PROTEQ LEVENSVERZEKERINGEN N.V.

Annual Report 2021

ATHORA

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1 OVERVIEW

1.1 KEY FIGURES

In € thousands	2021	2020	2019	2018	2017
Ratios					
Regulatory Solvency II	242%[1]	245%	241%	327%	263%
Profit or loss					
Net premium income	4,247	4,929	5,421	6,121	6,647
Investment income	10,350	27,323	27,578	19,715	13,384
Total income	14,598	56,872	45,406	27,633	20,031
Total expenses	11,962	49,600	39,361	24,685	16,059
Result before taxation	**2,636**	**7,272**	**6,045**	**2,948**	**3,972**
Tax expense	17,869	838	1,642	1,586	993
Net Result IFRS from continued operations	**-15,233**	**6,434**	**4,403**	**1,362**	**2,979**
Statement of financial position					
Total assets	**644,459**	**725,616**	**644,361**	**573,763**	**567,422**
Investments	621,007	678,380	625,330	565,076	556,061
Insurance liabilities	520,521	564,935	520,807	453,736	458,716

1 Regulatory Solvency II ratio 2021 is not final until filed with the regulator.

Proteq Levensverzekeringen N.V.

In this annual report, we use the name 'Proteq' when referring to the financial statements of Proteq Levensverzekeringen N.V.

The Proteq Report of the Executive Board, as referred to in section 2:391 of the Dutch Civil Code includes the following chapters: Key Figures (chapter 1.1), Message from the Executive Board (chapter 1.2), Organisation (chapter 2), Strategy and Developments (chapter 3) and Corporate Governance (chapter 4), excluding Report of the Supervisory Board (chapter 4.5).

1.2 MESSAGE FROM THE EXECUTIVE BOARD OF PROTEQ LEVENSVERZEKERINGEN N.V.

Dear stakeholders,

In 2021, Proteq concluded its strategy update reconfirming the strategic choices already made in 2020 to enhance investment returns and deploy an operating model that is more suitable to the narrower business focus.

It goes without saying that we will continue to adhere to our social role and, in the interest of our clients and society as a whole, continue to pay attention to sustainability, in our business operations and our investments.

We would like to express our appreciation for the constructive cooperation with the Works Council and our business partners. In particular, we would like to thank our valued employees for their tireless efforts in making the past year possible.

On behalf of the Executive Board, I would also like to convey my sincere thanks to Maarten Dijkshoorn, our former Chairman of the Supervisory Board, for the good cooperation over the last few years, his ability to connect with stakeholders and his guidance in the transitions to new ownership. In his role as chairman, he made a significant contribution in challenging times to the development of Proteq. We wish him all the best for the future.

Finally, when looking into 2022, it is inevitable to also mention the crisis in Ukraine. We are deeply concerned about the situation in Ukraine and our thoughts go out to the people of Ukraine and all those directly affected by the conflict. To support the humanitarian relief efforts for the war in Ukraine, Proteq and its employees have donated to Giro555 of the Cooperating Aid Organisations of the Netherlands. Proteq has no business activities in Ukraine, Russia or Belarus and there is no direct exposure through our own account investments portfolio and only very limited exposure through our unit linked portfolio. We will continue to monitor the developments closely.

Amstelveen, the Netherlands, 30 March 2022

On behalf of the Executive Board of Proteq Levensverzekeringen N.V.,
Jan de Pooter, Chief Executive Officer

2 ORGANISATION

2.1 ABOUT PROTEQ

Proteq Levensverzekeringen N.V. is a Dutch insurance company that manages an existing portfolio of individual life insurances. Proteq primarily operates in the Netherlands.

Legal Entity

Proteq Levensverzekeringen N.V. is a public limited company with a two-tier board structure consisting of an Executive Board (EB) and a Supervisory Board (SB).

Proteq Levensverzekeringen N.V. is a full subsidiary of Athora Netherlands N.V. The members of the Executive Board of Athora Netherlands N.V. are also the members of the Executive Board of Proteq Levensverzekeringen N.V. Certain topics are managed and controlled from a consolidated perspective. To the extent applicable, information in this board report is therefore presented on Athora Netherlands level.

The figure below shows the total structure of Athora Netherlands N.V. and the position of Proteq in this structure.

Proteq Levensverzekeringen N.V. within the structure of Athora Netherlands N.V. and business lines.

2.1.1 Composition of the Executive Board

The Executive Board is responsible for the management, strategy and operations of the company. The Executive Board per 31 December 2021 consisted of the following members:

- J.A. (Jan) de Pooter – Chief Executive Officer
- A.P. (Annemarie) Mijer – Chief Risk Officer (vice-chair)
- E.P. (Etienne) Comon – Chief Capital & Investment Officer
- J. (Jim) van Hees – Chief Financial Officer (a.i.)
- A. (Angelo) Sacca – Chief Commercial Officer

More information on the Executive Board is stated in Chapter 4: Corporate Governance.

2.1.2 Composition of the Supervisory Board

The Supervisory Board is responsible for advising the Executive Board and overseeing the Executive Board's management and the general business of the company and its associated business. It has an important role in the company's governance, by approving or dismissing significant business-related decisions. As of 31 December 2021 the Supervisory Board consisted of the following members:

- R.M.S.M. (Roderick) Munsters
- M.A.E. (Michele) Bareggi
- E. (Elisabeth) Bourqui
- F.G.H. (Floris) Deckers
- J.M.A. (Hanny) Kemna
- P.P.J.L.M.G. (Pierre) Lefèvre[1]

More information on the Supervisory Board is stated in Chapter 4: Corporate Governance.

2.1.3 Shareholder

Proteq Levensverzekeringen N.V. is a wholly owned subsidiary of Athora Netherlands N.V. The sole shareholder of Athora Netherlands N.V. is Athora Netherlands Holding Ltd. Athora Netherlands Holding Ltd. is a full subsidiary of Athora Holding Ltd.

2.2 OUR PEOPLE

2021 was another year of major demands on the resilience and adaptability of our employees due to the COVID-19 pandemic, which is still ongoing. As a result, the majority of our employees have been working from home the entire year. Although we were unable to meet at the office to celebrate festive moments, many beautiful ways have been found to remain connected, such as online events and the workshop 'remote leadership'.

This year also made a strong appeal to everyone's flexibility, creativity, patience and resilience due to internal changes that are in full swing. A new Executive Board was formed and an ongoing reorganisation resulted in work processes being set up differently and employees leaving the company. We tried to support colleagues who were affected by this at the earliest possible stage. They were offered training opportunities and received an extra outplacement budget on top of their growth budget in order to get the best possible guidance in finding another job.

As an employer, we tried to optimally facilitate employees and encouraged them to remain connected, for example by offering training courses and workshops and by including our employees in our strategy and a new, hybrid way of working; called PASS, which is an abbreviation that has several meanings: Pick a Smart Site, Pick a Smart Spot, Pick a Smart Solution. In addition, Culture Talks has been launched, an online programme in which employees discus our culture and values. Thanks to these measures, we have largely maintained the motivation and vitality of our employees until the middle of the year, as shown in the Pulse Survey that was conducted in June 2021. However, the Employee Survey in November showed that improvement is needed on the themes of Engagement and Commitment. We will pay extra attention to this in the months to come.

Our Employees in Numbers

Proteq's number of (internal and external) employees is 17 at the end of 2021 (2020: 18). Employees of Proteq are employed by Athora Netherlands. The costs of employees appointed to Proteq are charged to Proteq by Athora Netherlands. Below, the key figures are presented of Athora Netherlands as a whole.

[1] Pierre Levèvre has stepped down as member of the Supervisory Board, effective on 14 February 2022.

KEY FIGURES ATHORA NETHERLANDS HUMAN RESOURCES		
	2021	2020
Number of employees	1,428	1,971
- of which internal	1,218	1,674
- of which external[1]	210	297
Number of FTEs	1,412	1,931
- of which internal	1,209	1,653
- of which external	204	279
Ratio male-female	66%/34%	61%/39%
Female managers	20%	25%
Female members of senior management	22%	18%
Average length of service (years)	15.5	14.4
Average age (years)	47	46
Full-time/part-time ratio	77%/23%	74%/26%
Male/female ratio full-time	77%/23%	73%/27%
Male/female ratio part-time	27%/73%	25%/75%
Ratio permanent/temporary contract	96%/4%	96%/4%
Male/female ratio permanent	64%/36%	59%/41%
Male/female ratio temporary	64%/36%	55%/45%
Training costs (million)	€ 2.5	€ 3.9
Sickness absence	4.1%	3.4%
Percentage utilisation of personal development budget	53%	32%
Percentage of employees that have sworn the bankers oath	98%	98%

1 Number of external employees is based on contractual hours

More information regarding our staff can be found in section 3.3.2.3 Creating Value via Efficient and Sustainable Business

3 STRATEGY AND DEVELOPMENTS

3.1 2021 DEVELOPMENTS AND TRENDS

Implementation of New Strategy Focused on Pensions

Following the acquisition by Athora in April 2020, we conducted a Strategy and Operating Model Review over the summer. This review concluded with a number of new strategic decisions, to be executed through:

1. A simple yet complete and coherent portfolio of excellent customer solutions
2. An effective and efficient operating model and organisational structure
3. Strong investment capabilities
4. Strong sustainability capabilities and governance

We have made an expeditious start with implementation, including:

1. **Growth programme:** A comprehensive programme of work has been established around five key topics: customer excellence, accumulation (pension savings), decumulation (retirement solutions), digitisation, and business intelligence. In April 2021, fourteen new multidisciplinary teams were put in place to drive these efforts in an agile implementation approach.
2. **Transformation programme:** A transformation programme was set up to ensure transformation towards the new operating model and to realise benefits to ensure competitiveness while safeguarding customer service and experience.
3. **Optimisation of capital and investments:** A set of initiatives has been defined and well progressed to optimise our capital and investments. These efforts have been further reinforced with the introduction of the Chief Investment Officer role and the Investment Office team.
4. **Sustainability strategy & operating model:** A working group with members from all areas of the company has come together to define a comprehensive sustainability strategy to ensure we are sustainable in our internal operations, our products and our investments. We have reviewed our ambition levels in each area and defined a roadmap of work to ensure we meet these ambition levels.
5. **Reorganisations:** A series of reorganisations were announced following the Strategy and Operating Model Review and the implementation of these are underway.

In October, Athora Netherlands announced the sale of its asset manager ACTIAM to Cardano Group. As part of this transaction, we have entered into a long-term strategic partnership with Cardano, in which they will provide asset management services to our unit-linked business. The transaction follows the transfer of the own account investments from ACTIAM to our in-house Investment Office, mid-2021. This action complements the activities undertaken to optimise our capital and investments.

New Executive Board Composition and a Review of our Operating Model

In the second half of the year, we welcomed three new Executive Board members at Proteq. With the new Executive Board composition, we saw the need to take stock of our situation and evaluate progress since the Strategy and Operating Model Review. In the summer of 2021, we kicked off a project to:

- sense-check our strategy as defined in the Strategy and Operating Model Review, based on what we have learnt in the past year;
- further detail our strategy and articulate a strategic narrative to bring the broader organisation along the thinking;
- define (and raise) our ambition levels to enable long-term value creation objectives in terms of financial performance, growth performance and organisational & efficiency performance; and finally
- (re-)define a Target Operating Model (TOM), including organisational structure, to enable the above.

With the completion of the first three steps, we have confirmed that the strategy outlined in 2020 is the right one. We are now reviewing our operating model to ensure we are positioned to take advantage of the upcoming market opportunity introduced by the Pension Reform, achieve speed-to-market, create financial value and cultivate a high-performing culture within the organisation.

COVID-19 Impact

After a brief period of relief, the COVID-19 pandemic returned towards the end of the year, pushing the world into a new era of uncertainty. Luckily, Proteq's services have not been affected, therefore payments to our customers, suppliers and employees have continued as normal.

The impact for our stakeholders can be summarised as follows:

Customers: we have actively informed our customers about the possibilities for potential deferral of premium payment on pension policies and amending the pension scheme for their employees in light of the COVID-19 pandemic. We have also helped customers navigate the support options provided by the government. Efforts have also been made to reduce the problems for customers with payment problems. We have offered them tailored payment arrangements.

Financial strength: Despite a turbulent capital market during the year, our financial position remains strong. The 2021 impact of COVID-19 on our investment returns have again proved to be limited. Nevertheless, the pandemic is still having an impact on the world and we will continue to monitor the market.

Way of working: We have come to terms with the fact that the new normal will be different from what we were used to. At the same time, we recognise the opportunities presented with the accelerated digitisation and introduction of digital tools. We have therefore announced a new way of working at Proteq, in line with the smart working approach. This means:

- Employees are asked to pick a smart site / spot / solution for their work on any given day or part of day—nine to five in the office will no longer be the norm;
- Agreements will be made within each team as to what best suits the team, rather than an overarching company policy;
- The offices have been refurbished (sustainably, using recycled materials) to be conducive to this new way of working.
- Management will be extra alert with respect to the safety and well-being of our employees.

Challenges Ahead

Globally, the economy is suffering from the constraints introduced to manage the spread, and markets remain vulnerable. Proteq will therefore continue to keep a close eye on how our investments develop and how we can keep our business operations and financial position healthy.

3.2 STRATEGY PROTEQ

Proteq has to manage its existing portfolio to be able to maintain our future obligations to our customers. Therefore we must continue to keep our cost base under control. We aim to increase efficiency by implementing digital technologies and digitise (back end) processes using both proven and innovative technologies in the field of Customer Relations Management (CRM) and Business Process Management (BPM).

3.3 SUSTAINABILITY

Sustainability has been one of our top priorities as an embedded part of our strategy for years. Our main task is creating value in the long term for our customers and for the world around us. The global challenges we are currently facing, such as the climate crisis and the corona pandemic, demonstrate once again that the increased focus on sustainability in our company is imperative.

Apart from the obvious crises, 2021 reaffirmed how fragile our planet is. The Intergovernmental Panel on Climate Change (IPCC) released its Sixth Assessment Report on the current status of climate research in August. The IPCC report provides new calculations on global warming and finds that unless there are immediate, rapid and large-scale reductions in greenhouse gas emissions, warming will not be limited to 1.5°C. The climate is changing at an unprecedented rate, and the report indicates that humans are to blame.

For Proteq, this means that we are taking measures and exerting influence where we can. In our own business operations, in our investments and in influencing the companies and partners we work with or invest in. We will continue to provide fair and affordable insurance solutions, and ensure that our internal operations are gentle on our planet, our communities and our employees. We will continue to meet these challenges together with our stakeholders—including our clients, partners, government authorities and civil society.

Challenges and Ambitions

In 2020, we defined four sustainability challenges and ambitions for the coming years. Below, we list the progress in 2021 for each of these themes:

1. **Implementation of Improved Sustainability Strategy:**
   We have reviewed our sustainability strategy across the components Socially Responsible Investment, Sustainable Products and Corporate Social Responsibility. We then explored how we can strengthen our approach by introducing more integration and structure, so that we can increase our positive impact and are able to communicate better and more transparent on these topics. We are aware that this work is never finished, but we are in the process of significantly refining our approach. For example, we have decided to bring thought leadership, ownership and coordination together in a dedicated sustainability team and to appoint a Director of Sustainability.
2. **Exclusion versus engagement in responsible investing:**
   Our exclusion policy is a fundamental instrument in our socially responsible investment toolbox and we continue to actively maintain a list of industries and companies that we consider incompatible with our philosophy. But before excluding investing altogether, we exert our influence as an investor or potential investor through active engagement on key ESG topics, as we believe that—if successful—this will have a more direct impact on the real world than exclusion, which is always available if our engagement attempts fail. A good example is the 'satellite-based engagement to zero deforestation' initiative that our asset manager ACTIAM launched. In collaboration with a group of investors, companies are urged to reduce and mitigate deforestation associated for example, with the supply of palm oil or the production of soy. As a result, many of the contacted companies have asked their suppliers to take appropriate action. ACTIAM will monitor the results with its satellite data provider in the near future.
3. **Responsible products (non-investment):**
   We are taking further steps to explicitly include ESG considerations in our product development and underwriting policies and processes. As part of our marketing and sales activities we have engaged in more dialogues with customers and prospects on ESG matters. We see that this is highly valued by them and it is often an important reason to buy.
4. **Internal engagement:**
   Sustainability has long been an important part of the company's DNA. We see more and more clearly that our employees feel increasingly involved in this topic and are actively debating a number of dilemmas that our sustainability goals and ambitions raise. The management actively encourages this involvement and this debate.

These challenges and ambitions require our continued attention in the coming year. Regular discussions with key stakeholder groups confirm that these remain very valid.

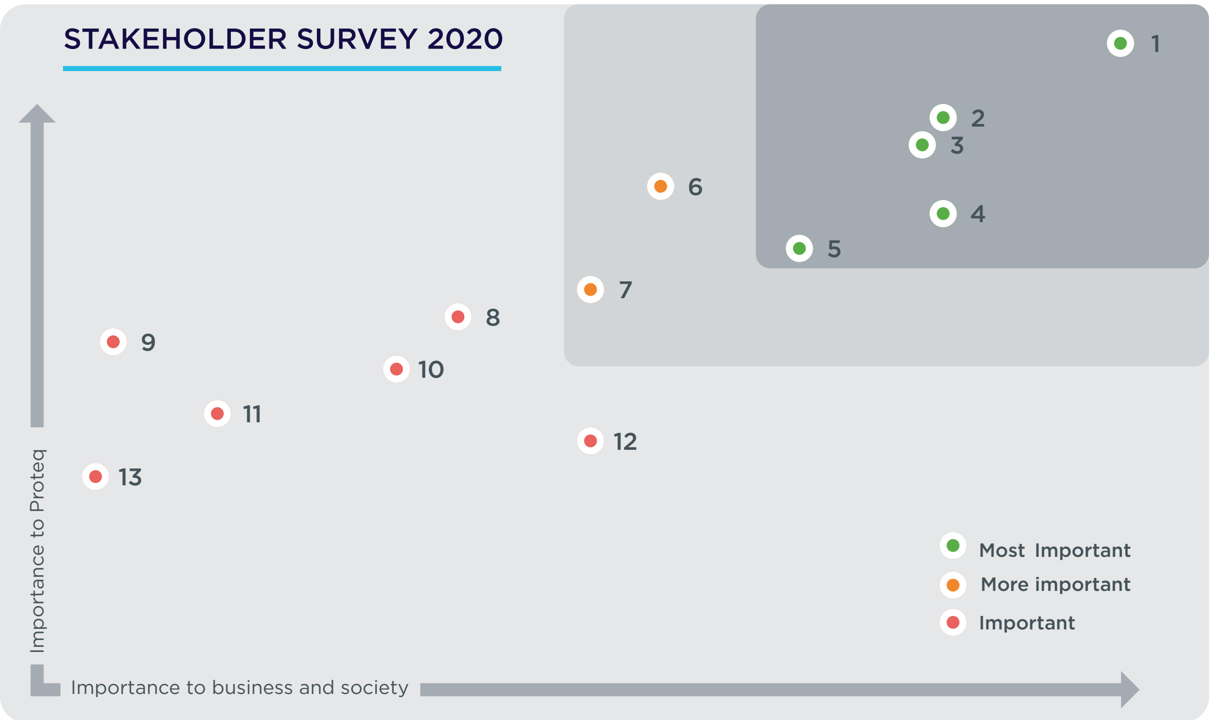
3.3.1 Stakeholders Engagement

On a bi-annual basis, we undertake surveys among a broad representative sample of our stakeholders including customers, partners, employees, government authorities and civil society. We use the results to update our strategy, along with our underlying targets and priorities. The last time we conducted this stakeholder survey was in 2020.

In December 2021, we recalibrated these results by interviewing key representatives from our stakeholder groups as well as key internal stakeholders including Executive Board members. These interviews helped us to bring focus to and refine our strategy, our priorities and our sustainability programme. Additionally, we will use the 2021 findings to update our disclosures and reporting in order to meet (information) requirements by these stakeholders. From the interviews with stakeholders and subsequent internal deliberations and discussion in the Executive Board we have identified the following areas as most important material topics of focus for the coming period:

1. Solvency
2. Responsible Investments
3. Appropriate and Simple Products
4. Products with added value for our customers
5. Biodiversity preservation

Apart from these, other topics will continue to receive our attention, not least our ongoing efforts to achieve net zero carbon emissions by 2050. The aim of this periodical survey is to follow trends and keep our focus aligned to trends and stakeholder requirements.



Key Topics

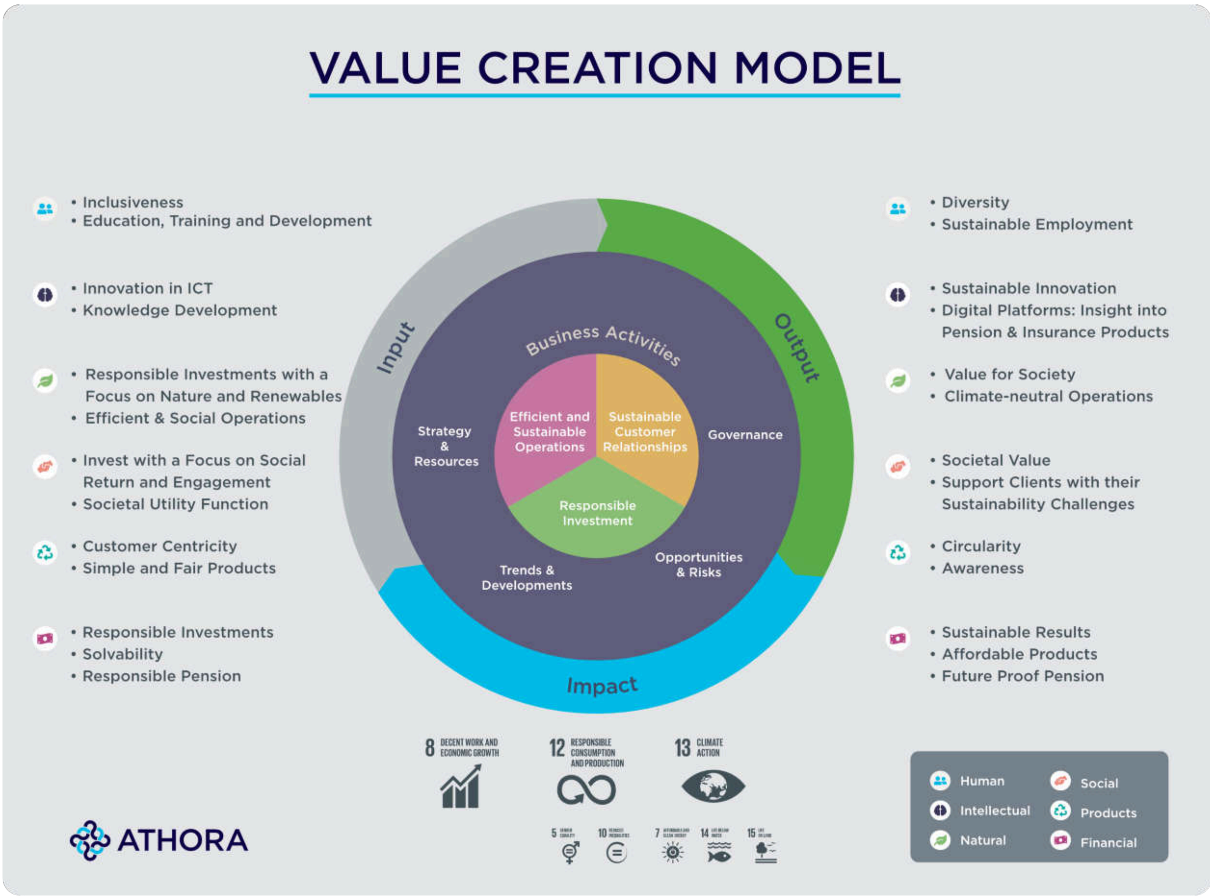
1. Solvency	8. Being a good employer
2. Responsible Investments	9. Diversity and Inclusion
3. Appropriate and simple products	10.Sustainable employability
4. Products with added value for our customers	11. Financial self-sufficiency of customers
5. Biodiversity preservation	12. Sustainable energy generation
6. Reduction of carbon emission by 50% in 2030	13. Strict selection of customers on integrity and sustainability
7. Responsible pension	

3.3.2 Value Creation

As an insurer, our role is to offer our customers simple and comprehensive products, with the choices we make today having an important impact on the protection of our customer' future income. Therefore, we recognise the importance of sustainability and focus on the long term value creation. As this is in essence what we do and stand for as an insurer.

Value Creation Model

Our value creation model shows the various sources (financial, produced, intellectual, human, social & relationships and nature) that we use to achieve our strategic targets and the values that we add with our core activities. It also shows how these collaborate with broader societal objectives summarised under the UN Sustainable Development Goals (SDGs).

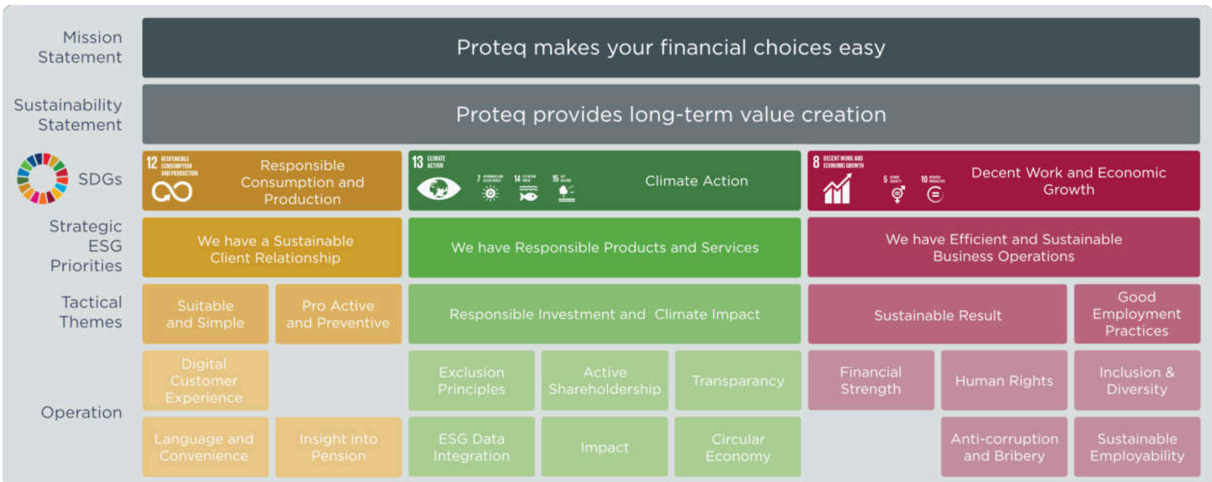


The Value Creation Model applies to Athora Netherlands as a whole, of which Proteq is a full subsidiary

How We Translate Strategies into Actions and Objectives

We have adopted the UN Sustainable Development Goals (SDGs) as a guideline for our business practices. The most relevant SDGs are shown in the illustration below, and these are in turn linked to the underlying tactical themes and operational topics.

The MVO Matrix above shows a complete illustration of the operational topics



The full Connectivity Table is published on the Athora Netherlands website:**athora.nl/en/corporate-responsibility/connectivity/**

3.3.2.1 Creating Value through Sustainable Customer Relationships

Fair and Transparent Service

Customer-centricity is essential for our success. We strive to earn and maintain the trust of our customers by being fair and transparent in our customer approach and by offering appropriate and simple products that add value to our customers. In doing so, we consistently apply the criteria of cost efficiency, usefulness, safety and understandability (CUSU) as prescribed by the regulator, the Dutch Authority for the Financial Markets (AFM) in our product design and approval processes for any new or adjusted propositions, as well as in our marketing, sales and customer service approach. This Product Approval and Review Process (PARP) is described in the Underwriting Risk Management Policy, the criteria are described in detail in the Product Oversight and Governance Policy Reference Model.

We measure our performance on development of appropriate, simple and value added products by a set of key risk indicators (KRIs). The KRIs include the number of product approvals that resulted in an orange and/or red PARP advisory code at an earlier stage of the development process. In 2021 there were none.

Another KRI is the number of changed and/or new applicable laws and regulations that have not been (fully) implemented on time or that are reported to be at risk of not being (fully) implemented on time. In 2021, we identified three relevant legislations for which timely implementation is at risk because legislation has not yet been finalised and approved by Parliament. We also measure the number of complaints about products and/or distribution by our customers and relations. In 2021 there were no such complaints.

Customer Loyalty and Customer Satisfaction

We take customer loyalty and customer satisfaction very seriously. Therefore, we continuously monitor our performance in these areas. Our customer loyalty measure (Net Promoter Score) helps us understand the customers' willingness to recommend a brand to friends and family, providing a broad perspective on how customers value the overall relationship with the brand. Our Customer Satisfaction measure (Delighted Customer Score) helps us to understand how our service is perceived by our customers, identifying drivers for short term improvement in key customer service processes.

NPS

The Net Promoter Score (NPS) is an important indicator for Customer Centricity within Athora Netherlands (and therefore Proteq). Based on the NPS survey results, our customers can be categorised in to different groups: 'Promotors', 'Passives' or 'Detractors'. NPS is measured on a continuous basis among the various customer segments (e.g., both private and business customers, and per product line). As a result, an overall Athora Netherlands score is derived and reported quarterly, in order to monitor the progress and gain insights in the areas for improvement.

In 2021, the Athora Netherlands NPS has slightly decreased to -21, driven by a higher NPS for the Pension Business and lower NPS for the Life Service Business.

NET PROMOTER SCORE		
	2021	2020
Proteq	-31	-29

Customer Satisfaction

In addition to NPS, the customer satisfaction is measured among the various customer segments. These scores reflect the level of customer satisfaction on a scale from 1 to 10 (1 = extremely dissatisfied, 10 = extremely satisfied) and is expressed as the percentage of customers that value our services with an 8 or higher (so called Delighted Customers).

The Delighted Customers Score has shown a light decreased to 44%, primarily driven by lower satisfaction scores. Overall, more than half of our customer base values their relationship with an 8 or higher in 2021.

DELIGHTED CUSTOMER SCORE		
	2021	2020
Proteq	44%	48%

Customer Privacy and Data Protection

Through our business operations, we record and maintain a large amount of data for a very long time. We are bound to secure customer data and data about our interactions with our customers. Proteq not only needs to make sure that we serve our customers well and respect their privacy, but we also have to be able to provide evidence that over the span of our often long term relationship with our customers, we adequately perform our duty of care and fulfil all our legal requirement such as tax filings and regular Sanction List scans.

With that in mind, data protection and the privacy of customer data are of key importance to us. Customers can trust that their personal data are safe with us. That is why we have implemented policies to protect customer data and customer privacy. The privacy statements as published on the websites of Athora Netherlands and our brands (Proteq doesn't have a website of its own) describe the categories of data we collect, the purposes of the collection of these data and how customers may access such data. Customers can contact Athora Netherlands with requests related to their data.

We also have a policy to handle data breaches to minimise possible damage to customers. The appointed Data Protection Officer is responsible for monitoring compliance with the law (e.g., GDPR). In 2021, 166 data breaches (2020: 331) were detected within our company (for Athora Netherlands as a whole, non-life not included) of which 9 (2020: 15) were reported to the Dutch Data Protection Authority. In 2021, we had key risk indicators in place concerning major data breaches and data breaches reported to authorities. Various management and process controls were also in place related to privacy.

3.3.2.2 Creating Value through Responsible Investing

Tightening our Sustainability Policy

In the second quarter of 2021, we tightened our policy for investments in tobacco and pornography. The already existing criteria for excluding producers and companies involved in the supply, retail and distribution of tobacco now includes companies involved in the production of electronic cigarettes. This policy change did not directly lead to further exclusions.

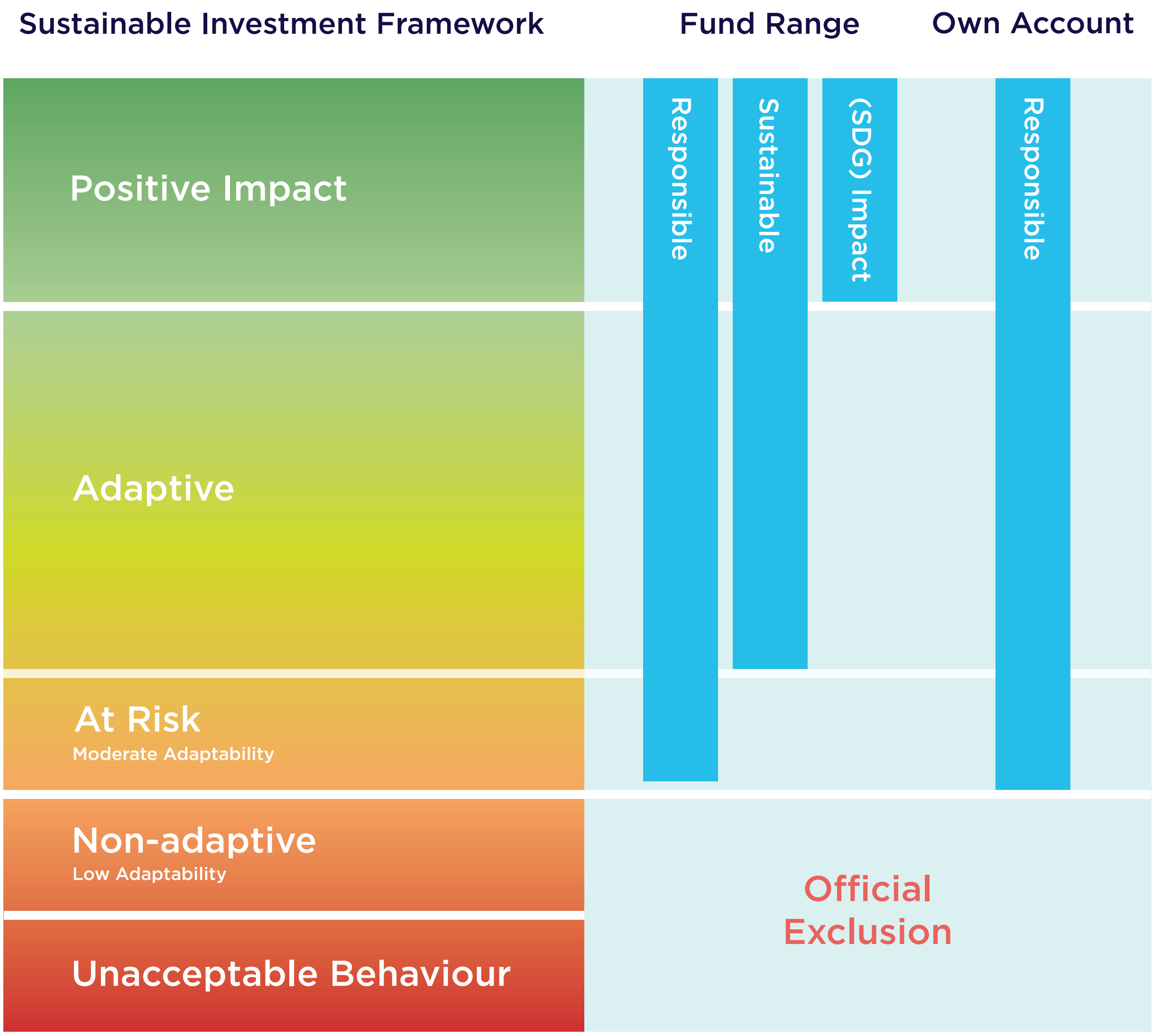
In the last quarter of 2021, government bond policies have been significantly expanded to include principles related to society, people and equality and the environment. This means, for example, that governments are expected to take into account the effects of climate change, resource scarcity and other environmental risks in their decision-making. This means that governments are expected to analyse risks and opportunities and incorporate the effects of climate change and resource scarcity into their policies.

Sustainability Goals and Framework

With our sustainable investment policy, we encourage companies, governments and institutions to operate sustainably. In the range of investment propositions we make a distinction between 'sustainable' and 'impact'-based investment propositions. In addition to the financial targets, strict sustainability targets have been formulated for both investment propositions. For impact-based investment propositions, the additional objective is that, either by the entity or the instrument in which the investment is made, demonstrable positive social added value is created, taking into account the sustainable development goals agreed by the UN.

Based on the above two steps from our Sustainable Investment Policy, we assess for every company, government or institution in which we can invest whether they treat the environment, people and society with respect and whether they contribute to our sustainability goals. In order to select entities that meet the requirements for sustainable and/or impact-based investment strategies, we divide all companies, governments and institutions in which investments can be made into the following five categories.

1. **Positive Impactful**: Companies, governments and institutions that seize the opportunity to consciously make a positive contribution to both the sustainable development goals agreed by the UN and the sustainability goals set in our Sustainable Investment Policy.
2. **Adaptive**: Companies, governments and institutions that are on or near the necessary path to make the transition to a sustainable way of operating within the set time. They demonstrate the willingness and adaptability to properly manage the risks to which they are exposed through the sustainability transitions in order to contribute to the sustainability goals set out in our Sustainable Investment Policy.
3. **At risk**: Companies, governments and institutions that are active outside the planetary boundaries, that are not on the required transition path and do not control all associated sustainability risks. They currently lack the adaptability to prepare for the transitions and are sensitive to operational and financial risks.
4. **Non-adaptive**: Companies, governments and institutions that operate outside the planetary boundaries, that are far from the required transition paths and that lack the ability to bring risk management to the required standard. These companies and countries face major operational and financial risks in the short and medium term.
5. **Unacceptable behaviour**: Companies, governments and institutions that do not meet ethical and sustainable minimum requirements as expressed in our Fundamental Investment Principles.



The investable universe for Proteq consists of companies, governments and institutions that fit into the categories 'At Risk', 'Adaptive' and 'Positive impactful'. By not investing in companies with 'unacceptable behavior', we prevent investing in companies that do not act in accordance with the principles of good governance, as referred to in the SFDR. By not investing in 'non-adaptive' companies, we also ensure that any sustainability risks are limited. This policy ensures that, in line with the SFDR, we seeks to invest in entities that do not seriously impair the achievement of the sustainability goals (do no significant harm), follow good governance practices and contribute to achieving our sustainability goals and financial objectives.

Investing Governance

Various departments and committees within Proteq have the responsibility to adequately implement our Sustainable Investment Policy. We are supported in this by ACTIAM:

- ACTIAM's Sustainability & Strategy team is responsible for the design, implementation and monitoring of the Sustainable Investment Policy. The team also performs the periodic sustainability screening, provides the Investment Office with the necessary information for ESG integration, performs the Active Ownership activities and develops new policies to ensure that the policy remains in line with new regulations and integrates new sustainability risks and opportunities into the policy. The team is responsible for monitoring the sustainability and climate characteristics of our investments and, if necessary or desirable, adjusts these characteristics in consultation with the concerned departments.

ACTIAM's ESG Committee is responsible for policy changes, substantiation for the inclusion or exclusion of companies or governments, monitoring sustainability opportunities and risks and conducting an annual climate scenario analysis. The CIO of ACTIAM, the heads of the Sustainability & Strategy, Product Development and Risk departments and an external professor of ethics sit on this committee. After each committee meeting, the ACTIAM board has the opportunity to make comments and suggestions about the decisions taken. The meetings are organised at least four times a year.
Our Investment Office is responsible for the actual implementation of our sustainability policy. This means that the Investment Office implements the results of the sustainability screening, performed by ACTIAM's Sustainability & Strategy team, within the investments that the Investment Office takes on itself as well as on the investments that are outsourced to external asset managers. For example, part of these results is the exclusion list, based on our Fundamental Investment Principles, which are applied to all investments, where possible. In addition, the Investment Office takes an active role in assessing the sustainability level of external managers, both during the initial selection process and during the subsequent continuous monitoring. The assumed sustainability level is determined by assessing the external managers on sustainability within the organisation and the relevant investment product. In addition, the exclusion policy and the policy on voting and engagement will be reviewed. Finally, the most recent PRI assessment of the asset manager concerned is analysed. The assessment of sustainability of the external manager is taken into account in the final assessment of the external managers.

Investing Strategy

We have formulated a holistic investment policy that take into account the sustainability opportunities and risks of investments and the impact of investments on society. The long-term goal of all of our investments is that the entities in which we invest can be placed within the planetary boundaries and the social foundations of society. In order to achieve these goals and comply with current and new legislation, our Sustainable Investment Policy consists of three steps:

Step 1: Fundamental Investment Principles

The basis of our Sustainable Investment Policy is that companies, governments and institutions must comply with socio-ethical principles. These Fundamental Investment Principles are based on a range of international conventions and principles, including the United Nations' Principles for Responsible Investment (PRI), Global Compact (UNGC), the UN Guiding Principles on Business & Human Rights and the OECD Guidelines for Multinational Enterprises. In addition, we do not invest in countries and companies that are subject to EU or UN sanctions, are involved in the production or trade of controversial weapons, are systematically involved in fraud, corruption or tax avoidance, or are significantly involved in tobacco, pornography or gambling. Companies, governments and institutions that do not comply with these principles exhibit unacceptable behavior and are consequently excluded from the investment universe. All companies, governments and institutions that comply with the investment principles also meet the conditions of good governance as formulated in the SFDR.

Compliance with the Principles is assessed on the basis of two main criteria: (1) repeated or systematic involvement in activities covered by the Principles, as well as failure to adequately address such involvement; and (2) insufficient measures to prevent this involvement in the future. Proteq assesses whether companies or institutions should be excluded as soon as it becomes clear that they cannot be convinced to change their behaviour. When it is decided to exclude a company and an investment is already made in this company, this investment will be sold with due observance of a certain time limit. This may also apply to companies that are not directly involved in violations of the Fundamental Investment Principles, but whose conduct or activities raise serious ethical questions.

When we decide to exclude a company and an investment is already made in this company, this investment will be sold with due observance of a certain time limit. This may also apply to companies that are not directly involved in violations of the Principles, but whose behaviour or activities raise serious ethical questions.

Step 2: Sustainability Themes

On the basis of material sustainability themes, Proteq also assesses the extent to which companies, governments and institutions have the potential and intentions to contribute to a more sustainable society and to prepare for the social transitions that are ongoing.

The purpose of this is twofold. On the one hand, this shows to what extent investments in these companies, governments or institutions contribute to the stated long-term sustainability goals. On the other hand, this assessment reduces the sustainability risks of the investments by assessing which companies, governments and institutions are (inadequately) prepared for changes in regulations, markets and society as required by the sustainability transition.

The potential and intention of companies, governments and institutions to change is referred to as the 'adaptability'. Companies, governments and institutions with insufficient adaptability are excluded from investment. This adaptability is assessed on the basis of seven Material Sustainability Themes that indicate how companies, governments and institutions deal with various sustainability transitions, and take into account:

- Use of fossil fuels: Controlling the use of fossil fuels. This affects, among other things, climate change, air pollution, the availability of energy and health.
- Water use: Controlling the use of fresh water in areas where water is scarce. This affects, among other things, the availability of water, water quality, health and food production.
- Land use: The management of land use, especially for agricultural and mining purposes. This affects climate change, loss of biodiversity and water flows, but also local communities and social inequality.
- Chemical waste management: The management of toxic substances, long-life chemicals, hazardous waste and plastics. This affects the environment and public health.
- Social capital management: Activities to maintain the right to exist (the so-called license to operate). This affects, among other things, human rights, relationships within communities, social equality and the access to and affordability of, for example, health care and financing.
- Human capital management: Activities related to labour and trade union rights and Working Conditions. These affect educational opportunities and income and gender inequalities.
- Organisational behaviour and integrity: Actions to create an ethical business climate. These affect local communities, social justice and working conditions. For companies, this concerns their own organisational model, but also the way in which they deal with other companies in the chain.

We assess the degree of adaptability for every company or government, as well as the extent to which our sustainability goals (do no significant harm) are impaired. A wide range of quantitative and qualitative sustainability indicators are used for this purpose, which come from a number of specialised ESG data suppliers. These indicators provide retrospective insight into the current degree of sustainability of companies and governments, but also provide insight into the goals, plans and investments to further shape the transition in a forward-looking manner. In line with the SFDR, we publish the main adverse effects of its investments on our website. Companies or governments that through their activities or operations make a significant negative contribution to one of the other of our Sustainability Goals are not included in the investable universe. We therefore strive to only invest in companies or governments that make at least a small contribution to one of the sustainability goals. In this way, we promote ecological and social characteristics and works towards achieving our sustainability goals.

Step 3: Positive Impact

Proteq strives to create a positive impact through its investments, in addition to excluding unacceptable behavior and mitigating sustainability risks. For this, we select companies that make a conscious contribution to one of the UN Sustainable Development Goals. In this case, it may concern companies that develop services or products that enable others to make a positive contribution to society. It may also concern companies that manage to make a positive contribution to the Sustainable Development Goals with their production methods.

Risk Management

For entities that comply with the Fundamental Investment Principles, we assess whether they are able to control their exposure to the material risks of not operating in the safe zone. Also part of this is their ability to capitalise on opportunities to operate within those zones. We are convinced that the integration of sustainability aspects and risks in the investment policy leads to better risk-return profiles. When assessing individual companies and governments according to the above framework, we explicitly look at the possible sustainability risks associated with the various sustainability themes and how companies and governments mitigate these risks.

In addition to sustainability risks relating to individual companies or sectors, Proteq also takes into account sustainability risks that may arise in specific countries or regions, such as increasing exposure to natural disasters (including climate change) or social unrest. Taking sustainability risks and opportunities into account creates a broader view of the companies, governments and institutions in which we invest in and improves decision-making, which can ultimately lead to the selection of companies, governments and institutions with lower downside risks and better returns.

Companies, governments and institutions can also be at risk from involvement in controversial themes and practices. In general, reduced involvement in controversial topics and practices for entities leads to reduced market risk and lower cost of capital. Lower cost of capital is generally associated with a higher investment valuation and/or greater return potential. Specific sustainability risks are discussed below and the way in which we deal with them in order to mitigate these risks in its portfolios.

This approach is applied to all entities and to investments in all asset classes. To this end, we use the following instruments:

Engagement

Engagement involves actively entering into a dialogue with companies, institutions and governments in order to propose solutions for their sustainability challenges and to stimulate change in the field of the environment, social aspects and/or corporate governance. The objectives of engagement include: ensuring that improvement is shown in ESG policy and ESG performance; ensuring that improvements to ESG standards are achieved; and influencing laws and regulations related to ESG standards.

The way in which the dialogue with companies, governments or institutions is entered into depends, among other things, on the reason for engagement, the willingness to cooperate and to answer questions. Engagement can be initiated from different angles, for example from new and/or changing laws and regulations and/or by collaborating with other investors to achieve certain ESG objectives and reduce ESG risks.

When it becomes clear after assessment that improvement of the policy or behaviour in the field of the environment, social aspects and/or corporate governance is necessary to prevent exclusion in the long term, a proactive discussion is started. In the case of equity investments, for example, the interest in these companies can be made clear from the role of shareholder that improvement is necessary.

In 2021, we conducted individual engagements and collective engagements towards companies in out portfolio. In particular, the following topics were discussed:

Climate Risks
A key element of our engagement programme is partnering with other investors through the Climate Action 100+ (CA100+) initiative. Since its inception in 2017, this initiative has grown into one of the largest engagement programmes in the world targeting the 100 largest greenhouse gas emitters. The engagement focuses on improving governance and management of climate-related risks, measures to be taken to reduce greenhouse gas emissions and improving reporting. Companies are expected to be transparent about their strategy to ensure they achieve net-zero emissions in line with the Paris climate agreement and to demonstrate their short-term plans to achieve this. Within this initiative, ACTIAM leads the engagement dialogue on behalf of Proteq with Bunge, an American multinational active in the food industry. There have been several discussions with the company in recent years, most recently in November 2021. This was shortly after the company published its new climate strategy with ambitious commitments to reduce emissions. As one of the largest soybean importers in the world,

its reduction targets are inextricably linked to preventing deforestation. It is therefore important to improve how Bunge monitors the value chain in order to guarantee that no deforestation takes place. In addition, ACTIAM wants to better understand how Bunge uses lobbying activities at the local, regional and national level to prevent further deforestation.

Deforestation Risks
In 2021, ACTIAM launched the second phase of its initiative called 'Satellite-based engagement against zero deforestation', which started in 2020. The initiative aims to remove barriers to achieving zero deforestation for the investee entities. ACTIAM joined forces with other investors, including Proteq, worth €1.8 trillion in assets under management, and led the investor initiative with the two main goals of the engagement: (1) improving traceability and disclosure of deforestation in the supply chain; and (2) reducing deforestation in the supply chain. In the second phase, engagement is conducted with twenty companies, which are divided into two groups. Companies in Group A have been selected because of their high deforestation rates but where there is a lack of satellite data from our partner Satelligence on production locations in the supply chain. Here the focus of the dialogue will be on improving traceability and transparency in supply chains. Group B companies were selected based on the production or sourcing of palm oil from Indonesia or Malaysia, from different stages of the palm oil supply chain and available satellite imagery.

Exclusion

If entities are categorised as non-adaptive, we consider them to be a significant risk to society and to investors. After approval of ACTIAM's ESG Committee such entities will be excluded from investments. Since there is generally little willingness among these entities to change to business conduct that fits the safe and fair zone category, engagement is unlikely to be successful.

In 2021, the total number of companies excluded due to being non-adaptive increased again. Most of the new exclusions, more than 75%, were based on high carbon intensity levels, either from own operations (scope 1 and 2) or products sold (scope 3). The high number of exclusions reflect the fact that the low carbon transition risks are materialising rapidly. The names of newly excluded entities and grounds for exclusion are published in quarterly reports published on the Athora Netherlands website throughout the year.

Metrics & Targets

In line with the SFDR and TCFD, we report on the sustainability impact of our financial products. In order to see whether these products show the right development towards achieving the various sustainability goals, we also monitor our carbon and water footprint. It also reports how great our climate risks are and what steps are being taken to mitigate these risks. Finally, it reports on investments in sustainable bonds in 2021 and on our contribution to the United Nations Sustainable Development Goals (SDGs)[2].

Carbon Emissions of the Investments

The carbon footprint of the investments is calculated in line with the method developed by the Partnership Carbon Accounting Financials (PCAF). The carbon footprint consists of the absolute total scope 1, scope 2 and scope 3 carbon emissions of the entities in which investments are made. The data is provided by external data providers MSCI ESG Research and Eurostat. The data is expressed in tons of CO2 equivalents, and therefore includes various greenhouse gases. Based on the share of the enterprise value of the company in which it is invested through investment in shares or the part of the debt in which it is invested through investment in bonds, a part of the total carbon emissions of the entities is allocated to our investments. The sum of the carbon footprint of all individual investments corresponds to the reported total carbon footprint of the investments.

[2] Appropriate indicators for all our sustainability goals are not yet available to measure progress in a consistent manner. That is why we participate in working groups on deforestation, biodiversity, plastic pollution, living wage and the SDGs to develop measurement methods for the remaining goals. In anticipation of these indicators, we assess the steps they are taking to further shape the transition for all companies on the basis of the current sustainability performance, but also the plans, goals and investments of companies. We have developed a method to assess whether a company is expected to make a minimal, average or high contribution to the objectives. It is monitored afterwards whether this expected contribution actually materialises.

CARBON EMISSIONS			
Investments	Capital per 31 December In € millions	CO2-emissions scope 1 and 2 Ton CO-2 per € million	CO2-emissions scope 3 Ton CO-2 per € million
2021			
Own account	30,494	11.8	72.0
Funds	26,065	50.4	257.4
2020			
Own account	37,861	27.2	15.9
Funds	24,075	56.9	134.2

The carbon footprint of the investments is calculated in line with the method developed by the Partnership Carbon Accounting Financials (PCAF). The carbon footprint consists of the absolute total scope 1, scope 2 and scope 3 CO2 emissions of the entities in which investments are made. The data is provided by external data providers MSCI ESG Research and Eurostat. The data is expressed in tons of CO2 equivalents, and therefore includes various greenhouse gases. Based on the share of the enterprise value of the company invested in through equity investment or the portion of debt invested through bond investment, a portion of the entities' total carbon emissions is allocated to Athora's investments. The sum of the carbon footprint of all individual investments corresponds to the reported total carbon footprint of the investments.

A distinction is made in the overview between the carbon footprint of the funds (managed by ACTIAM) and Athora's own account. In addition to the emissions, it is also shown which part of the emissions is based on reported values, estimated values and for which part of the portfolio no data is available. Compared to 2020, a lot has changed in Athora's own account portfolio. The largest change in CO2 emissions is therefore also determined by a change in the portfolio strategy, which has resulted in a significant drop in emissions per million euros invested (~-56%). The only comment that must be made here is that 10% of the portfolio cannot yet be measured properly, these are mainly the 'private' loans and investments where data availability is an obstacle. For the funds, a decrease has also been realised per million euros invested (~-11%). This is caused by the tools used by ACTIAM (engagement, exclusion, green bonds) and is in line with the stated objectives of reducing greenhouse gases in the portfolio by an average of 7% per year.

CARBON EMISSIONS PER PORTFOLIO SCOPE 1 & 2						
	Capital per 31 December	Reported	Estimated	Not available	Total	Intensity
Investments	In € millions	%	%	%	Ton CO-2	Ton CO-2 per € million
2021						
Own account	30,494	60.1%	29.6%	10.3%	360,735	11.8
Funds	26,065	79.4%	20.6%	0.0%	1,313,900	50.4

CARBON EMISSIONS PER PORTFOLIO SCOPE 3			
	Capital per 31 December	Total	Intensity
Investments	In € millions	Ton CO-2	Ton CO-2 per € million
2021			
Own account	30,494	2,196,233	72.0
Funds	26,065	6,708,600	257.4

Water

The method for calculating the water footprint is currently limited to companies. As a result, the current water footprint of portfolios containing government bonds will be lower than the actual footprint. The calculation of the water footprint follows the same method as that of the carbon footprint. In addition, the raw data underlying the water footprint is still relatively uncertain. We expect that with better data, the results may still change in the future.

Stressed water consists of the absolute water consumption of business activities in sectors and areas where there is high water scarcity. The water footprint cannot be calculated for real estate as here no data are available. The water footprint is only partially calculated for the investments in this asset class. In addition, the water footprint is not considered material for the real estate sector, because the real estate fund does not invest in water-scarce areas.

WATER USE				
Investments	Capital per 31 December In € millions	Of which relevant In € million	Total scarce water use In thousand liter	Intensity of scare water use Thousand liter per € million
2021				
Own account	30,494	688	45,693	1.5
Funds	26,065	4,183	355,044	13.6
2020				
Own account	37,861	880	495,752	13.1
Funds	24,075	4,054	902,330	37.5

Land & Biodiversity

Wrong land use due to deforestation can increase the amount of CO_2, affect biodiversity and lead to less income and food. It is our ambition to have no more deforestation in our portfolios by 2030. However, the availability of data on deforestation is still in its infancy. Therefore, via our brand Zwitserleven and together with ACTIAM, we have taken steps to use up-to-date information about global deforestation, trends and causes with external partners. This allows us to detect and quantify changes in vegetation due to plantation development or fire damage. The ultimate goal is to work towards a deforestation-free investment portfolio.

Climate Risks

We also assess the amount of climate risk at portfolio level. With a scenario analysis, we are even better able to identify the companies and sectors that are expected to be unable to make these sustainability transitions on time and therefore pose a sustainability risk for both equity and bond investments. It helps us to distinguish the frontrunners from the laggards within sectors, not only to identify which companies are most at risk, but also to be able to identify risks for different asset classes. Based on this, we assess whether these companies should be encouraged even more to adjust their policy or whether the screening should be tightened up.

Climate risks are therefore included in the considerations from different angles of the investment process. We calculate the 'risk value' (Value at Risk; VAR) for each company and then for the portfolio. This risk value is an estimate of the costs that a company will have to incur, i.e. the impact on the valuation, under the scenarios that global warming is limited to 1.5°C, 2°C or 3°C (the 1.5 degrees Celsius scenario is shown below per portfolio[2]. We try to distinguish between (i) the costs/benefits of stricter climate regulation, (ii) the costs/benefits of changing preferences or technological progress; and (iii) the costs of physical damage from climate change[3].

[2] The Value at Risk measures the value of a company that is under pressure under a certain climate scenario. MSCI uses the AIM CGE model to calculate, assuming that carbon prices are introduced that incentivize companies to meet a given rise in global temperature, to what extent a company is at risk from stricter legislation, has opportunities because it develops technologies that are needed for the energy transition, or is at risk from the physical effects of climate change.

[3] Note that the total climate risks are based on the companies for which risk estimates are available. For example, no estimates of climate risks are available for governments and supranationals because the models are not yet suitable for this.

CLIMATE RISKS				
Investments	**Value at Risk**	**Related to regulation**	**Related to technology**	**Related to climate impact**
2021				
Own account	-1.7%	-1.4%	0.1%	-0.4%
Funds	-12.9%	-9.8%	5.3%	-8.2%

The estimates of the climate risks for Proteq are based on Value-at-Risk estimates for equities and bond investments. On average, the climate risks for bonds are lower than for equity investments because of the chance that the bonds have a greater chance of getting back a part of the invested capital than shareholders in the event of bankruptcy. The figures show that for some of the companies in the portfolio, the climate transition does not result in risks, but offers the right opportunities of services that are necessary to generate renewable energy and realise energy savings. The risks from changing market conditions of stricter climate policies are expected to outweigh the opportunities for many companies. The markets are also ahead of investments, especially in common businesses.

It is not easy to compare the climate risks of our investments over time. On average, the climate risks in 2021 will be greater than in 2020. Legislation is becoming immersive and more measures must be taken in a shorter time as it takes longer at a global level to substantially reduce greenhouse gas emissions. Climate risks are also increasing. On the one hand, this is due to a global transition to a low-carbon society that is too slow. On the other hand, more information is also available for different climate scenarios to estimate the risks. The estimates are better calculated from the figures for 2020 and 2021 are partly caused by methodological start. That is why the development of climate risks is closely monitored. Companies that run high risks through engagement addressed on their risks and if this does not lead to sufficient activities, eventually terminated from investments. The companies in portfolio also document the transition to a low-carbon way of making things quickly enough and develop goals and policies for them to make the switch, for example to renewable energy.

Positive Impact

We strive to create a positive impact through its investments, in addition to excluding unacceptable behaviour and mitigating sustainability risks. We create this impact by, among other things, investing in sustainable bonds and investing in companies that contribute to the sustainable development goals selected for us.

Sustainable Bonds

Sustainable bonds are in line with our ambition to contribute as broadly as possible to the financing of sustainable activities. In 2021, we therefore invested again in loans from companies in both the financial and non-financial sector. Below are some examples of sustainable bonds in which we have invested in 2021:

- In the first quarter, the Swedish clothing company H&M introduced a sustainability-linked bond. For this loan, H&M has defined three objectives to which borrowed funds must contribute. One of these targets focuses on circularity: the proportion of recycled materials as part of total materials used in commercial goods. By recycling used textile fibers, the ecological footprint of sold clothing can be reduced. Recycled material reduces the consumption of new raw materials and reduces the use of chemicals, energy and water.
- In the second quarter, the World Bank launched a sustainable bond. Proceeds from the bond will be used to fund sustainable development projects, programs and activities in World Bank member countries. Each project is designed to achieve both positive social and environmental impacts; this is in line with the World Bank's dual objective. This could be, for example, improving food security and providing individuals and businesses with access to affordable financial products and services.

3.3.2.3 Creating Value via Efficient and Sustainable Business

People are the heart of our organisation and are crucial in fulfilling our mission. Therefore, we invest in the physical, mental and social health of our employees and offer individual development opportunities. In this way our employees have more control over their own career and their own health.

Diversity and Inclusion

Respect for every individual and their unique contribution is defined in our Code of conduct and and Diversity and Inclusion policy. We value differences and diversity, recognising that different perspectives make our organisation more colourful and better in serving our clients. We foster an inclusive culture in which everyone can be themselves.

To this end, have formulated goals to improve diversity and inclusion within the company.

Inclusion Goals
- 85% of the employees indicate that they can be themselves within our company.
- 75% of the employees indicate that they feel that they fit in with our company.
- 85% say that there is room for everyone's opinion within the team.
- 80% indicate that people of all backgrounds (culture, ethnicity, gender, sexual orientation, age, religion etc.) can succeed at our organisation.

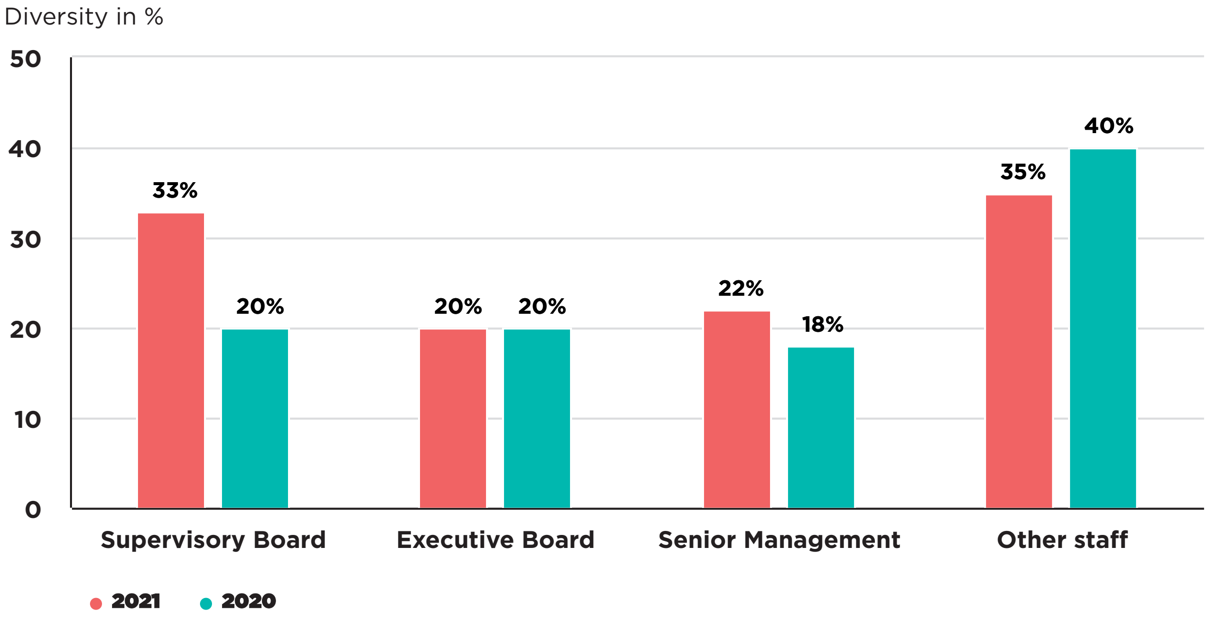
Diversity Goals
- Our long-term goals for gender equality remains: 40% male or female in SB, EB, Senior Management, Management and Others, as mentioned in the Equality-policy. To take it step by step, we first aim to have 30% Female in SB, EB, Senior management and Management in 2022.
- A balanced distribution of the age structure within the teams (after strategic review).
- At least three persons with a distance to the labour market employed by Athora Netherlands in 2022 (10 persons in 2025) or working via secondment.

After signing the Charter last year, we drew up an action plan, in collaboration with the Diversity Charter, on a number of sub-themes of diversity and inclusion, based on the goals formulated above. It has been agreed with the Executive Board which themes have been tackled in the past year in order to increase diversity and inclusivity within the company. Various activities and initiatives have taken place in this regard: for example, workshops have been given in management teams on Diversity Data and awareness, and the Talent Review process has been adapted so that it has become more gender neutral and so that women can progress better. Extra attention was paid to recognising and naming female talent and various publications on ID were published during the year to bring the theme to the attention of managers and employees in a positive way.

To further increase awareness within our company, we organised Diversity Day on 5 October. This solidarity day—a national initiative of Diversity in Business of the SER—illustrates the positive power that arises when you bring people together with differences in cultural origin, sexual orientation, age, gender or work capacity.

The employee survey we conducted in November showed that we have not yet achieved the Inclusion targets this year. The number of employees who indicate that they 'fit' with Athora has fallen from 73% to 64%. Most likely, the current reorganisation plays a major role.

Also in terms of diversity we are not yet where we would like to be. Currently 33% are female on the Supervisory Board, in line with the forthcoming law “More balanced male/female distribution in the top of the business community”. In the Executive Board this percentage is 20%. Especially when we look at women in management positions and the number of people with disabilities in employment, there is still considerable room for improvement. Therefore, in the coming year we are going to look at how we can further develop this theme. The fact that the organisation is going to continue to shrink presents us with an additional challenge to make this happen.



At Proteq, jobs are weighted regardless of gender. Women and men with comparable work experience, achievements and job level are given equal pay. The differences in wages between women and men are caused by the on average higher age of men and to level / grade differences. Within our company, women are on average 1.3 years younger than men and are underrepresented in the higher salary scales.

Sustainable Employability

To ensure the continuity of our business, we encourage employees to be healthy, motivated, competent and productive at work. The aim of our HRM Policy is to achieve sustainable employability for all employees. Sustainable employability is based on personal development, vitality and flexible employment conditions. In 2021, we participated in the certification process to become a Top Employer. Being certified means that as a company you put people first and allow employees to flourish because they are empowered by the best working conditions.

Personal Development
We believe it is important that our employees are able to adapt to a changing world. We therefore support them in their pursuit of sustainable employability, within or outside our organisation. In order to keep up with their profession or to develop new competences or knowledge, every employee has access to a personal growth budget. This year the growth budget has been increased from 750 to 1000 euros per employee per year. In addition to the growth budget, we offer many other development options, such as a Summer School, workplace learning, the deployment of speakers, etc. During the year, managers and employees make development and result agreements with each other and discuss progress.

Develop & Accelerate
In September we started the Develop & Accelerate Programme (D&A), a new initiative that focuses on both personal development and the transformation of our company. We went in search of so-called 'Changemakers'. In 2021 and 2022, approximately sixty talented employees will participate in this programme that will last approximately nine months, during which they will work on personal learning goals and strategic assignments. They are guided and challenged by their Business Challengers and executives. In addition to developing themselves and working on various assignments, the participants are also brushed up (partly by Athora's own professionals) on themes such as Change Management, Stakeholder Management and Leadership.

Leadership
Leaders and managers play an important role within our organisation. That is why we offer specific activities to support them. In the previous year, leadership dialogues have been held about the four essential roles of leadership. These roles are Inspire Trust, Create Vision, Execute Strategy and Coach Potential. The aim of these Leadership Dialogues was on the one hand stronger business performance

and on the other personal growth and development by reflecting together on practice and learning from each other in leadership.

Vitality
In various ways we support employees as much as possible in this Corona time when health and work/life balance are more important than ever. For example, we organise Inspiration sessions to teams, and give employees the oppertunity to participate in the Global challenge: a wellness solution that provides participants with knowledge and tools on a daily basis to build new healthy habits. In addition, employees can contact the company doctor for a preventive conversation if they have concerns about their (mental) health. And we offer workshops in the field of lifestyle, vitality and sleep. On the intranet we regularly gave tips about healthy working habits and other ways to remain vital.

Every employee who works from home receives a budget to set up his home workplace according to the applicable health and safety requirements. An instructional video is available to explain how to set up one's workplace correctly.

Health Safety and Well-being
In collaboration with our occupational health and safety service, we support our employees in the field of absenteeism and reintegration. This year the absenteeism rate has increased to 4.1% (2020: 3.4%), above our target of 4%. This increase in absenteeism is a trend that is visible nationally, which can be explained by delayed medical care. As a result, employees remain absent for longer. The fact that, in combination with the fact that we are currently undergoing rapid changes, an increase in the absenteeism figure was to be expected. In the coming year, the absenteeism rate is expected to fall below 4% again.

Our annual employee survey, held in November 2021, had a good response rate of 83%. It gave us insight into what is valued by our employees and where there are opportunities for improvement. The results show that improvement is needed in several areas. Employees indicate that they are currently less satisfied with the organisation and the working conditions and give a lower score on commitment and engagement. The Executive Board appreciates this feedback and will work hard in 2022 to make improvements. In January, the results were shared further in the organisation and improvement plans were drawn up at various levels.

Flexible Working Conditions
Working from the office will not be the same as before the Corona crisis. We opt for a hybrid form of working: alternating between working from home and working at the office. Smarter, more efficient, with an eye for sustainability and our well-being, and for achieving the desired result together. In this way we retain the benefits of working from home and the social cohesion of working at the office. Time at the office is important for transferring knowledge, inspiring and meeting each other. Our concept of hybrid working is called PASS, which is an abbreviation that has several meanings: Pick a Smart Site, Pick a Smart Spot, Pick a Smart Solution. It is currently being rolled out within our organisation. This new way of working also includes suitable employment conditions. That is why last year, in consultation with the Central Works Council, the working from home policy, the travel expenses scheme and the home working allowance were adjusted, among other things. In this way we can better match what is needed to work in a hybrid manner.

Energy Measures

For Proteq it is important to minimise the negative impact of our own business operations on the environment. Being climate neutral is one of our main objectives. Our offices operate on one hundred percent green gas and electricity, as they have been doing for several years. In 2021, we achieved a 63.3% drop in net carbon emissions for our own internal organisation to 700 tonnes. The main reason for this decline was the restrictions on working at the office, the reduction of staff and the minimisation of the travel movements caused by the COVID-19 pandemic.

When working from the office and business travel will resume, it is very likely that emissions will rise again. However, due to further reductions in staff and the even more stimulation of working from home, it is expected that it will not return to the level before the COVID-19 pandemic.

INTERNAL CARBON EMISSIONS		
Carbon emissions in tonnes	2021	2020
Scope 1 (biogas, lease cars)	515	509
Scope 2 (renewable electricity)	-	-
Scope 3 (business travel, commuting, waste, paper and water)	185	1,396
Net carbon emissions	**700**	**1,905**

To neutralise these emissions, 3,592 tons of CO2e Gold Standard, CDM, and 2,580 tons of CO2e Fairtrade Gold Standard, CDM for financial year 2021 were purchased. In total, this compensation is more than necessary for the actual emission basis, but it has also been decided to continue to support projects based on a social motive. An extra step was taken in 2021 to go for Fairtrade in addition to Gold Standard.

Nevertheless, our activities to work towards climate neutrality go beyond the offices in which we work. All our suppliers are requested to comply with our General Procurement Terms and Conditions. By agreeing with these terms and conditions, suppliers declare that they have taken steps or are in the process of taking steps to minimise their ecological footprint (including carbon emission, paper consumption, energy consumption and waste) and have implemented or are in the process of implementing similar sustainable procurement terms and conditions in their own organisation.

3.3.3 Managing Non-financial CSR-related Risks

Human Capital Risk

The reorganisation of Athora Netherlands was continued in 2021. The impact of the reorganisation and the sale of ACTIAM was closely monitored each quarter in the Quarterly Human capital report. This looked at the state of affairs with regard to the themes In and Outflow, Absenteeism, Vacancies and results of the Pulse survey and/or employee survey. If necessary, mitigating measures were taken to make adjustments. The Covid pulse in June showed that employees were satisfied with how Athora Netherlands dealt with the situation surrounding COVID-19 and that they were able to do their work effectively. The staff turnover, number of vacancies and in and outflow in 2021 went according to plan and, insofar as determined, were in line with the Operational Plan (OP).

In December 2021, the employee survey showed a lower score on employee satisfaction, engagement and commitment of our employees. The Employee satisfaction score dropped from 7.6 to 6.9. To prevent the risk of unwanted turnover and to improve employee satisfaction, improvement plans will be made from January in close collaboration with the board and management. A number of causes of these low scores, such as the lack of clarity of the strategy and lack of communication about this, have already been initiated by communication about this from the Executive Board in December.

The scores for Sustainable Employability and Psychological Safety have remained virtually stable. Within Proteq there is no room for unacceptable behaviour, such as discrimination, abuse of power, aggression or sexual harassment. This principle is stated in our code of conduct 'Common sense, clear conscience'. We stand for equal rights and opportunities for everyone in our organisation, that is why we signed the LGBTI manifesto in 2018.

Proteq also has a policy in place for unacceptable behaviour, with preventive measures for unacceptable behaviour, protection for those who report such behaviour and information on how to report incidents.

Our Diversity and Inclusion policy aims to create a culture of inclusion and equality, in which people are comfortable to voice their thoughts, come to shared understanding and develop innovative solutions, to ultimately create value for our customers, our shareholders and our employees.

Proteq collects and uses personal data of its Customers, suppliers, business partners, employees and other Individuals in the context of its business activities as an insurer and financial service provider. Lawfully, fairly, transparently and securely handling of personal data is of key importance for us. Privacy is not only treated in our Code of Conduct, but it is also one of the integrity and compliance risk themes mentioned in the Compliance Charter. This Risk Policy Data Privacy ("Policy") describes how we deal with personal data including the controls to identify, monitor and deal with the compliance and integrity risks involved with privacy and how this will be implemented.

Human Rights Risk

The UN Guiding Principles on Business and Human Rights, endorsed unanimously by the UN Human Rights Council in June 2011, underline the corporate responsibility to respect human rights. This responsibility, also affirmed in Principles 1 and 2 of the UN Global Compact and the OECD Guidelines for Multinational Enterprises, requires companies to avoid causing or contributing to adverse human rights impacts through their own activities, and to prevent, mitigate or remedy human rights impacts directly linked to their operations, products or services. The responsibility of companies to respect human rights refers, as a minimum, to the core internationally recognised human rights, contained in the International Bill of Rights. Depending on the circumstances, companies may need to consider additional universal human rights standards, for instance relating to the protection of the human rights of specific groups, such as indigenous peoples, women, persons with disabilities, and migrant workers and their families. We consider violations of the above mentioned international human rights mechanisms to be a violation of the Fundamental Investment Principles it adheres to. In addition, insufficiently protecting or even violating human rights, can directly lead to reputational damage and decreasing sales, creating a financial risk to investors.

For Companies

Periodically, at least four times per year, we screen our investment universe on potential controversies of non-compliance with the above mentioned principles. Companies that do not comply with the Fundamental Investment Principles enter a three month investigative period during which the controversies are systematically assessed. As part of this assessment, we investigate the severity, nature and number of controversies the companies are involved in as well as the actions they take to remedy the situation and prevent further violations from occurring. Based on this, the company is either:

- Excluded if systematic and large scale non-compliance to any of the criteria proves that companies are incapable of preventing non-compliance from occurring in the future. When the decision is made to exclude a company and investments have already been made, these assets will be sold within thirty days.
- Included if the violations are of incidental nature and if the company takes sufficient actions to prevent comparable incidents from happening in the future, or;
- Engaged if the company has not taken sufficient action to prevent future incidents and if engagement with the company is expected to result in the necessary behavioural improvements. During the engagement period, a dialogue is started with the company to discuss options to remedy any real or potential violations of the Principles. If after a two year engagement period the company has taken appropriate action and proven to prevent further structural violations of the Fundamental Investment Principles, the company will be included in the investment period. If there is not sufficient progress after this period and compliance with the Fundamental Investment Principles is not reached, the company will be excluded. This approach ensures that we only exclude companies once it becomes clear that there is no ability to persuade or encourage them to change their behaviour.

For Sovereigns

As a starting point, we will not invest in any sovereign that repeatedly or systematically fails to uphold and protect the most basic of human, civic and political rights, such as those enshrined in the 1948 Universal Declaration of Human Rights, the 1966 International Covenant on Civil and Political Rights, and the 1966 International Covenant on Economic, Social and Cultural Rights. To help determine which sovereigns are failing to meet these obligations, all sovereigns are evaluated based on the well reputed indicators from the Freedom House's Freedom in the World report, which is an annual comparative assessment of political rights and civil liberties worldwide. Sovereigns that are deemed 'Not Free' by Freedom House will be excluded from investments.

In addition, in case Freedom House indicates that a country is 'Partially Free' or if there is a conflict area in the country which is labelled as 'Not Free' or 'Partially Free', an individual country assessment is conducted. In the latter case, the following rules are applied: if a disputed territory—within the borders of one country— is invaded, threatened, occupied and/or militarised by another country, then the first country is not necessarily excluded. The affected country does not have effective control over these areas. Countries that are considered 'Free' or 'Partially Free' are excluded from investments if it is obvious that such countries have effective control over the conflicted areas.

Anti-corruption and Bribery Risks

It is our policy to conduct all of our business in an honest and ethical manner. This is also expressed in the zero tolerance approach we take to corruption and bribery. The prevention, detection and reporting of corruption and bribery are the responsibility of all those working for us.

We endorse the following conventions and principles: UN Convention Against Corruption, 2003, OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997, OECD Guidelines for Multinational Enterprises and Principle 10 of the UN Global Compact.

We have a corruption and bribery policy in place. Closely related to the corruption and bribery policy, we also have a code of conduct, pre-employment screening policy, client integrity policy (AML, CFT and Sanctions regime), procurement policy, institutional conflict of interests policy, incident management policy and whistleblowing policy in place. These policies describe, among others, principles to counter corruption and bribery on which we must takes adequate measures.

The principles and measures as described in the policies are translated in business controls and management controls. Among others the controls are related to:

1. the due diligence of employees, third parties, closely related stake holders and clients;
2. accepting and providing of gifts, hospitality and donations;
3. financial record keeping;
4. training and awareness of employees;
5. whistleblowing and hotline incident reporting mechanisms;
6. yearly business risk analyses on corruption, bribery, conflicts of interests and client integrity.

Based on the yearly risk analysis, we consider the risks of corruption and bribery of non-senior management, geographical factors, sector, product or transaction factors relatively low. Senior management (network and family related risks), procurement, account management, marketing & communication departments (third party risks) are considered the most vulnerable positions when it comes to corruption and bribery. If a case of bribery or corruption were to occur, it could lead to operational costs, reputation damage and damaged relations with stakeholders. The findings from the analysis performed are taken into account in the business control measures.

We have no explicit quantitative performance key risk indicators with respect to corruption and bribery (besides of incident reporting, employee conduct, institutional conflict of interests key risk indicators). We have however quantitative performance key risk indicators regarding employee conduct. The number of incidents related to dishonest, inappropriate and/or unprofessional behaviour were all within the corresponding key risk indicator norms. Furthermore, in 2021, we have not detected and reported any forms of corruption and bribery.

Financial Economic Crime

Financial Economic Crime refers to unlawful acts (including omissions) committed by an individual or a group of individuals resulting in a financial or economic advantage. Financial Economic Crime includes amongst other money laundering, circumventing sanction regulations and fraud. Athora Netherlands performed an additional risk assessment with regard to fraud. Based on the low risk outcome of this assessment no further mitigating actions are required.

As a Pension and Life insurer, sanctions and money laundering risks are assessed low, but not non-existent. The mortgage and real estate investment activities are being perceived and assessed as medium respectively higher risks. As a financial institution, we have the responsibility to ensure detection and prevention of unusual transactions. In our efforts to ensure compliance with applicable laws and regulations, instances of non-compliance can potentially occur. We assess product specific risks with regard to sanctions, money laundering and terrorist financing on a regular basis.

During 2020 and 2021, we executed an improvement programme to remediate identified shortcomings in relation to compliance with sanction law and anti-money laundering/counter terrorism financing regulation. The programme, which made significant steps in organisational governance, risk assessments, (automated) processes and tooling, aims to reduce residual risks on a structural basis. DNB performed an investigation in the second half of 2021. It is noted that there are still outstanding remediation actions to be concluded in 2022 in the areas of customer/business partner due diligence and transaction monitoring.

We have key risk indicators in place with regard to the number of high risk classified clients and/or business partners, the percentage of clients and/or business partners for which either no reproducible client due diligence or sanction list check has been performed, the number of ineffective Management Controls, the number of ineffective Process Controls and the number of overdue actions all related to financial economic crime. The aforementioned programme aims to mitigate financial economic crime risks to acceptable norms in 2022.

3.4 BUSINESS PERFORMANCE

Objectives for 2021

Proteq was focused on building on the strategic choices made in previous years, such as structurally and sustainably improving our processes, making our services more efficient and optimising our product range. We remained true to our goal to increase sales by strengthening our product positioning and capitalising on growth opportunities, and transforming into a more digital and data-driven organisation.

Achievements

Organisation
In 2021, we continued to work on our business automation project (Pega) to reduce manual work flows. The total handling time and lead time for all our processes has been reduced even further. The implementation of improved online self-service options has significantly reduced the influx of customer requests from distribution partners and customers.

We have also paid a lot of attention to legal and regulatory compliance (License to Operate), particularly anti-money laundering and sanctions regulations. We attach great importance to compliance and awareness within Proteq and the partners we work with. That is why we continuously check whether our working method is still sufficient and revise it where necessary. In addition, we have continued our efforts to keep the General Data Protection Regulation (GDPR) at the foreground. Precautions have been taken to introduce the EU Sustainable Finance Action Plan into our products.

Products
In the field of funeral insurance, we continued a campaign to inform existing customers about their possible under insurance and to encourage them to review if their situation still met their needs. As in 2020, we collaborated with distribution partners to inform their customers as well.

A number of proxy agreements with life insurance portfolios, which are non-selling, were terminated by mutual agreement. By fully integrating these portfolios into the systems and our processes, we avoid future challenges in terms of compliance and profitability.

Challenges

Proteq is operating in a shrinking market for individual life insurances. To keep costs competitive per policy, it remains important to reduce costs. We try to ensure that the restructuring of our organisation has no negative impact on performance and ultimately, our customers.

3.5 FINANCIAL RESULTS

Net premium income decreased 14% from € 4,929 thousand to € 4,247 thousand as a result of a shrinking portfolio.

The 2021 IFRS net result amounts to a loss of € 15,233 thousand after tax (2020: profit of € 6,434 thousand). The main driver of the result is mainly due to impact change deferred tax assets recoverability (€ -17,511 thousand).

Balance sheet

Assets
Total assets of Proteq decreased by € 81.1 million to € 644.5 million. Investments for own account have decreased by € 57.4 million in 2021. Main outflows originated from lower received cash collateral for derivatives and decreased prices of investments due to increased market interest rates.

Liabilities
Total liabilities of Proteq decreased by € 57.9 million to € 554 million, mainly due to the decrease of insurance liabilities and amounts due to banks.

Insurance liabilities decreased in 2021 mainly as a result of increased market interest rates.

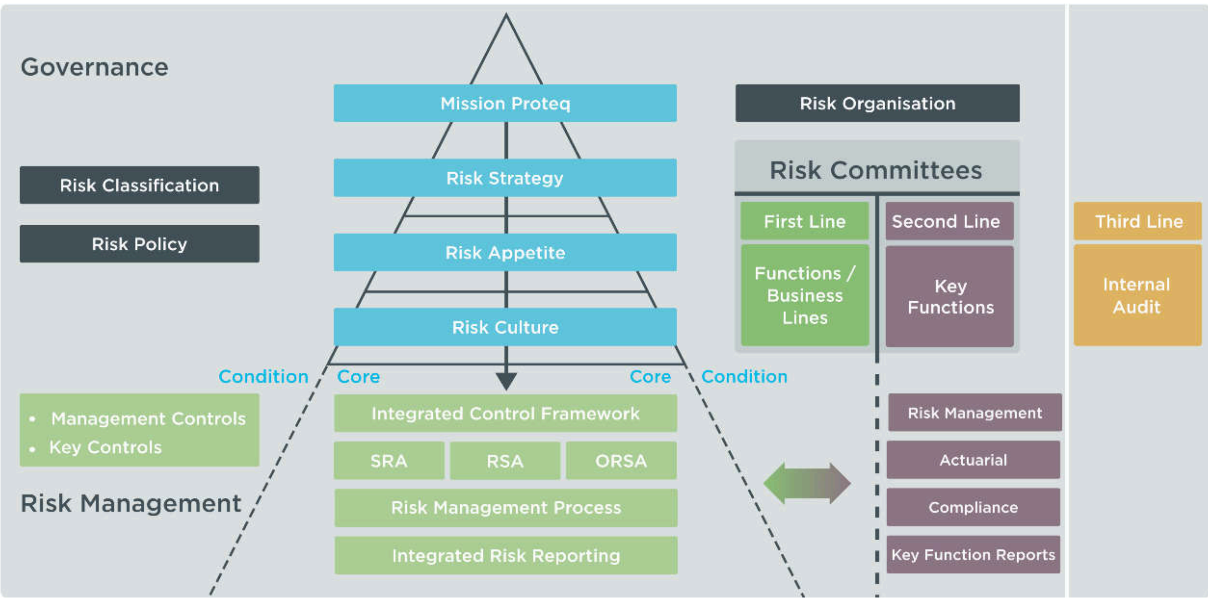
Amounts due to banks decreased as a result of lower received cash collateral for derivatives.

3.6 RISK AND CAPITAL MANAGEMENT

Risk and capital management is more extensively described in Chapter 7 'Managing Risks' in the financial statements.

Risk Management System

We have implemented a consistent and efficient risk management system in which specific Solvency II requirement such as the key functions and the Own Risk and Solvency Assessment (ORSA) are incorporated. It operates an integrated approach, with risk management integral part of the decision making process.



Risk Management

The core of the Risk Management System consists of a Governance part and a Risk management part. In the governance part, starting from the Proteq Mission and business strategy, the Risk Strategy and Risk Appetite are derived. The components Risk Policy, Risk Taxonomy and Risk Organisation are necessary conditions to enable these strategic risk processes. To ensure an integrated approach the first line (Business lines and Functions) and the second line key functions use the same risk taxonomy, operations are covered by the Risk Appetite and are aligned by a policy structure.

Risk Strategy

Proteq has derived a Risk Strategy, a supporting set of objectives following from the Athora Netherlands mission and vision to achieve the strategic goals. As main principles Proteq has defined a robust capital position, a sustainable capital generation and sound and controlled business operations. The Risk Strategy contains the key guiding principles and statements used when setting the Risk Appetite for each risk category from the risk taxonomy. Proteq provides guarantees for future payments to its customers and therefore needs adequate reserving and a strong capital position. The Executive Board would like to hold a buffer above regulatory capital requirement to absorb temporary volatility and provide more certainty to its customers.

Risk Appetite

The Risk Tolerance in the Risk Appetite is set at least annually and is subsequently translated into practical risk objectives. Risk Appetite is defined at Athora Netherlands level which includes the Risk Appetite of Proteq. Subsequently it is elaborated for risks on the individual legal entity level or specific Business lines or Functions in the form of individual quantitative risk limits and qualitative constraints. The limits are measurable; the qualitative constraints are observable. When implementing the strategy, the Executive Board gives guidelines to the product lines for establishing Operational plans, taking into account the set Risk Appetite and corresponding limits. With those objectives and constraints as starting point, the Product Lines optimise risk and return by developing the best possible products and services.

Risk Culture

The Risk Appetite Statement (RAS) of Proteq is divided into the Risk Appetites per risk type and the underlying Risk Tolerances. The Risk Appetite Statements are set at least annually. The risk tolerances-part contains measures for the maximum risk that Proteq willing to accept. These measures are defined for various sub-risks for every individual legal entity or specific Business Lines or Functions and are split into risk triggers (comparable to hard limits) and risk indicators (comparable to soft limits). When implementing the strategy, the Executive Board gives guidelines to the Business Lines for establishing Operational plans, taking into account the set Risk Tolerance in the Risk Appetite and corresponding limits on entity level. This helps the Business Lines and Functions optimize risk and return when developing the best possible products and services.

Risk Organisation

Athora Netherlands implemented the ‘Three Lines’ control model including the Solvency II Key Functions and a risk committee governance structure. It contributes to the strengthening of the Risk Culture, taking responsibility for managing risks and internal control, and eventually to the further optimisation and integration of the risk management.

Integrated Control Framework

The Integrated Control Framework (ICF) is Proteqs internal control system and is part of its Risk Management System. The ICF forms the basis for sound and controlled operations within Athora Netherlands and monitors Process Controls and Management Controls. The basis of the ICF and the GRC tooling was implemented in the period 2015-2017. In the previous years new initiatives were taken for further improvements. Based on an analysis of all the individual areas within the ICF a comprehensive programme has started where all the stakeholders are involved. The focus of this programme is to strengthen the fundament of the ICF, namely the quality of process risk assessments, process and key control design and change procedures. This program successfully continued in 2021, further strengthening the design of ICF processes and (key) controls.

Underwriting and Investment management

Proteq assesses underwriting risks by following the Product Approval and Review Process (PARP) for new or adjusted products and management of the existing portfolio. Proteq mitigates underwriting risks primarily by means of diversification and reinsurance. The reinsurance programme is determined on the basis of risk assessments of the various portfolios, the size of the portfolios, the nature of the underwriting risks, the profit or loss, the risk appetite and the financial strength of the reinsurance company. As part of optimising the risk profile, Proteq has concluded an additional longevity risk transfer on a part of the individual life portfolio.

The starting point for the ALM policy is the Balance Sheet Assessment (BSA), which is drawn up annually. The BSA seeks to find an optimum between risk and return within the preconditions that apply with regards to solvency, laws and regulations. This BSA is used as a basis for defining a Strategic Asset Allocation (SAA), which is in turn used to translate specific investment activities into an investment plan and investment mandates for selected asset managers, taking into account the risk tolerances in the Risk Appetite Statements (RAS), solvency ratio, the tax position and the long-term risk exposure. When finalising the SAA, specific attention is paid to the availability of sufficient expertise in the segments in which investments are held. All investments are monitored by means of reports on performance and capital. Investments are made in accordance with the prudent person principle taking into account the interests of the policyholders. The prudent person principle is part of the ALM policy. Investments are made exclusively in assets and instruments whose risks are properly identified, measured, monitored, managed, controlled and reported, but also comply with ESG principles.

Developments Non-financial risks

In 2021, the main developments in non-financial risks were 1) change risks associated with volume of change on transformation initiatives, strategy execution, license to operate and board stability 2) remediation program Sanctions AML 3) Business Process risk associated with strategic and organisational change and the ICF transformation 4) third party risk including new strategic outsourcing initiates 5) further attention and mitigation of cyber crime threats and ransomware developments and 6) all activities that are related with HR and culture aspects, impacted by both organisational change as a new working culture, created by the impact of COVID-19 on the organisation.

In 2021, DTC further improved the implemented Agile way of working, but also implemented new IT-frameworks. Process automation has increased the efficiency of IT processes. Proteq is aware that these developments require high standards of change management and service delivery management within the IT department in order to maintain an IT landscape that is in control and is managing IT risks. Compliance with regulations and legislation is key and IT Risk Management is at the right level to monitor and mitigate risks. A very low number of incidents and very high availability of the business application show the success of these high standards. In 2021 COVID-19 did not really impact the business continuity and productivity.

Cybercrime risk is growing over the years, and attackers are becoming more professionalised and aggressive. Especially ransomware is a real threat for companies. Also supply chain attacks and phishing attacks are becoming more frequent. As more services are outsourced, cyber crime does not only concern Proteq itself, but may also impact the outsourced services and data. For Proteq mitigating the cyber crime risk is a key priority. In 2021 no major incidents related to cyber crime occurred within Proteq. To manage the increasing risk effectively in 2021 additional mitigating measures were implemented, such as stricter monitoring of security measures implemented at suppliers. Fake phishing campaigns were held within Proteq to further promote awareness among employees. A cyber crime plan for 2022 has been drafted and Proteq will keep on focusing on mitigating this risk, also for outsourced services.

In 2021, Proteq updated the compact model risk overviews to maintain good insight in its model risk. Model risk was further reduced by follow-up of second line findings via improving models. Within the model landscape important steps towards lower model risk have been taken by improving models and systems. Ongoing model assessments on reporting, (asset) valuation and pricing models, following a risk based approach, further increased model insight and provides guidance towards lower model risk.

Proteq is exposed to potential institutional integrity risks relating to appropriate independency. Addressing these risks Proteq has a dedicated Institutional Conflict of Interest Policy including a concrete procedure. Furthermore, a governance framework with Athora Group is in place supporting collaboration and cooperation between Athora Netherlands and its shareholder Athora and its affiliates. The governance framework has been updated in 2021 to comply with the large company regime and other legal requirements, amongst others on the basis of written comments and feedback from the regulator. The effectiveness of the governance framework has also been monitored by Compliance and Internal Audit. The regulator is assessing these risks as part of its ongoing supervisory activities.

Proteq assesses product specific risks with regard to sanctions, money laundering and terrorist financing on a regular basis. During 2020 and 2021 Proteq executed an improvement programme to remediate identified shortcomings in relation to compliance with sanction law and anti-money laundering/counter terrorism financing regulation. The programme, which made significant steps in organisational governance, risk assessments, (automated) processes and tooling, aims to reduce residual risks on a structural basis. There are still outstanding remediation actions to be concluded in 2022 in the areas of customer/business partner due diligence and transaction monitoring.

Capital Position

The Solvency II ratio of Proteq remained stable with a small decrease from 245% to 242% in 2021.

The main items driving the change in the Solvency II ratio were:
- Balance sheet interest hedge adjustments have been executed having a positive impact on the Solvency II ratio of 49%-point;
- Spreads on bonds have tightened, leading to a positive impact on the Solvency II ratio of 21%-point;
- A substantiation of a loss absorbing capacity of deferred taxes had a 22%-point positive impact;
- Updated parameters for expense inflation risk leading to a decrease of the Solvency II ratio of -/-7%-point.
- The Volatility Adjustment (VA) of 7 bps at the end of 2020 decreased to 3 bps leading to a decrease of the Solvency II ratio of -/-6%-point;
- UFR decrease from 3.75% to 3.60% (-/-10%-point);
- Update of investment management expenses had a negative impact of -/-13%-point;
- The write-down of the DTA had a negative impact of -/-45%-point.

SOLVENCY II POSITION		
In € millions/percentage	2021[1]	2020[2]
Total eligible own funds	87	114
SCR	36	46
Solvency II ratio	242%	245%

1 Regulatory Solvency II ratio 2021 is not final until filed with the regulator
2 Figures as filed with the regulator

Capital Management

Capitalisation refers to the extent to which Proteq have buffer capital available to cover unforeseen losses and to achieve the strategic objectives of the company. Proteq manages its capitalisation within limits set in the Risk Appetite Statement. Annually target setting happens in the Operational Plan culminating in a Capital & Funding Plan. Monthly and quarterly forward looking monitoring enables Proteq taking timely action if capitalisation would deteriorate. Proteq assesses its capitalisation regularly with respect to level and quality in the ORSA and with respect to risk / return in the Balance Sheet Assessment.

Proteq aims for a robust and strong capital position in accordance to its risk profile, which contributes to both the confidence that clients have in the institution and access to financial markets. Proteq deems a solvency ratio between 140% and 200% as a normal going concern level. The objective of the Capital Policy is to ensure that there is sufficient capital to fulfill obligations towards policyholders and meet requirements. The second objective of the Capital Policy is to ensure capital is used as efficiently and flexibly as possible to facilitate the implementation of Proteq's strategy.

A preparatory crisis plan exist which describes the procedure that applies in a contingency situation. A contingency situation is a situation in which a capital deficit arises, or threatens to arise, that poses a direct threat to the going concern of Proteq. In its Risk Appetite, Proteq has defined specific triggers that determine whether a contingency situation exists. The COVID-19 Outbreak might lead to a contingency situation and Proteq is currently monitoring the potential impact of COVID-19 on its capital and Solvency II ratios, however at the moment based on the current solvency position no contingency situation is identified.

The ORSA is an integral part of Proteq's management control cycle. It is input for the operational plan and capital management and is used in determining the risk appetite. The ORSA 2020 concludes that Proteq's risk profile is well reflected in the SCR standard formula and solvency is adequate.

Solvency II

Under Solvency II, the supervision of the risks to which an insurer is exposed and the management of those risks play a central role. The financial requirements reflect the risks to which insurers are exposed. Moreover, Solvency II aims to be in line with market developments and the internal risk management systems used by insurers.

Proteq discloses its solvency position and financial condition on a Solvency II basis by means of public reports as required by law. Solvency II applies to the supervised insurance entitity Proteq.

Proteq calculates its position under Solvency II using the standard formula, applying the Volatility Adjustment (VA) and thus making use of the possibility of applying long-term guarantee measures. Proteq does not apply the Matching Adjustment.

The internal risk limit for the Solvency II capital ratio on Proteq level amounts to 140%. When determining the Solvency II capital ratio, the loss absorbing capacity of deferred tax assets may be set off against the Solvency Capital Requirement. Tax offsetting (Loss Absorbing Capacity of Deferred Taxes) in the SCR is applied at 35% for Proteq, including a 20% haircut.

Managing Sensitivities of Regulatory Solvency

In addition to underwriting risks, important market risks are interest rate risk and spread risk (credit spreads). Sensitivity to interest rates is measured by means of among others parallel movements in the yield curve.

The Ultimate Forward Rate (UFR) of 3.60% prescribed by the European Insurance and Occupational Pensions Authority (EIOPA) also introduces a risk. Over the course of time, the positive valuation effect of the UFR reduces, which puts downward pressure on the trend in solvency in the future. EIOPA annually re-calculates the UFR in accordance with the methodology to derive the UFR. For the euro the calculated target UFR for 2021 is 3.50%. As the UFR for the euro was 3.75% in 2020 and the annual change of the UFR is according to the methodology limited to 15 basis points, the applicable UFR is 3.60% in 2021. Per 1 January 2022 the applicable UFR will decrease to 3.45%. This will have a negative impact on solvency and IFRS results.

The solvency of the Life Insurance portfolio is sensitive to changes in the parameters used for calculating the value of insurance liabilities. These relate to mortality risk, longevity risk, expense risk (including inflation) and surrender risk, since these insurance risks proved to have most impact on the calculation of the SCR.

Quantitative information about risks and related sensitivities for both Solvency II and IFRS have been described in Chapter 7 'Managing Risks' in the financial statements.

4 CORPORATE GOVERNANCE

4.1 SHAREHOLDER

Athora Netherlands Holding Ltd. is the sole shareholder of Athora Netherlands N.V., since April 2020. Proteq Levensverzekeringen N.V. is a wholly owned subsidiary of Athora Netherlands N.V.

4.2 THE EXECUTIVE BOARD

The Executive Board is responsible for the management, strategy and operations of Proteq Levensverzekeringen N.V. The Executive Board carefully weighs the interests of all stakeholders and acts in the interests of Proteq Levensverzekeringen N.V. and its associated business.

Composition, Appointment and Role

Proteq Levensverzekeringen N.V. is subject to the full large company regime under which the members of the Executive Board are appointed by the Supervisory Board. The Supervisory Board may suspend or remove a member of the Executive Board.

The Executive Board as of 31 December 2021 consists of the following members:

COMPOSITION, APPOINTMENT AND ROLE			
Name	Nationality	Position	Date of appointment
J.A. (Jan) de Pooter	Dutch	Chief Executive Officer	8 July 2021
A.P. (Annemarie) Mijer	Dutch	Chief Risk Officer (vice-chair)	1 July 2020
E.P. (Etienne) Comon	French	Chief Capital & Investment Officer	1 July 2021
J. (Jim) van Hees	Dutch	Chief Financial Officer (a.i.)	1 July 2021
A. (Angelo) Sacca	Italian	Chief Commercial Officer	1 April 2020

On 1 May 2021, Y. (Yinhua) Cao stepped down as Chief Financial Officer. On 1 June 2021, R.H. (Tom) Kliphuis stepped down as Chief Executive Officer. On 1 August 2021, S.A. (Stefan) Spohr stepped down as Chief Operating Officer.

J.A. (Jan) de Pooter - Chief Executive Officer

Jan de Pooter (1969) studied business administration at the Amsterdam Academy and the VU University Amsterdam. From 2015 to 2020 he served as Chief Executive Officer (CEO) at Portuguese insurer Seguradoras Unidas (Tranquilidade). From 2005 to 2015, Mr. De Pooter held various leadership positions at Millennium bcp Ageas including Chairman of the Board of Directors. He started his career as Operations Manager at Fortis Investments Nederland.

A.P. (Annemarie) Mijer - Chief Risk Officer & Vice Chair

Annemarie Mijer (1970) holds a Master's Degree in Actuarial Mathematics. Mrs. Mijer joined from ABN AMRO where she served as Head of Central Risk Management. In 2015, she was appointed Chief Risk Officer and member of the Executive Board of Delta Lloyd Group. Prior to this, Mrs. Mijer held various senior leadership positions in ING Group and Nationale-Nederlanden. In April 2019, she was appointed as member of the Supervisory Board and Chair of the Audit Committee at Klaverblad Verzekeringen. Mrs. Mijer is a Certified Actuary of the Dutch Society of Actuaries and holds professional qualifications in Investment Analysis.

E.P. (Etienne) Comon - Chief Capital & Investment Officer

Etienne Comon (1973) holds a PhD in economics from Harvard University. He started his career at Goldman Sachs International as a member of the liability management team. Thereafter, Mr. Comon served as Head of ALM and Risk Advisory Team of both Nomura and Lehman Brothers. He joined Proteq from Goldman Sachs Asset Management International where he served as Head of Insurance Asset Management for the EMEA region. As Chief Capital & Investment Officer (CCIO) of Proteq N.V., his areas of responsibility are Balance Sheet Optimisation, Investment Office and Asset Management.

J. (Jim) van Hees - Chief Financial Officer a.i.

Jim van Hees (1974) has a Master of Science in Management from Nyenrode University. He started his career as a Treasury Management advisor for MeesPierson and later, served as manager for KPMG. He joined Proteq from PwC where he served in several senior finance positions with his most recent role senior director, focusing on servicing insurance, pension service providers and asset managers within the CFRO domain. As interim CFO of Proteq Levensverzekeringen N.V., Mr. Van Hees is responsible for Accounting & Financial Control, Financial Planning & Analysis, External & Regulatory Reporting and Tax.

A. (Angelo) Sacca - Chief Commercial Officer

Angelo Sacca (1977) holds a Master's Degree in Corporate Communications with Economics from Università degli Studi in Siena and is a certified Chartered Financial Analyst. Formerly a Managing Director in the Athora M&A team, he has led the management of the VIVAT transaction for Athora. He previously worked in the Financial Institutions Group at the M&A division of UBS and Greenhill & Co and as a Credit Analyst in the European insurance team of Standard & Poor's credit ratings. In the early part of his career, Mr. Sacca worked as management consultant with a focus on the financial services industry.

4.3 GOVERNING RULES

The gender balance in the Executive Board has not changed in 2021 and remains 80% men and 20% women. From a diversity perspective, in terms of age, background and nationality, but also experience in different settings a good balance has been maintained.

For future appointments of Executive Board members, Proteq N.V. will take into account all laws and regulations and its diversity in terms of gender, age, experience, nationality and background. The principle of having at least 30% men or 30% women is applied in succession planning for the Executive Board, Supervisory Board and senior leadership.

As part of the continuing education programme of Proteq, the Executive Board members participate in various education sessions. These sessions are sometimes attended together with the Supervisory Board members or with senior management of Athora Netherlands and are provided by internal and external speakers. The topics this year were capital management, pensions, governance, market abuse regulation, sustainability and anti-money laundering.

4.4 THE SUPERVISORY BOARD

The Supervisory Board is responsible for supervising the management of the Executive Board and the general business of the company and its associated business, as well as providing advice to the Executive Board. Supervision includes monitoring the company's strategy including realisation of the objectives, strategy, risk policy, integrity of business operations and compliance with laws and regulations.

The Supervisory Board may on its own initiative provide the Executive Board with advice and may request any information from the Executive Board that it deems appropriate. In performing its duties, the Supervisory Board weighs the interests of all stakeholders and acts in accordance with the interests of Proteq Levensverzekeringen N.V. and the business connected with it.

Meetings of the Supervisory Board

The Supervisory Board meets on a regular basis in accordance with an annual schedule, which in practice implies two-day meetings every six weeks on average. Decisions of the Supervisory Board are taken by a majority of votes cast. The Supervisory Board has drawn up internal regulations that elaborate and expand on a number of provisions from the company's articles of association. These regulations set out additional powers. All members of the Supervisory Board have declared their acceptance of these regulations and have undertaken to abide by the rules contained therein.

Composition, Appointment and Role

The members of the Supervisory Board are appointed by the General Meeting upon nomination of the Supervisory Board. The General Meeting and the Works Council may recommend candidates for nomination to the Supervisory Board. The Supervisory Board is required to nominate one-third of the Supervisory Board members on the special right of recommendation ('versterkt recht van aanbeveling') of the Works Council, unless the Supervisory Board objects to the recommendation on certain grounds.

The Supervisory Board as of 31 December 2021 consists of the following members:

COMPOSITION, APPOINTMENT AND ROLE			
Name	**Nationality**	**Position**	**Date of appointment**
R.M.S.M. (Roderick) Munsters	Dutch	Chairman	8 September 2021 (chair per 1 October 2021)
M.A.E. (Michele) Bareggi	Italian	Member	1 April 2020
E. (Elisabeth) Bourqui	Swiss	Member	16 November 2021
F.G.H. (Floris) Deckers	Dutch	Member	1 April 2020
J.M.A. (Hanny) Kemna	Dutch	Member	1 April 2020
P.P.J.L.M.G. (Pierre) Lefèvre[1]	Belgian	Member	26 July 2015

1 On 14 February 2022, Pierre Lefèvre stepped down as a member of the Supervisory Board.

On 1 October 2021, Maarten Dijkshoorn stepped down as member and chair of the Supervisory Board.

R.M.S.M. (Roderick) Munsters

Roderick Munsters (1963) has gained extensive managerial experience at various financial institutions. From 2009 to 2015, he was Chief Executive Officer at Robeco Group. From 2005 to 2009, he was a member of the Executive Committee and Chief Investment Officer of ABP Pensioenfonds & APG All Pensions Group. From 1997 to 2005, Mr. Munsters was Managing Director and Chief Investment Officer at PGGM Pensioenfonds. In addition to his function at Proteq, Roderick Munsters is a member of the Monitoring Committee Corporate Governance and a member of the Supervisory Board of Unibail-Rodamco-Westfield and PGGM Investments. In addition, he is Independent non-executive director at Moody's – Europe and at BNY Mellon European Bank. Mr. Munsters has both Dutch and Canadian nationality and holds a Master's degree in Economics & Corporate Finance and in Financial Economics from Tilburg University.

M.A.E. (Michele) Bareggi

Michele Bareggi (1973) is the chair of the Renumeration and Nomination Committee and member of the Risk Committee. He is Chief Executive Officer of Athora Group and member of the Executive Boards of Athora Belgium N.V., Athora lebensversicherung AG and Athora Life Re Ltd. Mr. Bareggi worked in the past as Managing Director at Morgan Stanley. He also held senior roles at Nomura Holdings, Lehman Brothers, JPMorgan and Credit Suisse First Boston.

E. (Elisabeth) Bourqui

Elisabeth Bourqui (1975) has held various board and senior management positions in the pension, asset management and consulting sector including CalPERS, ABB Group and Mercer. Mrs. Bourqui is currently CEO and co-founder at Berg Capital Management, an investment advisory firm. She is also a member of the Board of Directors at Bank Vontobel, Chair and member of the Board of Directors at Helsana HealthInvest AG and Board member at the Banque Cantonale Neuchâteloise, the Louis Jeantet Foundation, the Greenbrix Investment Foundation and the Swiss-Japan Chamber of Commerce. Mrs. Bourqui holds a master's degree in mathematics, and a PhD in financial mathematics, from the Swiss Federal Institute of Technology in Zurich.

F.G.H. (Floris) Deckers

Floris Deckers (1950) is a member of the Audit Committee and Risk Committee. Previously, he worked as CEO of Van Lanschot Bankiers and Senior Executive at ABN AMRO. In addition, Mr. Deckers has been chair of the Supervisory Board of Deloitte Netherlands as well as chair of the Supervisory Board of SBM Offshore. Mr. Deckers is currently a member of the Supervisory Board of Arklow Shipping Group Ireland, as well as for its Dutch subsidiary, and he is a board member of the Vlerick Business School in Gent and Leuven (Belgium).

J.M.A. (Hanny) Kemna

Hanny Kemna (1960) is chair of the Audit Committee, member of the Remuneration and NominationCommittee, Risk Committee and Conflict of Interest Committee. In addition to her function at Proteq, Mrs. Kemna is chair for the Supervisory Board of MN Services N.V. and vice chair of the Supervisory Board as well as Audit Committee Chair for Menzis. In addition, she is a non-executive director for ASA International, member of the Audit and Risk Advisory Committee to the Board of Géant and Extraordinary member to the board of the Dutch Court of Audit.

P.P.J.L.M.G. (Pierre) Lefèvre

Pierre Lefèvre (1956) is chair of the Risk Committee, member of the Audit Committee and Conflict of Interest Committee. After studying mechanical engineering and industrial administration, Mr. Lefèvre became internal auditor at Unilever before joining AXA Belgium N.V. in Belgium as a financial controller. He continued his career with AXA Belgium as general manager for Individual Life and later on as general manager for P&C Personal Lines. In 1994, he moved to AXA Insurance (United Kingdom) as chief executive officer of the P&C insurance business and was subsequently appointed chair of the board. In 1998 he was appointed as chair of the executive board of AXA Netherlands. Between 2002 and 2013 Mr. Lefèvre fulfilled various chief executive officer roles in subsidiaries of Groupama SA. Since 2013, Mr. Lefèvre has acted as independent non-executive director and chair of the risk committee of Hasting Group Holdings PLC. He also serves as an independent non-executive director and chair of the risk committee of Advantage InsuranceCompany Limited. Mr. Lefèvre is also a non-executive director of QBE Europe and chair of its Risk and Capital committee.

4.5 REPORT OF THE SUPERVISORY BOARD

Functioning of the Supervisory Board

The Supervisory Board aims to have a strong representation of diversity in terms of experience, gender, age, professional and cultural background. In accordance with the regulations of the Supervisory Board, the Supervisory Board considers complementarity, collegial collaboration, independence and diversity to be conditions for a proper performance of duties by the Supervisory Board.

With the appointment of Mr. Munsters on 8 September 2021 and Mrs. Bourqui on 16 November 2021, the gender balance in the Supervisory Board is 66% men and 33% women. Next to this, there is a good diversity in terms of experience, age and professional and cultural background. The principle of having at least 30% men or 30% women is applied in succession planning for the Executive Board, Supervisory Board and senior leadership.

All members have confirmed the moral and ethical conduct declaration, which includes the need to make a balanced assessment of the interests of customers, shareholder, bondholders, employees and the society in which the company operates. The regulations of the Supervisory Board explicitly provide that the Supervisory Board shall strike a careful balance between the interests of the company's stakeholders, such as the customers, the shareholder and all employees.

Self-assessment

Facilitated by an external and independant assessor the Supervisory Board assessed its functioning in 2021 in order to evaluate the functioning of the Supervisory Board as a whole, the functioning of the individual committees, the individual supervisory directors, the relationship with the Executive Board and the effectiveness of continuous education. This evaluation found that the Supervisory Board has performed according to what can be expected, with sufficient expertise and involvement from the individual members. The Supervisory Board has played a constructive role in building the foundation for future progress at Proteq. Furthermore the Supervisory Board conducted an assessment on Independence of Mind in 2021, facilitated by an external assessor. The outcome of this assessment was in line with the expectations and actions have been taken where necessary.

Continuous Education

Members of the Supervisory Board are encouraged to maintain and develop their expertise at the required standard and enhance it where necessary. This year, the Supervisory Board participated in trainings on Anti-mmoney Laundering, Outsourcing, LAC DT & DTA and Solvency II.

Important Topics and Key Discussions

The formal meetings of the Supervisory Board took place every six weeks (on average). Many additional meetings and conference calls were held. The attendance rate at meetings and committees is high, demonstrating the strength of the Supervisory Board's commitment. None of the Supervisory Board members were frequently absent at these meetings, meaning that there was always a valid quorum. During the formal meetings, the Supervisory Board was kept abreast of the strategy updates, capital and funding initiatives, risk appetite and commercial developments. Furthermore, the Supervisory Board was informed about the discussions and the resulting recommendations from committee meetings of the Supervisory Board.

In 2021, the Supervisory Board discussed and approved several items, such as topics related to the sale of ACTIAM, Operational Plan, Employee Survey and Strategy update. Building on the work done in 2020, the Supervisory Board had multiple discussions and in December 2021 agreed on the Proteq strategy, called 'Ambition 2025'. During the sales process of ACTIAM, the Supervisory Board safeguarded the corporate interest and properly weighed the interest of all stakeholders involved in this process such as policy holders, the shareholder employees and its bondholders. In addition, a strong focus of the Supervisory Board has been the governance framework under which Proteq operates.

The Supervisory Board and the Chairman of the Supervisory Board have been in regular contact with other stakeholders such as the Dutch Central Bank (DNB) and Dutch Authority for Financial Markets (AFM) on these topics.

Cooperation with Committees

The Supervisory Board has three committees: the Audit Committee, the Risk Committee and the Remuneration and Nomination Committee. Each member of the Supervisory Board has sufficient knowledge and experience to assess the main aspects of Proteq's policy and to form an independent opinion of the basic risks. Decisions regarding risk management and internal controls are prepared and recommended by the Risk Committee (RC) and the Audit Committee (AC), respectively. These committees have been carefully composed with at least two members of these committees having extensive knowledge of risk management / risk control and internal control / reporting, respectively.

- The Audit Committee discussed the audit scope, key audit matters, the external auditor's reports and the management letter of the external auditor. The independence of the external auditor and fees were also reviewed by the Audit Committee. The Audit Committee maintains regular contact with the external auditor through meetings between the chair of the Audit Committee and the external auditor. The Audit Committee discussed the annual plan and quarterly reports of the internal audit function. Furthermore the progress on the implementation IFRS 17 and 9 has been frequently discussed.

- The Risk Committee discussed the profile of the financial and non-financial risks related to the approved risk appetite. This included capital developments, capital generation and investment policy. The structure and operation of the risk control system was discussed, including compliance with relevant legislation and regulations such as Sanctions law and Wwft. The Risk Committee noted and discussed Proteq's consultations with DNB and considered the results of the on site examinations conducted by DNB. Furthermore, the Risk Committee discussed amongst others the impact of COVID-19 and Brexit.

- The Supervisory Board's Remuneration and Nomination Committee (ReNomCo) prepares decisions on remuneration regarding Identified Staff and employees in control functions. The ReNomCo members have sufficient expertise with regard to the remuneration policies, culture and incentives.
- The Conflicts of Interest Committee takes decisions with regard to institutional possible conflicts such as related party transactions. The meetings of the committee takes place in the presence of the Risk Management Key Function Holder and Compliance Key Function Holder and an external legal advisor to the committee. The committee is not a Supervisory Board committee but a separate committee whose regulations are governed by the Conflicts of Interest Policy. The topics of the Conflicts of Interest Committee include secondments and various investments.

The committees met in the presence of members of the Executive Board. The external auditors were represented by mutual agreement at all meetings of the Audit Committee and Risk Committee in 2021. Both the internal auditor and external auditor reported on the quality and effectiveness of governance, internal control and risk management. Cooperation between the Supervisory Board and the committees has been positive. The meetings of the committees elaborate on various subjects, so that the decisions of the Supervisory Board can be carefully prepared. The content of the meetings of the committees is fed back to the meeting of the Supervisory Board to ensure that the Supervisory Board members are kept fully informed and are well prepared to take balanced decisions.

The Supervisory Board appreciates the efforts made by the Executive Board and all employees in 2021 and complements them with the results achieved. We look forward to continuing our cooperation in 2022.

On behalf of the Supervisory Board, I would also like to convey my sincere thanks to Maarten Dijkshoorn, our former Chairman of the Supervisory Board, for the good cooperation over the last few years, his ability to connect with stakeholders and his guidance in the transitions to new ownership. In his role as chairman, he made a significant contribution in challenging times to the development of Proteq. We wish him all the best for the future.

Amstelveen, the Netherlands, 30 March 2022
On behalf of the Supervisory Board,

Roderick Munsters, Chairman

4.6 REMUNERATION

Introduction

Proteq Levensverzekeringen N.V. is a full subsidiary of Athora Netherlands N.V. All employees are employed by Athora Netherlands. The Group Remuneration Policy Athora Netherlands applies to all employees working under the responsibility of Athora Netherlands. The costs of employees appointed to Proteq are charged to Proteq by Athora Netherlands. The remuneration information in this paragraph is presented on Athora Netherlands level and as far as it applies to Proteq.

The remuneration paragraph describes the principles, governance and elements of the remuneration policies (4.6.1). It also gives an overview of the payment of (variable) remuneration in 2021 (4.6.2), as well as the actual remuneration of the (former) members of the Executive Board and Supervisory Board in 2021 (4.6.3).

4.6.1 Remuneration Policies

Proteq's Vision

The objective of our remuneration policies is to recruit and to retain highly qualified staff and to motivate employees to achieve high performance, to provide appropriate remuneration to all employees that contributes to the sustainability of Athora Netherlands and its subsidiaries including Proteq. Athora Netherlands ensures long-term value creation and has chosen to use four Sustainable Development Goals ("SDG") as a guideline for further development of the Corporate Social Responsibility policy in business operations. Pursuant to the SDGs, the HR principles for remuneration are aimed at ensuring high performance of the employees and focusses on personal growth of its employees by development of their talents and focusses on collaboration, enabling the customers to benefit of this growth.

Athora Netherlands operates a careful, controlled and sustainable Group Remuneration Policy which is in line with its business and risk management strategy, its risk profile, objectives, risk management practices and the long-term interests and its performance. The Group Remuneration Policy is in accordance with and contributes to solid and effective risk management and does not encourage risk-taking that is in breach of its policies and risk appetite. The Group Remuneration Policy has been drawn up in compliance with existing legislation and regulation and it takes account of the long-term interests of Athora Netherlands and its stakeholders. Athora Netherlands ensures that the Group Remuneration Policy is enforced within Athora Netherlands, its branches and subsidiaries including Proteq.

Athora Netherlands, including Proteq, is aware of its position within the broader society and the crucial role of the financial sector in the Netherlands and the importance of creating trust in this sector within society. As such, Athora Netherlands has a strong governance framework in place to ensure that employees are remunerated in a manner that is aligned with the interests of all stakeholders involved. Within this context, the key focus is on fixed remuneration rather than variable remuneration. When adopting the Group Remuneration Policy and underlying remuneration policies, the relevant corporate bodies involved and especially the Supervisory Board liaised with the Works Council, representatives of staff and the Athora Netherlands shareholder in order to establish a remuneration framework that is supported by all such stakeholders and society in general. Athora Netherlands will continue these dialogues.

Group Remuneration Policy

The Group Remuneration Policy Athora Netherlands applies to all employees working under the responsibility of Athora Netherlands and all of its subsidiaries, including Proteq and branch offices. The Group Remuneration Policy contains a number of annexes, which specify specific rules on remuneration in respect of the following (groups of) employees, summarised, (i) the Executive Board, (ii) "Above-CLA employees"—being employees of Athora Netherlands and its subsidiaries and branches who do not fall under the scope of our collective labour agreement ("CLA"), excluding the members of the Supervisory Board and the members of the Executive Board ("Remuneration Policies").

The Group Remuneration Policy is published internally and on the website: www.athora.nl.

Our Group Remuneration Policy incorporates the requirements which apply to remuneration as included in the Dutch Civil Code, Dutch Financial Markets Supervision Act (Wet op het financieel toezicht or "FMSA"), the Commission Delegated Regulation (EU) 2015/35 ("Solvency II") and the Guidelines on System of Governance of the European Insurance and Occupational Pensions Authority ("EIOPA Guidelines"), as applied to Athora Netherlands and all of its subsidiaries and branches.

Principles

Athora Netherlands' remuneration policies are based on the following principles:

- It supports Proteq's corporate strategy, and is aligned with the mission, vision and values of Proteq;
- It is compliant with the applicable legal rules and regulations;
- It may not threaten Proteq's ability to maintain an adequate capital base;
- It takes into account the interests of all stakeholders of Proteq: customers, employees, shareholders and society;
- It is transparent, easy to understand and simple to execute;

- It is aligned with Proteq's ambition to be a social responsible and number one pension provider in the Netherlands;
- It fits the risk profile of Proteq and of the relevant employee;
- It supports the attraction and retention of qualified employees that fit the job;
- It supports effective governance of remuneration and supervision thereof, and, where relevant, contains measures to prevent a conflict of interest;
- It encourages high team and company performance; and
- It is gender and age neutral. Jobs are weighted regardless of gender at Proteq. Men and women with comparable work experience, achievements and job level are given equal pay.

Governance

The members of the Executive Board and the members of the Supervisory Board of Athora Netherlands are also the members of the Executive Board and the members of the Supervisory Board of Proteq. Athora Netherlands' general meeting adopted the remuneration policy for the members of the Executive Board after consultation with the Supervisory Board. The Supervisory Board is also responsible for the implementation and evaluation of this policy.

The Supervisory Board, being the internal supervisory body of Athora Netherlands, has the authority to approve our Group Remuneration Policy and shall supervise its implementation by the Executive Board. The Group Remuneration Policy was established by the Executive Board and approved by the Supervisory Board after, insofar as applicable, fulfilment of any rights of the Works Council.

The remuneration and nomination committee of the Supervisory Board (the "ReNomCo") is responsible for supporting the Supervisory Board in overseeing the design of the Group Remuneration Policy and remuneration practices, their implementation and operation, and the preparation of decisions on remuneration, including decisions that may have consequences for the risks and risk control of Athora Netherlands which the Supervisory Board has to take.

The remuneration for Supervisory Board members is determined by the General Meeting. The remuneration for the current Supervisory Board members consists of an annual Supervisory Board fee and an additional fee for attending the meetings of Supervisory Board committees. The remuneration package consists of a fixed remuneration only.

Role of the Executive Board
The Executive Board implements and evaluates the Group Remuneration Policy as approved by the Supervisory Board in accordance with the provisions of the Group Remuneration Policy.

Role of the Working Group Remuneration
In addition, there is a working group remuneration ("WGR") in place comprising of the directors and/or specialists of the HR, legal, financial risk, non-financial risk, financial control and audit departments. The WGR participants may provide and will at request provide input on any decision of the Executive Board and/or the Supervisory Board on the following subjects: (i) the determination of the Identified Staff (as referred to below) list, (ii) the Group Remuneration Policy and the other Remuneration Policies, (iii) the setting of Key Performance Indicators ("KPIs"), (iv) the processes around variable remuneration and (v) any other material remuneration matters. Athora Netherlands reserves the right to prepare decisions of the Executive Board and Supervisory Board regarding the above-mentioned subjects in another way than through the WGR, provided that the input of the HR, legal & compliance, risk, financial control and audit department is taken into account.

Control Functions
Control functions are departments that are responsible for the control and supervision of operations as well as the risks arising from those operation, and in doing so operate independently from the organisation. Control functions play an active role in drafting, application and monitoring the Group Remuneration Policy. For this reason, officers in control functions are subject to additional rules aimed at safeguarding their independence, in case they are eligible to receive variable remuneration, as set out in the Remuneration Policies, as applicable.

Identified Staff

Every year, Athora Netherlands designates members of staff who are Identified Staff by using the Solvency II regulation.

Apart from certain specific requirements applicable to variable remuneration within the investment team of Athora Netherlands, the provisions of our Group Remuneration Policy, our CLA, if applicable, and any of the other Remuneration Policies apply equally to Identified Staff and staff not qualifying as Identified Staff.

Elements of the Remuneration Policies

Fixed Annual Salary
The regular fixed remuneration consists of a fixed annual gross salary, which includes a holiday allowance of 8% and a 13th month payment of 8.33%. The annual gross salary is based on the applicable salary scales. According to the CLA, once a year an employee may receive a periodic increase. This periodic increase in salary is linked to the extent to which the employee is judged to have grown in his or her role (achievement on competences) and depends on the relative salary position. The precise link between the competency assessment and the periodic increase is as follows: Insufficient: 0.0%; Almost sufficient: 0.0%; Good: 2.6%; Very good: 3.3%; Excellent: 4.0%.

The process regarding the annual salary increase for the Above-CLA Employees follows the process as described above, applicable for the employees in the CLA. Increase of the salaries of the members of the Executive Board is only possible, after adopting a proposal of the ReNomCo in the Supervisory Board in line with the remuneration policy for the Executive Board.

Total direct compensation is the total of fixed and variable remuneration (for Proteq only the total of fixed remuneration as we abolished variable remuneration), excluding benefits such as pension and allowances. We aim to provide total direct compensation levels for expected business and individual performance which, on average, are at the median of the markets in which we operate, benchmarked against relevant peer groups. To ensure we adhere to the Remuneration Policies, we monitor and benchmark salary levels. Fixed remuneration represents a sufficiently high proportion of the total direct compensation, which is in line with the level of expertise, years of experience and required skills. Job functions at Athora Netherlands are independently evaluated. The outcome of this evaluation results in a certain salary scale for such function which will be applied to the employees in scope.

Allowances
Employees may be entitled to fixed cash allowances in line with applicable legislation and in accordance with the applicable governance framework as included in this Group Remuneration Policy.

Employees that were previously entitled to variable remuneration based on performance, may, at the discretion of the Executive Board, in case of a cancellation or a deduction of such variable remuneration opportunity, be entitled to a fixed annual compensation. Reference is made to the paragraph on Variable Remuneration set out below.

Pension
Nearly all employees participate in the same pension scheme of Athora Netherlands. The current scheme is a Collective Defined Contribution (CDC) pension scheme, which is based on a pension accrual including an employee contribution of 4.5%. The scheme qualifies as a defined contribution scheme for IAS 19 purposes. The contributions are paid by Athora Netherlands and employees respectively as employer and employee contributions. For employees who were employed by Athora Netherlands as per 31 December 2017 and with a salary exceeding the maximum pensionable salary for pension accrual, a compensation for the loss of pension accrual is applied. The compensation consists of a permanent supplement payment for as long as a maximum pensionable salary applies. The annual compensation is 16.35% of the fixed annual gross pensionable salary as indicated in the collective labour agreement of VIVAT (previous name for Athora Netherlands) 2017 minus the maximum amount for pension accrual referred to in article 18ga of the Wage Tax Act 1964 (2015: € 100,000 gross; and 2021: € 112,189 gross). The permanent supplement payment is not pensionable and is not taken into account for the calculation of severance payments, including the transition fee (transitievergoeding) or any other wage components or benefits. Athora Netherlands does not award discretionary pension.

Performance Management
Performance management is a core business process, in which (i) KPIs are set to align individual KPIs with the long-term strategy of the business of Athora Netherlands and Proteq and to ensure a sustainable and successful business for all its stakeholders and (ii) competences with respect to the individual behaviour of employees will be measured.

KPIs are used to monitor and track progress towards realisation of our strategic goals. As a result, the proposed KPIs are fully aligned to the strategy and operational plan. Athora Netherlands operates a performance management process linked to remuneration to prevent rewarding for failure and to address the long-term impact of the profitability of the organisation within the risk appetite framework approved by the Supervisory Board.

The performance management cycle starts every year with setting the KPIs in the first quarter of a financial year. These KPIs are in line with the company targets and the company's mission, its long-term strategy and the aim to ensure a sustainable and successful business for all stakeholders of Athora Netherlands and shall not encourage risk taking that exceeds the risk tolerance limits. The KPIs do not result in incentifying and/or rewarding excessive risk taking as well as unwanted behaviours relating to market conduct, reputational risks, conflicts of interest, etc. More than 50% of the KPIs are related to non-financial targets. The KPIs are for example related to maintaining customer advocacy (delighted customer score), sound and controlled organisation, sustainability, employee satisfaction, financial KPIs and one or more individual KPIs. The KPIs are defined on the following levels: organisational, department and personal. For the Control Functions, insofar as the KPIs are used to determine any Variable Remuneration, the KPIs used shall be independent from the performance of the operational units and areas that are submitted to their control.

Besides KPIs, also competences will be set, covering behavioural aspects of employees: for example, their attitude towards change and collaboration (the "How").

Variable Remuneration
As of 2018, Athora Netherlands abolished the performance related bonus in the CLA and abolished the variable remuneration for the Executive Board and for Above-CLA Employees.

Retention & Sign-on Bonus
Athora Netherlands exercises great restraint when agreeing such arrangements as retention bonus or sign-on bonus. Such arrangements may be agreed only if this is in line with the Remuneration Policies and such arrangements are approved in accordance with applicable legislation, regulations and Athora Netherlands' governance.

Other Benefits
Depending on the position on the salary scale; our senior management, employees in the highest CLA salary scale and our field/sales employees may be eligible for a lease car or a lease car allowance in line with the car policy. As part of Athora Netherlands' commitment to sustainable investment principles, certain types of cars and certain brands are no longer included in this policy, however exceptions are made for 100% electric models.

Hold Back & Claw Back
Athora Netherlands has the power to hold back or claw back all or part of any variable pay awarded (Section 135 (6 & 8), Book 2 of the Dutch Civil Code in connection with FMSA Section 1:127 Subsection 2 & 3). Whole or partial hold back or claw back will take place in any case if the employee has not met relevant competence standards and standards for appropriate conduct, or was responsible for conduct that led to a considerable deterioration of the financial position of Athora Netherlands and/or Proteq.

Severance Payment
If and insofar a severance payment is due to an employee, such payment will be equal to the transitional fee within the meaning of article 7:673 of the Dutch Civil Code unless (i) the relevant employee can benefit from a different arrangement as explicitly agreed upon in an applicable social plan or (ii) otherwise determined at the discretion of the Executive Board or, where it relates to Above-CLA Employees or Identified Staff, the Remuneration and Nomination Committee and approved by the Supervisory Board. No severance payment is due and payable when a contract is terminated at the

employees' own initiative, by serious culpable conduct or neglect by the employee or failure of Athora Netherlands if the employee is considered day-to-day policy maker.

A severance payment to day-to-day policy makers, which includes also the members of the Executive Board, may not be in excess of 100% of the fixed annual gross salary.

Athora Netherlands has agreed upon an extension of Athora Netherlands' Social Plan until 2023 with the trade unions which is applicable in case of reorganisation(s).

4.6.2 Overview Remuneration 2021

Fixed Remuneration

According to the CLA, employees have received a periodic salary increase on 1 February 2021, insofar the maximum of the scale is not reached and a collective salary adjustment of 2,25% per January 2021. For Above-CLA Employees the previously mentioned was applied as well.

Performance Management

In the first quarter of 2021, KPIs were set on a company, department and individual level (e.g., capital generation, customer engagement, leadership (employee engagement, strategy alignment and attractiveness of the employer), risk & control, solvency ratio, compliance, license to operate and personal targets). More than 50% are non-financial KPIs. In addition to KPIs, also competences were set. These personal development skills (with a maximum of three) are chosen from the company's broad set of values with two general skills: excellence, focus and a personal one: development of your own talent.

Variable Remuneration

In 2021, no variable remuneration for awarding performance was paid within Proteq.

In 2021, Athora Netherlands did not use the right to apply a holdback and clawback.

Retention & Sign-on Bonus

The retention schemes offered in 2018 and 2019 due to the strategic review which led to the change of ownership of Athora Netherlands, have been awarded end of 2020 as the conditions were met. The Identified Staff in this scheme are partly paid in 2020 (60%) and will be partly paid in three deferred payments up to 2023 (in total 40%). In 2021, deferred payments of the retention scheme and a sign-on bonus are paid (€ 0.4 million to 43 employees within Athora Netherlands. This also includes employees of Proteq).

Severance Payment

Our Athora Netherlands N.V. Social Plan 1 January 2021—31 December 2023 has been applied for employees who became redundant in 2021. They received severance payments in line with this Social Plan.

Number of Employees with a Remuneration Exceeding € 1 Million

In 2021, one employee received a total annual remuneration exceeding € 1 million (in 2020: three employees). This employee primarily works for Athora Netherlands, SRLEV N.V. and Proteq.

4.6.3 Actual Remuneration (former) Members of the Executive Board and the Supervisory Board

Reference is made to Note 11 Related parties (Intragroup balances with key management personnel of Proteq) for the actual remuneration of (former) members of the Executive Board and the Supervisory Board.

FINANCIAL STATEMENTS

5 FINANCIAL STATEMENTS

5.1 STATEMENT OF FINANCIAL POSITION

Before result appropriation and in € thousands	Ref.[1]	31 December 2021	31 December 2020
Assets			
Investments	1	621,007	678,380
Derivatives	2	19,017	38,767
Deferred tax	3	-	5,888
Other assets	4	2	31
Cash and cash equivalents	5	4,433	2,550
Total assets		**644,459**	**725,616**
Equity and liabilities			
Share capital[2]		3,178	3,178
Share premium reserve		45,121	45,121
Fair value reserve		3,719	11,677
Retained earnings		38,460	53,693
Total shareholders' equity	6	**90,478**	**113,669**
Insurance liabilities	7	520,521	564,935
Derivatives	2	1,817	4,904
Deferred tax	3	9,093	-
Corporate income tax		3,638	3,349
Amounts due to banks	8	17,702	33,400
Other liabilities	9	1,210	5,359
Total equity and liabilities		**644,459**	**725,616**

1 The references relate to the notes to the financial statements in Section 6.3

2 The share capital amounts to € 15,890,000 and comprises of 35,000 ordinary shares with a nominal value of € 454 per share. Of all shares, 7,000 shares are issued and fully paid up.

5.2 STATEMENT OF PROFIT OR LOSS

In € thousands	Ref.[1]	2021	2020
Income			
Total gross regular premiums Life		3,803	4,187
Total gross single premiums Life		446	744
Less: Reinsurance premiums		2	2
Net premium income	13	**4,247**	**4,929**
Fee and commission income		1	**-**
Net fee and commission income		**1**	**-**
Investment income	14	10,350	27,323
Result on derivatives	15	-	24,622
Total income		**14,598**	**56,872**
Expenses			
Result on derivatives	15	16,306	-
Technical claims and benefits	16	-7,347	46,650
Staff costs	17	2,094	1,993
Other operating expenses	18	846	895
Other expenses	19	63	62
Total expenses		**11,962**	**49,600**
Result before tax		**2,636**	**7,272**
Tax expense	20	17,869	838
Net result continued operations for the period		**-15,233**	**6,434**
Attributable to:			
- Shareholders		-15,233	6,434
Net result continued operations for the period		**-15,233**	**6,434**

1 The references relate to the notes to the financial statements in Section 6.3.

5.3 STATEMENT OF TOTAL COMPREHENSIVE INCOME

Statement of Other Comprehensive Income

In € thousands	Ref.[1]	2021	2020
OCI to be reclassified subsequently to profit or loss			
Unrealised revaluations investments available for sale	21	-36,179	-999
Realised gains and losses fair value reserve transferred to profit or loss	21	1,077	16,729
Results on allocated investments and interest derivatives	21	24,545	-10,890
Income tax relating to items that may be reclassified		3,714	-1,210
Tax rate adjustment relating to items that may be reclassified		-1,115	-410
Net OCI to be reclassified to profit or loss subsequently		**-7,958**	**3,220**
Other comprehensive income (net of tax)		**-7,958**	**3,220**

1 The references relate to the notes to the financial statements in Section 6.3

Statement of Total Comprehensive Income

In € thousands	2021	2020
Net result for the period	-15,233	6,434
Other comprehensive income (net of tax)	-7,958	3,220
Total comprehensive income (net of tax)	**-23,191**	**9,654**
Attributable to:		
- Shareholders	-23,191	9,654

5.4 STATEMENT OF CHANGES IN EQUITY

Statement of Changes in Shareholders' Equity 2021

In € thousands	Issued share capital[1]	Share premium reserve	Fair value reserve	Retained earnings	Total shareholders' equity
Balance as at 1 January 2020	**3,178**	**45,121**	**11,677**	**53,693**	**113,669**
Other comprehensive income	-	-	-7,958	-	-7,958
Net result 2021	-	-	-	-15,233	-15,233
Total comprehensive income 2021	**-**	**-**	**-7,958**	**-15,233**	**-23,191**
Total changes in equity 2021	**-**	**-**	**-7,958**	**-15,233**	**-23,191**
Balance as at 31 December 2021	**3,178**	**45,121**	**3,719**	**38,460**	**90,478**

1 The share capital amounts to € 15,890,000 and comprises of 35,000 ordinary shares with a nominal value of € 454 per share. Of all shares, 7,000 shares are issued and fully paid up.

The Executive Board proposes to the General Meeting of Shareholders to distribute, similar to 2020, no dividends on ordinary shares for 2021.

Statement of Changes in Shareholders' Equity 2020

In € thousands	Issued share capital	Share premium reserve	Fair value reserve	Retained earnings	Total shareholders' equity
Balance as at 1 January 2020	**3,178**	**45,121**	**8,457**	**47,259**	**104,015**
Other comprehensive income	-	-	3,220	-	3,220
Net result 2020	-	-	-	6,434	6,434
Total comprehensive income 2020	**-**	**-**	**3,220**	**6,434**	**9,654**
Total changes in equity 2020	**-**	**-**	**3,220**	**6,434**	**9,654**
Balance as at 31 December 2020	**3,178**	**45,121**	**11,677**	**53,693**	**113,669**

Statement of Changes in Fair value Reserve

In € thousands	2021	2020
Balance as at 1 January	**11,677**	**8,457**
Unrealised revaluations	-36,179	-999
Realised gains and losses transferred to profit or loss	1,077	16,729
Results on allocated investments and interest derivatives	24,545	-10,890
Income tax	3,714	-1,210
Tax rate adjustment	-1,115	-410
Total changes in equity	**-7,958**	**3,220**
Balance as at 31 December	**3,719**	**11,677**

5.5 CASH FLOW STATEMENT

In € thousands	2021	2020
Cash flow from operating activities		
Result before tax	2,636	7,272
Adjustments for non-cash items included in profit before tax:		
Amortisation of investments	-375	-444
Unrealised results on investments through profit or loss	16,339	-24,622
Taxes		
Taxes paid	-	-6,151
Change in operating assets and liabilities:		
Change in amounts due to banks	-15,698	22,739
Change in investments	23,738	-26,818
Change in derivatives	323	-49
Change in other assets	30	10
Changes in insurance liabilities	-44,414	44,128
Change in other liabilities	-4,148	4,716
Net cash flow from operating activities	**-21,569**	**20,781**
Cash flow from investment activities		
Sale and redemption of investments and derivatives	271,106	388,728
Purchase of investments and derivatives	-247,654	-410,184
Net cash flow from investment activities	**23,452**	**-21,456**
Cash flow from finance activities		
Net cash flow from financing activities	**-**	**-**
Net increase in cash and cash equivalents	**1,883**	**-675**
Cash and cash equivalents 1 January	2,550	3,225
Cash and cash equivalents as at 31 December	**4,433**	**2,550**
Additional disclosure with regard to cash flows from operating activities:		
Interest income received	10,017	4,988
Dividends received	-	3
Interest paid	53	142

6 NOTES TO THE FINANCIAL STATEMENTS

6.1 ACCOUNTING POLICIES FOR THE FINANCIAL STATEMENTS

6.1.1 General Information

Proteq Levensverzekering N.V., incorporated and established in the Netherlands, is a public limited liability company incorporated under the laws of the Netherlands. Proteq Levensverzekering N.V. is a wholly owned subsidiary of Athora Netherlands N.V. with a registered office at Amstelveen, the Netherlands and Athora Netherlands N.V. is a wholly owned subsidiary of Athora Netherlands Holding Ltd. with a registered office in Dublin, Ireland, whose ultimate parent is Athora Holding Ltc. domiciled in Bermuda.

Proteq Levensverzekering N.V. has its registered office located in Alkmaar, the Netherlands and has its principal place of business located at Kruseman van Eltenweg 1, 1817 BC Alkmaar, the Netherlands. The registration number at the Dutch Chamber of Commerce Trade is no. 37056151. Proteq Levensverzekering N.V. is a provider of individual life insurance products.

In the financial statements within this annual report the name 'Proteq' is used.

The key accounting policies and the changes herein used in the preparation of the financial statements are set out in this section.

Adoption of the Financial Statements

The financial statements of Proteq for the year ended on 31 December 2021 were authorised for publication by the Executive Board following the approval by the Supervisory Board on 30 March 2022. The financial statements will be submitted to the General Meeting of Shareholders for adoption.

6.1.2 Basis of Preparation

Statement of IFRS Compliance

Pursuant to the option offered in article 2:362(8) of the Dutch Civil Code, Proteq prepares its financial statements in accordance with International Financial Reporting Standards (IFRS) as endorsed by the European Union.

Relevant New standards, Amended Standards and Interpretations of Existing Standards Effective as of 2021

New or amended standards become effective on the date specified in the relevant IFRS, but may allow early adoption. New or amended standards that become effective as of 1 January 2021 and that are relevant to Proteq are disclosed below.

Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7)

Following the financial crises the benchmark InterBank Offered Rates (IBOR) are to be replaced by new alternative Risk Free Rates. As a part of this reform (also referred to as IBOR reform) the Euro Overnight interest Average (EONIA) will be replaced by the Euro Short Term-Rate (ESTR) in January 2022. At the end of 2021, LIBOR was ceased.

To consider the financial reporting implications of the reform, IASB issued the following amendment to IFRS that became effective as at 1 January 2021:

Interest Rate Benchmark Reform Phase 2: Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16

These amendments were issued in August 2020 and become effective as at 1 January 2021. They are mostly the narrow-scope amendments that only apply to the hedge relationships which are directly affected by interest rate benchmark reform, as defined in the previous amendments. Also, additional disclosures with regard to risks arising from financial instruments subject to interest rate benchmark reform are required. Furthermore IFRS 9 is amended with regard to the changes in the basis for determining the contractual cash flows as a result of interest rate benchmark reform. As for Proteq the derivatives are currently the only financial instruments impacted by IBOR reform and the reform does not have impact on Proteq's hedge accounting, the amendments are expected to have an insignificant impact on Proteq's financial statements.

Relevant New Standards, Amended Standards and Interpretations of Existing Standards Effective Date on or after January 2022

Relevant new standards, amendments to existing standards and interpretations, effective for reporting periods beginning on or after 1 January 2022, were not early adopted by Proteq. New or amended standards that become effective on or after 1 January 2022 and that are relevant to Proteq are disclosed below.

IFRS 9 Financial Instruments (including Amendments)

IFRS 9, the new standard on financial instruments has an effective date of 1 January 2018. IFRS 9 replaces most of the current IAS 39 'Financial Instruments: Recognition and Measurement' and includes new requirements for the recognition and measurement of financial assets and liabilities, a new forward looking model for the recognition of impairment losses and a new regulation in order to better align hedge accounting with economic reality and risk management. However, since Proteq has decided to apply the temporary exemption from applying IFRS 9, the implementation of IFRS 9 by Proteq (including all the amendments) has been postponed until 1 January 2023, the effective date of IFRS 17.

IFRS 17 Insurance contracts (including Amendments)

On 18 May 2017 the IASB has issued IFRS 17, the new comprehensive standard on insurance contracts covering recognition and measurement, presentation and disclosure. IFRS 17 replaces IFRS 4 the current standard on insurance contracts. IFRS 4 allows insurers to continue their previous local accounting policies for the measurement of insurance contracts. IFRS 17 provides a comprehensive model (the general model) for the measurement of insurance contracts, supplemented by the variable fee approach for contracts with direct participation features.
The main features of the new accounting model for insurance contracts comprise:

- Measurement of insurance liabilities is based on the present value of probability weighted future cash flows to fulfil the contract, increased with a risk adjustment to reflect uncertainties in these cash flows.
- A Contractual Service Margin (CSM) that is equal and opposite to any day one gain in the fulfilment cash flows of a group of contracts. The CSM represents the unearned profitability of the insurance contracts and is recognised in profit or loss over the coverage period of the contract.
- The recognition of insurance revenue and insurance service expenses in profit or loss based on the concept of services provided during the period. Insurance services results (earned revenue less incurred claims) are presented separately from the insurance investment income and expenses.
- The effects of changes in discount rates will be reported in either profit or loss or other comprehensive income, determined by an accounting policy choice.
- Extensive disclosures to provide information on the recognised amounts and the nature and extent of risks arising from these contracts.

In March 2020 the IASB has decided that the effective date of IFRS 17 will be deferred to annual reporting periods beginning on or after 1 January 2023. Retrospective application of the standard is required. Early adoption is permitted. Proteq plans to adopt IFRS 17 per 1 January 2023.

Impact of IFRS 9 and IFRS 17

Since Proteq is predominantly an insurance company, both financial instruments and liabilities arising from insurance contracts are significant items in its financial statement. Therefore the introduction of

IFRS 9 and IFRS 17 will have a substantial impact not only on amounts recognised in Proteq's financial statements but also on governance, systems and data requirements.
In 2021 Proteq further strengthened the programme management and the supporting teams. Proteq remains on track for the implementation of IFRS 9 and IFRS 17 on 1 January 2023. Important milestones realised until now are the selection of the CSM engine, the preparation of the policy papers, and financial impact assessment. In 2021 two further key milestones were initiated and realised according to the planning: the technical completion of the chain test and the dry-run. The crucial steps to be completed in 2022 include analyzing the financial results, realising an initial CSM and opening balance sheet, implementing the Target Operating Model, conducting the parallel-runs and completing transition to the business (data, model and system acceptance).

Reference to the Conceptual Framework (Amendments to IFRS 3)

The purpose of this amendment is to address uncertainties with regard to the recognition assets and liabilities as a result of business combinations. In line with Conceptual Framework an amendment to IFRS 3 was made confirming that recognition of contingent assets at the acquisition date is not permitted. Also the uncertainties with regard to recognising contingent liabilities arising from levies were addressed.

The amendment is to be applied prospectively as of 1 January 2022, so it does not have an impact on current Proteq reporting but will be applied to the future business combinations undertaken by Proteq.

Onerous Contracts—Cost of Fulfilling a Contract (Amendments to IAS 37)

The amendment was made to address the uncertainty with regard to the costs needed to be taken into account when assessing if a contract is onerous (the incremental costs or all the attributable costs). The amendment was added to clarify that all the attributable costs need to be taken into account.

Those amendments apply for annual reporting periods beginning on or after 1 January 2022. Earlier application is permitted.

The amendment will probably have a very limited impact on Proteq as majority of contracts issued by Proteq are insurance contracts, which are not in scope of IAS37.

Amendments to IAS 1 Presentation of Financial Statements: Classification of Liabilities as Current or Non-current

The purpose of this amendment is to address the inconsistency in IAS1 with regard to classifying the liabilities as current and non-current (whether the classification of a liability as non-current should be made based on existing rights or rather the expectations to exercise these rights).

The standard was amended to clarify that a distinction between current and non-current liabilities should be made based on existing rights at reporting date and that entities' expectations with regard to exercising these rights are not relevant. Also the definition of the settlement was added, according to which a roll over is not a settlement as it does not result in a transfer of economic resources.

The amendment applies for annual reporting periods beginning on or after 1 January 2023 retrospectively.
The amendment will have a very limited impact on Proteq financial statements as most of the liabilities recognised by Proteq clearly have a non-current character and the liabilities classified as current are very straightforward and most likely their classification will not change as a result of the amendment.

Disclosure of Accounting Policies (Amendments to IAS 1 and IFRS Practice Statement 2)

The purpose of this amendment is to clarify the uncertainty about what constituted a significant accounting policy. The amendment made clarifies that material accounting policy information needs to be disclosed, bearing in mind the concept of materiality. Also, additional guidance was added in order to help entities to determine whether accounting policy information is material to the financial statements (in the same way as other information: by considering qualitative and quantitative factors).

The amendment applies for annual reporting periods beginning on or after 1 January 2023 retrospectively.
The amendment is not expected to have any impact on amounts recognised Proteq financial statements, it may however lead to small adjustments in accounting policies disclosed.

Definition of Accounting Estimates (Amendments to IAS 8)

The amendment was made as a result of the difficulties entities faced in distinguishing changes in accounting policies from changes in accounting estimates. These difficulties arose because the previous definition of a change in accounting estimate in IAS 8 was not sufficiently clear.

In order to address the issue multiple adjustments were made in IAS8:
- The definition of an accounting estimate has been added (monetary amounts in financial statements that are subject to measurement uncertainty). An entity develops an accounting estimate to achieve the objective set out by the accounting policy, when items have to be measured at monetary amounts that cannot be observed directly and must instead be estimated.
- An amendment was made clarifying that the effects of a change in an input or a change in a measurement technique on an accounting estimate are changes in accounting estimates (not changes in accounting policies) unless they result from the correction of prior period errors.

The amendment applies for annual reporting periods beginning on or after 1 January 2023 prospectively.

The amendment is not expected to have significant impact on the amounts recognised in Proteq financial statements.

Deferred Tax related to Assets and Liabilities arising from a Single Transaction (Amendments to IAS12)

The amendments were made to reduce diversity in the way that entities account for deferred tax on transactions and events leading to the initial recognition of both an asset and a liability (for instance lease contracts). The amendments narrow the scope of the initial recognition exception under IAS 12, so that it no longer applies to transactions that give rise to equal taxable and deductible temporary differences.

The amendment applies for annual reporting periods beginning on or after 1 January 2023. The amendments will be applied to transactions that occur on or after the beginning of the earliest comparative period presented. In addition, at the beginning of the earliest comparative period presented, recognise a deferred tax asset will be recognised (provided that sufficient taxable profit is available) and a deferred tax liability for all deductible and taxable temporary differences associated with leases and decommissioning obligations.

The amendment is not expected to have significant impact on the amounts recognised in Proteq financial statements.

Changes in Policies, Presentation and Estimates

Changes in Policies

In 2021 there were no significant changes in policies.

Changes in Presentation

In 2021 there were no significant changes in presentation.

Changes in Estimates

The effects of significant changes in estimates are disclosed in the notes to the financial statements relating to the items concerned. The most significant changes in estimates concern the insurance liabilities (refer to note 7 'Insurance Liabilities' and to the section 'Assumptions IFRS LAT' under 'Insurance Liabilities' in 6.1 Accounting Policies for the Statement of Financial Position).

6.1.3 General Accounting Policies

The accounting policies set out below have been applied consistently to all the periods presented in the financial statements.

Functional Currency and Reporting Currency

The financial statements have been prepared in thousands of euros (€). The euro is the functional and reporting currency of Proteq. All financial data presented in euros is rounded to the nearest thousand, unless stated otherwise.

Foreign Currencies

Upon initial recognition, transactions in foreign currencies are converted into euros against the exchange rate at the transaction date.

Monetary items in the statement of financial position denominated in foreign currencies are translated into euros at the exchange rate applicable at the reporting date. Exchange rate differences arising from these transactions and from converting monetary items in the statement of financial position denominated in foreign currencies are recognised in the statement of profit or loss within investment income or gains and losses on financial instruments, depending on the item in the statement of financial position to which they relate.

The exchange rate differences of non-monetary items in the statement of financial position measured at fair value, with changes in the fair value recognised in the statement of profit or loss, are accounted for as part of these changes in the value of the related item in the statement of financial position. Exchange rate differences of non-monetary items in the statement of financial position measured at fair value, with changes in the fair value being recognised in other comprehensive income, are incorporated into shareholders' equity. Non-monetary items measured at historical cost are measured at the exchange rate applicable on the initial transaction date.

Accounting Based on Transaction Date and Settlement Date

All purchases and sales of financial instruments that have been settled in accordance with standard market practices are recognised at the transaction date, i.e. the date on which Proteq commits itself to buying or selling the asset or liability. All other purchases or sales are recognised as forward transactions until they are settled.

Offsetting Financial Instruments

Financial assets and liabilities are offset and their net amounts are reported in the statement of financial position if the following conditions are met:
- a legally enforceable right to set off the recognised amounts exists,
- Proteq intends to settle the items on a net basis, or to realise the asset and the liability simultaneously.

If either of these conditions are not met, amounts are not offset.

Estimates and Assumptions

The preparation of the financial statements requires Proteq to make estimates and assumptions based on complex and subjective opinions and best estimates. In this process, management judges situations on the basis of available information and financial data that are likely to change in the future. Although estimates are made to the best of the management's knowledge, actual results will differ from these estimates and the use of other assumptions or data can lead to materially different results.

Estimates and underlying assumptions are reviewed on a regular basis. The resulting impact on accounting estimates is recognised in the period in which the estimate is revised or in the period of revision and future periods if the revision impacts both the reporting period and future periods. The main accounting policies involving the use of estimates concern the methods for determining liabilities arising from insurance contracts, the provisions for bad debts, the fair value of assets and liabilities, deferred tax and impairments.

Fair Value of Assets and Liabilities

Fair Value

The fair value is the price that Proteq would receive to sell an asset or to pay to transfer a liability in an orderly transaction between market participants in the principal market, or in the most advantageous market and assuming the highest and best use for non-financial assets.

Fair Value Hierarchy

The fair value of financial assets and liabilities is determined using quoted prices where available. These quoted prices are primarily derived from transaction prices for listed instruments. If transaction prices are not available, market prices from independent market participants or other experts are used. Proteq applies a transfer price when determining fair value; as a result, financial assets are initially recognised at their bid prices and financial liabilities at their offer prices.

In markets where activity has decreased or in inactive markets, the range of prices from different sources can be significant for a certain investment. Selecting the most appropriate price requires judgement; available market information relating to the fair value of the instrument is taken into account.

When no market price is available for certain financial assets and liabilities, the fair value of these financial assets and liabilities is determined using valuation techniques, which may vary from net present value calculation to valuation models that use accepted economic methodologies. Input used in these models is based on observable market information to the extent possible. All valuation methods used are assessed and reviewed according to the Proteq governance procedures.

6.1.4 Accounting Policies for the Statement of Financial Position

Financial Assets

Proteq classifies its financial assets in one of the following categories: (1) available for sale, or (2) loans and receivables. The classification depends on the purpose for which the financial assets are acquired. Management decides to which category the asset is allocated at initial recognition.

Upon initial recognition, financial assets are measured at fair value including transaction costs, with the exception of the category ‘at fair value through profit or loss’, in which transaction costs are recognised directly in the statement of profit or loss.

The categories of financial assets are explained in more detail in the following section.

Proteq measures its financial liabilities at amortised cost with the exception of derivatives and liabilities from investments for account of third parties. For more information see the corresponding sections.

Investments

Available for Sale (Fair Value Through Other Comprehensive Income)

Financial assets that do not meet the criteria defined by management for loans and receivables or are not designated as at fair value through profit or loss are classified as available for sale.

After initial recognition, available-for-sale financial assets are subsequently measured at fair value. Unrealised gains and losses arising from fair value adjustments of these investments are recognised within other comprehensive income (shareholders’ equity), net of deferred taxes.

When financial assets are sold, any accumulated fair value adjustments are recognised in the statement of profit or loss as investment income. Proteq uses the average cost method to determine the related gains and losses.

Loans and Receivables (Amortised Cost)

Loans and receivables comprise unlisted debt investments with a fixed term and private loans. Loans and receivables are measured at amortised cost using the effective interest method, less an allowance for impairment if deemed necessary.

Impairment of Financial Assets

At reporting date, Proteq assesses whether there is objective evidence of an impairment of investments classified as loans and receivables and as available for sale. Impairment losses are recognised directly in the statement of profit or loss as 'impairment losses'.

Investments in Fixed Income Instruments
Investments in debt securities measured at amortised cost or available for sale are tested for impairment if there is objective evidence of financial distress at the counterparty, declining markets for the counterparty's product or other relevant indicators. This test comprises both quantitative and qualitative considerations. Debt securities are assessed for aspects including expected credit losses and credit losses already incurred (e.g. due to default), market data on credit losses and other evidence of the issuer of the instrument's inability to meet its payment commitments.

When a loan is uncollectable, it is written off against the relevant allowance for impairment.

Investments in Equity Instruments
An investment in equity instruments is considered to have been subject to impairment if its carrying amount exceeds the recoverable value for an extended period, which means that its fair value:
- has decreased 25% or more below cost; or
- has been at least 5% below cost for nine months or more.

Depending on the availability of data, the fair value of unlisted equities is determined based on:
- the price of the most recent transaction (as an indication);
- current fair values of other, similar investments (in entities); or
- valuation methods in accordance with accepted economic methods that use market data to the extent possible.

Reversal of Impairments
If the amount of an impairment loss decreases in a subsequent period, and the decrease can be related objectively to an event occurring after the impairment was recognised, the impairment allowance is (partially) reversed. That reversal is recognised in profit or loss. Impairments on equity securities are never reversed.

Derivatives

Derivatives are recognised at fair value upon inception. The fair value of publicly traded derivatives is based on quoted bid prices for assets held or liabilities to be issued, and quoted offer prices for assets to be acquired or liabilities held.

The fair value of non-publicly traded derivatives depends on the type of instrument and is based on a present value model or an option valuation model. Proteq recognises derivatives with a positive market value as assets and derivatives with a negative market value as liabilities.

Changes in the fair value of derivatives, that do not qualify for cash flow hedge accounting, are accounted for in the statement of profit or loss as gains and losses on financial instruments.

Loans and Advances due from Banks

These assets concern receivables from banks with a remaining maturity of one month or more, not including interest-bearing securities. These receivables are measured at amortised cost using the effective interest method, less any impairment losses.

Cash and Cash Equivalents

Cash and cash equivalents include bank balances and demand deposits with a remaining maturity of less than one month. These receivables are measured at amortised cost using the effective interest method, less any impairment losses.

Taxes

Income tax expense

Income tax relates to payable or recoverable tax on the taxable profit for the reporting period and taxes due from previous periods, if any. Current tax receivables and payables are measured using the tax rate applicable at the reporting date or the tax rate applicable to the previous period the taxes due relate to.

Deferred tax assets and liabilities

Deferred tax assets and liabilities are recognised for tax losses carried forward and for temporary differences between the tax bases of assets and liabilities and their carrying amounts in the financial statements. This is based on the tax rates that will apply in the period in which the deferred tax assets or tax liabilities are settled.

Deferred tax assets and liabilities are measured at the undiscounted amount expected to be received or paid. Deferred tax assets are only recognised if sufficient taxable profits are expected to be available in the near future against which these temporary differences can be utilised. Deferred taxes are recognised for temporary differences between the carrying amount and the value for tax purposes.

Deferred tax assets are assessed at the reporting date; if it is no longer likely that the related taxable profit will be achieved, the asset is reduced to its recoverable value. Deferred tax assets and liabilities are presented on a net basis to the extent that they relate to the same tax authority and that they are settled simultaneously.

Tax group

Athora Netherlands N.V. and its subsidiaries, including Proteq Levensverzekeringen N.V., form a tax group for corporate income tax and value added tax (VAT) and as a result are jointly and severally liable for the fiscal unity's corporate income tax and VAT liabilities.

Other Assets

Other assets consist of receivables from direct insurance policies, other receivables and accrued assets.

Equity

Issued share capital

The share capital comprises the issued and paid-in ordinary shares.

Share premium reserve

The share premium reserve concerns the paid-in surplus capital in addition to the nominal value of the issued ordinary shares.

Fair value reserve

Gains and losses arising from changes in the fair value of assets that are classified as available for sale are recognised in the fair value reserve (net of taxes). If the particular assets are sold, settled or as a result of other events are no longer recognised; the corresponding cumulative gains and losses is then transferred from the fair value reserve to profit or loss (see the section entitled 'Financial assets'). Exchange rate differences on non-monetary financial assets that are classified as available for sale are also recognised in this reserve.

Shadow accounting is applied to the fair value reserve for fixed-income securities that are held to cover insurance liabilities.

Insurance Liabilities

Insurance liabilities arise from insurance contracts. Insurance contracts are contracts that concern the transfer of significant insurance risk. These contracts can also involve investment risks. Proteq issues life insurance contracts. Proteq recognises insurance liabilities from the earliest of the beginning of the coverage period or the date on which the first payment of the policyholder becomes due.

Proteq has continued applying the accounting policies in use at the time of transition to IFRS for the valuation of the insurance contract liabilities since the first adoption of IFRS (the historically applied accounting policies). The insurance liabilities reported at the reporting date are valued at the higher of:
- the historic value based on the assumptions used to calculate the (guaranteed) premium and
- the minimum value according to the liability adequacy test.

The first method uses premium calculation principles for interest and mortality (life insurance contracts).

For insurance liabilities IFRS requires a liability adequacy test to be performed. The carrying amount of the insurance liability based on historical cost and reduced by related intangible assets like the Value of Business Acquired (VOBA) and deferred acquisition costs (if applicable) is compared to the current estimates of future cash flows corresponding to the insurance liability. When the latter is higher, there is a deficit. Under IFRS 4, the carrying amount of the insurance liability has to be supplemented by this deficit, thus increasing the value of the insurance liability based on the current estimates of future cash flows.

The details of the valuation principles for life insurance contracts and the corresponding liability adequacy test are described below.

Life Insurance

Life insurance contracts comprise general account life insurance policies (funeral insurance only). These contracts provide mainly long-term insurance for events that lead to a payment in cash upon the death of the insured.

General Account Life Insurance Policies

General

For these contracts, Proteq incurs insurance risk as well as investment risk. These insurance contracts are individual funeral expenses insurance policies.

Measurement of life insurance liabilities is in principle based on historical tariff rates set at the inception date of the underlying contracts. A periodic IFRS liability adequacy test is performed on these liabilities. Since there is a deficit in the liability adequacy test (LAT) at the end of 2020 and 2021, the insurance liabilities are currently measured at the probability weighted best estimate of future cash flows based on current assumptions discounted by the swap curve including Ultimate Forward Rate (UFR). Both measurement principles are explained below.

Measurement at Tariff Rates

Locked-in Interest Rate

Liabilities arising from life insurance contracts with a locked-in interest rate are determined on the basis of a prospective actuarial method taking into account all future benefit payments and premiums to be received, if applicable.

Actual payments and the timing of payments also depend on social, economic and demographic trends, inflation, investment returns, the behaviour of policyholders and other factors, as well as assumptions about developments in mortality rates. Lapse, like early surrender or a waiver of premium, is also taken into account for some life insurance products. The assumptions used in the measurement of life insurance contracts at the reporting date are based on the calculation principles set at the contract's inception date.

Most policies have a fixed discount rate between 3% and 4%. The discount rate for recent insurance contracts is generally lower than 3%. For guaranteed products, the rate of return guaranteed in the insurance contract is used. The interest rate in these insurance contracts equals the investment return achieved on the corresponding investments.

Embedded Options and Guarantees in Insurance Contracts

Proteq does not separately recognise embedded derivatives in insurance contracts, such as options to surrender insurance contracts at a fixed amount, or at a fixed amount and a guaranteed interest rate (i.e. closely linked to the basic insurance contract), but recognises them under the host contract from which they stem. The time value of the embedded options is not included in the measurement of the embedded derivative, but it is taken into account when determining LAT.

Cost Surcharges

Premiums include loadings to cover expenses. When premiums are received or fall due, the surcharges are released; they are then available to cover actual expenses, including administration, renewal expenses and acquisition costs.

Profit-sharing

The present value of any profit share that has been awarded but has not yet been distributed is included in the provision for profit-sharing which is included in the life insurance liabilities.

In addition to non-profit-sharing insurance contracts, the insurance portfolio also contains insurance contracts with discretionary or contractual profit-sharing rights.

Discretionary profit-sharing schemes concern the right of individual policyholders to receive additional benefit payments over and above any insured or guaranteed capital. The determination of the amount and timing of these additional benefits is at the discretion of Proteq's management. Profit shares already awarded are also included in liabilities arising from insurance contracts.

For insurance contracts with discretionary participation features, all realised and unrealised gains and losses, that are eligible for profit sharing, on fixed-income financial assets in the portfolio backing the participating insurance contracts are transferred to insurance liabilities, if they constitute a net gain on a cumulative basis. These additions are made regardless of the management's decision about the profit amounts paid out to the policyholders.

Shadow Accounting

Realised gains and losses on assets backing insurance liabilities can affect the measurement of insurance liabilities. IFRS 4 contains an option generally referred to as 'Shadow Accounting' to reduce accounting mismatches which may occur when insurance liabilities and investments backing those liabilities:

- are measured on a different basis; or

- have changes in their measurements recorded in different line items of total comprehensive income (net income versus other comprehensive income).

Proteq applies this option which means that unrealised gains or losses on assets backing certain insurance liabilities are treated similarly to realised gains and losses for the purpose of measuring insurance liabilities. For Proteq this leads to the following changes in the way cumulative unrealised net gains are accounted for:
- Unrealised fair value changes of Available for Sale fixed income financial assets, which are initially recognised in other comprehensive income, are transferred to the insurance liabilities without affecting profit or loss.
- Fair value changes of interest rate derivatives, to which no cash flow hedge accounting is applied, are initially recognised in profit or loss. Subsequently these changes are transferred to the insurance liabilities through profit or loss.

Shadow Accounting limits accounting mismatches only as far as those are caused by market interest rate changes. If, after the application of Shadow Accounting, any deficit under the Liability Adequacy Test remains, Proteq strengthens the insurance liabilities further through profit or loss.

Measurement Based on Current IFRS LAT Assumptions.

IFRS LAT Methodology

Under IFRS, the carrying amount of an insurance liability, net of VOBA and deferred acquisition costs (if applicable), is required to be at least equal to the discounted current estimates of future cash flows under its insurance contract plus a risk margin. The total carrying amount of the liabilities tested, consists of the carrying amount based at historical tariff rates, supplemented with any liabilities arising from interest rate guarantees on life insurance contracts, liabilities to cover for the longevity risk and the effects of shadow accounting.

It is tested, based on current assumptions, whether these carrying amounts will ultimately be adequate to cover the commitments to policyholders. When performing this test, best estimate future contractual cash flows are projected, taking into account current and future developments in mortality, the behaviour of policyholders, claims handling and management costs. These cash flows are discounted using the (bid price) swap curve including the Ultimate Forward Rate as set for Solvency II reporting purposes for the financial year. The valuation of the future expected profit-sharing and the time value of embedded options and guarantees are included in the resulting best estimate provision. The best estimate is increased with a risk margin, which is calculated using the Cost of Capital method. The resulting liability is compared to the carrying amount, after shadow accounting, of the insurance liabilities adjusted for any differences between fair value and book value of other balance sheet items. If the discounted current estimates of future cash flows arising from the insurance contract increased with a risk margin is higher, a LAT deficit exists.

The IFRS LAT is calculated on a net basis; the effects of reinsurance contracts on the projected cash flows are comprised in the outcome.

Recognition of a Deficit

If the outcome of the test, taking into account the shadow accounting adjustments, is a deficit, the carrying amount of insurance liabilities will be supplemented via technical claims and benefits in profit or loss. The increase of the carrying value of insurance liabilities and related assets is effected first by impairing any VOBA or any deferred acquisition costs, if available. Any remaining deficit will be added to insurance liabilities through profit or loss. If the deficit decreases in the next reporting period, the prior addition will be reversed to the extent it was recognised in profit or loss (technical claims and benefits).

Test Level and Frequency

The IFRS liability adequacy test is performed at least quarterly for the entire portfolio of life insurance contracts.

Assumptions IFRS LAT

The following assumptions were used in performing the IFRS liability adequacy test as at 31 December 2021 (for the assumptions that were adjusted in the current year also the assumptions from the previous year are presented):

- Discount rate: derived from the (bid price) swap curve. The curve converges to the Ultimate Forward Rate (UFR) based on the Smith-Wilson method in accordance with Solvency II including an Ultimate Forward Rate as set for Solvency II reporting which for the financial year 2021 converges after the 20 years point (last liquid point) to 3.60% (2020: 3.75%) in 40 years.
- Profit allocation is in accordance with the applicable profit-sharing arrangements and the company's decisions regarding discretionary profit sharing.
- Cost allocation and distribution of efficiency gains based on internal assessment in line with assumptions used for Solvency II technical provisions.
- Projected mortality probability data for the entire population based on Prognose Model AG 2020 (same as in 2020) adjusted for experience on each portfolio based on both external and internal research.
- Lapse and early surrender data based on internal research.
- Inflation rate: derived from market data.
- Cost inflation consists for around 75% out of expected salary increases, taking into account the agreements in the Collective Labour Agreements (CLA) and for 25% the inflation of other costs and the price inflation curve with an instantaneous 2% UFR from last liquid point 20 years onwards.
- Cost of capital rate: 4% (2020: 4%).

Financial Liabilities

Derivatives

See the previous section entitled 'Derivatives'.

Amounts Due to Banks

Amounts due to banks comprise unsubordinated debts to credit institutions. Upon initial recognition, amounts due to banks are measured at fair value, including transaction costs incurred. These liabilities are subsequently measured at amortised cost.

Any difference between the measurement at initial recognition and the redemption value based on the effective interest method is recognised in the statement of profit or loss.

Other Liabilities

Other liabilities include creditors, other taxes and accrued liabilities.

6.1.5 Accounting Policies for the Statement of Profit or Loss

Income and expenditure are allocated to the period to which they relate. Costs are recognised in the cost category to which they relate.

Income

Income represents the fair value of the services. Income is recognised as described in the following sections.

Premium Income

Premium income from insurance contracts, exclusive of taxes and other charges, comprises regular premiums.

Regular premiums are recognised as income when payment by the policyholder falls due.

Investment Income

Investment income consists of interest, dividends and revaluations.

Interest

The item interest comprises interest income from investments. Interest on financial assets is accounted for using the effective interest method based on the actual purchase price. The effective interest method is based on estimated future cash flows, taking into account the risk of early redemption of the underlying financial instruments and direct costs and income, such as transaction costs charged, brokerage fees and discounts or premiums.

Commitment fees, together with related direct costs, are deferred and recognised as adjustments of the effective interest on a loan if it is likely that Proteq will conclude a particular loan agreement. If the commitment expires without Proteq having provided the loan, the fee is recognised at the moment the commitment term expires. If it is unlikely that a particular loan agreement will be concluded, the commitment fee is recognised pro rata as a gain during the commitment period.

Interest income on monetary financial assets that have been subject to impairment and have been written down to the estimated recoverable amount is calculated over the amortised cost of the financial asset net of any reduction for impairment or uncollectibility.

Dividends

Dividends income is recognised in the statement of profit or loss as soon as the entity's right to payment is established. In the case of listed securities, this is the date on which these securities are quoted ex-dividends.

Revaluations

This item serves to recognise realised and unrealised increases and decreases in the fair value of financial assets qualifying as at fair value through profit or loss. Revaluations concern the difference between the fair value at the reporting date or net proceeds from the sale during the reporting period on the one hand, and the fair value at the beginning of the reporting period or the purchase price during the reporting period on the other.

Realised gains and losses, i.e. the difference between the selling price and amortised cost, of financial assets coming under the other categories are recognised in this item as well.

Result on Derivatives

Gains and losses on derivative and other financial instruments are recognised under this item. Derivatives are measured at fair value. Gains and losses from revaluations to fair value are directly recognised in the statement of profit or loss within gains and losses on financial instruments. However, if derivatives are designated as hedging instruments, the recognition of a resulting gain or loss depends on the nature of the hedged item and the effectiveness of the hedging relationship. The ineffective portion of any gains or losses of a cash flow hedge is recognised directly as result on derivatives.

Expenses

Expenses are recognised in the statement of profit or loss on the basis of a direct relationship between costs incurred and the corresponding economic benefits. If future economic benefits are expected to occur in different reporting periods, expenses are recognised in the statement of profit or loss based on a systematic allocation method. Expenses are directly recognised in the statement of profit or loss if they do not generate any future economic benefits.

Technical Claims and Benefits

This item comprises benefits and claims paid, surrender, claim handling costs and the changes in the general account insurance liabilities which include the difference between actual and expected results on the general account insurance portfolio. The changes in insurance liabilities resulting from shadow accounting on interest rate derivatives and LAT-deficit are also presented as this item.

Staff Costs

This item concerns expenses related to staff, including salaries, social security contributions and pension costs. The salaries, social security contributions and costs of the SNS REAAL defined contribution pension scheme were charged by Athora Netherlands to Proteq.

Other Operating Expenses

This includes office expenses, accommodation expenses and other operating expenses.

Impairment Losses

This item includes impairments of assets whose carrying amounts exceed their recoverable amounts. Financial assets, receivables and other assets may be subject to impairment. As soon as an impairment loss is identified, it is recognised in the statement of profit or loss. The specific policies for impairment are explained in greater detail in Section 6.1.4 entitled ‘Accounting policies for the statement of financial position’ (see the applicable items).

Other Interest Expenses

This item comprises interest expenses on loans issued by Proteq. Interest expenses are recognised in the statement of profit or loss based on the effective interest method.

Other Expenses

Other expenses comprise all expenses that cannot be accounted for within the items in the statement of profit or loss described above. These expenses have no direct relation with the primary and secondary business operations, occur occasionally, and are incurred in a single reporting period or arise in a single reporting period; they are amortised over multiple reporting periods, where applicable.

6.1.6 Contingent Liabilities and Commitments

Contingent liabilities are liabilities not recognised in the statement of financial position because the existence is contingent on one or more uncertain events that may or may not occur in the future not wholly within the control of Proteq. It is not possible to make a reliable estimate of such liabilities.

The maximum potential credit risk arising from pledges and guarantees is stated in the notes. In determining the maximum potential credit risk, it is assumed that all the counterparties will no longer live up to their contractual obligations and that all the existing collateral is without value.

6.1.7 Cash Flow Statement

The cash flow statement is prepared according to the indirect method, and distinguishes between cash flows from operational, investment and financing activities. Cash flows in foreign currency are converted at the exchange rate applicable on the transaction date. With regard to cash flow from operations, operating results before tax are adjusted for gains and losses that did not result in income and payments in the same financial year and for movements in provisions and accrued and deferred items.

6.1.8 COVID-19 Impact

After a brief period of relief, the COVID-19 pandemic returned towards the end of the year, pushing the world into a new era of uncertainty. For Athora Netherlands, our customers, suppliers, employees and other stakeholders, the impact last year turned out to be minimal.

The impact for our stakeholders can be summarised as follows:

Customers: we have actively informed our customers about the possibilities for potential deferral of premium payment on pension policies and amending the pension scheme for their employees in light of the COVID-19 pandemic. We have also helped customers navigate the support options provided by the government.

Financial strength: Despite a turbulent capital market during the year, our financial position remains strong. The 2021 impact of COVID-19 on our investment returns have again proved to be limited. Nevertheless, the pandemic is still having an impact on the world and we will continue to monitor the market.

Way of working: We have come to terms with the fact that the new normal will be different from what we were used to. At the same time, we recognise the opportunities presented with the accelerated digitisation and introduction of digital tools. We have therefore announced a new way of working at Athora Netherlands, in line with the smart working approach. This means:

- Employees are asked to pick a smart site / spot / solution for their work on any given day or part of day—nine to five in the office will no longer be the norm;
- Agreements will be made within each team as to what best suits the team, rather than an overarching company policy;
- The offices have been refurbished (sustainably, using recycled materials) to be conducive to this new way of working.
- Management will be extra alert with respect to the safety and wellbeing of our employees.

Challenges Ahead

Globally, the economy is suffering from the constraints introduced to manage the spread, and markets remain vulnerable. Athora Netherlands will therefore continue to keep a close eye on how our investments develop and how we can keep our business operations and financial position healthy.

Financial impacts

The impact of COVID-19 as per 31 December 2021 is limited. There was no increase in impairments on investments or amounts in arrears. Additionally, no concession were issued to third parties. The known impact on cashflows were nihil.

The updated mortality tables recently published by the Actuarial Society of the Netherlands did not show a significant increase in mortality risk because of COVID-19. The total amount of technical liabilities were not negatively affected.

The ultimate impact of COVID-19 on our results going forward is still impossible to accurately predict. We will continue to monitor the effects in the longer term.

A contingency situation is a situation in which a capital deficit arises, or threatens to arise, that poses a direct threat to the going concern of Athora Netherlands. In its Risk Appetite, Athora Netherlands has defined specific triggers that determine whether a contingency situation exists. The COVID-19 Outbreak might lead to a contingency situation and Athora Netherlands is currently monitoring the potential impact of COVID-19 on its capital and Solvency II ratios, however at the moment based on the current solvency position no contingency situation is identified.

6.2 ACQUISITIONS AND DISPOSALS

There were no acquisition or disposal of businesses in the financial year 2021. There were no acquisition or disposal of businesses in 2020 either.

6.3 NOTES TO THE FINANCIAL STATEMENTS

1 Investments

BREAKDOWN OF INVESTMENTS		
In € thousands	**2021**	**2020**
Available for sale	620,996	678,371
Loans and receivables	11	9
Balance as at 31 December	**621,007**	**678,380**

BREAKDOWN OF AVAILABLE FOR SALE: LISTED AND UNLISTED						
	Shares and similar investments		**Fixed-income investments**		**Total**	
In € thousands	**2021**	**2020**	**2021**	**2020**	**2021**	**2020**
Listed	-	-	598,289	650,239	**598,289**	**650,239**
Unlisted	22,707	23,115	-	5,017	**22,707**	**28,132**
Total	**22,707**	**23,115**	**598,289**	**655,256**	**620,996**	**678,371**

The decrease of shares and similar investments in 2021 was related to the divestments in money market funds. Fixed-income investments decreased by € 57 million mainly due to negative revaluation as a result of increased market interest rates.

STATEMENT OF CHANGES IN AVAILABLE FOR SALE						
	Shares and similar investments		**Fixed-income investments**		**Total**	
In € thousands	**2021**	**2020**	**2021**	**2020**	**2021**	**2020**
Balance as at 1 January	**23,115**	**48,673**	**655,255**	**576,648**	**678,370**	**625,321**
Purchases and advances	139,784	160,500	107,868	249,176	**247,652**	**409,676**
Disposals and redemptions	-140,019	-186,425	-131,086	-202,303	**-271,105**	**-388,728**
Revaluations	-173	370	-33,853	32,091	**-34,026**	**32,461**
Amortisation	-	-	375	444	**375**	**444**
Received Coupons	-	-	-8,361	-9,966	**-8,361**	**-9,966**
Accrued Interest	-	-	8,091	9,166	**8,091**	**9,166**
Dividend Received/ Negative Distribution	-	-3	-	-	**-**	**-3**
Balance as at 31 December	**22,707**	**23,115**	**598,289**	**655,256**	**620,996**	**678,371**

BREAKDOWN OF AVAILABLE FOR SALE: MEASUREMENT						
	Shares and similar investments		**Fixed-income investments**		**Total**	
In € thousands	**2021**	**2020**	**2021**	**2020**	**2021**	**2020**
(Amortised) cost	22,745	23,146	453,280	474,853	**476,025**	**497,999**
Revaluation	-38	-31	139,364	174,460	**139,326**	**174,429**
Accrued interest	-	-	5,645	5,943	**5,645**	**5,943**
Balance as at 31 December	**22,707**	**23,115**	**598,289**	**655,256**	**620,996**	**678,371**

The carrying amount of the fixed-income investments lent in a securities lending program as at 31 December 2021 amounts to € 39,199 thousand (2020: € 1,027 thousand). The lending periods are open-ended and can be terminated on request. The fair value of investments received from the counterparty as collateral at 31 December 2021 was € 40,208 thousand (2020: € 1,122 thousand). Collateral is only accepted in the form of equity and fixed income securities, with restrictions on the quality. Although collateral is at the disposal of Proteq, it is Proteq's policy not to trade with collateral received given the open-ended character of the initial securities lending transaction.

Some investments have been posted as collateral for amounts due to derivates. The carrying amount (market value) of investments posted as collateral at 31 December 2021 was € 38,122 thousand (2020: € 23,414 thousand). The collateral received for derivatives are reported in Note 22 Financial Instruments.

BREAKDOWN OF LOANS AND RECEIVABLES		
In € thousands	**2021**	**2020**
Private loans	11	9
Total	**11**	**9**

STATEMENT OF CHANGES IN LOANS AND RECEIVABLES		
	Loans and receivables	
In € thousands	**2021**	**2020**
Balance as at 1 January	**9**	**9**
Purchases and advances	2	-
Balance as at 31 December	**11**	**9**

Investment Portfolio

BREAKDOWN OF INVESTMENTS IN INTEREST-BEARING INVESTMENT PORTFOLIO		
In € thousands	**2021**	**2020**
Investments		
- Available for sale	598,289	655,256
- Loans and receivables	11	9
Interest-bearing investment portfolio	**598,300**	**655,265**

The following table shows the breakdown of the interest-bearing investment portfolio by sector.

BREAKDOWN OF INTEREST-BEARING INVESTMENT PORTFOLIO (SECTOR)				
In € thousands	**2021**		**2020**	
Sovereign	471,039	79%	503,051	77%
Corporate bonds - financial sector	83,388	14%	103,952	16%
Corporate bonds - non-financial sector	43,863	7%	47,902	7%
Mortgage backed securities	-	0%	351	0%
Other	9	0%	9	0%
Total	**598,301**	**100%**	**655,265**	**100%**

The following table shows a breakdown of the interest-bearing investments by rating category.

BREAKDOWN OF INTEREST-BEARING INVESTMENT PROFILE (RATING)				
In € thousands	**2021**		**2020**	
AAA	407,645	68%	445,843	68%
AA	66,765	11%	78,113	12%
A	69,844	12%	75,961	12%
BBB	53,065	9%	55,339	8%
< BBB	971	0%	-	0%
Not rated	11	0%	9	0%
Total	**598,301**	**100%**	**655,265**	**100%**

Of the interest-bearing investment portfolio, 91% of investments had an A rating or higher (year-end 2020: 92%).

The table below contains the breakdown of the interest bearing investment portfolio by geographic area.

BREAKDOWN OF INTEREST-BEARING INVESTMENT PROFILE (GEOGRAPHIC)				
In € thousands	**2021**		**2020**	
Germany	220,347	36%	236,695	36%
Netherlands	193,191	32%	224,947	34%
France	39,466	7%	35,035	5%
United States Of America	30,327	5%	27,815	4%
Austria	14,816	2%	11,687	2%
Spain	13,123	2%	6,808	1%
United Kingdom	11,400	2%	17,742	3%
Finland	10,161	2%	15,409	2%
Italy	9,591	2%	3,757	1%
Luxembourg	5,543	1%	5,423	1%
Belgium	4,160	1%	16,365	2%
Switzerland	3,281	1%	4,917	1%
Japan	2,494	0%	2,580	0%
Denmark	1,822	0%	3,341	1%
Jersey	-	0%	1,037	0%
Other European countries	28,268	5%	23,408	4%
Oceania	6,329	1%	12,002	2%
North-America	3,981	1%	6,297	1%
Total	**598,301**	**100%**	**655,265**	**100%**

The interest-bearing investment portfolios of Proteq have predominantly European debtors. The German Government and Dutch Government represent, as single debtors, an interest of more than 5% each in the interest-bearing investment portfolio.

The category "Other European countries" also consists of European and other international institutions that cannot be allocated to a single country (2021: € 28,268 thouand / 2020: € 23,408 thousand).

2 Derivatives

BREAKDOWN OF DERIVATIVES						
	Positive value		Negative value		Balance	
In € thousands	2021	2020	2021	2020	2021	2020
Derivatives held in the context of asset and liability management to which no hedge accounting is applied	19,017	38,767	1,817	4,904	**17,200**	**33,863**
Total	**19,017**	**38,767**	**1,817**	**4,904**	**17,200**	**33,863**

The derivatives position decreased with € 16,663 thousand in 2021. This is due to changes in market value caused by long-term interest rate movements.

STATEMENT OF CHANGES IN DERIVATIVES		
In € thousands	2021	2020
Balance as at 1 January	**33,863**	**8,685**
Purchases	-	508
Disposals	33	-
Revaluations	-16,339	24,621
Accrued interest	-357	49
Balance as at 31 December	**17,200**	**33,863**

For more information about derivatives see Note 15 Results on derivatives and Note 23 Hedging.

3 Deferred Tax

ORIGIN OF DEFERRED TAX 2021				
In € thousands	1 January	Change through profit or loss	Change through equity	31 December
Investments	**-42,342**	190	7,661	**-34,491**
Derivatives	**-8,225**	3,944	-	**-4,281**
Insurance contracts	**56,455**	-4,203	-5,062	**47,190**
Other	-	-17,511	-	**-17,511**
Total	**5,888**	**-17,580**	**2,599**	**-9,093**

ORIGIN OF DEFERRED TAX 2020				
In € thousands	1 January	Change through profit or loss	Change through equity	31 December
Investments	**-32,870**	-622	-8,850	**-42,342**
Derivatives	**-1,716**	-6,509	-	**-8,225**
Insurance contracts	**39,582**	9,642	7,231	**56,455**
Total	**4,996**	**2,511**	**-1,619**	**5,888**

The total amount of change in deferred tax through profit or loss is € -17,580 thousand (2020: € 2,511 thousand). This amount is due to temporary differences (2021: € -370 thousand; 2020: € 1,531 thousand), the impact of the change in corporate income tax rate of (2021: € 301 thousand; 2020: € 980 thousand) and the impact of non-recoverable deferred tax assets (DTA) of € -17,511 thousand in 2021. See also note 20 Income Tax.

On 15 September 2020, the Dutch government published the 2021 budget proposals, which include a proposal of the corporate income tax rate in 2021. These tax rate changes replaced the tax rate changes as announced and substantively enacted at the end of 2019. This proposed change was substantively enacted per year end 2020. In 2021 and further years the corporate income tax rate remains 25%. As a result the deferred tax position per ultimo 2020 is recalculated at 25%. The total impact of the reversal of corporate income tax rate reduction is € 570 thousand (gain) of which € 980 thousand via profit or loss account as tax benefit and € 410 thousand as a loss via equity.

However, on 21 December 2021 The Senate approved the Tax Plan 2022 including the increase of the corporate income tax rate from 25% to 25.8% as of 1 January 2022. This means that this tax rate change is substantively enacted and that the 31 December 2021 deferred tax calculation is based on the updated rate. The total impact of the change 2021 in tax rate is € 261 thousand (gain) of which € 301 thousand via the profit or loss account as tax benefit and € 40 thousand as a loss via equity.

In 2021 Proteq updated the model applied to the reassessment of the DTA recoverability. The most significant update relating to the tax loss carry-back and carry-forward rules stemmed from the new tax laws in respect of loss compensation adopted in 2021. Also the assumptions regarding the dividend payments and loans' redemption and coupon payments were updated following Proteq' new capital deployment policies. Other adjustment included the refinements in DTA and DTL run-off patterns, refinements in modelling for new business and fiscal equalization reserves.

These model adjustments combined with the update of the economic data (mostly relating to interest rates and spreads) resulted in DTA no longer being fully recoverable. Based on this updated net DTA recoverability reassessment, the carrying amount of deferred tax assets decreased with € 17,511 thousand of non-recoverable DTA. This decrease was recognised in profit or loss as tax expense (refer to note 20 Income Tax).

4 Other Assets

BREAKDOWN OF OTHER ASSETS		
In € thousands	**2021**	**2020**
Receivables from policyholders	2	3
Receivables from direct insurance	**2**	**3**
Receivables from group companies	-	-
Other accrued assets	-	28
Total	**2**	**31**

The receivables are expected to be recovered within twelve months after reporting date.

5 Cash and Cash Equivalents

BREAKDOWN OF CASH AND CASH EQUIVALENTS		
In € thousands	**2021**	**2020**
Short-term bank balances	4,433	2,550
Total	**4,433**	**2,550**

Short-term bank balances are at the company's free disposal.

6 Equity

BREAKDOWN OF EQUITY		
In € thousands	2021	2020
Equity attributable to the shareholder	90,478	113,669
Total	**90,478**	**113,669**

The share capital amounts to € 15,890,000 and comprises of 35,000 ordinary shares with a nominal value of € 454 per share. Of all shares, 7,000 shares are issued and fully paid up.

For further details on shareholders' equity, see Section 5.4. Statement of changes in equity.

7 Insurance Liabilities

As per 31 December 2021 the total amount of insurance liabilities is € 520,521 thousand (2020: € 564,935 thousand).

BREAKDOWN OF INSURANCE LIABILITIES		
In € thousands	2021	2020
Provision for Life insurance obligations	337,616	339,120
Results on allocated investments and interest derivatives	182,905	225,815
Total	**520,521**	**564,935**

Measurement of life insurance liabilities is in principle based on historical tariff rates set at the inception date of the underlying contracts. A periodic IFRS liability adequacy test is performed on these liabilities. Since there is a deficit in the liability adequacy test (LAT) at the end of 2020 and 2021, the insurance liabilities are currently measured at the probability weighted best estimate of future cash flows based on current assumptions discounted by the swap curve including Ultimate Forward Rate (UFR).

STATEMENT OF CHANGES IN PROVISIONS FOR LIFE INSURANCE OBLIGATIONS		
In € thousands	2021	2020
Balance as at 1 January	**339,120**	**340,511**
Benefits paid	-12,262	-12,673
Premiums received	4,249	4,930
Interest added	11,976	12,044
Technical result	-2,970	-3,054
Release of expense loading	-2,497	-2,638
Balance as at 31 December	**337,616**	**339,120**

Individual insurance policies are sold as policies with a benefit in money (the traditional insurance that may or may not include profit-sharing or interest profit-sharing).

Traditional insurance policies
Proteq bears the investment risk related to traditional insurance policies. A form of profit-sharing (discretionary) exists for a significant portion of the portfolio. This breakdown is shown in the accompanying table.

BREAKDOWN OF TRADITIONAL INSURANCE POLICIES		
In € thousands	**2021**	**2020**
Discretionary profit sharing	256,286	256,807
Without profit-sharing	81,330	82,313
Total	**337,616**	**339,120**

RESULTS ON ALLOCATED INVESTMENTS AND INTEREST DERIVATIVES		
In € thousands	**2021**	**2020**
Revaluation reserve of fixed income investment portfolio	55,574	64,477
Results on fixed income financial assets backing insurance contracts with discretionairy participation features and related derivates	127,331	161,338
Total	**182,905**	**225,815**

The revaluation reserve of fixed income investment portfolio decreased by € 8,903 thousand. The increasing interest rates have lead to a negative impact on the market value of assets.

Shadow accounting decreased with € 34,007 thousand mainly as a result of interest rate movements (shadow accounting mainly consists of returns and expected cashflows on derivatives, realised results on bonds sold and amortisation on Shadow Accounting).

Liability Adequacy Test results

RECONCILIATION OF THE IFRS INSURANCE LIABILITIES AND THE LAT RESULTS		
In € thousands	**2021**	**2020**
Insurance liabilities before LAT[1]	464,947	500,458
IFRS LAT reserve	520,521	564,935
Deficit	**-55,574**	**-64,477**

1 Insurance liabilities before LAT is excluding revaluation reserve of fixed income investment portfolio.

The deficit is covered by the revaluation reserve of the fixed income investment portfolio. The development of the provision calculated for LAT was a result of portfolio developments and the related market impact (€ -52,200 thousand), operating assumption changes (€ 5,350 thousand), the UFR change to 3,60% (€ 4,172 thousand) and model and methodology updates (€ -1,736 thousand).

Due to a decrease in interest rate curve applied in the IFRS LAT, the technical provision decreased by € 46,543 thousand (excluding the UFR change to 3,60%).

STATEMENT OF CHANGES IN IFRS LAT RESERVE		
In € thousands	2021	2020
Balance as at 1 January	**564,935**	**520,807**
Portfolio Movements	-11,486	-7,416
Operating Assumption Changes:		
- Lapse	615	1,562
- Mortality	780	7,521
- Expense	-317	-12,095
- Assetmanagement costs	3,437	-1,762
- Update Risk Margin Assumption Changes	835	-3,249
Market Impacts	-40,714	60,217
Other	2,436	-650
Balance as at 31 December	**520,521**	**564,935**

The category 'other' consist of the UFR change to 3,60% (€ 4,172 thousand) and model and methodology updates (€ -1,736 thousand).

8 Amounts due to Banks

BREAKDOWN OF AMOUNTS DUE TO BANKS		
In € thousands	2021	2020
Due on demand	17,702	33,400
Total	**17,702**	**33,400**

The amount of € 18 million (2020: € 33 million) due on demand relates to cash collateral. The Increase is caused by received collateral of € 16 million, which relates to the increase of the net derivative exposure.

9 Other Liabilities

BREAKDOWN OF OTHER LIABILITIES		
In € thousands	2021	2020
Debts to group companies	306	4,615
Investment transactions to be settled	6	9
Other liabilities	49	174
Benefits to be Paid	849	561
Total	**1,210**	**5,359**

The other liabilities are expected to be settled within twelve months after reporting date.

10 Guarantees and Commitments

Netherlands Reinsurance Company for Losses from Terrorism

In 2022, Proteq will take a 0.04% share in the Life cluster (2021: 0.05%) of the Netherlands Reinsurance company for Losses from Terrorism (Nederlandse Herverzekeringsmaatschappij voor Terrorismeschaden N.V.). In 2022, the guarantee will be € 27 thousands (one third of total guarantee of € 82 thousands) (2021: € 30 thousands) for the Life cluster and total premiums will amount to € 2 thousands (2021: € 2 thousands).

Legal proceedings

In Proteq's efforts to ensure compliance with applicable laws and regulations, instances of non-compliance occur. This includes insufficient compliance with anti-money laundering regulations for the life insurance portfolio of Proteq. Regulatory risk is present. Remediation actions are being initiated and closely monitored to address and resolve this.

In Proteq’s ordinary course of its business disputes arise, mainly regarding coverage and compensation of damages. These lead to proceedings involving claims by but mostly against Proteq. In certain of such proceedings, very large or indeterminate amounts are sought. While it is not feasible to predict or determine the ultimate outcome of all pending or threatened proceedings, Proteq is not aware of any proceedings (including any such proceedings which are pending or threatened of which Proteq is aware) which may have, or have in the recent past had, a significant effect on the financial condition, profitability or reputation of Proteq.

Guarantee schemes

As per 1 January 2019, the Recovery and Resolution insurance companies Act (Wet herstel en afwikkeling van verzekeraars) came into force. This also affects Proteq. The Recovery and Resolution insurance companies Act will enable insurance companies and DNB to be better prepared for a crisis situation and gives DNB opportunities to intervene better in case of a bankruptcy of an insurance company. In those cases DNB is enforced to take care of the interests of policyholders.

11 Related Parties

Identity of Related Parties

Parties qualify as a related party if one of the parties has the power to exercise control or significant influence on the other in terms of deciding on financial or operational issues.

Until 1 April 2020, Proteq's related parties were its ultime parent Anbang and Anbangs affiliates and its parent VIVAT, VIVATs' key management personnel and their close family members. On 1 April 2020, Athora acquired 100% of the shares of VIVAT (current: Athora Netherlands) from Anbang. From that date, Athora and its affiliates became part of Athora Netherlands' and Proteq's related parties. Anbang and its affiliates and VIVAT Schade were no longer related parties. Unless stated otherwise, transactions with related parties are conducted at arm’s length.

Intra-group Balances and Transactions between Proteq, Athora Netherlands, Athora and Affiliates

INTRA-GROUP BALANCES AND TRANSACTIONS						
	Athora Netherlands		Affiliates		Total	
In € thousands	2021	2020	2021	2020	2021	2020
Positions						
Assets						
Other assets (receivables from group companies)	-	-	-	-	**-**	**-**
Liabilities						
Corporate income tax payable	3,638	3,349	-	-	**3,638**	**3,349**
Other liabilities (liabilities to group companies)	306	4,468	-	147	**306**	**4,615**
Transactions						
Expenses						
Service fees expenses	-	-	432	570	**432**	**570**
Staff costs	2,094	1,993	-	-	**2,094**	**1,993**
Other operating expenses	846	881	-	-	**846**	**881**

There are no intra-group balances and transactions between Proteq and Athora. Regarding staff costs and other operating expenses we refer to the Note 17 and Note 18.

Intra-group Balances and Transactions with Key Management Personnel of Proteq

The key management personnel consists exclusively of the members of the Executive Board and the Supervisory Board. This applies to Proteq and also to Athora Netherlands N.V. and SRLEV N.V. Proteq Levensverzekeringen N.V. is a full subsidiary of Athora Netherlands N.V. The members of the Executive Board and the members of the Supervisory Board of Athora Netherlands N.V. are also the members of the Executive Board and the members of the Supervisory Board of Proteq Levensverzekeringen N.V. The remuneration information is presented on Athora Netherlands level.

The transfer of shares of Athora Netherlands from Anbang to Athora at 1 April 2020 led to a change in the composition of the Executive Board. In 2020 five members have resigned and four new members have been appointed to the Executive Board.

The Executive Board comprised five members as at 31 December 2021 (31 December 2020: 5). The Supervisory Board comprised five members as at 31 December 2021 (31 December 2020: 5).

Actual Remuneration (former) Members of the Executive Board

The following table provides a breakdown of the total remuneration of the Executive Board, including former and existing key management.

BREAKDOWN OF REMUNERATION (FORMER) MEMBERS OF THE EXECUTIVE BOARD		
In € thousands	**2021**	**2020**
Short-term employee benefits	3,775	3,766
Post-employment benefits	103	108
Other long-term benefits	-	74
Termination benefits	1,443	4,531
Total	**5,321**	**8,479**

The other long-term benefits and a part of the short-term employee benefits relate to a retention scheme as recognised in the statement of profit or loss; the vesting of this scheme is subject to certain conditions and any payment will be made in instalments based on current remuneration regulations.

The termination benifits consist of contractual agreed severance payments to former members of the Executive Board and their salary until the end of their notice period without the obligation to perform work. This is in line with the applicable remuneration policy Executive Board and applicable legislation.

Reference is made to Section 6.1.5 for the accounting principles of 'Staff Costs'.

Loans, Advances and Guarantees

There are no loans, advances or guarantees outstanding on 31 December 2021 (and 2020) and/or granted to members of the Executive Board during 2021.

Actual Remuneration (former) Members of the Supervisory Board

The following table provides an overview of the total remuneration of the Supervisory Board members (excluding 21% VAT).

BREAKDOWN OF REMUNERATION (FORMER) MEMBERS OF THE SUPERVISORY BOARD		
In € thousands	**2021**	**2020**
Total fixed actual remuneration for Supervisory Board members	554	555
Total remuneration related to membership Supervisory Board Committees	21	21
Total	**575**	**576**

Loans, Advances and Guarantees

There are no loans, advances or guarantees outstanding on 31 December 2021 (and 2020) and/or granted to members of the Supervisory Board during 2021.

Other intra-group balances and transactions

Athora Group maintains a number of active share plans and schemes, which includes a Management Equity Plan, a Long-Term Incentive Plan and a Employee Co-invest Plan.

Some members within the Executive and Supervisory Board were already part of management within Athora Group and continue participating in one or more of these plans. These plans and its requirements did not have an impact on Proteq financial statements.

12 Events after the Reporting Date

Russia-Ukraine war

The Russian invasion of Ukraine and rapidly escalating events since late February 2022 are a real tragedy to the people and are causing disruption to business and economic activity in the region and worldwide.

At the date of this report the scale and length of this invasion is unknown, and the situation is still changing from day to day. We are deeply concerned about the situation in Ukraine and our thoughts go out to the people of Ukraine and all those directly affected by the conflict.

Proteq has no business activities in Ukraine, Russia or Belarus and there is no direct exposure through our own account investments portfolio. We will continue to monitor the developments closely.

13 Net Premium Income

BREAKDOWN OF NET PREMIUM INCOME		
	Own account	
In € thousands	2021	2020
Total gross regular premiums Life	3,803	4,187
Total gross single premiums Life	446	744
Total gross premium income Life	4,249	4,931
Reinsurance premiums	2	2
Total net premium income Life	**4,247**	**4,929**

The reinsurance premium relates to Terrorism coverage (NHT).

14 Investment Income

BREAKDOWN OF INVESTMENT INCOME		
In € thousands	2021	2020
Fair value through profit or loss	1,102	1,356
Available for sale	9,110	25,772
Loans and receivables	138	195
Total	**10,350**	**27,323**

BREAKDOWN OF INVESTMENT INCOME 2021				
In € thousands	Fair value through profit or loss	Available for sale	Loans and receivables	Total
Total interest and dividend	1,102	8,033	138	**9,273**
Realised gains and losses	-	1,077	-	**1,077**
Total	**1,102**	**9,110**	**138**	**10,350**

Interest income from Fair value through profit or loss consists of interest income from derivatives.

BREAKDOWN OF INVESTMENT INCOME 2020				
In € thousands	Fair value through profit or loss	Available for sale	Loans and receivables	Total
Total interest and dividend	1,356	9,043	195	**10,594**
Realised gains and losses	-	16,729	-	**16,729**
Total	**1,356**	**25,772**	**195**	**27,323**

15 Result on Derivatives

The result on derivatives in 2021 (€ -16,306 thousand) is caused by changes in interest rates (2020: € 24,622 thousand). For further details, see Note 2 Derivatives.

16 Technical Claims and Benefits

Technical claims and benefits include benefits paid, surrenders and changes in insurance liabilities. This item also includes profit-sharing and discounts.

BREAKDOWN OF TECHNICAL CLAIMS AND BENEFITS		
In € thousands	**2021**	**2020**
General account benefits and surrenders	12,262	12,673
Change in general account insurance liabilities	-1,681	-1,391
Profit-sharing and discounts	437	739
Results on allocated investments and interest derivatives	-18,365	34,629
Total	**-7,347**	**46,650**

17 Staff Costs

Staff costs amount to € 2,094 thousand (2020: € 1,993 thousand) and mainly consist of staff costs recharged by Athora Netherlands N.V. The staff cost slightly increased as a result of a higher recharge by Athora Netherlands of staff costs.

Proteq's number of internal FTE's is 15 at the end of 2020 (2019: 15).

18 Other Operating Expenses

Other operating expenses € 846 thousand (2020: € 895 thousand) include direct and indirect costs related to IT, marketing, external advisors and other expenses.

19 Other Expenses

BREAKDOWN OF OTHER EXPENSES		
In € thousands	**2021**	**2020**
Other management fees	39	43
Other interest expenses	24	19
Total	**63**	**62**

20 Income Tax

BREAKDOWN OF TAX EXPENSE		
In € thousands	**2021**	**2020**
In financial year	289	3,349
Corporate income tax due	**289**	**3,349**
Due to temporary differences	370	-1,531
Due to change in income tax rate with regard to deferred tax	-301	-980
Non-recoverable deferred tax	17,511	-
Deferred tax (including tax rate change)	**17,580**	**-2,511**
Total	**17,869**	**838**

The corporate income taxes are irrevocable for the years up to and including 2018.

RECONCILIATION BETWEEN THE STATUTORY AND EFFECTIVE TAX RATE		
In € thousands	**2021**	**2020**
Statutory income tax rate	25.0%	25.0%
Result before tax	2,636	7,272
Statutory corporate income tax amount	**659**	**1,818**
Due to change in income tax rate with regard to deferred tax	-301	-980
Non-recoverable deferred tax	17,511	-
Total	**17,869**	**838**
Effective tax rate	677.9%	11.5%

The effective tax rate of 677.9% differs compared to the nominal rate of 25%. This is the result of the reassessment of the deferred tax assets recoverability as explained in note 3 Deferred Tax.

21 Income tax effects relating to Other Comprehensive Income

BREAKDOWN OF INCOME TAX EFFECTS RELATING TO OTHER COMPREHENSIVE INCOME						
In € thousands	**Before tax amount**		**Tax (expense) benefit**		**Net of tax amount**	
	2021	**2020**	**2021**	**2020**	**2021**	**2020**
Unrealised revaluations investments available for sale	-36,179	-999	7,883	-574	**-28,296**	**-1,573**
Realised gains and losses fair value reserve transferred to profit or loss	1,077	16,729	-222	-8,277	**855**	**8,452**
Results on allocated investments and interest derivatives	24,545	-10,890	-5,062	7,231	**19,483**	**-3,659**
Total comprehensive income	**-10,557**	**4,840**	**2,599**	**-1,620**	**-7,958**	**3,220**

22 Financial Instruments

Fair Value of Financial Assets and Liabilities

The table below shows the fair value of Proteq's financial assets and liabilities. It only shows the financial assets and financial liabilities and does not include items that do not meet the definition of a financial asset or liability. The total fair value shown below does not represent the value of the company as a whole.

FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES				
	Fair value	Carrying amount	Fair value	Carrying amount
In € thousands	**2021**	**2021**	**2020**	**2020**
Financial assets				
- Available for sale	620,996	620,996	678,371	678,371
- Loans and receivables	11	11	9	9
Derivatives	19,017	19,017	38,767	38,767
Other assets	2	2	31	31
Cash and cash equivalents	4,433	4,433	2,550	2,550
Total financial assets	**644,459**	**644,459**	**719,728**	**719,728**
Financial liabilities				
Derivatives	1,817	1,817	4,904	4,904
Amounts due to banks	17,702	17,702	33,400	33,400
Other liabilities	1,210	1,210	5,359	5,359
Total financial liabilities	**20,729**	**20,729**	**43,663**	**43,663**

The fair values represent the amount that would be received to sell a financial asset or paid to transfer a financial liability in an orderly transaction between market participants at the reporting date. The fair value of financial assets and liabilities is based on quoted market prices, where observable. If prices in an active market are not available, various valuation techniques are used to measure the fair value of these instruments. Parameters used in such valuation techniques may be subjective and various assumptions are used, for instance for the discount rate and the timing and size of expected future cash flows. Where possible and if available, the valuation techniques make use of observable inputs in relevant markets. Changes in assumptions can significantly influence estimated fair values. The main assumptions for each item are explained in the section on fair value hierarchy below.

The carrying amount of financial assets and liabilities at amortised cost is shown excluding accrued interest. Accrued interest related to these instruments is recognised within other assets or other liabilities.

Measurement of Financial Assets and Liabilities

The following methods and assumptions are used to determine the fair value of financial instruments.

Investments

The fair value of equities is based on quoted prices in an active market or other available market data. The fair value of interest-bearing securities, is also based on quoted market prices or if actively quoted market prices are not available, on the discounted value of expected future cash flows. These discounted values are based on the relevant market interest rate, taking into consideration the liquidity, creditworthiness and maturity of the investment.

Derivatives

The fair value of nearly all derivatives is based on observable market inputs, such as market interest rates and foreign exchange rates. The fair value of a number of non-publicly traded derivatives depends on the type of instrument and is based on a discounted value model or an option valuation model.

Other Assets

Given the predominantly short-term nature of other assets, the carrying amount is considered to be a reasonable approximation of the fair value.

Cash and Cash Equivalents

The carrying amount of the cash and cash equivalents is considered to be a reasonable approximation of the fair value.

Amounts Due to Banks

The fair value of amounts due to banks has been estimated based on the discounted value of the future cash flows, using the prevailing interest rate plus a risk premium. The risk premium is based on the credit risk assumed by the market for holding such instruments issued by Proteq Levensverzekeringen N.V., differentiated by maturity and type of instrument. The carrying amount of any amount that is due within one month is considered to be a reasonable approximation of the fair value.

Other Liabilities

The carrying amount of the other liabilities is considered to be a reasonable approximation of the fair value.

Hierarchy in Determining The Fair Value of Financial Instruments

A large part of the financial instruments is recognised at fair value. The fair value of financial instruments measured at fair value in the statement of financial position or for which the fair value is disclosed is classified as a level. This level depends on the parameters used to determine fair value and provides further insight into the valuation. The levels are explained below:

Level 1 – Fair Value Based on Quoted Prices in an Active Market

Quoted prices from exchanges, brokers or pricing institutions are observable for all financial instruments in this valuation category. In addition, these financial instruments are traded on an active market, which allows the price to accurately reflect current and regular market transactions between independent parties. The investments in this category mainly concern listed equities and bonds, including investment funds on account of policyholders whose underlying investments are listed.

Level 2 – Fair Value Based on Observable Inputs

This category includes financial instruments for which no quoted prices are available but whose fair value is determined using models where the parameters include available market inputs. These instruments are mostly privately negotiated derivatives and private loans. This category also includes investments whose prices have been supplied by brokers but for which there are inactive markets. In these cases, available prices are largely supported and validated using market inputs, including market rates and actual risk premiums related to credit rating and sector classification.

Level 3 – Fair Value not Based on Observable Market Data

The financial instruments in this category have been assessed individually. The valuation is based on management’s best estimate, taking into account most recently known prices. In many cases analyses prepared by external valuation agencies are used. These analyses are based on data unobservable in the market, such as assumed default rates associated with certain ratings.

The table below shows the instruments in level 1, level 2 and level 3. Financial assets and liabilities not measured at fair value and whose carrying amount is a reasonable approximation of fair value are not classified by level.

FAIR VALUE HIERARCHY 2021					
		Fair value			
In € thousands	Carrying amount	Level 1	Level 2	Level 3	Total
Financial assets measured at fair value					
Investments available for sale	620,996	619,447	1,549	-	**620,996**
Derivatives	19,017	-	19,017	-	**19,017**
Financial assets not measured at fair value					
Investments loans and receivables	11	-	11	-	**11**
Other assets	2	-	-	-	**2**
Cash and cash equivalents	4,433	-	-	-	**4,433**
Financial liabilities measured at fair value					
Derivatives	1,817	-	1,817	-	**1,817**
Financial liabilities not measured at fair value					
Amounts due to banks	17,702	-	-	-	**17,702**
Other liabilities	1,210	-	-	-	**1,210**

FAIR VALUE HIERARCHY 2020					
		Fair value			
In € thousands	Carrying amount	Level 1	Level 2	Level 3	Total
Financial assets measured at fair value					
Investments available for sale	678,371	671,431	6,589	351	**678,371**
Derivatives	38,767	-	38,767	-	**38,767**
Financial assets not measured at fair value					
Investments loans and receivables	9	-	9	-	**9**
Other assets	31	-	-	-	**31**
Cash and cash equivalents	2,550	-	-	-	**2,550**
Financial liabilities measured at fair value					
Derivatives	4,904	-	4,904	-	**4,904**
Financial liabilities not measured at fair value					
Amounts due to banks	33,400	-	-	-	**33,400**
Other liabilities	5,359	-	-	-	**5,359**

The table below shows the movements in financial instruments measured at fair value and classified in level 3 in 2021. There were only some available for sale investments measured at fair value and classifed in level 3.

STATEMENT OF CHANGES IN LEVEL 3 FINANCIAL INSTRUMENTS - AVAILABLE FOR SALE		
In € thousands	**2021**	**2020**
Balance as at 1 January	351	1,895
Realised gains or losses recognised in profit or loss	-	-8
Unrealised gains or losses recognised in other comprehensive income	-	-3
Purchase/acquisition	-	2,809
Sale/settlements	-351	-4,345
Other	-	3
Balance as at 31 December	**-**	**351**
Total gains and losses included in profit or loss	-	-8

In € thousands	2021	2020
Bonds issued by financial institutions	-	351
Total	**-**	**351**

The fair value financial instruments classified in level 3 is partly based on inputs that are not observable in the market.

The sensitivity of the fair value of equity securities is calculated as the movement in fair value of the equity securities in the event of a general shock in the market. In this calculation, the look through principal is taken into account. The impact on shareholders' equity of a +10% equity shock and a -10% equity shock are for 2021 nihil.

Offsetting Financial Assets and Liabilities

The table below shows the financial assets and liabilities that are subject to offsetting and the related amounts that are not set off but serve to mitigate credit risk.

FINANCIAL ASSETS AND LIABILITIES 2021							
		Related amounts not netted in the carrying amount					
In € thousands	**Gross carrying amount**	**Offsetting carrying amount**	**Netted carrying amount**	**Financial instruments**	**Cash collateral**	**Other financial collateral**	**Netted value**
Financial assets							
Derivatives	19,017	-	19,017	-	17,702	-	**1,315**
Total financial assets	**19,017**	**-**	**19,017**	**-**	**17,702**	**-**	**1,315**
Financial liabilities							
Derivatives	1,817	-	1,817	-	-	-	**1,817**
Total financial liabilities	**1,817**	**-**	**1,817**	**-**	**-**	**-**	**1,817**

FINANCIAL ASSETS AND LIABILITIES 2020							
				Related amounts not netted in the carrying amount			
In € thousands	Gross carrying amount	Offsetting carrying amount	Netted carrying amount	Financial instruments	Cash collateral	Other financial collateral	Netted value
Financial assets							
Derivatives	38,767	-	**38,767**	-	38,300	-	**467**
Total financial assets	**38,767**	**-**	**38,767**	**-**	**38,300**	**-**	**467**
Financial liabilities							
Derivatives	4,904	-	**4,904**	-	4,904	-	**-**
Total financial liabilities	**4,904**	**-**	**4,904**	**-**	**4,904**	**-**	**-**

Management of Past Due and Impaired Assets

The table below sets out the financial instruments by arrears and/or impairment.

FINANCIAL INSTRUMENTS - IMPAIRMENTS 2021					
In € thousands	Not in arrears nor impaired	Financial assets that are past due but not impaired	Financial assets that have been impaired	Provision for bad debt	Total
Investments	620,996	-	-	-	**620,996**
Loans and receivables	11	-	-	-	**11**
Other financial assets	2	-	-	-	**2**
Total	**621,009**	**-**	**-**	**-**	**621,009**

FINANCIAL INSTRUMENTS - IMPAIRMENTS 2020					
In € thousands	Not in arrears nor impaired	Financial assets that are past due but not impaired	Financial assets that have been impaired	Provision for bad debt	Total
Investments	678,371	-	-	-	**678,371**
Loans and receivables	9	-	-	-	**9**
Other financial assets	31	-	-	-	**31**
Total	**678,411**	**-**	**-**	**-**	**678,411**

Proteq recognises impairments on equities if the market value has fallen to 25% below cost price, or has been at least 5% below cost price uninterruptedly for at least nine months.

Proteq recognises impairments on fixed-income financial instruments if there is a loss event related to the financial instrument. To identify such events, the financial instruments are periodically assessed on the basis of a number of criteria set by Finance. Financial instruments meeting one or more of these criteria are analysed and assessed individually to determine whether there is a loss event.

Maturity schedule for financial liabilities

The table below shows the undiscounted cash flows from the principal financial liabilities, other than derivatives, by contract maturity date. In 2021 there were no undiscounted cash flows from the principal financial liablities, other than derivatives.

LIQUIDITY CALENDAR FINANCIAL LIABILITIES 2021						
In € thousands	< 1 month	1 - 3 months	3 - 12 months	1 - 5 years	> 5 years	Total
Amounts due to banks	17,702	-	-	-	-	**17,702**
Total	**17,702**	**-**	**-**	**-**	**-**	**17,702**

The table below shows the undiscounted cash flows from all derivative contracts by maturity date.

LIQUIDITY CALENDAR DERIVATIVES 2021						
In € thousands	< 1 month	1 - 3 months	3 - 12 months	1 - 5 years	> 5 years	Total
Interest rate derivatives	-	-	-	382	1,435	**1,817**
Total	**-**	**-**	**-**	**382**	**1,435**	**1,817**

LIQUIDITY CALENDAR DERIVATIVES 2020						
In € thousands	< 1 month	1 - 3 months	3 - 12 months	1 - 5 years	> 5 years	Total
Interest rate derivatives	-	-	-	1,019	3,886	**4,905**
Total	**-**	**-**	**-**	**1,019**	**3,886**	**4,905**

The table regarding the cash flows from insurance business is included in chapter 7.6.2.1.

IFRS 9 Disclosures

As mentioned in the section “Relevant New Standards” Proteq qualifies for the temporary exemption and consequently is allowed to defer the implementation of IFRS 9. Due to the application of the temporary exemption, Proteq is required to provide additional disclosures in order to enable comparability with financial statements published by entities applying IFRS 9. These disclosures concern the changes in fair value of financial instruments and credit risk exposure.

Changes in Fair Value

According to amended IFRS 4-requirements the disclosures concerning the fair value and the changes in fair value for all the interest bearing financial assets are disclosed divided on two groups:

- Financial assets that pass the SPPI-test excluding the financial assets held for trading or managed on a fair value basis;
- Other financial assets that fail the SPPI-test including financial assets held for trading and financial assets that are managed on a fair value basis.

Along with the Business Model Assessment, the Solely Payments of Principal and Interest (SPPI) test is one of the two criteria in IFRS 9 to determine whether an interest bearing financial asset should be classified as measured at amortised cost or fair value through other comprehensive income (FVOCI). It is tested whether the contractual terms of the financial asset give rise, on specified dates, to cash flows that are solely payments of principal and interest.

A financial asset that fails the SPPI-criterion is measured at fair value through profit or loss (FVTPL). Equity instruments and derivatives are excluded from the SPPI-test.

The disclosures are required for the following items:

Investments

STATEMENT OF CHANGES IN FAIR VALUE OF INVESTMENTS SPPI AND NON-SPPI 2021						
	Available for sale		Loans and receivables		Total	
In € thousands	SPPI[1]	non-SPPI	SPPI	non-SPPI	SPPI	non-SPPI
Balance as at 1 January	**627,146**	**28,109**	**9**	**-**	**627,155**	**28,109**
Purchases and advances	103,238	4,630	2	-	**103,240**	**4,630**
Disposals and redemptions	-119,442	-11,644	-	-	**-119,442**	**-11,644**
Changes in fair value	-33,543	-310	-	-	**-33,543**	**-310**
Other movements	417	-312	-	-	**417**	**-312**
Balance as at 31 December	**577,816**	**20,473**	**11**	**-**	**577,827**	**20,473**

1 Available for sale is excluding equity instruments which do not pass SPPI test.

STATEMENT OF CHANGES IN FAIR VALUE OF INVESTMENTS SPPI AND NON-SPPI 2020						
	Available for sale		Loans and receivables		Total	
In € thousands	SPPI[1]	non-SPPI	SPPI	non-SPPI	SPPI	non-SPPI
Balance as at 1 January	**556,053**	**20,595**	**9**	**-**	**556,062**	**20,595**
Purchases and advances	233,006	16,170	-	-	**233,006**	**16,170**
Disposals and redemptions	-193,874	-8,429	-	-	**-193,874**	**-8,429**
Changes in fair value	31,881	210	-	-	**31,881**	**210**
Other movements	81	-437	-	-	**81**	**-437**
Balance as at 31 December	**627,147**	**28,109**	**9**	**-**	**627,156**	**28,109**

1 Available for sale is excluding equity instruments which do not pass SPPI test.

Other movements includes accrued interest and received coupons.

Other Assets

There are items recognised in Other assets, that qualify as financial instruments under IFRS 9. All financial assets recognised in Other assets meet the SPPI-test. As these assets constitute short-term receivables that are expected to be recovered within 12 months, their face value is deemed to be an approximation of their fair value. Bearing in mind their short term character, no statement of changes is being presented. For more details refer to section 6.3 Note 5 'Other assets' in the notes to the financial statements.

Cash and Cash Equivalents

Cash and cash equivalents include bank balances and demand deposits with a remaining maturity of less than one month. These items meet SPPI-conditions. For the changes in value of these items refer to 5.5 cash flow statement.

Credit Risk Disclosures

For the financial assets that pass the SPPI-test (excluding the financial assets held for trading or managed on a fair value basis) the disclosure of their carrying amounts under IAS 39 separated into credit risk rating grades need to be made. Additionally for the assets that do not have low credit risk, the fair value needs to be disclosed.

BREAKDOWN OF FAIR VALUE OF FINANCIAL ASSETS 2021 (RATING)			
In € thousands	Available for sale	Loans and receivables	Total
AAA	407,643	-	**407,643**
AA	62,751	-	**62,751**
A	64,367	-	**64,367**
BBB	42,084	-	**42,084**
< BBB	971	-	**971**
Not rated	-	11	**11**
Total	**577,816**	**11**	**577,827**

BREAKDOWN OF FAIR VALUE OF FINANCIAL ASSETS 2020 (RATING)			
In € thousands	Available for sale	Loans and receivables	Total
AAA	445,843	-	**445,843**
AA	73,997	-	**73,997**
A	68,599	-	**68,599**
BBB	38,708	-	**38,708**
< BBB	-	-	**-**
Not rated	-	9	**9**
Total	**627,147**	**9**	**627,156**

Proteq considers the financial assets with the credit rating BBB or higher as the assets with low credit risk.
The assets rated lower than BBB are not considered to be the assets with low credit risk. As these assets are classified as available for sale, their fair value equals their carrying amount.

23 Hedging

Proteq was applying hedge accounting until 1 July 2021. On that date Proteq voluntarily decided to prospectively discontinue the application of the hedge accounting, as the management concluded that the application of hedge accounting would not provide a significant benefit from a financial risk volatility perspective.

The nominal amounts of the derivatives used for hedging purposes shown in the table below reflect the degree to which Proteq is active in the relevant markets.

DERIVATIVES FOR HEDGING PURPOSES 2021						
	Nominal amounts				Fair value	
In € thousands	< 1 year	1 - 5 years	> 5 years	Total	Positive	Negative
Interest rate contracts						
- Swaps and FRAs	20,000	253,950	515,000	**788,950**	19,017	-1,817
Total	**20,000**	**253,950**	**515,000**	**788,950**	**19,017**	**-1,817**

DERIVATIVES FOR HEDGING PURPOSES 2020						
	Nominal amounts				Fair value	
In € thousands	< 1 year	1 - 5 years	> 5 years	Total	Positive	Negative
Interest rate contracts						
- Swaps and FRAs	35,000	273,950	255,000	**563,950**	38,767	-4,905
Total	**35,000**	**273,950**	**255,000**	**563,950**	**38,767**	**-4,905**

The nominals of the derivatives are not disclosed netted (positive and negative).

The nominal amounts are the units of account relating to the derivatives, specifying the relationship with the underlying values of the primary financial instruments. These nominal amounts are not an indication of the size of the cash flows or market and credit risks relating to the transactions.

24 Audit Fees

Pursuant to Section 382a(3) of Book 2 of the Dutch Civil Code, the company has availed itself of the exemption from disclosing the audit fees in the annual report. These disclosures have been included in the annual report 2021 of Athora Netherlands N.V.

25 Result Appropriation

For the provisions of the articles of association governing the appropriation of profit or loss reference is made to Section Other information.

The Executive Board proposes to the General Meeting of Shareholders to deduct the negative result for 2021 of € 15,233 thousand from the retained earnings of Proteq Levensverzekeringen N.V.

In accordance with the resolution of the General Meeting of Shareholders held on 29 April 2021, the result for 2020 of € 6,434 thousand has been added to the retained earnings of Proteq Levensverzekeringen N.V.

7 MANAGING RISKS

7.1 RISK MANAGEMENT SYSTEM

7.1.1 General

Proteq has established a Risk Management System (see figure Risk Management) that is aimed at a controlled and effective achievement of the strategic objectives. It relates risks to the strategic, financial and operational objectives as well as to the objectives in the areas of sustainability and reputation. The framework consists of organisational, control and culture components. The management of Proteq recognises that transparency is a vital element in effective risk management. The Executive Board, which is responsible for setting the Risk Management System, monitors that the desired culture and level of risk awareness are translated into identifiable aspects, such as desirable behaviour, details of the risk appetite or criteria for evaluation of employees.

The guidelines in the Risk Management System enable risk assessments to be performed properly and efficiently. These guidelines apply to the entire organisation. Proteq encourages an open corporate culture in which risks can be discussed, employees responsible to share knowledge on risks and (pro)active risk management is appreciated.

The established Integrated Control Framework (ICF), part of the Risk Management System, provides the basis for the internal control system consisting of key controls (process, general IT and application) and management controls measuring risk maturity and performance within Proteq.

The management of Business Lines and Functions is responsible for day-to-day operations within the Risk Management System, schedules testing of operating effectiveness of key controls. The Management Controls, divided in different components, are assessed periodically by a management Self Assessment and are monitored risk based by second line Risk.

7.1.2 Overview

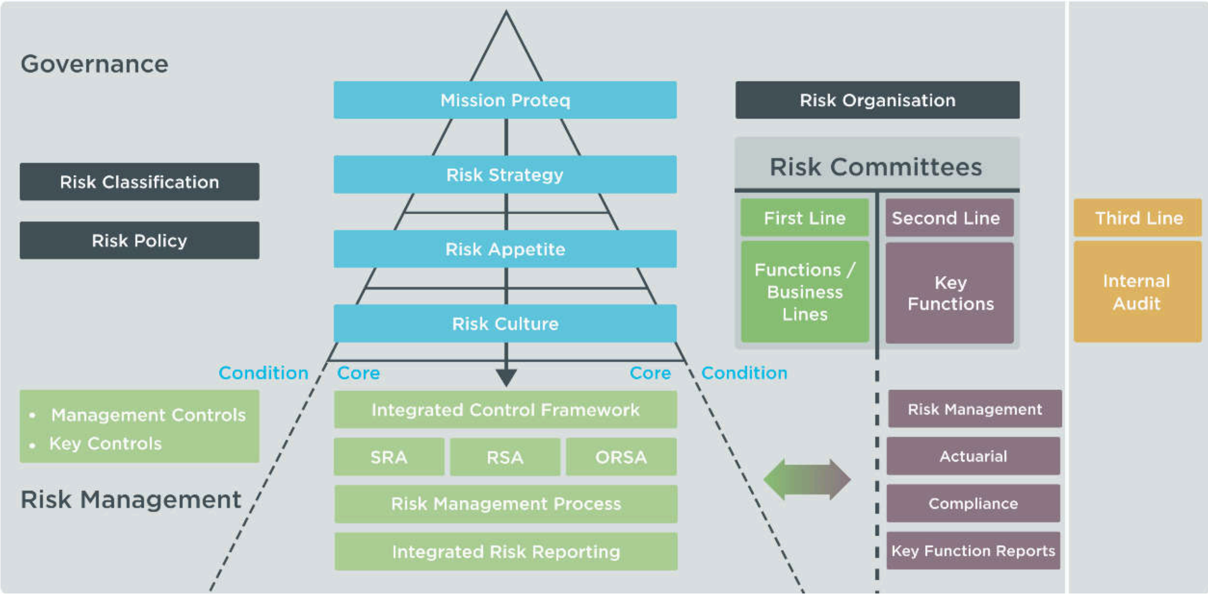
In the Risk Management System, specific Solvency II requirement such as the Key Functions and the Own Risk and Solvency Assessment (ORSA) are incorporated. The Proteq Risk Management System operates an integrated approach for risks that the organisation is or could be exposed to, with Risk Management being an integral part of the decision making process. Major decisions of the Executive Board have to be accompanied by a Key Function opinion.

The core of the Proteq Risk Management System consists of a Governance part and a Risk management part. In the governance part, starting from the Proteq Mission and business strategy, the Risk Strategy and Risk Appetite are derived. The components Risk Policy, Risk Taxonomy and Risk Organisation are necessary conditions to enable these strategic risk processes. To ensure an integrated approach the first line (Business Lines and Functions) and the second line key functions use the same risk taxonomy, operations are covered by the Risk Appetite and are aligned by a policy structure.

Governance including an adequate Risk Culture, is conditional for performing risk management on operational level, with as the core a control cycle of risk identification-measurement- mitigation and continuous monitoring and reporting. The Risk Management Process is supported by the ICF, built up from several components that together form the basis for sound and controlled business operations and hence for visibly being in control of Proteq and its Business Lines and Functions. The ICF measures maturity and performance of risk management and ensures steering on correct and complete risk reports.

The internal reports are a part of (the operation of) the Risk Management Process. The reports on recognised types of risks are input for the integrated risk reports, enabling Key Risk Indicator (KRI) monitoring and drawing management attention to deviations of the risk appetite.

Proteq performs Risk Self Assessments (RSA) and Strategic Risk Assessments (SRA), enabled by the Risk Management Function (RMF). An ORSA is incorporated in the Proteq Risk Management System, enabled and coordinated by the RMF, and is performed at least annually, for which the EB is accountable.



Risk Management

7.2 RISK MANAGEMENT GOVERNANCE

7.2.1 Mission

Athora Netherlands, including Proteq, has expressed the ambition to become the most valued Pension provider in the Netherlands offering the best value for money in a sustainable way and provide quality service to our customers. With this focus as starting point a Risk Strategy is set out that contributes to a sustainable growth of Proteq, for the benefit of all its stakeholders.

In order to achieve the mission, Proteq takes its role in society seriously. Environmental, social and corporate governance (ESG) forms an integral part of the strategy and business operations. Proteq believes that responsible corporate behaviour with respect to ESG factors is key to deliver long term value for policyholders, employees, shareholders and the wider society. ESG trends and changes in regulation may also introduce considerable financial risks (on assets) and non-financial risks (e.g. reputational) and need careful management and consideration. Proteq aims to set the example and will actively but cautiously target sustainable investments.

7.2.2 Risk Strategy

Proteq has derived a Risk Strategy, a supporting set of objectives following from the Athora Netherlands mission and vision to achieve the strategic goals. As main principles Proteq has defined a robust capital position, a sustainable capital generation and sound and controlled business operations. Proteq aims for a robust and strong capital position, which contributes to the trust of customers, employees, society and financial markets in the company.

The Risk Strategy contains the key guiding principles and statements used when setting the Risk Appetite for each risk category from the risk taxonomy. The risk appetite is the extent to which Proteq is prepared to accept/take risks in pursuit of realising its strategic objectives. As an Insurance company and Asset manager, Proteq deliberately takes Insurance (Underwriting) risks and Market risks aiming for returns. In doing so, taking Credit (investments) risk and Liquidity risk may contribute to those returns.

Operational and Compliance risks are inherent risks that have to be controlled and managed, as they are part of Proteqs license to operate and support being able to successfully execute our strategy.

Proteq provides guarantees for future payments to its customer and therefore needs adequate reserving and a strong capital position. The Athora Netherlands board chooses to hold a buffer above regulatory requirement to absorb temporary volatility and provide more certainty to its customers.

7.2.3 Risk Appetite

The Risk Appetite Statement (RAS) of Proteq is divided into the Risk Appetites per risk type and the underlying Risk Tolerances. The Risk Appetite Statements are set at least annually by the Executive Board and confirmed by the Risk Committee (RC) of the Supervisory Board.

Risk Appetite Framework

Risk Appetite is defined at Athora Netherlands level, including Proteq. The risk tolerances-part contains measures for the maximum risk that Proteq is willing to accept. These measures are defined for various sub-risks for every individual legal entity or specific Business Lines or Functions and are split into risk triggers (comparable to hard limits) and risk indicators (comparable to soft limits).

When implementing the strategy, the Executive Board gives guidelines to the Business Lines for establishing Operational plans, taking into account the set Risk Tolerance in the Risk Appetite and corresponding limits on entity level. This helps the Business Lines and Functions optimise risk and return when developing the best possible products and services.

The evaluation of the Risk Tolerance in the Risk Appetite, consists of several steps, including risk identification, the selection of measures, risk mitigation, risk criteria, reporting and monitoring.

7.2.4 Risk Culture

Culture and conduct in general play a vital role in steering a company, and specifically in adequate risk management. Both are considered standard elements in performance evaluation meetings and in annual performance objectives. Proteq has awareness programmes in place that focus on how employees hold each other accountable for their conduct and how they can escalate matters if necessary.

Key pillars that support the strategy of Proteq to be the most valued pension provider are Focus, Excellence and Talent. Focus allows employees to excel in retirement. By doing so, we retain and attract top talent. Focus, Excellence and Talent are used as the organisational competencies to support the desired collective development. With these competencies there is a clear link to Culture and defined behaviours.

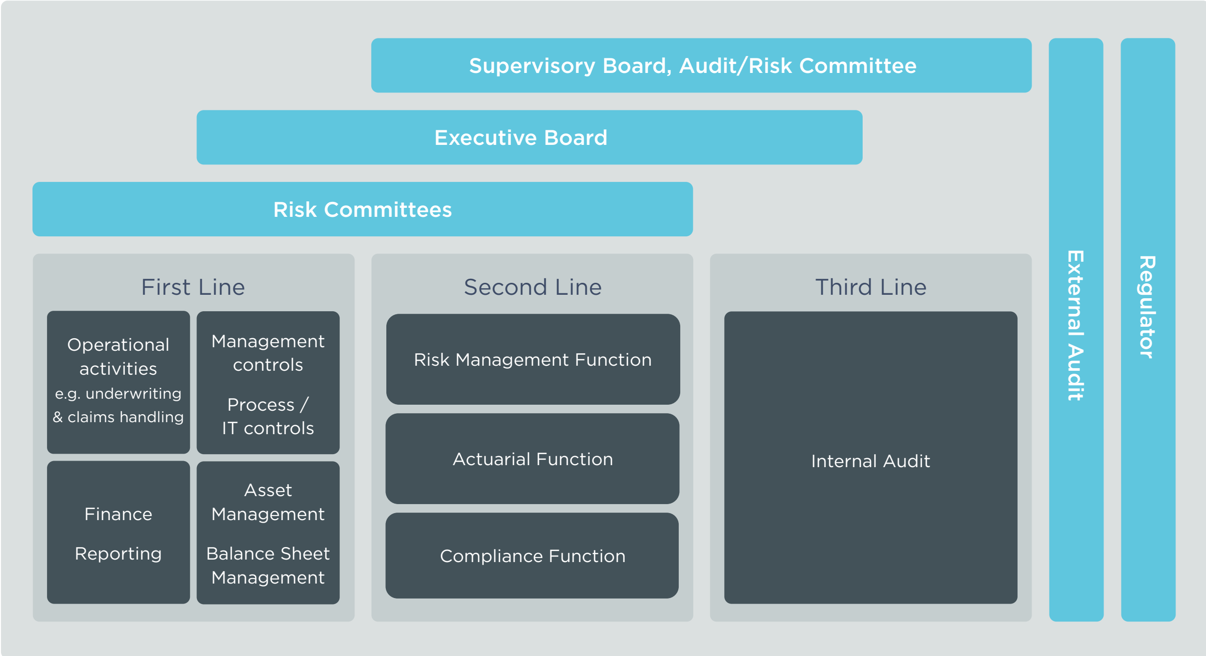
Proteq realises that the tone at the top is defining for Risk Culture, which makes communication and exemplary behaviour determinant. Proteq encourages an open corporate culture in which risks are to be discussed, employees feel responsible to share knowledge on risks and where (pro) active risk management is appreciated. Exemplary behaviour, the openness for discussion of dilemmas, practicability of policy and transparency are inseparably linked to an open corporate culture.

Risk Culture is also embedded in the organisation by risk management being an integral part of the organisational processes and decision making of Proteq. Decision making is clear, explicit, and in line with the Risk Policy and Risk Appetite of Proteq. The management teams of the Business Lines and Functions promote awareness of risks and are supported by the second line departments of the Risk organisation. The management teams are responsible for ensuring that risk decisions are made in accordance with the delegated authorisations, in consultation with all second line Solvency II key functions.

Furthermore, Proteq ensures that senior management and employees on key functions at all times are fit and proper to fulfil their job. Finally, the Remuneration Policy of Athora Netherlands discourages taking undesired and irresponsible risks focused on short-term profit and personal gain.

7.2.5 Risk Organisation

Proteq implemented the ‘Three Lines’ control model including the Solvency II Key Functions and a risk committee governance structure. It contributes to the strengthening of the Risk Culture, taking responsibility for managing risks and internal control, and eventually to the further optimisation and integration of the risk management.



Three Lines of Defence

First Line: Risk Taker

Business plans are prepared in the first line. With this preparation, the first line operationalises the (risk) strategy, focusing on the primary process (i.e. underwriting, claims handling, preparing financial accounts) of the business and on investment activities.

Within the policy framework and subject to internal procedures and risk limits, it is the objective of the risk taker to achieve an optimum risk/return. Consequently risks are managed by identifying, measuring, mitigating and monitoring them and report whether the risks remain within the risk appetite of Athora Netherlands and its underlying entities, including Proteq.

Risk Self Assessments are carried out and in combination with the ORSA, these assessments could lead to changes in the (risk) strategy. For all these activities the first line has an active role in various risk committees including the ability to demonstrate management and process key controls according to the standards as set by the ICF.

Second Line: Risk Management

The second line has a monitoring role in respect of the risk management actions and activities carried out by the first line. The second line assesses actions in the first line, and is responsible for monitoring the overall risk profile to be in line with the risk appetite.

The second line is also responsible for formulating the Risk Management System and setting Risk Policies. The first line is responsible for the execution of these policies. The second line assesses policy compliance on a regular basis, using risk reports, reports on management and process key controls and own observations. Furthermore, the second line sets the mandates in line with the risk appetite. It also defines basic principles and preconditions for risk models and the control framework and supports central decision-making bodies. The data used, including models, assumptions and techniques, are validated periodically.

The second line risk management organisation of Athora Netherlands, including Proteq, is part of the Risk department, resorting under the Chief Risk Officer (CRO). The CRO is member of the Executive Board.

Third Line: Internal Audit

Audit Athora Netherlands is the independently operating audit function: Audit Athora Netherlands provides assurance and consulting services, helping Athora Netherlands to accomplish its objectives by evaluating and improving the effectiveness of governance, risk management and control processes.

Audit Athora Netherlands does not take part in determining, implementing or steering of Athora Netherlands' risk appetite, risk management processes and risk responses. Audit Athora Netherlands reports to the chairman of the Executive Board of Athora Netherlands and has direct access to the Chairman of the Audit Committee of the Supervisory Board of Athora Netherlands.

Audit Athora Netherlands performs risk based audits on Proteqs risk management processes, including their design and how well they are working, on the management of key risks, including the effectiveness of the controls and other activities, and on the reliability and appropriateness of risks and reporting of risk and control status. This means formulating an opinion on whether the organisation’s risk management methodology is understood by key groups or individuals involved, including the Executive Board and the Audit Committee. Further, Audit assesses whether risk management processes are sufficient to protect the assets, reputation, and ongoing operations of the organisation.

Risk Committees

In addition to the risk management organisation, Athora Netherlands has established Risk Committees to manage risks effectively, in line with regulatory expectations. Athora Netherlands has established the following Risk Committees: Finance and Risk Committee (FRC), Investment and Balance Sheet Committee (IBSC), Operational Risk and Compliance Committee (ORC Athora Netherlands) and Product Committee (PC). Decisions of the ORC Athora Netherlands are leading for the local Business Lines and Functions MT’s in the area of sound and controlled business operations. In the MTs, the issues regarding Operational Risk and Compliance are discussed. Decisions of the PC are leading for the local Business Lines MT’s in the area of Product, Marketing and Pricing.

Key Functions

In accordance with Solvency II Athora Netherlands recognises four Key Functions. The Functions carry out activities on behalf of all insurance entities of Athora Netherlands, including Proteq. All Key Functions are segregated from each other and are not structured hierarchically in relation to each other. The second line Key Functions report to the CRO. The Director Risk is the Risk ManagementFunction Holder, the Director Actuarial Risks is the Actuarial Function Holder and the Director Legal and Compliance is the Compliance Function Holder. The Director Audit Athora Netherlands is the Audit Function Holder.

The Risk Management Function (RMF) coordinates the Enterprise Risk Management Report (ERM Report), an integrated report with Key Takeaways from the three second line Key Functions (Risk Management Function, Actuarial Function and Compliance Function). Besides the major risks within Athora Netherlands it shows strategic developments and emerging risks. The ERM Report presents issues compiled on the basis of the information obtained from monitoring reports, risk dashboards, RAS, Internal Control Statements, reports by internal and external regulators, incidents and issues reported, and own assessments & perceptions. The Risk opinion is discussed in the risk committees, in the EB and in the Risk Committee of the Supervisory Board.

The RMF annually provides the Risk Management Function Review Report, aimed at providing a sufficient level of assurance that the Solvency II-figures, and Solvency II and IFRS sensitivities, are determined adequate and reliable. This RMF report is submitted to the EB and the Audit Committee of the Supervisory Board.

The Actuarial Function (AF) opines on the adequacy of the Technical Provision used for IFRS-LAT and Solvency II purposes. It furthermore assesses the reliability and adequacy of Underwriting and Reinsurance programmes. The Actuarial Function Report (AFR) is submitted to the EB and the Audit Committee of the Supervisory Board.

Regularly the RMF and the AF submit an update based on the follow-up of findings in the AFR and RMF report, supplemented with recent findings and advices.

The main purpose of the Compliance Function is to support management in conducting its business operations in a controlled, honest and sound manner, and with regard to the risks which in this context are a threat to achieving the strategic objectives, obligations arising from laws and regulations, insights from social discussions and guidelines imposed by regulators. The Compliance Function provides regularly, as part of the ERM Report, a report on the most important Compliance Risks of Proteq to the EB and the Risk Committee of the Supervisory Board.

7.2.6 Risk Policy

Proteq has an integrated risk management policy structure. The entire policy structure is accessible to employees through the internal policy site. The policy structure ensures the timely identification and assessment of risks and adequate monitoring and reporting of the material risks, both on board and workplace level. The Risk Policy is structured in levels, the aim is to give insight in the cascading from (Solvency II) legislation, (second line) risk policy, corresponding processes and (first line) implementation. At least once a year the Risk Policies are assessed, adjusted if necessary and approved following regular governance.

7.2.7 Risk Taxonomy

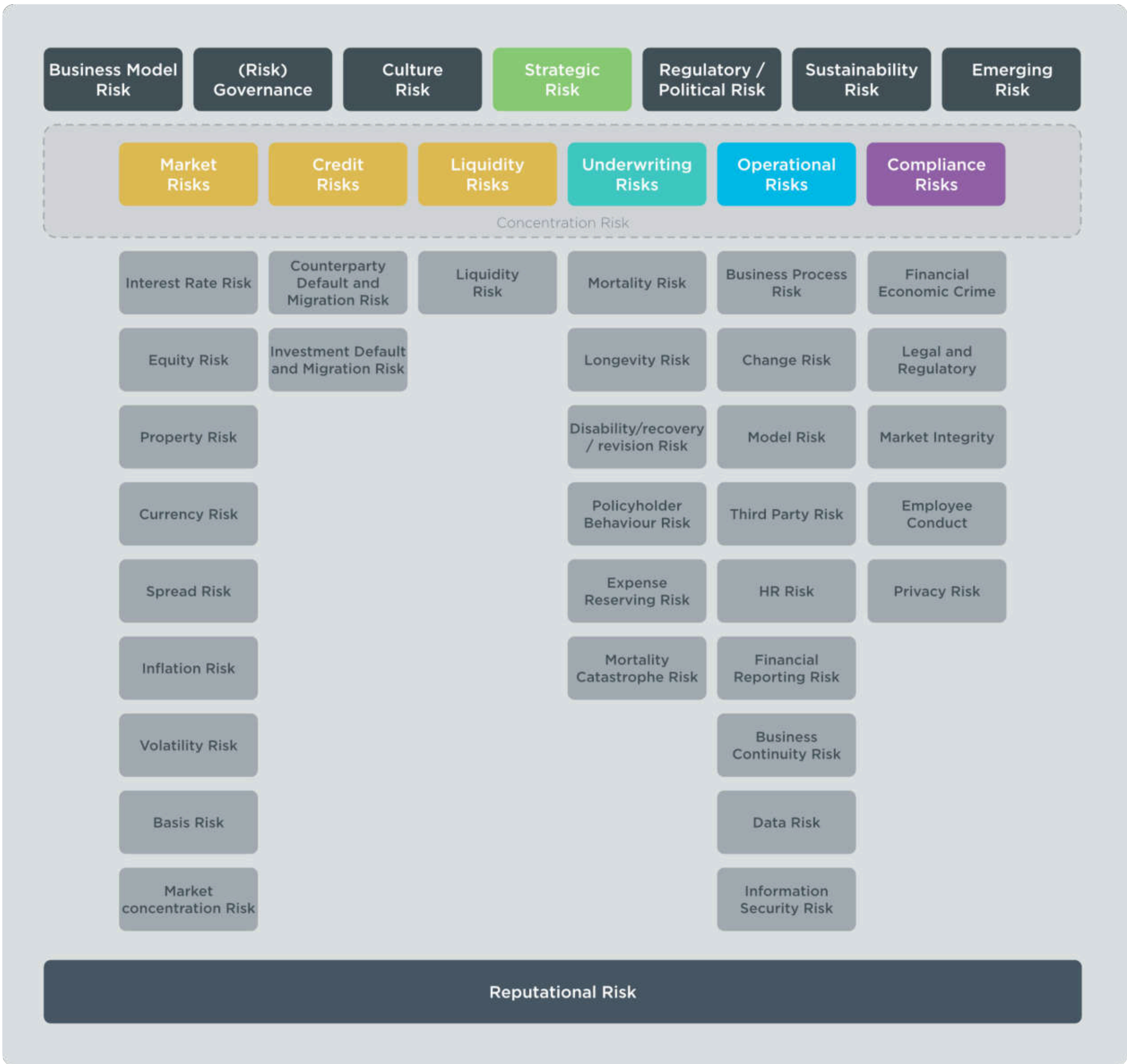
Proteq provides insight into the risks for the business itself and for its stakeholders in order to manage these risks within the indicated tolerance levels. This includes both behaviour related and financial aspects of Risk Management. Clarity is crucial to ensure adequate risk management. In order to clarify the communication and management of risks, the risk taxonomy includes an extensive list of mutually exclusive risk types to which Proteq is or could be exposed.

Proteq has defined and structured different risk types, partly based on applicable laws and regulations (such as SII Standard Formula), and on the international ORX Reference Taxonomy.

As part of its strategy, deliberately takes Underwriting risks and Market risks aiming for returns. As a consequence, taking Credit (investments) risk and Liquidity risk may contribute to those returns. Compliance risk and Operational risks are inherent risks that have to be controlled and managed.

Strategic Risks
Strategic risks relate to future business developments and may eventually materialise as one of the main or sub risk types. Strategic risks are monitored in the Enterprise Risk Management Report. In the risk assessment on the Operational Plans several internal and external strategic development scenarios are taken into account.

Proteq recognises several strategic risks, from which Business model risk, Governance risk and Sustainability risks are most notable. Emerging risk is a newly developing or changing risk that may evolve to one of the main or sub risk types, and which is perceived to have a potential significant impact on Proteqs financial strength, competitive position or reputation. Identifying and assessing emerging risks are incorporated in the risk management system.



Risk Taxonomy

Proteq applies the Solvency II Standard Formula. Not all of the risk categories are part of the Solvency Capital Requirement (SCR) calculation. The SCR calculation does not contain Liquidity, Model and Compliance Risk.

The risk categories will be explained in the more detail in the next paragraphs.

To give more insight in the risks the company is exposed to, sensitivities are determined on best effort basis for different underwriting and market risks in paragraph 7.5 and further. For underwriting risks and spread risks the sensitivities shown are the estimated impact on own funds without recalculating the SCR after shock. For the other market risks the sensitivities shown are the estimated impact on own funds including the estimated impact on the SCR market and life underwriting risk after shock.

7.3 RISK CONTROL

Risk control within the risk management process is a continuous process of identifying and assessing risks and establishing controls. Risk control is an inextricable part of the strategy, policy, processes, procedures, operational embedding, allocation of capacity and responsibilities, and independent testing of control effectiveness. The first and second line departments have been assigned a responsibility in this process, which is supported by the Integrated Control Framework (ICF).

7.3.1 Integrated Control Framework

The Integrated Control Framework (ICF) is Proteqs internal control system and is part of its Risk Management System. The objective of the ICF is to provide reasonable assurance regarding the design, effectiveness and efficiency of Proteqs management activity, operations and processes, the reliability of Proteqs financial, operational and other internal and external reporting, and compliance with regulatory requirements.

Internal control is a dynamic and iterative process. The ICF contains four core components within this process that form the basis to ensure and provide assurance for a sound and controlled execution of the operations within Proteq. These components are Risk assessment, Control activities, Testing and assurance and Monitoring activities. For all these components standards and key requirements are defined.

The ICF forms the basis for sound and controlled operations within Proteq, measures the maturity of risk management and monitors Process Controls and Management Controls.

7.3.2 Process Controls and Management Controls

Optimisation of Integrated Control Framework

The improvement and optimisation of the ICF is a continuous process. Proteqs organisation develops and changes over time and the ICF continuously adapts to the new situation. The basis of the ICF and the GRC tooling was implemented in the period 2015-2017. Like in the previous years also in 2020 new initiatives were taken for further improvements. Based on an analysis of all the individual areas within the ICF a comprehensive program has started where all the stakeholders are involved. The focus of this program is to strengthen the fundament of the ICF, namely the quality of process risk assessments, process- and key control design and change procedures. This program successfully continued in 2021 with an ICF Transformation Steerco, representing all business and functions and second line. Accountability and responsibility was set in a new policy and RACI. Training and process RCSA sessions were held in order to further strengthen the responsibility and capability of first line to timely recognise changes leading to operation changes, performing process risk assessments and further strengthening the design of ICF processes and (key) controls.

A first line risk report was introduced in which each quarter the key Business Lines and Functions report on their Risk profile. The reports includes non-financial risk KRI results, changes with operational impact, incidents & risk events, Key control testing results and number of action points. For each category the results are presented including impact and follow up actions where necessary. The 1st line Risk Reports are reported by the Functions and Business Lines to the Local ORC's and the ORC Athora Netherlands.

Testing of Effectiveness

Process controls
Periodically the effectiveness of process key controls is tested according to a predefined schedule. Within a quarterly cycle the first line performs the testing activities for those process key controls that are subject to testing requirements. Results are part of the first line risk report that is reported to the ORCs of the Business lines and Functions and also to the ORC Athora. The second line department performs an independent review which may contain a reperformance. The results of the review activities are discussed with, reported toand followed up by responsible first line management. As part of the ICF transition in 2021 the second line assessed and provided maturity scores to first line as of Q3 to score the quality of the testing files, to further assist 1st line in taking full responsibility and further decrease dependence on 2nd line reperformances.

Management controls
Management controls (or entity level controls) provide an understanding and insight in the maturity level of risk management and risk control in the individual Business Lines- and Functions. Management controls are designed on the basis of relevant legislation (e.g. WFT, Solvency II) and internal risk management and compliance policies. The individual management controls are tested annually by the first line in a self-assessment process. As a result of the increased maturity level reached in 2020, the management controls were assessed with reduced scoping in 2021, focusing on data management. The

second line review results are reported to Business Lines and Functions, and on an aggregated level to the EB.

The professional standards and scoping used for testing by Proteqs first and second line are assessed by the external auditor in order to, as much as possible, make use of these testing procedures for audit purposes.

7.3.3 Risk Management Process

In this section for Underwriting Risk, Market Risk, Counterparty Default Risk and Non-financial risk the Risk Management Process is elaborated. For Liquidity Risk and Model Risk this is included in Section 7.8 and Section 7.9.

7.3.3.1 Underwriting Risk

Proteq assesses new underwriting risks continuously and manages existing underwriting risks, for both new business and for the existing portfolio.

Operational Plan

Derived from the Athora Netherlands strategy, the Operational Plan (OP) sets targets with respect to volume and value of new business and the existing portfolio. The OP describes the planned development of the insurance portfolio together with the related capital requirement for the next three years taking into account an assigned risk budget or available capital. The OP sets out in broad terms whether Proteq wants to enter new markets, which forms of distribution will be used, whether new (forms of) insurance products will be developed, and which products will be adjusted or terminated. It also lays down possible measures relating to acceptance and the mitigation of claims.

Product Development, Pricing and Acceptance

In accordance with the OP, new or adjusted products are developed which follow the Product Approval and Review Process (PARP). Starting from the customer’s interests the target group, coverage and terms and conditions are determined. This is the basis for the best estimate risk premium, taking into account options and guarantees, capital requirements and the internal pricing curve. Furthermore, criteria related to profitability and risk control measures (acceptance criteria, clauses, any reinsurance) must be met.

The Product Committee (PC), in which the Solvency II second line Key Functions are represented, is responsible for approval of new products, including the pricing. A selling product review is performed regularly, existing products follow a risk based product review calendar.

Technical Provisions

The provision is calculated monthly. The IFRS Liability Adequacy Test on the premium and claims reserves is performed once a quarter, or more frequently if this is deemed necessary. Any reserves that are inadequate are increased. The most recent insights as to parameters are involved. The Actuarial Function assesses the Solvency II Technical Provision and expresses an opinion on its reliability and adequacy at least once a year.

Parameter Study

The evaluation for long-term policies (Life, Disability) of the underwriting parameters (e.g. mortality, lapses, disability, recovery) takes place by a parameter study. The aim of this study is to value the existing insurance portfolio and set the cost price of new Life insurance policies. Thereby relevant information on portfolio developments is taken into account.

Portfolio Analysis

Portfolio analysis is aimed at optimising risks and returns within the risk policy structure. This can lead to new strategic insights in areas such as entering new markets or terminating products. The analysis is based on the impact of underwriting risks following from various measures: SII own funds, long-term profitability, SCR and the VNB. Based on the risk appetite, Proteq mitigates underwriting risks primarily by means of diversification and reinsurance.

7.3.3.2 Market Risk

The ALM-policy covers the management of market risk, counterparty default risk and liquidity risk.

The starting point for the ALM policy is the Balance Sheet Assessment (BSA), which is drawn up annually. The BSA seeks to find an optimum between risk and return within the preconditions that apply with regards to solvency, laws and regulations. This BSA is used as a basis for defining a Strategic Asset Allocation (SAA), which is in turn used to translate specific investment activities into an investment plan and investment mandates for selected asset managers, taking into account the risk tolerances in the Risk Appetite Statements (RAS), solvency ratio, the tax position and the long-term risk exposure. When finalising the SAA, specific attention is paid to the availability of sufficient expertise in the segments in which investments are held. All investments are monitored by means of reports on performance and capital.

Investments are made in accordance with the prudent person principle and in the interest of the policyholders. The prudent person principle forms part of the ALM policy. Investments are made exclusively in assets and instruments for which the risks are properly identified, measured, monitored, managed, controlled and reported, but also comply with ESG principles.

The way Proteq has organised its investment governance and oversight for both Own Account and Unit Linked ensures that the investment process operates in the context of (and ensures consistency with) the nature and duration of the insurance and re-insurance liabilities, the strategic and financial plans, the Risk Strategy and ensures that the overall risk position remains within the Risk Appetite Statement and other risk limits.

Proteq monitors market risk end for mitigation, instruments are used such as interest rate swaps, futures, FX forwards, interest rate swaptions and fixed income investments.

Sensitivity analyses and stress tests

Stress tests provide information on how sensitive investments and liabilities are to interest rate risk and other market risk. These risks are quantified (and monitored) on a regular basis.

For interest rate risk several parallel and non-parallel shocks are defined. For market risk a number of combined scenarios is determined with (different) simultaneous shocks to the various sub-market risks.

These market risk scenarios are monitored and reported on a regular basis, and if deemed necessary adjustments are made to existing market risk exposures (e.g. interest rate risk). The aim is to reduce the sensitivity of the Solvency II ratio within pre-defined risk appetite levels. This evaluation is supported by metrics for yield curve risk including non-linear interest rate risk (convexity). In this way Proteq manages interest rate risk of the Solvency II ratio.

This approach reflects the sensitivity of the entire statement of financial position (of fixed cash flows, options, risk margin and required capital) drawn up.

7.3.3.3 Compliance Risks and Operational Risks

Compliance risks and Operational risks (see section 7.9) are managed following the risk management cycle: risk identification, risk measurement, risk mitigation, risk monitoring and risk reporting.

Risk identification

Risks are identified to its strategic objectives and at all levels within the organisation. Several different approaches are used such as risk assessments, analysis of incidents, and leveraging the experience of its employees and its competitors, including the consideration of emerging risks. Risk identification is both considered from top-down and bottom-up bases. Proteq maintains a Risk Taxonomy to facilitate the risk identification process. The Risk Taxonomy also serves as a major organizing principle for its risk control, risk oversight activities and risk reporting.

Risk measurement

In order to understand the magnitude of the exposure of the identified risks, risks are measured. The measurement of risks supports the risk management process through quantitative controls and limits. Risk measurement involves either or both qualitative and quantitative approaches depending on the nature of the risk and taking account of expert judgement and considering both normal and stressed scenarios. The level of risk is measured before and after considering additional mitigating measures.

Risk mitigation

The risk mitigation activities (avoid, transfer, mitigate and accept) are aimed at controlling risks within the boundaries set by the risk appetite.

Risk Monitoring

In order to ensure that risks stay within the risk appetite, they are monitored. Within the monitoring activities both the first line and second line take their role. Given the outcome of the monitoring activities Proteq can determine the most appropriate course of action. The goal of risk monitoring is to ensure that Proteq carefully controls its risk-taking decisions as well as its total risk profile.

Risk Reporting

The primary objective of risk reporting – defined as all regular and ad-hoc reports by first and second line – is to create internal risk transparency and meet external disclosure requirements. Objectives are to provide stakeholders with accurate and timely information about material risk issues by means of concise and understandable messages, to design reports so that they optimally meet recipients' needs and to facilitate informed decision making.

Developments

In 2021 the main developments in non-financial risks were 1) change risks associated with volume of change on transformation initiatives, strategy execution, license to operate and board stability 2) remediation program Sanctions AML 3) Business Process risk associated with strategic and organisational change and the ICF transformation 4) third party risk including new strategic outsourcing initiates 5) further attention and mitigation of cybercrime threats and ransomware developments and 6) all activities that are related with HR and culture aspects, impacted by both organisational change as a new working culture, created by the impact of COVID-19 on the organisation. In order to maintain a sound and controlled organisation, the associated risks were addressed, managed and monitored within the Athora Netherlands risk management procedures.

7.4 CAPITAL MANAGEMENT

7.4.1 Definition

Capitalisation refers to the extent to which Proteq has buffer capital available to cover unforeseen losses and to achieve the strategic objectives of the company. Proteq manages its capitalisation within limits set in the Risk Appetite Statements. Annually target setting happens in the Operational Plan culminating in a Capital & Funding Plan. Monthly and quarterly forward looking monitoring enables Proteq taking timely action if capitalisation would deteriorate. Proteq assesses its capitalisation regularly with respect to level and quality in the ORSA and with respect to risk / return in the Balance Sheet Assessment.

7.4.2 Capital Policy

Proteq aims for a robust capital position, which contributes to both the confidence that clients have in the institution and access to financial markets. Proteq deems a solvency ratio between 140% and 200% as a normal going concern level. The objective of the Capital Policy is to ensure that there is sufficient capital to fulfill obligations towards policyholders and meet requirements. The available capital of

Proteq has to meet internal risk appetite standards as well as external requirements of regulators, rating agencies and also includes commercial considerations. Capitalisation generally refers to the relationship between risk-bearing activities and available regulatory capital (own funds). The second objective of the Capital Policy is to ensure that capital is used as efficiently and flexibly as possible to facilitate the implementation of Proteqs strategy.

A preparatory crisis plan exists, which describes the procedure that applies in a contingency situation. A contingency situation is a situation in which a capital deficit arises, or threatens to arise, that poses a direct threat to the going concern of Proteq. In its Risk Appetite, Proteq has defined specific triggers that determine whether a contingency situation exists. The emphasis of these triggers is on capital metrics and these are linked to governance and management measures. Proteqs Capital Policy forms the basis for lower level policies, process descriptions and procedures.

Management uses the Operational Plan, Capital and Funding Plan, Balance Sheet Assessment, Risk Dashboards, ORSA, Preparatory Crisis Plan and Financial Risk Reporting for managing the capital position. The Capital and Funding Plan describes the medium-term activities relating to capital and funding, including a five-year solvency forecast. The Capital and Funding Plan is based on the Operational Plan.

7.4.3 Regulatory Framework

Solvency II is a risk-based regime consisting of three pillars. Pillar 1 regulates the capital requirements. Insurers should be capitalised adequate to their risks. Therefore, this pillar introduces two risk weighted measures: the Minimum Capital Ratio (MCR), and the Solvency Capital Ratio (SCR). Pillar 2 demands an adequate level of risk management and governance. Pillar 3 establishes standards of transparency.

7.4.4 ORSA

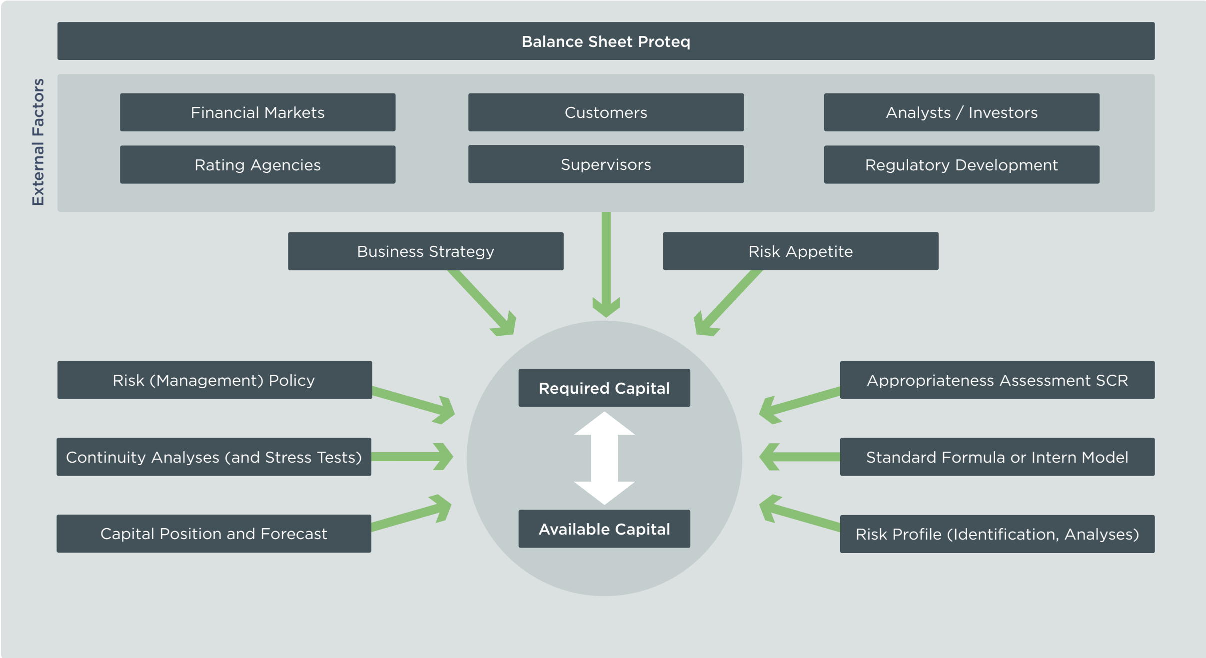
As part of its risk-management system Proteq conducts its own risk and solvency assessment (ORSA). That assessment includes:

- the overall assessment of solvency taking into account the specific risk profile, approved risk tolerance limits and the business strategy of Proteq;
- the significance in which the risk profile of Proteq deviates from the assumptions underlying the SCR calculated with the standard formula.

The ORSA is an integral part of Proteq’s management control cycle and is filed with the regulator.

7.4.4.1 ORSA Process

The ORSA considers external factors, the business strategy, future developments, the risk profile and risk appetite to assess the amount and quality of capital. An overview is shown in the figure below.



ORSA Process

Proteq performs the ORSA annually and if any significant change in its risk profile occurs. The Executive Board is accountable and actively involved. The appropriateness of the risk measurement is assessed and adequacy of capital is tested against a range of stressed scenarios thereby considering the possible effect of management actions.

7.4.4.2 Scenario Tests and Mitigating Action

An extensive risk identification process takes place. The identified risks are subject to a range of stress scenarios, which are severe but plausible, to test the financial position of Proteq. This is in contrast to the Preparatory Crisis Plan, in which the scenarios should be severe enough to create a direct threat to the going concern of Proteq.

For all scenarios in the ORSA mitigating management actions have been assessed.

7.4.4.3 Main Conclusions

Athora Netherlands concludes that the standard formula is an appropriate risk management for Athora Netherlands' risk profile and Proteq's solvency is adequate for protecting its policy holders. Risks that are out-of-scope of the standard formula have been identified in risk assessments, examined in stress scenarios and mitigated by managerial actions. The quality of Athora Netherlands' capital is sufficient, refinancing of a limited part of Athora Netherlands loans is only due in 2024. Athora Netherlands and her insurance entities, in particual in this case Proteq, comply with capital requirements and substantial liquidity and a Revolving Credit Facility is available at Athora Netherlands to recover from stress. Proteq believes that capital generation should improve substantially by moving towards the new strategic asset allocation and making the organisation more efficient and simultaneously growing the pension business, as planned in the new strategy.

7.4.5 Preparatory Crisis Plan

On 1 January 2019, the new law on Recovery and Resolution of insurers (Wet herstel en afwikkeling van verzekeraars) came into force in The Netherlands. As a result of this law, Proteq has established a Preparatory Crisis Plan. In a Preparatory Crisis Plan an insurance group identifies its core businesses and sets out the possible key recovery measures to be taken in a situation of financial distress. The Preparatory Crisis Plan includes early warning indicators for emerging crises, a crisis management governance framework and the management actions Proteq has at its disposal in a crisis situation to maintain its core businesses viable for the future. The effectiveness of the management actions is evaluated using different stress scenarios.

7.4.6 Capital Position

In 2021 as part of Athora Netherlands' strategy to achieve profitable growth for our company, Proteq remained focused on improving capital generation. For example, by increasing the exposure to market risks.

The Solvency II ratio of Proteq remained stable with a small decrease from 245% to 242% in 2021. The main items driving the change in the Solvency II ratio were;

- Balance sheet interest hedge adjustments have been executed having a positive impact on the Solvency II ratio of 49%;
- Spreads on bonds have tightened, leading to a positive impact on the Solvency II ratio of 21%;
- A substantiation of a loss absorbing capacity of deferred taxes had a 22% positive impact ;
- Updated parameters for expense inflation risk leading to a decrease of the Solvency II ratio of -/-7%.
- The Volatility Adjustment (VA) of 7 bps at the end of 2020 decreased to 3 bps leading to a decrease of the Solvency II ratio of -/-6%;
- UFR decrease from 3.75% to 3.60% (-/-10%);
- Update of investment management expenses had a negative impact of -/-13%;
- The write-down of the DTA had a negative impact of -/-45%.

The organic capital generation of Proteq was hampered by the UFR-drag and low expected asset returns caused by a low exposure to market risks. As part of investment deployment program, the Investment Office has made progress in the further expansion of our market access to secure prudent and future proof investment and risk management capabilities.

Solvency II Ratio

Proteq produces all regulatory reports that are mandatory under the Solvency II legislation. These comply to guidance notes on the interpretation of Solvency II as published by the supervisory authorities EIOPA and DNB.

For internal purposes, Proteq calculates the Solvency II position on a quarterly basis and updates monthly this position in the intervening months. Proteq calculates its position under Solvency II using the standard formula, applying the Volatility Adjustment (VA) and thus making use of the possibility of applying long-term guarantee measures. Proteq does not apply the Matching Adjustment. The required and available capital (own funds) under Solvency II are determined on the basis of information at year-end. The yield curve used, including the Ultimate Forward Rate (UFR), Credit Risk Adjustment (CRA) and VA, is published by EIOPA.

EIOPA annually re-calculates the UFR in accordance with the methodology to derive the UFR. For the euro the calculated target UFR for 2021 is 3.50%. As the UFR for the euro was 3.75% in 2020 and the annual change of the UFR is according to the methodology limited to 15 basis points, the applicable UFR is 3.60% in 2021. Per 1 January 2022 the applicable UFR will decrease to 3.45%. This will have a negative impact on solvency and IFRS results.

Under Solvency II, capital is called 'eligible own funds' and is divided into three tiers. These tiers reflect the ability to absorb capital losses, with Tier 1 being the highest capital quality (which can be further split in restricted and unrestricted Tier 1 capital) and Tier 3 the lowest. Proteq does not have 'ancillary own funds' (such as letters of credit and guarantees) which require supervisory approval.

The following table shows the breakdown of the eligible own funds, starting from shareholders' equity:

BREAKDOWN OWN FUNDS		
In € millions	2021	2020[1]
Shareholders' equity	90	114
Reconciliation IFRS-Solvency II	-3	-
Total available own funds	**87**	**114**
Tiering restriction	-	-
Total eligible own funds	**87**	**114**

1 Figures as filed with the regulator.

The following items result in differences between IFRS shareholders' equity and Solvency II own funds.

Reconciliation IFRS-Solvency II

The reconciliation encompasses the following significant differences in measurement under Solvency II and under IFRS:

- Technical provisions – Under Solvency II the technical provisions are measured using Solvency II parameters, taking into account current market estimates. Under IFRS a liability adequacy test on the technical provision is performed, if the carrying amount of the technical provision is inadequate, the provision is increased. With respect to economic parameters used, there are differences regarding the interest rate curve and the cost of capital. The difference in the interest rate curves increased and is a main driver for the development of the reconciliation of IFRS and Solvency II. The difference also stems from the difference in cost of capital.
- Deferred Tax Assets – Due to differences in the calculation method and in the valuation of assets and liabilities the resulting DTA position is different.

Tiering Restriction

The use of own funds of different tiers is subject to certain limits under Solvency II. These limits are related to the required capital or Tier 1 capital, and is applied to define the Eligible Own Funds. These limits can cause a difference between the Available Own Funds and the Eligible Own Funds. In 2021 Proteq has no tiering restriction.

The table below shows the eligible own funds, the Solvency Capital Requirement and the resulting Solvency II ratio.

BREAKDOWN TIERING					
	Tier 1		Tier 2	Tier 3	Total
In € millions	Unrestricted	Restricted			
Eligible own funds to meet the SCR 2021	87	-	-	-	**87**
Eligible own funds to meet the SCR 2020[1]	108	-	-	6	**114**

1 Figures as filed with the regulator.

The decrease in Eligible Own Funds can be mainly explained by the write-down of the DTA.

SOLVENCY II RATIO		
In € millions/percentage	2021[1]	2020[2]
Total eligible own funds	87	114
SCR	36	46
Solvency II ratio	242%	245%

1 Regulatory Solvency II ratio 2021 is not final until filed with the regulator

2 Figures as filed with the regulator

Development Solvency Ratio

The development in 2021 of the solvency ratio is explained by the analysis of change as presented in the graphs below. The movement consists of the categories Capital Generation, Capital Effects, Market Impacts, One-time items, Tax and Tiering effects and Miscellaneous Movements.

Capital Generation is defined as the change of eligible own funds caused by (organic) capital generation due to expected asset return, Value New Business, release of Risk Margin, unwinding of the UFR and coupon payments to subordinated loans.

In Capital Effects the effects to capital are shown, (Restricted) Tier 1 and Tier 2 capital issuances, Tier 1 capital injection). In 2021 this category is not applicable for Proteq.

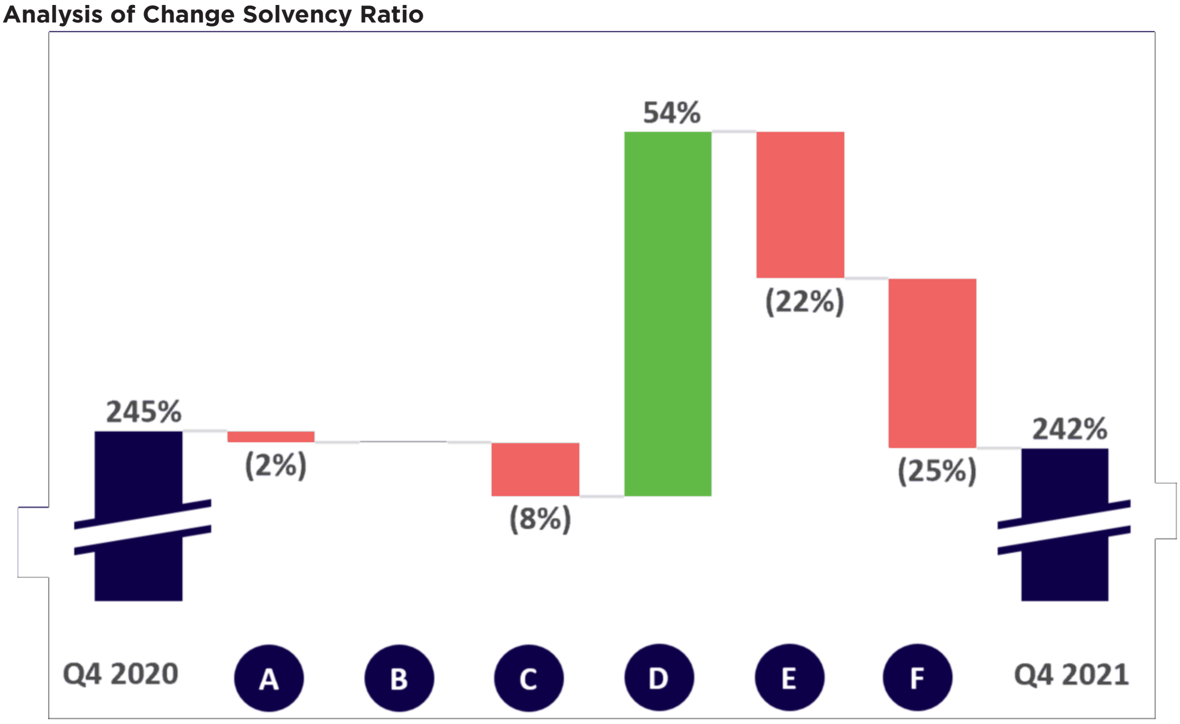
In Market Impacts the impact of economic variance to the asset and liability return is taken into account (e.g. spread and interest rate movement). Next to these movements, also the change caused by the Volatility Adjustment is taken into account.

One-time items show the impact of events like the UFR decrease, Balance Sheet Management actions like investment deployments and changes in models.

Changes of Tax and Tiering constitute movement in the DTA/DTL due to movement in the fiscal position, changes in corporate income tax rate and the change in ineligible own funds. Furthermore, the movement in the Loss Absorbing Capacity of Deferred Taxes is taken into account.

Miscellaneous Movements consist mainly of changes in insurance parameters (including expense), insurance results, as well as other business developments. It also contains the regular development (run-off development and new business) of the SCR.

Analysis of Change Solvency Ratio



The Solvency II ratio of Proteq levensverzekeringen N.V. decreased from 245% to 242% in 2021. The main drivers of this movement are:

A) Capital Generation (-/-2%)
The organic capital generation of Proteq is hampered by the UFR-drag and low due to low expected asset returns caused by a low exposure to market risks.

B) Capital Effects (+/+0%)
There have been no capital effects for Proteq.

C) Market Impacts (-/-8%)
Market impacts had a negative impact of 8%-point on the Solvency II ratio. The movement in interest rates and decrease of spreads had a positive impact, which was more than offset by the impact of the VA decrease from 7 bps at the end of 2020 to 3 bps at the end of 2021 and the increased inflation expectations.

D) One-time Items (+/+54%)
One-off items had a positive impact of 54%-point on the Solvency II ratio, mainly due to Balance Sheet Management initiatives slightly moving the hedge position from regulatory to economic hedging, switching the SCR interest rate risk from down to up and also decreasing the SCR interest rate risk. The positive impact of an improved inflation curve for the liabilites. These were partly offset by the UFR decrease from 3.75% to 3.60%.

E) Tax and Tiering Effects (-/-22%)
Applying a loss absorbind capacity of deferred taxes had a postive effect on the Solvency II ratio this was more than offset by the write down of the Deferred Tax Asset.

F) Miscellaneous Movements (-/-25%)
Operating assumptions changes had a negative impact on the Solvency II ratio.

7.4.7 Risk Profile

SOLVENCY CAPITAL REQUIREMENT		
In € millions	2021	2020
Life underwriting risk	24	24
Market risk	19	29
Counterparty default risk	7	6
Diversification	-13	-15
Basic Solvency Capital Requirement	**37**	**44**
Operational risk	2	2
Loss-absorbing capacity of deferred taxes	-3	-
Net Solvency Capital Requirement	**36**	**46**

In 2021, the SCR decreased mainly due to lower market risk, and the introduction of a loss-absorbing capacity of deferred taxes.

Changes in the item "Diversification" is the result of changes in the underlying risk modules. Not all risks will materialise at the same time and at their full magnitude resulting in diversification between different risk types.

When determining the Net Solvency Capital Requirement, the loss-absorbing capacity of deferred taxes may be set off against the Basic Solvency Capital Requirement. Proteq has examined whether, following a loss of the same size as the (pre-tax) SCR shock, future profits will be sufficient to be able to recover, partially or fully, the change in deferred tax assets caused by that loss.

In 2021 Proteq updated the model applied to the reassessment of the DTA recoverability. The most significant update relating to the tax loss carry-back and carry-forward rules stemmed from the new tax laws in respect of loss compensation adopted in 2021. Also the assumptions regarding the dividend payments and loans' redemption and coupon payments were updated following Proteq's new investment deployment policies. Other adjustment included the refinements in DTA and DTL run-off patterns, refinements in modelling for new business and fiscal equalization reserves.

For Solvency II and IFRS the recoverability of the DTA is tested using the same model and assumptions. However, the non-recoverable amount for IFRS is based on the base result of the recoverability calculation, where for Solvency II the non-recoverable amount is based on the weighted average of multiple scenarios, for spread assumptions, future new business and insurance portfolio movements. This leads to a different amount of non-recoverable DTA in Solvency II in comparison to IFRS.

These model adjustments combined with the update of the economic data (mostly relating to interest rates and spreads) resulted in DTA no longer being fully recoverable. Based on this updated net DTA recoverability reassessment, the carrying amount of deferred tax assets decreased with € 10,650 thousand of non-recoverable DTA for IFRS and with € 10,603 thousand for Solvency II of non-recoverable DTA.

Due to the changes in the model and supported by the write-down of the DTA and a capital injection, the feasibility that, following a loss of the same size as the (pre-tax) SCR shock, future profits will be sufficient to partly recover the change in DTA caused by that loss, increased. Helped by capital support from Athora group after a SCR shock. Leading to a LAC DT in the SCR of 35% for Proteq including a 20% haircut.

Relevant regulation and current guidance (Delegated Regulation, Level 3 guidelines, Dutch Central Bank Q&A's and IAS12) is taken into account in the development of the LAC DT methodology.

The risk categories and the way in which they are managed, will be explained in more detail in the next paragraphs. To give more insight in the risks the company is exposed to, sensitivities are determined on best effort basis for different underwriting and market risks in the next sections. For underwriting risks and spread risks the sensitivities shown are the estimated impact on own funds without recalculating the SCR after shock. For the other market risks the sensitivities shown are the estimated impact on own funds including the estimated impact on the SCR market and life underwriting risk after shock. The impact of interest rate sensitivity on SCR counterparty default risk has been taken into account.

7.5 UNDERWRITING RISK

7.5.1 Risks - General

The underwriting risk is the risk that the own funds, earnings or solvency will be threatened as a result of the inability to make payments (either now or in the future) from premium and/or investment income owing to incorrect and/or incomplete assumptions (mortality, longevity, claims, policy holders' behaviour, catastrophes, interest and expenses) used in the development of the product and the determination of its premium. The interest rate risk related to insurance products forms part of the market risk.

7.5.2 Life

Proteq Levensverzekeringen N.V. includes only Life insurance.

7.5.2.1 Risk Categories

The underwriting risk in the Life business includes the significant sub-risk categories of mortality risk, longevity risk, lapse risk, catastrophe risk and expense risk. Proteq is also exposed to interest rate risk in the context of guarantees for both IFRS and Solvency II.

Mortality Risk and Longevity Risk

The risk most typically associated with Life insurance policies is mortality and longevity risk. These risks mainly affect the duration and timing of the payment of the insured cash flows. Mortality risk dominates and indicates the risk for the company of the policyholder dying earlier than expected.

To forecast the survival probabilities of the entire population, Proteq uses the model published by the Netherlands Actuarial Association (Projection table AG2020) which combines mortality rates of several European countries with those of The Netherlands. The probabilities are reviewed at least once a year and updated if necessary to include the most recent observations. Once a year Proteq also reviews and if required updates the empirical figures for portfolio mortality on the basis of research into observed mortality within the Life portfolio.

Lapse Risk

Other underwriting risks that affect the Life insurance portfolio are risks associated with policyholders' behaviour, such as early surrender (the policyholder terminates the policy before the maturity date) or conversion to a paid-up status (the policyholder terminates the regular premium payment before the maturity date).

Life Expense Risk

Proteq runs expense risk if actual costs turn out to be higher than the amounts received from the cost loadings included in the pricing calculation. This relates to changes in the level, trend or volatility of the costs related to the fulfilment of insurance or reinsurance contracts.

Proteq uses a 'run off' assumption in its models. This means that it takes into account portfolios that decline in size owing to no new policies combined with the expiry of existing policies. As a result, it will be harder to spread fixed costs over a declining total number of policies. This assumption is reflected in the projection parameters for the technical provision.

Interest Rate Guarantee Risk

In the case of traditional insurance policies, Proteq bears the interest rate risk on the investments that are held to cover the obligations to policyholders. When a benefit or annuity payment is due, Proteq pays the policy holder a predetermined nominal amount.

The following table indicates which risks are associated with specific products for the Life insurance portfolio of Proteq.

PRODUCTS IN THE LIFE INSURANCE PORTFOLIO (SOLVENCY II)								
Product	Product features		Risks per product					
	Guarantee	Profit-Sharing	Mortality	Longevity	Catastrophe	Lapse	Expense	Disability
Funeral insurance	Insured capital	√	√	√	√	√	√	

7.5.2.2 Life Insurance Portfolio

The individual Life insurance portfolio mainly consists of funeral policies.

The next table provides an overview of the product portfolio.

SCOPE OF VARIOUS INSURANCE CATEGORIES 2021			
In € millions	Annual premium	Sum insured	Technical provision for insurance contracts[1]
Savings-based mortgages	-	-	-
Life annuity	-	-	-
Term insurance	-	-	-
Traditional savings	-	-	-
Funeral insurance	4	513	338
Traditional insurance policies (individual)	**4**	**513**	**338**
Individual insurance policies in investment units	-	-	-
Traditional insurance policies (group)	-	-	-
Group insurance policies in investment units	-	-	-
Subtotal	**4**	**513**	**338**
Reinsurance of term insurance	-	-	-
Proportional reinsurance	-	-	-
Total	**4**	**513**	**338**

1 The technical provision for insurance contracts is before LAT.

BREAKDOWN OF VARIOUS INSURANCE POLICIES 2020			
In € millions	Annual premium	Sum insured	Technical provision for insurance contracts[1]
Savings-based mortgages	-	-	-
Life annuity	-	-	-
Term insurance	-	-	-
Traditional savings	-	-	-
Funeral insurance	5	523	339
Traditional insurance policies (individual)	**5**	**523**	**339**
Individual insurance policies in investment units	-	-	-
Traditional insurance policies (group)	-	-	-
Group insurance policies in investment units	-	-	-
Subtotal	**5**	**523**	**339**
Reinsurance of term insurance	-	-	-
Proportional reinsurance	-	-	-
Total	**5**	**523**	**339**

1 The technical provision for insurance contracts is before LAT.

7.5.2.3 Life Reinsurance

The insurance business has a largely integrated reinsurance programme for the life portfolio. For 2021 the catastrophe reinsurance cover was split into two separate reinsurance covers for the life and non-life legal entities to anticipate the upcoming acquisition. The catastrophe reinsurance contract for life was concluded as an umbrella cover for the different sub portfolios together, with a cover from € 15 million up to € 90 million.

7.5.2.4 SCR and sensitivities

The table below shows the SCR of the underwriting risk Life. In these calculations only the policies which are negatively affected by these sensitivities are taken into account.

SCR LIFE UNDERWRITING RISK		
In € millions	**2021**	**2020**
Mortality risk	5	6
Longevity risk	2	3
Lapse risk	2	3
Life expense risk	21	20
Life catastrophe risk	0	0
Diversification	-6	-8
SCR Life underwriting risk	**24**	**24**

As Proteq's portfolio consists of funeral insurances only. The main drivers of life underwriting risk are life expense risk and mortality risk. The life underwriting risk remained stable.

Proteq's portfolio of funeral policies is not directly exposed to longevity risk. However, in case policyholders live longer than expected, expenses will be higher.

Mortality risk

The capital requirement for life mortality risk is equal to the loss in basic own funds resulting from an instantaneous permanent increase of 15% in the mortality rates used for the calculation of the technical provisions. The increase in mortality rates will apply only to insurance policies for which the increase in mortality rates leads to an increase in technical provisions, without risk margin, being the best estimate provision.

Longevity Risk

The capital requirement for life longevity risk is equal to the loss in basic own funds resulting from an instantaneous permanent decrease of 20% in the mortality rates used for the calculation of the technical provisions. The conditions for the calculation are exactly the same as those specified in relation to life mortality risk, although in this case it concerns an increase in the best estimate provision in the event of a falling mortality rate. The groups whom this concerns will generally be those that are less affected by the life mortality risk.

Disability-morbidity risk

This risk is not present in the portfolio, the effect of the shock is set to 0.

Lapse risk

The capital requirement for life lapse risk is equal to the largest of the following capital requirements:
- The capital requirement for the risk of a permanent increase in lapse rates. This is equal to the loss in basic own funds of insurance and reinsurance undertakings that would result from an instantaneous permanent increase of 50%.
- The capital requirement for the risk of a permanent decrease in lapse rates. This is equal to the loss in basic own funds of insurers and re-insurers that would result from an instantaneous permanent decrease of 50%.
- The capital requirement for mass lapse risk. This is equal to the loss in basic own funds that would result from a discontinuance of 40% of the policies.

At year end 2021, the risk of decrease in lapse rates is dominant. At year end 2020, the risk of decrease in lapse rates was also dominant.

Life expense risk

The capital requirement for life-expense risk is equal to the loss in basic own funds that would result from the following combination of instantaneous changes:
- an increase of 10% in the amount of expenses taken into account in the calculation of the technical provisions;
- an increase of 1 percentage point in the cost-push inflation rate (expressed as a percentage) used for the calculation of the technical provision.

The above shock is applied to all Proteq's continuing operating expenses.

Revision risk

This risk is not present in the portfolio, the effect of the shock is set to 0.

Life catastrophe risk

The capital requirement for life catastrophe risk is equal to the loss in basic own funds resulting from an instantaneous permanent increase of 0.15 percentage points to the mortality rates in the following 12 months. This risk is very limited present in the portfolio.

Diversification

Not all risks will materialise at the same time and at their full magnitude resulting in diversification between different risk types.

The value of the Life insurance portfolio is sensitive to changes in the underwriting parameters used for calculating the market value of liabilities. In order to obtain information on these sensitivities, the effects of changes in mortality rates, surrender rates (including conversions to non-contributory policies) and expense assumptions, including inflation, are calculated separately. The most material items have been disclosed.

The key sensitivities of IFRS equity to changes in the underwriting parameters are the sensitivities to mortality risk and expenses. Due to the long term nature of the Life insurance portfolio these sensitivities are sensitive for interest rate movements.

The Solvency II ratio sensitivities for underwriting parameters are based on the estimated impact on own funds without recalculating the SCR after shock.

SENSITIVITY AS A RESULT OF CHANGES IN UNDERWRITING PARAMETERS

	IFRS net result		IFRS shareholders' equity		Solvency II ratio	
In € millions	2021	2020	2021	2020	2021	2020
10% increase in surrender rates (including non-contributory continuation)	0	1	0	1	1%	0%
10% lower mortality rates for all policies (longevity risk)	2	2	2	2	7%	5%
10% increase in expenses assumptions + 1% increase in inflation	-15	-15	-15	-15	-44%	-40%

7.6 MARKET RISK

7.6.1 Risks - General

Market risks can potentially have a substantial financial impact on the value of the assets and liabilities of the insurance business. Unfavourable changes in market conditions have an impact on Proteq's earnings and/or own funds. To manage the mismatch between the assets and liabilities an ALM (Asset and Liability Management)-framework is in place. This framework is designed to bring about an investment strategy that optimises the relationship between risks and returns. The framework also ensures that Proteq's operations remain within the boundaries of its risk appetite.

The market risk is the risk arising from the level or volatility of market prices of financial instruments which have an impact of the value of the assets and liabilities of Proteq. The ALM-framework aims to properly reflect the structural mismatch between assets and liabilities, with respect to the duration thereof.

The following eight sub-market risks have been defined: interest rate risk, equity risk, property risk, spread risk, basis risk, market risk concentrations, currency risk and volatility risk. Proteq can achieve its financial objectives by managing these risks adequately. It does this by reducing losses due to movements in the level and/or volatility of market prices of financial assets.

Compared to Solvency II (standard model) market risk classification, Proteq recognises two additional market risks, namely volatility risk and basis risk.

7.6.2 SCR Market Risk

Exposure to market risk is measured under the Solvency II regime using adverse movements in financial variables. The main driver of market risk is the Solvency Capital Requirement for spread risk and to lesser extent the Solvency Capital Requirements for Equity and interest rate risk.

The relevant types of market risk in Solvency II are displayed in the table below:

SCR MARKET RISK		
In € millions	**2021**	**2020**
Interest rate risk	16	22
Equity risk	-	-
Property risk	-	-
Spread risk	10	11
Concentration risk	-	0
Currency risk	-	-
Diversification	-7	-4
SCR market risk	**19**	**29**

The main drivers for the SCR market risk decrease are the decrease in interest rate risk and the switch from an up to down interest rate shock sensititvity, leading to another correlation matrix, resulting in a higher diversification effect.

7.6.2.1 Interest Rate Risk

Interest rate risk is a key component of Proteq's market risk profile. Interest rate risk arises when the interest rate sensitivities of the assets and liabilities are not equal and it is expressed as movements in the capital position if market rates change.

Nominal Insurance Liabilities by buckets

The table below presents nominal cash flows arising from insurance liabilities, net of reinsurance (liabilities) by maturity segment.

CASH FLOWS FROM INSURANCE BUSINESS 2021							
In € millions	**< 1 year**	**1 - 5 years**	**5 - 10 years**	**10 - 15 years**	**15 - 20 years**	**> 20 years**	**Total**
Insurance liabilities - Life	14	53	69	74	66	414	**690**
Total	**14**	**53**	**69**	**74**	**66**	**414**	**690**

CASH FLOWS FROM INSURANCE BUSINESS 2020							
In € millions	< 1 year	1 - 5 years	5 - 10 years	10 - 15 years	15 - 20 years	> 20 years	Total
Insurance liabilities - Life	15	54	69	73	66	414	**691**
Total	**15**	**54**	**69**	**73**	**66**	**414**	**691**

The cash flows from the underwriting provisions concern cash flows with a nominal guarantee. This does not include cash flows driven by options and guarantees and the risk margin. The cash flows arising from the underwriting provisions are estimated on a best estimate basis. Assumptions are made of mortality, surrender and costs. A change in assumptions can alter the view of the cash flows in the table. The cash flow projections do not include future profit-sharing. Also the Ultimate Forward Rate (UFR) introduces a risk. It limits the interest rate sensitivity of value of the cash flows of the liabilities included in the table above. Over the course of time, this downward pressure of the UFR on the interest rate sensitivity of the in-force liabilities will disappear.

The capital requirement for interest rate risk is determined on the basis of two scenarios in which the risk free yield curve is exposed to shocks affecting both assets and liabilities. The first scenario is 'interest rate up' and the second 'interest rate down'. The capital requirement for interest rate risk is defined by the scenario which has the most negative impact on basic own funds. The sign of the SCR interest rate shock (up or down) has to be determined based on the net SCR interest rate risk in accordance with SII legislation. However, the gross SCR interest rate risk determines the size of SCR interest rate risk.

The interest rate scenario used for the up and down Solvency II shocks are prescribed; being in effect a parallel up shock of 100 bps and a non-parallel down shock, both without re-applying the UFR. For Proteq the down shock is leading.

SCR INTEREST RATE RISK		
In € millions	2021	2020
SCR interest up shock	-16	-5
SCR interest down shock	-	-22
SCR interest rate risk	**16**	**22**

The interest rate risk decreased mainly due to balance sheet management actions, moving the hedge position from regulatory to more economic hedging, decreasing the SCR interest rate down risk and switching it to an interest up shock.

Proteq uses a scenario based approach to control the sensitivity of solvency to market conditions, such as interest rates and spreads. The key solvency metric to express the risk is based on the regulatory solvency reported to the Dutch Central Bank (DNB). This method is chosen because Proteq has decided to use regulatory solvency as the principle factor in managing market risks.

From this perspective also the, over 2021 prescribed UFR of 3.60% by EIOPA introduces a risk. Over the course of time, the positive valuation effect of the UFR reduces, which puts downward pressure on the trend in solvency in the future. EIOPA annually re-calculates the UFR in accordance with the methodology to derive the UFR. For the euro the calculated target UFR for 2020 is 3.50%. As the UFR for the euro was 3.75% in 2020 and the annual change of the UFR is according to the methodology limited to 15 basis points, the applicable UFR is 3.60% in 2021. Per 1 January 2022 the applicable UFR will decrease to 3.45%. This will have a negative impact on solvency.

The tables below show the sensitivity of the IFRS result, IFRS equity and Solvency II ratio to changes in interest rates as a result of a decrease or an increase by 0.50% of the interest rates (maintaining the UFR at 3.60%), decreases in the UFR of 0.15% and 0.50% and the impact of the VA on the Solvency II ratio.

Under IFRS the impact of different UFR is slightly different than under Solvency II due to the VA (not applicable under IFRS).

SENSITIVITY						
	IFRS net result		IFRS shareholders' equity		Solvency II ratio	
In € millions	2021	2020	2021	2020	2021	2020
Interest +50 bps	-13	-8	-13	-8	0%	5%
Interest -50 bps	17	9	17	9	-5%	7%
UFR -15 bps	-3	-3	-3	-3	-3%	-8%
UFR -50 bps	-10	-11	-10	-11	-13%	-32%
Excluding VA	0	0	0	0	-3%	-14%

The sensitivities increased due to hedge adjustments. The sensitivity of Solvency II ratio for excluding VA decreased due to the decrease of the VA from 7 bps to 3 bps.

Proteq's interest rate hedging policy aims to ensure that obligations towards policyholders are fulfilled in both the short term and the long term. In addition, it aims to enable its providers of capital to receive a reasonable return (in terms of market value) that is in line with Proteq's risk exposure and to stabilise the solvency capital. Proteq manages its interest rate risk by stabilising the Solvency II ratio after an up or down interest rate shock, taking the UFR of 3.60% into account.

7.6.2.2 Equity Risk

The SCR for equity risk is equal to the loss in market value of the basic own funds in the event of a sudden shock to equities including a so-called symmetric adjustment. This adjustment corrects the equity shock for the difference between the current level of global equity prices and a long-term average and can vary between a minus 10% adjustment and a plus 10% adjustment.

SCR for equity risk consists of type 1 and type 2 equities. Type 1 equities are equities listed in regulated markets which are members of the EEA or OECD. Type 2 equities are equities listed in countries other than members of the EEA and/or OECD, non-listed equities, private equities, hedge funds, commodities and other alternative investments.

The SCR for equity risk is defined as the aggregation of the capital requirement for type 1 equities and the capital requirement for type 2 equities, allowing a correlation of 0.75 between types 1 and 2.

A transitional arrangement can be applied to type 1 equities in order to reduce the standard capital charge. Proteq does not apply this transitional arrangement.

The SCR for equity risk is € 0 million at year end 2021.

7.6.2.3 Spread Risk

Spread risk is defined as the sensitivity of the value of assets, liabilities and financial insturments to changes in the level or volatility of the credit spread above the risk- free interest rate term structure. The spread risk for the insurance business arises in the fixed-income investment portfolio, which includes securitsations, loans, corporate and government bonds that are sensitive to changes in credit risk surcharges. Increasing credit risk surcharges have a negative effect on the market value of underlying bonds.

The SCR for spread risk is determined by calculating the impact on the eligible own funds due to the volatility of credit spreads over the term structure of the risk-free rate. The required capital for spread risk is equal to the sum of the capital requirements for bonds, loans and structured products. The capital requirement takes into account the market value, the modified duration and the credit quality category.

SCR SPREAD RISK		
In € millions	**2021**	**2020**
Bonds and loans	10	11
Spread risk	**10**	**11**

Spread risk decreased slightly.

Proteq defines basis risk as the risk that offsetting investments in a hedging strategy will not experience price changes in entirely opposite directions from each other. This imperfect correlation between the two investments creates the potential for excess gains or losses in a hedging strategy, thus adding risk to the position.

Credit risk surcharges are also a source of basis risk in the valuation of insurance liabilities. The basis risk relates to the risk of a mismatch between the interest rate used in the valuation of the liabilities and the interest rate used for the asset portfolio. This basis risk mainly emanates from the risk that movements in the interest rate on the EU government bonds held in portfolio will not be in line with movements in the swap rate.

The swap curve (including UFR) is currently used when discounting insurance liabilities under IFRS. A change in the swap curve has a direct impact on the value of the insurance liabilities. This leads to volatility in the available capital, as the interest rate used for the valuation of the investment portfolio differs from the relevant swap curve for the insurance liabilities.

Under the Solvency II regime the swap curve with a prescribed Ultimate Forward Rate (UFR) is used when discounting insurance liabilities, adjusted for credit risk (CRA) and a Volatility Adjustment (VA). The VA moves along with the credit spreads, but still substantial basis risk exists because the VA is based on a reference portfolio instead of Proteq's own asset portfolio, and also a 65% scaling factor is applied to determine the VA. For managing market risks a number of combined scenarios is determined with (different) simultaneous shocks to risk categories. In this scenario based approach among others credit spreads, volatility (interest rate volatility and equity volatility) and best estimates for the VA are taken into account.

While interest rate risk regarding the Solvency II ratio sheet is well matched, there remains significant volatility as the credit risk profile of Proteq differs from the profile implied by the Volatility Adjustment (VA).

Under Solvency II an increase of credit spreads also leads to an increase of the Volatility Adjustment impacting the value of the liabilities. Proteq assumes that an increase of all credit spreads of 50 bps leads to an increase of the VA of 23 bps, an increase of 50 bps on corporates to an increase of the VA of 13 bps and an increase of 50 bps on government bonds to an increase of the VA of 10 bps. The change of the VA has no impact on the value of the liabilities under IFRS.

SENSITIVITY						
	IFRS net result		**IFRS shareholders' equity**		**Solvency II ratio[1]**	
In € millions	**2021**	**2020**	**2021**	**2020**	**2021**	**2020**
Credit spreads Government Bonds +50 bps	-21	-24	-21	-24	-30%	-45%
Credit spreads Corporates +50 bps	-2	-2	-2	-2	9%	22%
All Credit spreads +50 bps	-23	-26	-23	-26	-19%	-19%

1 An increase of credit spreads also leads to an increase of VA, impacting the value of the liabilities.

7.6.2.4 Concentration Risk

Concentration risk is defined as all risk exposures associated with a potential loss that is significant to endanger the solvency or financial position of insurance and reinsurance undertakings.

A concentration risk charge is prescribed under Solvency II when the issuer exposure exceeds a certain percentage threshold of the asset base depending on the credit rating of the issuer and the type of investment. The SCR for concentration risk is calculated on the basis of single name exposure. This means that undertakings which belong to the same corporate Group are treated as a single name exposure.

Proteq still holds substantial investments in German and Dutch government bonds and supranational issuers which are excluded from (the Solvency II scope of) concentration risk. As of 31 December 2021, the applicable Solvency II thresholds have not been exceeded and as a result no concentration risk charge was applicable to Proteq.

7.6.2.5 Currency Risk

Currency risk is defined as the sensitivity of the value of assets and liabilities to changes in the level or volatility of exchange rates.

Proteq is not exposed to currency risk.

7.6.2.6 Volatility Risk

Volatility risk is defined as the risk of losses due to changes in (implied) volatilities (interest rate and equity). The volatility risk is not material.

7.6.2.7 Diversification

Not all risks will materialise at the same time and at their full magnitude, resulting in diversification between different risk types. Solvency II prescribes a correlation matrix for the diversification effect in the SCR Market Risk module in order to aggregate the results of the types of market risks. This leads to a lower amount of total Market Risk compared to the sum of the individual market risk types. Solvency II furthermore prescribes that a downward SCR interest rate shock will be more correlated with an equity, spread and property shock compared to an upward interest rate shock.

At 31 December 2021, Proteq had a net balance sheet exposure to a upward interest rate shock.

7.7 COUNTERPARTY DEFAULT RISK

7.7.1 Risks - General

Proteq defines counterparty default risk as the risk of potential losses due to unexpected payment defaults of the counterparties and debtors of Proteq within the next twelve months.

The SCR Counterparty Default Risk covers risk-mitigating contracts such as reinsurance arrangements, derivatives, security lending and repos, and cash at bank, retail mortgages and receivables from intermediaries, as well as any other credit exposures not covered by the SCR Spread Risk.

For each counterparty, the overall credit default risk exposure of Proteq to that counterparty is measured, irrespective of the legal form of its contractual obligations. Its calculation also takes into account collateral or other security held by or for the account of Proteq and the risks associated therewith.

Fixed-income Investment Portfolio

The counterparty default risk within the fixed-income investment portfolios of Proteq is the risk that an issuer of a bond or a debtor of a private loan does no longer meet its obligations. The strategic allocation to the various investment grade categories within the fixed-income portfolio is determined in the context of ALM and laid down in mandates with the asset managers.

Derivatives Exposure

The counterparty default risk related to the market value of the derivatives held by Proteq with a counterparty is managed by means of a Credit Support Annex (CSA) agreement in accordance with standard industry practice. These agreements stipulate that the underlying value of the derivatives must be posted as collateral in liquid instruments, such as cash and government bonds, to cover the counterparty default risk.

7.7.2 SCR Counterparty Default Risk

The counterparty default risk module reflects the possible loss as a consequence of defaults and deterioration in the credit standing of counterparties over a 12-month period. The SCR for the counterparty default risk is determined by aggregating the capital requirements of type 1 and type 2 exposures.

Type 1 exposures are exposures that have low diversification effects and for which the counterparty is likely to have an external rating. Solvency II treats the following as type 1 exposures:

- risk-mitigation contracts, including reinsurance arrangements, special purpose vehicles (SPVs), insurance securitisations and derivatives;
- cash at bank;
- deposits with ceding undertakings;
- commitments received by an insurance or reinsurance undertaking which have been called up but are unpaid;
- legally binding commitments which the insurer has provided or arranged and which may create payment obligations depending on the credit standing of a counterparty.

The capital requirement for counterparty default risk on type 1 exposures depends on the loss-given-default (LGD) and the probability of default (PD) of every single name exposure. The PD depends on the creditworthiness of the single name exposure.

Type 2 exposures consist of all exposures to which the capital requirement for spread risk is not applicable and which are not of type 1. In general, these are diversified exposures which do not have an external rating. Solvency II explicitly mentions the following exposures in the context of type 2:
- receivables from intermediaries;
- policyholder debtors;
- mortgage loans which meet a set of requirements.

The capital requirement for counterparty default risk on type 2 exposures as defined by EIOPA is equal to the sum of 90% of the LGD of receivables from intermediaries due for more than three months and 15% of the LGD of other type 2 exposures.

The SCR for counterparty default risk is determined by aggregating the capital requirements for type 1 and type 2 exposures with a correlation of 0.75 between types 1 and 2. This gives rise to diversification between type 1 and type 2 capital requirements because not all risks will materialise at the same time and at their full magnitude.

COUNTERPARTY DEFAULT RISK		
In € millions	**2021**	**2020**
Type 1 exposures	7	6
SCR counterparty default risk	**7**	**6**

The increase in SCR counterparty default risk is due to the increase for type 1 exposures.

7.8 LIQUIDITY RISK

7.8.1 Risks - General

Liquidity risk is defined as the risk that Proteq would have insufficient liquid assets to meet its financial liabilities in the short term, in a going concern situation or in times of a stress situation, or if obtaining the necessary liquidity would mean incurring unacceptable costs or losses.

The liquidity risk is monitored and managed both at consolidated level and at legal entity level separately as no risk capital is charged according to the standard formula of Solvency II.

7.8.2 Policy

The policy of Proteq is to have more liquidity available than it is required to hold based on internal risk management minimum levels. The objective of the internal risk management minimum levels is to ensure that Proteq is able to fulfill its obligations towards policyholders and all legal obligations.

The liquidity risk policy uses three sources of liquidity:
1. the cash position
2. the liquidity buffer
3. the liquidity contingency policy.

Cash position

The first source of liquidity concerns the cash position. This position is built up from the cash management process from investments (managed by ACTIAM) and cash management process from underwriting and operating activities. In the investments cash management process all cash flows from investments are managed by our Asset Manager (ACTIAM).

Proteq has taken into account that all obligations to policyholders must be respected and that these obligations will be paid throughout the underwriting and other operating cash management process. If at any time these obligations exceed the premium income additional cash will be transferred from the investment cash management process. Otherwise, when premiums exceed the payments in the operational cash management process, cash will be transferred to the investments cash management process, for the purpose of the investing excess cash (temporarily).

Liquidity buffer

The second source is the liquidity buffer. Together with the cash position, the liquidity buffer forms the overall liquidity position of the entity. The liquidity buffer is a good indicator for the overall liquidity position of Proteq and takes into account all available assets and the impact of prescribed shocks in a stress situation. Monitoring of this buffer accounts for an important part of the daily activities of Proteq.

Liquidity contingency policy

The last source of liquidity relates to a situation in which the normal liquidity and buffers turn out to be insufficient. In case of such a contingency, Proteq has implemented a Crisis Management Team (CMT) structure and a predefined set of potential management actions. The CMT must take timely action in rapidly deteriorating liquidity circumstances in order to avoid a bankruptcy that could occur in the worst case and/or to settle all of the obligations under the insurance portfolio in an orderly manner.

7.8.3 Exposure

The required liquidity is determined based on absorbing shocks in a stress situation. The shocks are applied on prescribed risk categories. These risk categories are mass lapse (Life insurance) and interest rate movements. In total, the liquidity buffer is sufficient to cover a severe liquidity stress scenario.

7.9 NON-FINANCIAL RISK

7.9.1 Risks - General

Management of the Business Line or Function is responsible for the overall risk management cycle in their Business Line or Function from identification to monitoring and management of action plans. They report about the status of both operational and compliance risk directly to the Executive Board members. Compliance and Operational Risk, as second line departments, monitor and provide advice to management on compliance risk and operational risk. They have frequently direct contact with the EB and SB and are represented in the Risk and Audit Committee of the Supervisory Board, PC, ORC Athora Netherlands and in the ORC's and PMP's of the MTs (see Section 7.2.5 Risk Organisation) of Proteq. Within the PMP MTs, Compliance advices on the development, evaluation and approval of products in accordance with laws, regulations, the AFM criteria and criteria related to treating customers fairly.

Compliance Risk

Compliance risk is the risk that an organisation is potentially able to suffer legal or regulatory sanctions, material financial loss, or loss of reputation as a result of non-compliance with applicable laws, regulations, rules, self-regulatory standards, codes and unwritten rules.

Non-compliance with integrity- and/or conduct related rules can potentially lead to regulatory action, financial loss and/or damage to the reputation of Proteq, for example fines, compensation, disciplinary action, imprisonment or exclusion proceedings.

Laws and regulations within scope pertain amongst others to those laws and regulations as supervised by the Authority for the Financial Markets (AFM), the Dutch Central bank (DNB), the Authority for Consumers and Markets (ACM) and the Data Protection Authority (AP) for aspects related to nonfinancial risks. This includes the Dutch Financial Supervision Act (Wft), the Dutch Money Laundering and Terrorist Financing (Prevention) Act (Wwft), the Dutch Sanctions Act, as well as relevant European laws such as Solvency II, AIFMD and guidance from the Dutch Association of Insurers and other relevant bodies.

Operational Risk

Operational risk represents the risk of an economic loss, a negative reputational or supervisory impact resulting from inadequate or failed internal processes, people and systems, or from external events. Operational risks include the risk of a material misstatement in Proteqs financial reporting and legal risks, but excludes strategic and business risks. Operational risk events can lead to adverse consequences beyond a pure financial loss. The assessment of possible reputational impacts following an operational event is an explicit part of the operational risk management process.

Operational risks are inherent in all of Proteqs insurance products, activities, processes and systems and the management of operational risk is a fundamental element of Proteqs risk management framework. Operational (and compliance) risks are inherent risks that do not provide more returns when taking more risk and have to be controlled and managed. The responsibility of Proteq also extends to managing risks for outsourced activities. Proteq recognises the following types of operational risk categories: Business Process risk, Change risk, Model risk, Third Party risk, HR risk, Financial Reporting risk, Business Continuity risk, Data risk and Information Security risk.

7.9.2 Exposure to Non-financial Risks

During 2021, as an important part of Proteq's risk management system, Proteq further improved the Integrated Control Framework where process and management controls are an important part. Continuous attention on the quality of process and control design, testing of effectiveness of controls, monitoring compliancy, reporting and analysis tooling and process ownership enables the organisation to manage and monitor compliance and operational risks in an efficient and effective manner. Based on the monitoring of all risk types, in this paragraph the main developments and risk events are described. Proteq's management is of the opinion that action plans and programs are in place to sufficiently address and mitigate these risks.

Compliance Risk

Due to the great complexity of the legislation with regard to Solvency II, IFRS, GDPR, Wwft, ILM, IDD, PRIIPS and Supply Chain Responsibility, legislation may not be implemented on time, resulting in Proteq not being compliant and potentially suffering reputational damage. Proteq has a framework in place to track the implementation of legislative requirements in order to be in control of this risk.

Proteq is exposed to potential institutional integrity risks relating to appropriate independency. Addressing these risks Proteq has a dedicated Institutional Conflict of Interest Policy including a concrete procedure. Furthermore, a governance framework with Athora Group is in place supporting collaboration and cooperation between Athora Netherlands and its shareholder Athora and its affiliates. The governance framework has been updated in 2021 to comply with the large company regime and other legal requirements, amongst others on the basis of written comments and feedback from the regulator. The effectiveness of the governance framework has also been monitored by Compliance and Internal Audit. The regulator is assessing these risks as part of its ongoing supervisory activities.

As a Life insurer, sanctions- and money laundering risks are assessed low, but not non-existent. The mortgage and real estate investment activities are being perceived and assessed as medium respectively higher risks. As a financial institution, Athora Netherlands has the responsibility to ensure detection and prevention of unusual transactions. In Athora Netherlands' efforts to ensure compliance with applicable laws and regulations, instances of non-compliance can potentially occur. Athora Netherlands assesses product specific risks with regard to sanctions, money laundering and terrorist financing on a regular basis. During 2020 and 2021 Athora Netherlands executed an improvement programme to remediate identified shortcomings in relation to compliance with sanction law and anti-money laundering/counter terrorism financing regulation. The programme, which made significant steps in organisational governance, risk assessments, (automated) processes and tooling, aims to reduce residual risks on a structural basis. DNB performed an investigation in the second half of 2021. It is noted that there are still outstanding remediation actions to be concluded in 2022 in the areas of customer/business partner due diligence and transaction monitoring.

Risks (including reputational risk) are not fully excluded in the non-accruing investment-linked policy file, due to the combined effects of intermittent media exposure, political opinion, court judgements and in-action on the part of customers. The client base is continuously addressed through Proteq’s aftercare program.

Due to the General Data Protection Regulation’s challenging consequences on systems and processes, privacy risks should be taken into account. Special attention has been paid to cleansing of data and to prevention of data breaches when personal data is transferred or available to third parties, particularly in the context of the migration programme of VIVAT Schadeverzekeringen to Nationale Nederlanden. The migration programme will be finalised in 2022. As part of the 2021 Compliance Monitoring Plan, a review of operational effectiveness of storage and disposal of personal data was carried out across Athora Netherlands, including the physical archive. Given the importance of protecting personal data, monitoring of privacy risks is also part of the 2022 Compliance Monitoring Plan. Local Privacy Champions, in cooperation with the appointed Data Protection Officer, safeguard full attention on Proteqs compliance with the privacy regulation.

Operational Risk

Business Process Risk

Proteq change projects, both initiated from strategic change, as well as license to operate projects were identified as the main source of business process risk as same resources were often needed for both change as daily operations. New strategic activities required embedding in the ICF and training and awareness for process risk management. The structural improvement of process and control design received full attention in 2021 in the ICF transformation program with training programmes, Risk and Controls self-assessment sessions held and enhancement of 1 st line responsibility. Further attention will be necessary to assure sound and controlled processes at all areas of Proteq, that is still subject to new strategic organisation changes that may impact capacity, knowledge and will require additional risk assessment activities.

Change Risk
Important strategic changes combined with a large volume of license to operation programs bear change risk and require stable Board level supervision and alignment on strategic steps forward. During 2021 improvements were made in the change portfolio management governance to further align strategy execution and improve business agility. The improvement of the process change process further facilitates sound and controlled change implementation.

Model Risk
In 2021, Proteq updated the compact model risk overviews to maintain good insight in its model risk. Model risk was further reduced by follow-up of second line findings via improving models. Within the model landscape important steps towards lower model risk have been taken by improving models and systems. Ongoing model assessments on reporting, (asset) valuation and pricing models, following a risk based approach, further increased model insight and provides guidance towards lower model risk.

Third Party Risk
Monitoring and governance regarding outsourcing within Proteq required further risk attention and a Centre of Excellence is being installed to further develop monitoring standards and make Proteq outsourcings partners further adhere to strict outsourcing requirements in order to mitigate Proteq third party risk and withstand future strategic challenges.

The approach of Proteq is to outsource activities in those areas in the customer value chain where an external service provider can provide added value. When specific activities for outsourcing have been identified a risk analysis is part of the preparation phase. In case of cloud services an additional risk analysis is performed to manage the risks particularly related to cloud. The results of the risks analysis are reflected in the contracts with the service providers. In 2021 the risk management framework for the risks related to outsourcing contracts, has been improved, for example checking ISAE3402 certifications for key suppliers. The level of maturity of control within the outsourcing process has been improved and actions for further improvement were established.

HR Risk
Effective resourcing is essential for the execution of strategy and to qualitatively maintain business as usual activities including a healthy balance on in- and external FTE 's. To accomplish a new and fit company culture, culture aspects will be embedded within the strategy program, removing possible silo's and stimulating involvement in the hybrid working concept. Staff turnover will be monitored closely during strategic changes to mitigate HR risk.

Financial reporting Risk
Effective and timely implementation of IFRS17 is identified as the main source for future financial reporting risk. The ICF transformation within Finance improved demonstrability and risk awareness of financial reporting processes but will require further attention and awareness to further align with ICF requirements and to demonstrably mitigate financial reporting risks.

Business Continuity Risk
Business continuity risk was regarded minimal in 2021 as working from home proved to be no obstacle for running efficient and effective processes. Fallback tests were held and proved to be successful. Further strategic outsourcing may impact business continuity and therefore require additional mitigating measures.

Data Risk
Data risk was regarded minimal throughout 2021 but attention for data expertise will increase to mitigate data risk related strategy initiatives for digitalisation and automation.

Information Technology Risk
For the Proteqs Data, Technology and Change (DTC) organisation, 2021 has been a year of a lot of challenges. The P&C migration to NN is ahead of schedule and programmes like IFRS and more 'standard' projects were conducted and overall delivered on schedule and within financial boundaries. DTC also focussed on possibilities for outsourcing as an alignment with the Proteq business strategy and organisation. A plan for further development of the organisation including a large cost reduction, has been conducted and will be continued in 2022 and 2023.

In 2021 DTC further improved the implemented Agile way of working, but also the SAFe and IT4IT implementation have been improved. Process automation has increased the efficiency of IT processes. Proteq is aware that these developments require high standards of change management and service delivery management within the IT department in order to maintain an IT landscape that is in control and is managing IT risks. Compliance with regulations and legislation is key and IT Risk Management is at the right level to monitor and mitigate risks. A very low number of incidents and very high availability of the business application show the success of these high standards. In 2021 COVID-19 did not really impact the business continuity and productivity.

DTC is more and more a data driven organisation thus improving the quality of decision making and customer orientation. Data governance is in place to evaluate, direct and monitor data initiatives and the implementation of data policies and data related legislation. The integration of processes, systems and data based on a solid data infrastructure has been successful to improve quality, efficiency and cost reduction.

Cybercrime Risk
Cybercrime risk is growing over the years, and attackers are becoming more professionalised and aggressive. Especially ransomware is a real threat for companies. Ransomware attacks are becoming more frequent and the amount of money demanded is increasing. Also supply chain attacks and phishing attacks are becoming more frequent. As more services are outsourced, cybercrime does not only concern Proteq itself, but may also impact the outsourced services and data.

For Proteq mitigating the cybercrime risk is a key priority. In 2021 no major incidents related to cybercrime occurred within Proteq. Cybercrime will remain high on the agenda of the Athora Netherlands Board and Risk Boards. To manage the increasing risk effectively in 2021 additional mitigating measures were implemented, such as stricter monitoring of security measures implemented at suppliers. Fake phishing campaigns were held within Athora to further promote awareness among employees regarding our own behavioural aspects that can make us more vulnerable for cybercrime. Incident response training has been practiced to minimise damage done by an attack. A cybercrime plan for 2022 has been drafted and Proteq will keep on focusing on mitigating this risk, also for outsourced services.

7.9.3 SCR Operational Risk

Operational risk is the risk of losses caused by weak or failing internal procedures, weaknesses in the action taken by personnel, weaknesses in systems or because of external events. This takes into account legal risks, but risks that are a consequence of strategic decisions or reputational risks are disregarded. The technical provision for own risk is part of the calculation of the SCR operational risk.

The basic capital requirement for operational risk is calculated by taking the maximum of (a) the capital requirement for operational risks on the basis of earned premiums and (b) the capital requirement for operational risks on the basis of technical provisions and adding 25% of the expenses incurred in respect of unit linked business.

SCR OPERATIONAL RISK		
In € millions	2021	2020
Proteq	2	2

Operational risk remained stable.

Amstelveen, the Netherlands, 30 March 2022

The Supervisory Board

R.M.S.M. (Roderick) Munsters

M.A.E. (Michele) Bareggi

E. (Elisabeth) Bourqui

F.G.H. (Floris) Deckers

J.M.A. (Hanny) Kemna

The Executive Board

J.A. (Jan) de Pooter

A.P. (Annemarie) Mijer

E.P. (Etienne) Comon

J. (Jim) van Hees

A. (Angelo) Sacca

OTHER INFORMATION

1 PROVISIONS IN ARTICLES OF ASSOCIATION GOVERNING THE APPROPRIATION OF PROFIT OR LOSS

Article 35

35.1. The profit shall be to the appropriation of the general meeting.

35.2. The company can only make payments to shareholders and other entitled parties to the account of the profit up for distribution in so far as the own capital is larger than the subscribed capital increased by the reserves that have to be kept by law.

35.3. Profit distribution shall only take place after adoption of the annual accounts which show that the distribution is allowed.

Article 36

36.1. Dividend shall become payable within fourteen days after declaration, unless the general meeting determines another date on a motion by the board of directors.

36.2. Dividend that has not been claimed within five years after it has become payable, shall revert to the company.

36.3. The general meeting may decide that dividends shall be paid entirely or partially in another form than in cash.

36.4. If so decided by the general meeting on a motion by the board of directors, interim dividend shall be distributed, including an interim distribution of reserves, with due observance of the provisions in section 2:105 paragraph 4 Civil Code.

36.5. A deficit may only be amortised to the account of the statutory reserves insofar as is allowed by law or these articles of association.

Independent auditor’s report

To: the shareholder and supervisory board of Proteq Levensverzekeringen N.V.

Report on the audit of the financial statements 2021 included in the annual report

Our opinion

We have audited the financial statements 2021 of Proteq Levensverzekeringen N.V. (‘Proteq’ or ‘the Company’), based in Alkmaar, the Netherlands.

In our opinion the accompanying financial statements give a true and fair view of the financial position of Proteq Levensverzekeringen N.V. as at 31 December 2021, and of its result and its cash flows for 2021 in accordance with International Financial Reporting Standards as adopted by the European Union (EU-IFRS) and with Part 9 of Book 2 of the Dutch Civil Code.

The financial statements comprise:

- The statement of financial position as at 31 December 2021
- The following statements for 2021: the statements of profit or loss, total comprehensive income and changes in equity and the cash flow statement
- The notes comprising a summary of the significant accounting policies and other explanatory information.

Basis for our opinion

We conducted our audit in accordance with Dutch law, including the Dutch Standards on Auditing. Our responsibilities under those standards are further described in the “Our responsibilities for the audit of the financial statements” section of our report.

We are independent of Proteq Levensverzekeringen N.V. in accordance with the EU Regulation on specific requirements regarding statutory audit of public-interest entities, the Wet toezicht accountantsorganisaties (Wta, Audit firms supervision act), the Verordening inzake de onafhankelijkheid van accountants bij assurance-opdrachten (ViO, Code of Ethics for Professional Accountants, a regulation with respect to independence) and other relevant independence regulations in the Netherlands. Furthermore, we have complied with the Verordening gedrags- en beroepsregels accountants (VGBA, Dutch Code of Ethics).

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

Information in support of our opinion

We designed our audit procedures in the context of our audit of the financial statements as a whole and in forming our opinion thereon. The following information in support of our opinion and any findings were addressed in this context, and we do not provide a separate opinion or conclusion on these matters.

Our understanding of the business

Proteq Levensverzekeringen N.V. is a life insurance company with Athora Netherlands N.V. as holding company. Proteq manages an inactive, individual life insurance portfolio of the Reaal brand that mainly consists of funeral insurances. We paid specific attention in our audit to a number of areas driven by the operations of the entity and our risk assessment.

We start by determining materiality and identifying and assessing the risks of material misstatement of the financial statements, whether due to fraud or error in order to design audit procedures responsive to those risks and to 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.

Materiality

Materiality	EUR 1.8 million (2020: EUR 2 million)
Benchmark applied	2% of total shareholder's equity (2020: 2% of total shareholder's equity)
Explanation	We consider Proteq's total shareholder's equity and solvency, and the ability to meet policyholder liabilities, key indicators for the users of its financial statements. As such, we have based materiality on total shareholder's equity.

We have also taken into account misstatements and/or possible misstatements that in our opinion are material for the users of the financial statements for qualitative reasons.

We agreed with the supervisory board that misstatements in excess of EUR 97 thousand, which are identified during the audit, would be reported to them, as well as smaller misstatements that in our view must be reported on qualitative grounds.

Teaming and use of specialists

We ensured that the audit teams both at group and at component levels included the appropriate skills and competences which are needed for the audit of a client in the financial services industry. We included specialists in the areas of IT audit, forensics, sustainability, legal and income tax and have made use of our own actuaries and experts in the areas of valuation of technical provisions and valuation of unlisted investments.

Our focus on climate risks and the energy transition

Climate change and the energy transition are emerging topics and lead to significant change for many businesses and society. The executive board of Proteq has reported in the section 3.3 'Sustainability' of the annual report how the Company is addressing climate-related and environmental risk and taking into account related regulatory and supervisory guidance and recommendations.

As part of our audit of the financial statements, we evaluated the extent to which climate-related risks and the possible effects of the energy transition are taken into account in accounting estimates and significant assumptions as well as in the design of relevant internal control measures by Proteq, including those related to the estimation of liabilities related to insurance contracts. Furthermore, we read the

Executive Board report and considered whether there is any material inconsistency with the financial statements.

Based on the audit procedures performed, we do not deem climate-related risks to have a material impact on the accounting estimates or significant assumptions used in the financial reporting per 31 December 2021.

Our focus on fraud and non-compliance with laws and regulations

Our responsibility
Although we are not responsible for preventing fraud or non-compliance and we cannot be expected to detect non-compliance with all laws and regulations, it is our responsibility to obtain reasonable assurance that the financial statements, taken as a whole, are free from material misstatement, whether caused by fraud or error.

Our audit response related to fraud risks
We identify and assess the risks of material misstatements of the financial statements due to fraud. During our audit we obtained an understanding of the Company and its environment and the components of the system of internal control. This includes the risk assessment process and the executive board's process for responding to the risks of fraud and monitoring the system of internal control and how the Supervisory Board exercises oversight, as well as the outcomes.
We refer to section 3.3.3 of the Executive Board report for Executive Board's (fraud) risk assessment.

We evaluated the design and relevant aspects of the system of internal control and in particular the fraud risk assessment, as well as the code of conduct, whistle blower procedures and incident registration. We evaluated the design and the implementation and, where considered appropriate, tested the operating effectiveness, of internal controls designed to mitigate fraud risks.

As part of our process of identifying fraud risks, we evaluated fraud risk factors with respect to financial reporting fraud, misappropriation of assets and bribery and corruption in close co-operation with our forensic specialists. In our risk assessment we considered the potential impact of amongst others organizational changes. We evaluated whether these factors indicate that a risk of material misstatement due to fraud is present.

We incorporated elements of unpredictability in our audit. We also considered the outcome of our other audit procedures and evaluated whether any findings were indicative of fraud or non-compliance.

As in all of our audits, we addressed the risks related to management override of controls, and used data analysis procedures to identify and address high-risk journal entries. We also performed procedures among others to evaluate key accounting estimates for management bias that may represent a risk of material misstatement due to fraud, in particular relating to important judgment areas and significant accounting estimates as disclosed in 'Estimates and Assumptions' (Note 6.1.3 to the financial statements), that include valuation of insurance liabilities including shadow accounting and liability adequacy test. We refer to the description of our audit approach in the key audit matter 'Estimates used in calculation of insurance liabilities including shadow accounting and Liability Adequacy Test (LAT)'.

We considered available information and made enquiries of relevant executives, directors (including internal audit, legal, compliance, actuarial function and risk management) and the Supervisory Board.

The fraud risk we identified, enquiries and other available information did not lead to specific indications for fraud or suspected fraud potentially materially impacting the view of the financial statements.

Our audit response related to risks of non-compliance with laws and regulations
We assessed factors related to the risks of non-compliance with laws and regulations that could reasonably be expected to have a material effect on the financial statements from our general industry experience, through discussions with the Executive Board, inspecting the integrity risk analysis (SIRA), reading minutes, inspection of internal audit and compliance & risk management reports and performing substantive tests of details of classes of transactions, account balances or disclosures. We refer to note 7.9 to the financial statements for details of the Proteq's compliance risk (management).

We also inspected lawyers' letters, communicated with and read correspondence with regulatory and supervisory authorities and remained alert to any indication of (suspected) non-compliance throughout the audit. In case of potential non-compliance with laws and regulations that may have a material effect on the financial statements, we assessed whether Proteq has an adequate process in place to evaluate the impact of non-compliance for its activities and financial reporting amongst which compliance with the Dutch Act on the prevention of money laundering and financing of terrorism for which there are still outstanding remediation actions to be concluded. Furthermore, the Company updated its governance framework in 2021 to comply with the large company regime and other legal requirements. Finally we obtained written representations that all known instances of non-compliance with laws and regulations have been disclosed to us. We refer to section 'Compliance Risk' in note 7.9.2 'Exposure to Non-financial Risks – Compliance Risk'

Our audit response related to going concern
The executive board made a specific assessment of the Company's ability to continue as a going concern and to continue its operations for at least the next 12 months. We discussed and evaluated the specific assessment with the executive board exercising professional judgment and maintaining professional skepticism.

We considered whether the executive board's going concern assessment, based on our knowledge and understanding obtained through our audit of the financial statements or otherwise, contains all events or conditions that may cast significant doubt on the Company's ability to continue as a going concern, also focusing on whether the Company will continue to meet the regulatory solvency requirements. To this end, we also inspected the Own Risk & Solvency Assessment (ORSA). 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.

Based on our procedures performed, we did not identify serious doubts on the Company's ability to continue as a going concern for the next 12 months. 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 a company to cease to continue as a going concern.

Our key audit matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements. We have communicated the key audit matters to the Supervisory Board. The key audit matters are not a comprehensive reflection of all matters discussed.

Estimates used in calculation of insurance liabilities including shadow accounting and Liability Adequacy Test (LAT)	
Risk	Proteq has insurance liabilities of EUR 520 million representing 94% of the Company's total liabilities. The measurement of insurance liabilities involves judgment over uncertain future outcomes, mainly the ultimate total settlement value of long-term liabilities, including any guarantees provided to policyholders. The Company's IFRS liability adequacy test (LAT) is performed in order to confirm that insurance liabilities are adequate in the context of expected future cash outflows. As at 31 December 2021, the LAT shows a significant deficit. As a consequence, insurance liabilities are primarily measured on the basis of the LAT to cover for this deficit. Changes in estimates and assumptions used in the LAT therefore directly impact Proteq's profit or loss in case this deficit cannot be covered by the revaluation reserve of the fixed income investment portfolio (shadow account). As at 31 December 2021 the deficit is covered by the revaluation reserve. The setting of mortality, longevity, expense and lapse assumptions in the LAT, as well as discount curves, require application of significant judgment and we considered the potential risk of management override of controls or other inappropriate influence over the financial reporting process. The company applies shadow accounting in its financial reporting as disclosed in note 6.1.4. Shadow accounting is complex, requires judgment regarding results that apply for shadow accounting and has a significant impact on the liabilities arising from insurance contracts. The company has comprehensive procedures and internal controls in place to determine the shadow accounting. We refer to the Accounting Policies (6.1.4) on 'Insurance Liabilities' and Note 7 'Insurance Liabilities' of the financial statements.
Our audit approach	Our audit procedures included, amongst others, assessing the appropriateness of the Company's accounting policies related to the measurement of insurance liabilities and the IFRS LAT according to IFRS 4 'Insurance contracts'. We involved our actuarial specialists to assist us in performing audit procedures in this area. This included among others consideration of the appropriateness of the mortality, longevity, expense and lapse assumptions used in the valuation of life insurance liabilities. As part of these procedures, we evaluated Company and industry data, and expectations of developments in this respect. In addition, we considered the validity of the Company's IFRS LAT results which is a key test performed in order to ensure that insurance liabilities are adequate in the context of expected future cash flows based on best estimate assumptions plus a risk margin. Our work on the LAT includes evaluating the reasonableness of the projected cash flows and challenging the assumptions adopted, including mortality, longevity, expenses (including inflation) and lapses

	and discount curves, based on Company's and industry experience data, expected market developments and trends. We audited the application of shadow accounting amongst others by inspecting the reconciliations of the fair value changes of the investments with the investment administration, assessing the calculation and the accounting of the related shadow accounting adjustment in the liabilities arising from insurance contracts. Other key audit procedures included evaluating the Company's methodology for calculating the insurance liabilities and an evaluation of the design of internal controls in this respect. We considered the analysis of the movements in insurance liabilities during the year. We assessed whether the movements are in line with the changes in assumptions adopted by the Company, our understanding of developments in the business and our expectations derived from market experience. We evaluated Proteq's disclosures in relation to insurance liabilities and LAT results in accordance with IFRS 4 'Insurance contracts'.
Key observations	We consider the estimates used in the calculation of insurance liabilities and in the IFRS LAT to be within a reasonable range. The disclosures of insurance liabilities and LAT results meet the requirements of EU-IFRS.

Reliability and continuity of the information technology and systems	
Risk	Proteq is highly dependent on its IT systems and IT infrastructure for the continuity of the operations and preparation of its financial statements. Proteq continues to invest in its IT systems and IT infrastructure and processes to meet clients' needs and business requirements. Proteq is continuously improving the efficiency and effectiveness of its IT systems and IT infrastructure and the reliability and continuity of the electronic data processing, including its defence against cyber-attacks. Taking into account the significance of the IT systems and IT infrastructure for Proteq's process of preparation of the financial statements, we considered this a key audit matter with respect to potential impact it can have on the financial statements and continuity of processes and effectiveness of internal controls in processes relevant to reporting.
Our audit approach	IT audit professionals are an integral part of the audit team and assessed the reliability and continuity of the IT environment to the extent necessary for the scope of our audit of the financial statements. Our audit was not primarily designed to express an opinion on the continuity and reliability of Proteq's automated data processing (or parts thereof) and we have not been instructed to do so by the executive board. As part of our audit procedures we have assessed the changes in the IT systems and IT infrastructure and have tested the reliability and continuity of electronic data processing within the scope of the audit of the financial statements. Our procedures included evaluating the design and testing operating effectiveness

Reliability and continuity of the information technology and systems	
	of controls with regards to IT systems and processes relevant for financial reporting as well as additional (substantive) procedures if deemed necessary. In response to the (inherent) increased frequency and severity of cyber incidents and heightened concerns from regulators and other stakeholders about cybersecurity attacks and breaches, we have evaluated cybersecurity risks as part of our annual audit procedures. Our main focus during this audit was to gain an understanding of the cybersecurity risks at Proteq and the actions taken by the Company to address these risks.
Key observations	Our testing of the IT (general) controls and IT substantive procedures performed, provided sufficient evidence to enable us to rely on the adequate and continued operation of the IT systems relevant for our audit of the financial statements.

Report on other information included in the annual report

The annual report contains other information in addition to the financial statements and our auditor's report thereon.

Based on the following procedures performed, we conclude that the other information:

- Is consistent with the financial statements and does not contain material misstatements
- Contains the information as required by Part 9 of Book 2 of the Dutch Civil Code for the management report and the other information as required by Part 9 of Book 2 of the Dutch Civil Code.

We have read the other information. Based on our knowledge and understanding obtained through our audit of the financial statements or otherwise, we have considered whether the other information contains material misstatements. By performing these procedures, we comply with the requirements of Part 9 of Book 2 of the Dutch Civil Code and the Dutch Standard 720. The scope of the procedures performed is substantially less than the scope of those performed in our audit of the financial statements.

The Executive Board is responsible for the preparation of the other information, including the management report in accordance with Part 9 of Book 2 of the Dutch Civil Code and other information required by Part 9 of Book 2 of the Dutch Civil Code.

Report on other legal and regulatory requirements

Engagement

We were engaged by the supervisory board as auditor of Proteq Levensverzekeringen N.V. on 29 October 2015, as of the audit for the year 2016 and have operated as statutory auditor ever since that date.

No prohibited non-audit services

We have not provided prohibited non-audit services as referred to in Article 5(1) of the EU Regulation on specific requirements regarding statutory audit of public-interest entities.

Description of responsibilities regarding the financial statements

Responsibilities of the executive board and the supervisory board for the financial statements

The executive board is responsible for the preparation and fair presentation of the financial statements in accordance with EU-IFRS and Part 9 of Book 2 of the Dutch Civil Code. Furthermore, the executive board is responsible for such internal control as the executive board determines is necessary to enable the preparation of the financial statements that are free from material misstatement, whether due to fraud or error.

As part of the preparation of the financial statements, the executive board is responsible for assessing the Company's ability to continue as a going concern. Based on the financial reporting frameworks mentioned, the executive board should prepare the financial statements using the going concern basis of accounting unless the executive board either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so. The executive board should disclose events and circumstances that may cast significant doubt on the Company's ability to continue as a going concern in the financial statements.

The supervisory board is responsible for overseeing the Company's financial reporting process.

Our responsibilities for the audit of the financial statements

Our objective is to plan and perform the audit engagement in a manner that allows us to obtain sufficient and appropriate audit evidence for our opinion.

Our audit has been performed with a high, but not absolute, level of assurance, which means we may not detect all material errors and fraud during our audit.

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. The materiality affects the nature, timing and extent of our audit procedures and the evaluation of the effect of identified misstatements on our opinion.

We have exercised professional judgment and have maintained professional skepticism throughout the audit, in accordance with Dutch Standards on Auditing, ethical requirements and independence requirements. The 'Information in support of our opinion' section above includes an informative summary of our responsibilities and the work performed as the basis for our opinion.
Our audit further included among others:

- Performing audit procedures responsive to the risks identified, and obtaining audit evidence that is sufficient and appropriate to provide a basis for our opinion
- Obtaining an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control
- Evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Executive Board

- Evaluating the overall presentation, structure and content of the financial statements, including the disclosures
- Evaluating whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation

Communication

We communicate with the supervisory board regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant findings in internal control that we identify during our audit. In this respect we also submit an additional report to the audit committee of the Supervisory Board in accordance with Article 11 of the EU Regulation on specific requirements regarding statutory audit of public-interest entities. The information included in this additional report is consistent with our audit opinion in this auditor’s report.

We provide the supervisory board 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 the supervisory board, we determine the key audit matters: those matters that were of most significance in the audit of the financial statements. 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, not communicating the matter is in the public interest.

Amsterdam, 30 March 2022

Ernst & Young Accountants LLP

Signed by M. Koning

ADDITIONAL INFORMATION

1 PRINCIPLES UNDERLYING/NON-UNDERLYING RESULT

- Definition and usefulness of Net Underlying Result (NUR):

Net result IFRS of Proteq has a high volatility as result of the valuation of all assets and liabilities on a fair value basis. In the NUR, major fair value movements as result of market developments and parameter changes have been eliminated from IFRS-result. Proteq believes that the NUR provides useful information to stakeholders and investors which results in greater comparability of results with peers and that it enhances their understanding on the financial impact of management decisions (e.g., repositioning of investments, additional cost-savings). The NUR should be viewed as complementary to, and not as a substitute for net result IFRS.

- Limitations of the usefulness Net Underlying Result:

Given the complexity in valuation of derivatives it is not possible to fully eliminate all fair value movements from NUR. This could lead to distortion in comparability of figures between different periods. In addition to the impact of additional investment income from derivatives the increase of the NUR was also supported by ongoing investment deployment activities and lower costs.

ATHORA

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