of the investment. All transaction costs directly attributable to the acquisition are also included in the cost of the investment. After initial measurement, loans and receivables are measured at amortised cost, using the effective interest rate method. Gains and losses are recognised in the Income Statement when the investments are derecognised or impaired, as well as through the amortisation process.

Available-for-sale financial assets

Available-for-sale financial assets are non-derivative financial assets that are designated as available-for-sale. These investments are initially recorded at fair value. After initial measurement, available-for-sale financial assets are measured at fair value. Fair value gains and losses are reported as a separate component in Other Comprehensive Income until the investment is derecognised or the investment is determined to be impaired. On derecognition or impairment, the cumulative fair value gains and losses previously reported in equity are transferred to the Income Statement.

(e) Fair value of financial instruments

The fair value of financial instruments that are actively traded in organised financial markets is determined by reference to quoted market bid prices for assets and offer prices for liabilities, at the close of business on the reporting date, without any deduction for transaction costs.

The fair value of floating rate and overnight deposits with credit institutions is their carrying value. The carrying value is the cost of the deposit and accrued interest.

If the fair value cannot be measured reliably, these financial instruments are measured at cost, being the fair value of the consideration paid for the acquisition of the investment or the amount received on issuing the financial liability. All transaction costs directly attributable to the acquisition are also included in the cost of the investment.

An analysis of fair values of financial instruments and further details as to how they are measured are provided in Note 11.

2.4 Summary of significant accounting policies- continued

(f) Impairment of financial assets

The Company assesses at each reporting date whether a financial asset or group of financial assets is impaired.

Assets carried at amortised cost

If there is objective evidence that an impairment loss on assets carried at amortised cost has been incurred, the amount of the impairment loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows (excluding future expected credit losses that have not been incurred) discounted at the financial asset's original effective interest rate. The carrying amount of the asset is reduced and the loss is recorded in the Income Statement.

(f) Impairment of financial assets- continued

The Company first assesses whether objective evidence of impairment exists individually for financial assets that are individually significant, and individually or collectively for financial assets that are not individually significant. If it is determined that no objective evidence of impairment exists for an individually assessed financial asset, whether significant or not, the asset is included in a group of financial assets with similar credit risk characteristics and that group of financial assets is collectively assessed for impairment. Assets that are individually assessed for impairment and for which an impairment loss is, or continues to be, recognised are not included in a collective assessment of impairment. The impairment assessment is performed at each reporting date.

Assets carried at amortised cost- continued

If, in a subsequent year, the amount of the impairment loss decreases and that decrease can be related objectively to an event occurring after the impairment was recognised, the previously recognised impairment loss is reversed. Any subsequent reversal of an impairment loss is recognised in the Income Statement, to the extent that the carrying value of the asset does not exceed its amortised cost at the reversal date.

Available-for-sale financial assets

If an available-for-sale financial asset is impaired, an amount comprising the difference between its cost (net of any principal repayment and amortisation) and its current fair value, less any impairment loss previously recognised in Other Comprehensive Income, is transferred from equity to the Income Statement. Reversals in respect of equity instruments classified as available-for-sale are not recognised in the Income Statement.

Reversals of impairment losses on debt instruments classified at available-for-sale are reversed through the Income Statement if the increase in the fair value of the instruments can be objectively related to an event occurring after the impairment losses were recognised in the Income Statement.

(g) Derecognition of financial assets

A financial asset (or, when applicable, a part of a financial asset or part of a group of similar financial assets) is derecognised when:

- The rights to receive cash flows from the asset have expired;
- The Company retains the right to receive cash flows from the asset, but has assumed an obligation to pay them in full without material delay to a third party under a 'pass-through' arrangement; and
- The Company has transferred its rights to receive cash flows from the asset and either:
 - has transferred substantially all the risks and rewards of the asset, or
 - has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

When the Company has transferred its right to receive cash flows from an asset and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognised to the extent of the Company's continuing involvement in the asset. Continuing involvement that takes the form of a guarantee over the transferred asset is measured at the lower of the original carrying amount of the asset and the maximum amount of consideration that the Company could be required to repay.

When continuing involvement takes the form of a written and/or purchased option (including a cash settled option or similar provision) on the transferred asset, the extent of the Company's continuing involvement is the amount of the transferred asset that the Company may repurchase, except that, in the case of a written put option (including a cash settled option or similar provision) on an asset measured at fair value, the extent of the Company's continuing involvement is limited to the lower of the fair value of the transferred asset and the option exercise price.

2.4 Summary of significant accounting policies- continued

(h) Impairment of non-financial assets

The Company assesses at each reporting date whether there is an indication that an asset may be impaired. If any such indication exists, or when annual impairment testing for an asset is required, the Company estimates the asset's recoverable amount. An asset's recoverable amount is the higher of an asset's or cash-generating unit's fair value less costs to sell and its value in use. The recoverable amount is determined for an individual asset, unless the asset does not generate cash inflows that are largely independent of those from other assets or groups of assets.

For assets excluding goodwill, an assessment is made at each reporting date as to whether there is any indication that previously recognised impairment losses may no longer exist or may have decreased. If such indication exists, the Company makes an estimate of the recoverable amount. A previous impairment loss is reversed only if there has been a change in the estimates used to determine the asset's recoverable amount since the last impairment loss was recognised. If that is the case, the carrying amount of the asset is increased to its recoverable amount.

That increased amount cannot exceed the carrying amount that would have been determined, net of depreciation, had no impairment loss been recognised for the asset in prior years. Such reversal is recognised in the Income Statement unless the asset is carried at revalued amount, in which case the reversal is treated as a revaluation increase.

(i) Equipment

Equipment is stated at cost, excluding the costs of day to day servicing, less accumulated depreciation and accumulated impairment losses. Replacement costs are capitalised when incurred and if it is probable that future economic benefits associated with the item will flow to the entity and the cost of the item can be measured reliably.

Depreciation is provided on a straight line basis over the useful lives of the following classes of assets:

- Computer and electronic equipment: 4 years
- Furniture, fixture and fittings: 8 years
- Electrical and plumbing installations: 6 years

The assets' residual values and useful lives are reviewed and adjusted if appropriate at each financial year end.

Impairment reviews are performed when there are indicators that the carrying value may not be recoverable. Impairment losses are recognised in the Income Statement as an expense.

Equipment is derecognised upon disposal or when no further future economic benefits are expected from its use or disposal. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in the Income Statement in the year the asset is derecognised.

(j) Reinsurance Ceded

The Company cedes insurance risk in the normal course of business for all of its businesses. Reinsurance assets represent balances due from reinsurance companies. Amounts recoverable from reinsurers are estimated in a manner consistent with the outstanding claims provision or settled claims associated with the reinsurer's policies and are in accordance with the related reinsurance contract.

Reinsurance assets are reviewed for impairment at each reporting date or more frequently when an indication of impairment arises during the reporting year. Impairment occurs when there is objective evidence as a result of an event that occurred after initial recognition of the reinsurance asset that the Company may not receive all outstanding amounts due under the terms of the contract and the event has a reliably measurable impact on the amounts that the Company will receive from the reinsurer. The impairment loss is recorded in the Income Statement.

Gains or losses on buying reinsurance are recognised in the Income Statement immediately at the date of purchase and are not amortised.

Ceded reinsurance arrangements do not relieve the Company from its obligations to policyholders.

Reinsurance assets or liabilities are derecognised when the contractual rights are extinguished or expire or when the contract is transferred to another party.

2.4 Summary of significant accounting policies- continued

(k) Insurance receivables

Insurance receivables are recognised when due and measured on initial recognition at the fair value of the consideration received or receivable. Subsequent to initial recognition, insurance receivables are measured at amortised cost, using the effective interest rate method. The carrying value of insurance receivables is reviewed for impairment whenever events or circumstances indicate that the carrying amount may not be recoverable, with the impairment loss recorded in the Income Statement.

(l) Deferred expenses

Deferred acquisition costs ("DAC")

Those direct and indirect costs incurred during the financial year arising from the writing or renewing of insurance business contracts are deferred to the extent that these costs are recoverable out of future premiums. All other acquisition costs are recognised as an expense when incurred.

Subsequent to initial recognition, DAC are amortised over the year in which the related income is earned. The reinsurers' share of deferred acquisition costs is amortised in the same manner as the underlying asset amortisation is recorded in the Income Statement.

Changes in the expected useful life or the expected pattern of consumption of future economic benefits embodied in the asset are accounted for by changing the amortisation year and are treated as a change in an accounting estimate.

An impairment review is performed at each reporting date or more frequently when an indication of impairment arises. When the recoverable amount is less than the carrying value, an impairment loss is recognised in the Income Statement. DAC are also considered in the liability adequacy test for each reporting year. DAC are derecognised when the related contracts are either settled or disposed of.

Reinsurance commissions

Commissions' receivable on outwards reinsurance contracts are deferred and amortised on a straight line basis over the term of the expected premiums earned.

(m) Cash and cash equivalents

Cash and cash equivalents comprise cash at bank and in hand and short-term deposits with a maturity of three months or less in the Statement of Financial Position.

(n) Insurance contract liabilities

Non-life insurance (which comprises general insurance and healthcare) contract liabilities

Non-life insurance and reinsurance contract liabilities are recognised when contracts are entered into and premiums are charged/estimated. These liabilities are known as the outstanding claims provision, which are based on the estimated ultimate cost of all claims incurred but not settled at the reporting date, whether reported or not, together with related claims handling costs. Delays can be experienced in the notification and settlement of certain types of claims, therefore the ultimate cost of these cannot be known with certainty at the reporting date. The liability is not discounted for the time value of money. The liabilities are derecognised when the contract expires, is discharged or is cancelled.

The provision for unearned premiums represents premiums received for insurance business risks that have not yet expired. Generally the reserve is released over the term of the insurance contract and is recognised as premium income.

At each reporting date the Company reviews its unexpired risk and a liability adequacy test is performed as laid out under IFRS 4 to determine whether there is any overall excess of expected claims and deferred acquisition costs over unearned premiums. This calculation uses current estimates of future contractual cash flows after taking account of the investment return expected to arise on assets relating to the relevant non-life insurance technical provisions. If these estimates show that the carrying amount of the unearned premiums (less related deferred acquisition costs) is inadequate, the deficiency is recognised in the Income Statement.

2.4 Summary of significant accounting policies- continued

(o) Other financial liabilities and insurance payables

Other financial liabilities and insurance payable are recognised when due and measured on initial recognition at the fair value of the consideration received less directly attributable transaction costs. Subsequent to initial recognition, they are measured at amortised cost using the effective interest method.

(p) Derecognition of financial liabilities and insurance payables

Financial liabilities and insurance payables are derecognised when the obligation under the liability is discharged, cancelled or expired.

When the existing liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the Income Statement.

(q) Provisions

General

Provisions are recognised when the Company has a present obligation (legal or constructive) as a result of a past event, and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. Where the Company expects some or all of a provision to be reimbursed, the reimbursement is recognised as a separate asset but only when the reimbursement is virtually certain. The expense relating to any provision is presented in the Income Statement net of any reimbursement. If the effect of the time value of money is material, provisions are discounted using a current pre-tax rate that reflects, where appropriate, the risks specific to the liability. Where discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.

(r) Equity movements

Ordinary share capital

The Company has issued ordinary shares that are classified as equity. Incremental external costs that are directly attributable to the issue of these shares are recognised in equity, net of tax.

Dividends on ordinary share capital

Dividends on ordinary shares are recognised as a liability and deducted from equity when they are approved by the Company's shareholders. Interim dividends are deducted from equity when they are paid.

(s) Revenue recognition

Gross premium

Premium recognition is described in accounting policy (a) dealing with insurance and reinsurance contracts.

Reinsurance premiums

Premium recognition is described in accounting policy (a) dealing with insurance contracts.

Investment income

Interest income is recognised in the Income Statement as it accrues and is calculated by using the effective interest method. Fees and commissions that are an integral part of the effective yield of the financial asset or liability are recognised as an adjustment to the effective interest rate of the instrument.

2.4 Summary of significant accounting policies- continued

(s) Revenue recognition – continued

Realised gains and losses

Realised gains and losses recorded in the Income Statement on investments include gains and losses on financial assets. Gains and losses on the sale of investments are calculated as the difference between net sales proceeds and the original or amortised cost and are recorded on occurrence of the sale transaction.

(t) Foreign currency translation

These financial statements are presented in Euro, which is the 's functional and presentation currency.

(u) Events after the reporting date

The financial statements are adjusted to reflect events that occurred between the reporting date and the date when the financial statements are authorised for issue, provided they give evidence of conditions that existed at the reporting date. Events that are indicative of conditions that arose after the reporting date are disclosed, but do not result in an adjustment of the financial statements themselves.

3. Investment return

	Notes	2019 €	2018 €
<i>Investment income</i>			
Available-for-sale financial assets interest income		1,190,345	1,171,453
Interest income on loans and receivables		251,758	172,286
Other interest income		-	-
Available-for-sale financial assets amortisation of discount	11	9,021	8,887
Total investment income		1,451,124	1,352,626
<i>Investment expenses and charges</i>			
Available-for-sale financial assets amortisation of premium	11	(958,245)	(1,090,671)
Impairment Allowance		43,887	(228,790)
Total investment expense		(914,358)	(1,319,461)
Total investment return		536,766	33,165
Analyzed between:			
Allocated investment return transferred to the technical account		190,527	11,808
Investment return included in the non-technical account		346,239	21,357
Total investment return		536,766	33,165

4. Net operating expenses

	Notes	2019 €	2018 €
Acquisition costs		60,647,241	56,365,767
Reinsurer's commissions and profit commission		(32,998,096)	(32,810,503)
Deferred acquisition costs		(3,902,135)	(6,936,203)
Deferred reinsurer's commissions		(1,659,619)	1,377,690
Administrative expenses		2,409,144	2,204,076
Total net operating expenses		24,496,535	20,200,827
Allocated to:			
Technical Income Statement		22,087,391	17,996,751
Non-technical Income Statement	5	2,409,144	2,204,076
Total net operating expenses		24,496,535	20,200,827

Total commissions for direct business accounted for during the year amounted to €44,942,435 (2018: €40,720,572).

5. Administrative Expenses

	Notes	2019 €	2018 €
IT & other operational costs		1,509,641	1,235,450
Amortisation of intangible assets	8	-	-
Depreciation of equipment	9	17,008	6,586
Professional Fees		433,148	311,750
Director's fees		7,000	7,000
Employee benefit expenses	6	554,952	653,387
Other expenses		206,043	318,899
		2,727,792	2,533,072
Allocated to:			
Technical Income Statement		318,648	328,996
Non technical Income Statement		2,409,144	2,204,076
		2,727,792	2,533,072

Professional fees include fees charged by the auditor for services rendered during the financial year ending 31 December relating to the following:

	2019 €	2018 €
Annual statutory audit	26,500	26,500

6. Employee benefit expenses

	Notes	2019 €	2018 €
Wages and salaries		448,620	553,306
Social Security		106,332	100,081
Total employee benefit expenses	5	554,952	653,387

6. Employee benefit expenses – continued

The average number of persons employed during the year was:

	2019	2018
Technical	3	4
Managerial	4	3
	7	7

7. Income tax expense

(a) Current tax expense for the year

	Note	2019 €	2018 €
Current tax expense		35,662,469	31,313,862
Deferred tax expense		15,361	(80,076)
Total income tax expense		35,677,830	31,233,786

(b) Reconciliation of tax expense

	2019 €	2018 €
Profit before tax for the year	101,936,657	89,231,053
Non allowable expenses	-	8,333
Taxable Profit for the year	101,936,657	89,239,386
Tax expense at Malta's statutory income tax rate of 35%	35,677,830	31,233,785
Total income tax expense	35,677,830	31,233,785

8. Intangible assets

	2019 €	2018 €
Computer software		
Year ended 31 December		
Opening balance	-	-
Amortisation charge	(-)	(-)
Closing carrying amount	-	-
At 31 December		
Cost	468,139	468,139
Accumulated amortisation	(468,139)	(468,139)
Closing carrying amount	-	-

Intangible assets, which have been amortised over a period of four years, are still in use albeit they are fully written off.

9. Equipment

	Computer and electronic equipment €	Furniture, fixtures and fittings €	Electrical and plumbing installations €	Total €
Year ended 31 December 2018				
Opening carrying amount	1,529	16,394	7,231	25,154
Additions	5,561	1,565	-	7,126
Disposals	-	-	-	-
Depreciation charge	(2,155)	(2,836)	(1,595)	(6,586)
Depreciation release on disposal	-	-	-	-
Closing carrying amount	4,935	15,123	5,636	25,694
At 31 December 2018				
Cost	8,618	22,686	9,570	40,874
Accumulated depreciation	(3,683)	(7,563)	(3,934)	(15,180)
Carrying amount	4,935	15,123	5,636	25,694
Year ended 31 December 2019				
Opening carrying amount	4,935	15,123	5,636	25,694
Additions	41,686	-	-	41,686
Disposals	-	-	-	-
Depreciation charge	(12,576)	(2,836)	(1,596)	(17,008)
Depreciation release on disposal	-	-	-	-
Closing carrying amount	34,045	12,287	4,040	50,372
At 31 December 2019				
Cost	50,304	22,686	9,570	82,560
Accumulated depreciation	(16,259)	(10,399)	(5,530)	(32,188)
Carrying amount	34,045	12,287	4,040	50,372

10. Loans and receivables

	2019 €	2018 €
Amortised cost		
Deposits held with financial institutions	87,500,000	61,500,000
Total loans and receivables at amortised cost	87,500,000	61,500,000
Fair Value		
Deposits held with financial institutions	87,500,000	61,500,000
Total loans and receivables at fair value	87,500,000	61,500,000

The above deposits earn interest at an average fixed rate of 0.36% (2018: 0.29%).

10. Loans and receivables- continued

Loans and receivables mature as follows:

	2019 €	2018 €
<i>Loans and receivables</i>		
Within one year	22,500,000	14,000,000
Between one and two years	65,000,000	47,500,000
	87,500,000	61,500,000

11. Available-for-sale financial assets

	2019 €	2018 €
Fair value	81,969,798	65,849,596
Debt securities		
Total available-for-sale financial assets	81,969,798	65,849,596

The carrying value of available-for-sale financial assets is equivalent to the fair value of those assets.

(a) Available-for-sale financial assets mature as follows:

	2019 €	2018 €
<i>Available-for-sale financial assets</i>		
Within one year	16,101,678	8,475,466
Between one and two years	25,888,654	16,348,832
Between two and five years	39,979,466	41,025,298
	81,969,798	65,849,596

(b) Reconciliation

	2019 €	2018 €
At beginning of reporting year	65,849,596	56,274,989
Additions	25,080,011	19,467,980
Maturities	(8,400,000)	(8,640,000)
Amortization of premiums (note 3)	(949,224)	(1,081,784)
Fair value gains/loss recorded in Other Comprehensive Income (note 18)	345,528	57,201
Impairment Allowance	43,887	(228,790)
At end of reporting year	81,969,798	65,849,596

(c) Fair value hierarchy

The following table shows an analysis of financial instruments recorded at fair value by level of the fair value hierarchy:

	2019 Level 1 €	2018 Level 1 €
31 December		
Available-for-sale financial assets		
Debt securities	81,969,798	65,849,596
Total financial assets shown at fair value	81,969,798	65,849,596

11. Available-for-sale financial assets- continued

(c) Fair value hierarchy- continued

Included in the Level 1 category are financial assets that are measured by reference to published quotes in an active market. A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency and those prices represent actual and regularly occurring market transactions on an arm's length basis.

12. Deferred Taxation

Deferred income tax

	2019 €	2018 €
At beginning of reporting year	14,391	74,447
Other comprehensive Income (note 18)	120,935	20,020
Profit and loss account (note 7)	15,361	(80,076)
Total deferred income tax liability	150,687	14,391

Temporary differences

	2019 €	2018 €
Attributable to unrealized fair value	215,402	94,467
Attributable to other provisions	(64,715)	(80,076)
Total deferred income tax liability	150,687	14,391

	2019 €	2018 €
Deferred Tax Asset	(64,715)	(80,076)
Deferred Tax Liability	215,402	94,467
Total deferred income tax liability	150,687	14,391

13. Insurance liabilities and reinsurance assets

	2019 €	2018 €
Gross		
Insurance contracts		
- claims outstanding	10,981,011	10,064,976
- claims incurred but not reported	10,466,305	9,306,633
- provision for unearned premiums	105,882,440	102,782,426
Reinsurance acceptances		
- claims outstanding and claims incurred but not reported	4,800,444	4,094,297
- provision for unearned premiums	20,104,551	18,228,065
Total technical provisions, gross	152,234,751	144,476,397

13. Insurance liabilities and reinsurance assets- continued

Recoverable from reinsurer

Insurance contracts		
- claims outstanding	4,916,020	4,860,486
- claims incurred but not reported	4,783,801	4,562,204
- provision for unearned premiums	41,598,199	46,998,937
	<hr/>	<hr/>
Total reinsurer's share of insurance liabilities	51,298,020	56,421,627

Net

Insurance contracts		
- claims outstanding	6,064,991	5,204,490
- claims incurred but not reported	5,682,504	4,744,429
- provision for unearned premiums	64,284,241	55,783,489
Reinsurance acceptances		
- claims outstanding and claims incurred but not reported	4,800,444	4,094,297
- provision for unearned premiums	20,104,551	18,228,065
	<hr/>	<hr/>
Total technical provisions, net	100,936,731	88,054,770

Claims are classified as current liabilities. The claims are largely based on case-by-case estimates supplemented with additional provisions for IBNR, in those instances where the ultimate cost determined by estimation techniques is higher.

Amounts due from reinsurer in respect of claims already paid by the Company on the contracts that are reinsured are offset against the amounts due to the same reinsurer for the premium ceded under the respective treaties. The balances due from/to reinsurer are disclosed within receivables and payables in notes 15 and 19.

The development tables below give an indication of the time it takes to settle certain claims. This is attributable to certain classes of business taking several years to develop. The claims development table takes into consideration the direct insurance business written only and therefore excludes the effect of claims arising on reinsurance acceptance.

The top half of the table below illustrates how the Company's estimate of total claims incurred for each financial year has changed at successive year-ends on a net basis. The bottom half of the table reconciles the cumulative claims to the amount appearing in the Statement of Financial Position on a net basis.

The accident-year basis is considered to be the most appropriate for the business written by the Company.

13. Insurance liabilities and reinsurance assets- continued

	Acc yr 2012	Acc yr 2013	Acc yr 2014	Acc yr 2015	Acc yr 2016	Acc yr 2017	Acc yr 2018	Acc yr 2019	Total
Estimate of cumulative claims									
- at end of year	8,988,790	9,834,718	9,953,661	9,789,271	9,518,811	9,107,142	13,662,078	15,909,049	
- one year later	8,095,330	8,065,309	8,007,955	9,029,600	8,878,854	9,545,283	11,844,240		
- two years later	6,904,471	8,336,301	6,973,219	7,882,610	8,362,612	8,506,852			
- three years later	7,120,739	8,441,943	7,086,396	8,296,110	8,471,660				
- four years later	7,141,830	8,353,327	6,891,382	8,082,754					
- five years later	7,131,934	8,321,376	6,833,002						
- six years later	7,116,630	8,303,596							
- seven years later	7,116,115								
Estimate of cumulative claims	7,116,115	8,303,596	6,833,002	8,082,754	8,471,660	8,506,852	11,844,240	15,909,049	75,067,268
Cumulative payments to date	7,115,674	8,267,062	6,755,073	7,823,714	7,957,803	7,857,589	8,836,376	3,906,038	58,519,329
Liability recognised in balance sheet	441	36,534	77,929	259,040	513,857	649,263	3,007,864	12,003,011	16,547,939

13. Insurance liabilities and reinsurance assets - continued

Movements in (re)insurance liabilities

(a) Claims and loss adjustments

	2019	2018
	€	€
Gross		
At beginning of reporting year	23,465,905	21,226,610
Claims settled during the year	(13,680,728)	(12,830,252)
Increase in liabilities		
- arising from current year claims	22,339,728	20,083,680
- arising from prior year claims	(5,877,146)	(5,014,133)
At end of reporting year	26,247,759	23,465,905

	2019	2018
	€	€
Reinsurer's share		
At beginning of reporting year	9,422,689	8,362,771
Claims settled during the year	(3,313,657)	(3,409,180)
Increase in liabilities		
- arising from current year claims	6,430,875	6,421,603
- arising from prior year claims	(2,840,087)	(1,952,505)
At end of reporting year	9,699,820	9,422,689

	2019	2018
	€	€
Net		
At beginning of reporting year	14,043,216	12,863,839
Claims settled during the year	(10,367,071)	(9,421,072)
Increase in liabilities		
- arising from current year claims	15,908,853	13,662,077
- arising from prior year claims	(3,037,059)	(3,061,628)
At end of reporting year	16,547,939	14,043,216

(b) Provision for unearned premiums

The movements for the year are summarized as follows:

	2019	2018
	€	€
At beginning of reporting year	121,010,489	114,657,211
Premiums written during the year	183,085,574	163,261,008
Premiums earned during the year	(178,109,074)	(156,907,730)
At end of reporting year	125,986,989	121,010,489

14. Deferred acquisition costs

	2019	2018
	€	€
At beginning of reporting year	54,293,854	48,781,694
Expenses deferred during the year	4,948,274	5,512,160
At end of reporting year	59,242,128	54,293,854

14. Deferred acquisition costs - continued

Deferred acquisition costs are classified as follows:

	2019 €	2018 €
Current	20,883,531	18,882,942
Non-current	38,358,597	35,410,912
At end of reporting year	59,242,128	54,293,854

15. Insurance and other receivables

	2019 €	2018 €
<i>Receivables arising from direct insurance operations</i>		
- due from group undertakings	7,449,700	5,896,621
- due from claims handler	834,288	840,130
- due from others	25,742	3,648
<i>Receivables arising from reinsurance acceptances</i>		
- due from ceding undertakings	27,534,313	20,909,386
<i>Other loans and receivables and available-for-sale investments</i>		
- due from parent	169,011	97,075
- accrued interest	634,435	574,937
At 31 December	36,647,489	28,321,797

Insurance and other receivables are all classified as current assets.

16. Cash and cash equivalents

	2019 €	2018 €
Cash at bank	42,949,570	44,617,829
Short-term deposits (including demand and time deposits)	5,000,000	10,000,000
Total cash and cash equivalents	47,949,570	54,617,829

Short-term deposits were made for varying periods of between one day and three months depending on the immediate cash requirements of the Company. Deposits held earned an interest of 0.01% when compared to no interest earned in previous year (2018: NIL). The carrying amounts disclosed above reasonably approximate fair value at the reporting date.

17. Share capital

	2019 €	2018 €
Authorised ordinary shares		
40,000 (2018: 40,000) ordinary shares of €100 each	4,000,000	4,000,000
Ordinary shares issued and fully paid		
40,000 (2018: 40,000) ordinary shares of €100 each	4,000,000	4,000,000

18. Other reserve

This reserve records fair value changes on available-for-sale investments, representing unrealized gains not available for distribution.

	2019 €	2018 €
Balance at 1 January	175,176	137,995
Gross Movement in Revaluation	345,528	57,201
Deferred tax (note 12)	(120,935)	(20,020)
Balance at 31 December	399,769	175,176

19. Insurance and other payables

	2019 €	2018 €
<i>Creditors arising out of reinsurance acceptances</i>	6,176,270	3,423,924
<i>Creditors arising out of direct insurance operations</i>	36,799,449	39,756,712
<i>Other payables</i>		
- due to parent	170,729	134,696
- social security and other taxes	207,921	192,265
- accruals and other payables	741,399	664,309
	44,095,768	44,171,906

The carrying amount disclosed above reasonably approximate fair value at reporting date. Repayment years are disclosed in Note 21.

20. Risk management framework

Capital management objectives, policies and approach

The Company has established the following capital management objectives, policies and approach to manage the risks that affect its capital position:

- To maintain the required level of stability of the Company thereby providing a degree of security to policyholders.
- To allocate capital efficiently and support the development of business by ensuring that returns on capital employed meet the requirements of its capital providers and of its shareholders.
- To retain financial flexibility by maintaining strong liquidity and access to a range of capital markets.
- To align the profile of assets and liabilities taking account of risks inherent in the business.
- To maintain financial strength to support new business growth and to satisfy the requirements of the policyholders, regulators and stakeholders.
- To maintain strong credit ratings and healthy capital ratios in order to support its business objectives and maximise shareholders value.

The Company's capital management policy for its insurance business is to hold sufficient capital to cover the statutory requirements based on the MFSA Directives, including any additional amounts required by the Malta Financial Services Authority, the Regulator. The Company was compliant with the regulatory solvency requirements throughout the financial year.

20. Risk management framework - continued

Capital management objectives, policies and approach- continued

The Solvency II Directive (2009/138/EC) came into force on 1st January 2018, with new regulatory requirements that dictate the capital required to service the risks the Company is currently undertaking. Solvency II also outlines how the own funds shall be derived by converting the Statement of Financial Position from an IFRS perspective to one where assets and liabilities are measured in line with their underlying economic value. As of this date, the solvency calculations under Solvency I regime will no longer be applicable.

The Directors are actively involved in the implementation of the Solvency II rules and these are highly embedded in the Company's operations. Regular monitoring of the SCR is considered crucial and a Capital Management and Dividend Policy has been put in place to describe the principles governing capital management and dividend distribution of the Company, that is, the process to be followed prior to effecting any decision impacting the capital position of RCI Insurance Limited thereby ensuring that the Company has sufficient levels of capital at all times to be able to service existing and foreseeable risks.

Based on the unaudited SCR calculations as at 31 December 2019, the Company has complied with the capital and solvency requirements as stipulated in the rules issued by the MFSA. Going forward, the Company is also expected to continue meeting the solvency II requirements, based on the projected SCR calculations included in the 2019 ORSA report. In the case of any solvency gap, the Directors have put in place a capital plan aimed to ensure that the Company will have adequate 'own funds' to meet the required SCR.

21. Insurance and financial risk

(a) Insurance risk

The principal risk the Company faces under insurance contracts is that the actual claims and benefit payments or the timing thereof, differ from expectations. This is influenced by the frequency of claims, severity of claims and actual benefits paid. Therefore, the objective of the Company is to ensure that sufficient reserves are available to cover these liabilities. The most significant risks for miscellaneous financial loss covers is a recession leading to high unemployment whilst for accident and health covers significant risks arise from lifestyle changes and epidemics.

The above risk exposure is mitigated by diversification of different classes of business across a large portfolio of insurance contracts and geographical areas. The variability of risks is also improved by careful selection and implementation of underwriting strategy guidelines and claim review policies, as well as the use of reinsurance arrangements.

The Company underwrites payment protection insurance covering accident and health and miscellaneous financial loss to clients of its ultimate parent Company, RCI Banque S.A. on a direct basis. Risks under these insurance policies on average span over a period of four years. As at the end of the year, the Company was operating in Germany, France, Italy and Spain. In addition, the Company also continued writing reinsurance business with two counterparties. The risks are situated in France and Germany.

The variability of risks is improved by careful selection and implementation of underwriting strategies, which are designed to ensure that risks are diversified in terms of type of risk and level of insured benefits. The Company's business is underwritten through an intermediary's network consisting of Group companies. Internal underwriting guidelines are in place to enforce appropriate risk selection criteria and are reinforced by controls that are in place at a Group level. Strict claim review policies to assess all new and ongoing claims, regular detailed review of claims handling procedures and frequent investigation of possible fraudulent claims are all policies and procedures put in place to reduce the risk exposure of the Company. The Company further enforces a policy of actively managing and promptly pursuing claims, in order to reduce its exposure to unpredictable future developments that can negatively impact the business.

The Company purchases reinsurance on its direct business as part of its risk mitigation program. Reinsurance ceded is placed on a proportional basis. This quota-share reinsurance is taken out to reduce the overall exposure of the Company to all classes of business in all countries. Amounts recoverable from the reinsurer are estimated in a manner consistent with the outstanding claims provision and are in accordance with the reinsurance contracts. Although the Company has reinsurance arrangements, it is not relieved of its direct obligations to its policyholders and thus a credit exposure exists with respect to ceded insurance, to the extent that the reinsurer is unable to meet its obligations assumed under such reinsurance agreements.

21. Insurance and financial risk – continued

(a) Insurance risk – continued

The Company has placed its reinsurance treaty with an AA- rated Company. The Company actively monitors the rating of the reinsurer. The Company has assessed the risks being underwritten through the reinsurance treaty and is of the view that no retrocession is required. The Company has also limited its exposure due to policy limits and by entering into proportional reinsurance treaties.

Key assumptions

The principal assumption underlying the liability estimates is that the Company's future claims development will follow a similar pattern to past claims development experience within the RCI Group.

The Company has therefore assumed an ultimate loss ratio in order to estimate its total claims cost and IBNR. Given the reinsurance treaty in place, a deterioration or improvement in this final loss ratio will not have a significant impact on the profit or loss for the year.

(b) Financial risks

(1) Credit risk

Credit risk is the risk that one party to a financial instrument will cause a financial loss to the other party by failing to discharge an obligation.

The Company writes PPI risks for the Renault group through various group entities. The Company therefore has no counterparty insurance credit risk to parties outside the Renault group thereby reducing substantially its credit risk.

The Company invests in French, Italian and Spanish government bonds, EIB bonds, European Union bonds, corporate bonds with reputable counterparties and holds deposits with RCI Banque S.A., a BBB (2018: BBB) rated financial institution licensed and regulated by the French Banque de France, a member of the Renault Group.

The primary debtor is the Company's parent undertaking, a BBB (2018: BBB) rated financial institution licensed and regulated by the French Banque de France.

Reinsurance is placed with a counterparty that has an AA- (2018: AA-) credit rating. At each reporting date, management performs an assessment of the creditworthiness of the reinsurer and updates the reinsurance purchase strategy, ascertaining suitable allowance for impairment.

The credit risk in respect of customer balances incurred on non-payment of premiums or contributions will only persist during the grace year specified in the policy document or trust deed until expiry, when the policy is either paid up or terminated. Commission paid to intermediaries is netted off against amounts receivable from them to reduce the risk of doubtful debts.

Credit exposure

The table below shows the maximum exposure to credit risk for the components of the Statement of Financial Position and items such as future commitments as at 31 December.

	Notes	2019 €	2018 €
Financial instruments			
Loans and receivables	10	87,500,000	61,500,000
Available-for-sale financial assets			
debt securities	11	81,969,798	65,849,596
Reinsurer's share of technical provisions	13	51,298,020	56,421,627
Insurance and other receivables	15	36,647,488	28,321,797
Cash and cash equivalents	16	47,949,570	54,617,829
Total credit risk exposure		305,364,876	266,710,849

21. Insurance and financial risk- continued

(b) Financial risks - continued

(1) Credit risk – continued

Credit exposure by credit rating

The table below provides information regarding the credit risk exposure of the Company at 31 December by classifying assets according to the Standard and Poor's credit ratings (or equivalent) of the counterparties. AAA is the highest possible rating. Assets that fall outside the range of AAA to BBB- are not rated.

31 December 2019	Neither past due nor impaired						Total €
	AA €	AA- €	A €	A- €	BBB €	Not rated €	
<i>Financial assets</i>							
Loans and	-	-	-	-	87,500,000	-	87,500,000
Available-for-sale assets: debt	12,361,736	9,822,883	25,456,910	17,043,029	17,285,240	-	81,969,798
Reinsurer's share of technical provisions	-	51,298,020	-	-	-	-	51,298,020
Insurance	42,391	7,750,440	19,963,269	307,071	7,724,285	860,032	36,647,488
Cash and cash	-	-	-	-	26,469,784	21,479,786	47,949,570
Total	12,404,127	68,871,343	45,420,179	17,350,100	138,979,309	22,339,818	305,364,876

31 December 2018	Neither past due nor impaired						Total €
	AAA €	AA €	AA- €	A €	BBB €	Not rated €	
<i>Financial assets</i>							
Loans and receivables	-	-	-	-	61,500,000	-	61,500,000
Available-for-sale financial assets: debt securities	405,727	20,638,610	5,003,478	22,511,972	17,289,809	-	65,849,596
Reinsurer's share of technical provisions	-	-	56,421,627	-	-	-	56,421,627
Insurance receivables	12,156	160,036	-	21,206,669	6,099,158	843,778	28,321,797
Cash and cash equivalents	-	-	-	-	40,040,747	14,577,082	54,617,829
Total	417,883	20,798,646	61,425,105	43,718,641	124,929,714	15,420,860	266,710,849

During the year, no credit exposure limits were exceeded. The Company actively manages its product mix to ensure that there is no significant concentration of credit risk. During the year ended 31 December 2019, the portion of the total assets held with a particular counterparty remained at the same level of 34% (2018: 34%), which is a related party to the Company.

Impaired financial assets

For assets to be classified as 'past-due and impaired' contractual payments must be in arrears for more than 90 days. At 31 December 2019, €184,903 of the Company's assets were impaired (2018: €228,790).

21. Insurance and financial risk- continued

(b) Financial risks - continued

(2) Liquidity risk

Liquidity risk is the risk that an entity will encounter difficulty in meeting obligations associated with financial instruments. In respect of catastrophic events there is also a liquidity risk associated with the timing differences between gross cash out-flows and expected reinsurance recoveries.

The following policies and procedures are in place to mitigate the Company's exposure to liquidity risk:

- A Company liquidity risk policy setting out the assessment and determination of what constitutes liquidity risk for the Company. Compliance with the policy is monitored and exposures and breaches are reported to the Company Board. The policy is regularly reviewed for pertinence and for changes in the risk environment.
- Set guidelines on asset allocations, portfolio limit structures and maturity profiles of assets, in order to ensure sufficient funding available to meet insurance and investment contracts obligations.

The following table indicates the expected timing of cash flows arising from the Company's liabilities:

31 December 2019

	0-1 year €	1-5 years €	>5 years €	Total €
Technical provisions	83,677,089	65,482,608	3,075,055	152,234,752
Deferred revenue	6,688,012	11,733,452	551,001	19,057,210
Deferred tax	215,402	-	-	215,402
Insurance and other payables	22,465,210	20,660,351	970,207	44,095,768
Income tax payable	35,662,685	-	-	35,662,685
Total	148,708,398	97,876,411	4,596,263	251,265,815

31 December 2018

	0-1 year €	1-5 years €	>5 years €	Total €
Technical provisions	77,440,827	63,865,919	3,169,651	144,476,397
Deferred revenue	7,124,822	12,729,324	631,754	20,485,900
Deferred tax	94,467	-	-	94,467
Insurance and other payables	20,027,358	23,002,920	1,141,628	44,171,906
Income tax payable	31,314,612	-	-	31,314,612
Total	136,002,085	99,598,163	4,943,033	240,543,281

(3) Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: foreign exchange rates (currency risk), market interest rates (interest rate risk) and market prices (price risk). The Company invests in fixed income securities and deposits thereby exposing itself to interest rate risk. The Company's assets and liabilities are all denominated in Euro thereby leaving the Company with no currency exposure.

(4) Interest rate risk

Interest rate risk is the risk that the value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates.

21. Insurance and financial risk- continued

(b) Financial risks - continued

(4) Interest rate risk - continued

Floating rate instruments expose the Company to cash flow interest risk, whereas fixed interest rate instruments expose the Company to fair value interest risk. The Company invests primarily in fixed interest rate bonds, long-term and short-term deposits which are re-priced at renewal of the deposit.

The Company's net exposure to interest rate risk is not considered to be material in view of the fact that the interest rates of the available-for-sale financial assets are fixed. Accordingly a sensitivity analysis for interest rate risk disclosing how profit or loss and equity would have been affected by changes in interest rates that were reasonably possible at reporting date is not deemed necessary.

22. Cash generated from operating activities

	Notes	2019 €	2018 €
Profit before tax		101,936,657	89,231,053
<i>Adjustment for</i>			
Depreciation of equipment	9	17,008	6,586
Interest income		(1,442,103)	(1,343,740)
Net amortisation of premium on available-for-sale investments	11b	949,224	1,081,784
Impairment Allowance		(43,887)	228,790
<i>Movements in items in the Statement of Financial Position</i>			
Increase in reinsurer's share of technical provisions		5,123,607	(1,151,416)
Increase in deferred acquisition costs		(4,948,274)	(5,512,160)
Decrease/Increase in insurance and other receivables		(8,194,258)	4,883,947
Increase in technical provisions		7,758,354	8,592,575
Decrease/Increase in insurance and other payables		(76,138)	(3,238,420)
Increase in deferred revenue		(1,428,692)	1,465,881
Cash generated from operating activities		99,651,498	94,244,880

23. Contingencies and commitments

(a) Capital commitments and operating leases

The Company has no capital commitments as at the reporting date.

24. Related party disclosures

(a) Transactions with related parties

The Company enters into transactions with its parent, group undertakings and key management personnel in the normal course of business. Related parties are defined as those that have an ability to control or exercise significant influence over the other party in making financial and operation decisions.

24. Related party disclosures - continued

(a) Transactions with related parties – continued

Details of significant transactions carried out during the year with related parties are as follows:

	2019 €	2018 €
Investment income from parent	251,859	172,286
	2019 €	2018 €
Dividends paid (note 25)	57,997,268	47,849,428
Commission paid to group undertaking	44,942,435	40,720,572
Claim handling fees paid to group undertaking	1,195,089	1,046,799
Recharge of expenses for back-office services provided by group undertakings	1,425,234	1,207,479

Director's fees have been disclosed in Note 5. The General Manager, the Chief Financial Officer, Chief Risk Officer and Chief Legal and Compliance Officer are considered by the Company to be Key Management Personnel. The total payments to Key Management Personnel were €329,509 (2018: €341,286).

(b) Balances with related parties

(1) Receivables from and payables to related-parties are as follows:

	Notes	2019 €	2018 €
Receivables from related parties			
Debtor arising out of direct insurance operations			
- group undertakings	15	7,449,700	5,896,621
Deposits held with parent	10	87,500,000	61,500,000
Interest income due from parent	15	169,011	97,075
Cash and cash equivalents held with parent	21	26,469,784	40,040,747
		2019 €	2018 €
Payables to related parties			
Creditor arising out of direct insurance operations			
- group undertakings		3,388,499	2,733,983
- parent company		170,729	134,696

Loans and receivables are unsecured and earn an average fixed interest of 0.36% (2018: 0.29%) (note 10). Deposits held with group undertakings did not earn any interest during 2018 (2018: NIL) (note 16). All other outstanding balances at the reporting date are unsecured and interest free. Settlement will take place in cash.

There was no provision for doubtful debts at the reporting date and no bad debt expense during the year.

25. Dividends

	2019 €	2018 €
Dividends paid on ordinary shares net (note 24)	57,997,268	47,849,428
Dividends per ordinary share	1,449.93	1,196.24

26. Subsequent Events

Due to the recent rapid development of COVID-19, various countries have introduced quarantine and social distancing measures, which had a significant impact on the level and scale of various business activities. The impact on the automotive industry will affect the level of new insurance business to be written by the Company. The impact of the current health and economic uncertainty on individuals could also lead to policyholder lapsing on their premium and claims under the classes of business underwritten by the Company. The recent volatility in financial markets has had limited impacts on the valuation of the investment portfolio and no deterioration in the credit risk of the main counterparties was noted.

Whilst there is still a significant degree of uncertainty, management has estimated the financial effect on premiums, claims and other exposures, based on current prevailing circumstances and do not anticipate a material impact of the profitability of the Company. The analysis extends to the solvency of the Company and it is expected that the target solvency would be maintained within the risk appetite. Taking also into consideration the analysis carried out in the Own Risk and Solvency Assessment and on ad hoc stress scenarios based on possible adverse impacts of COVID-19, the Company should be well capitalized to absorb any foreseeable impact and envisages that it will continue to satisfy all regulatory solvency requirements.