



COORDINATION ARRANGEMENT

Vienna Insurance Group AG

March 2015



**COORDINATION
ARRANGEMENTS VIENNA
INSURANCE GROUP**

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Coordination arrangements

Introduction

Based on Article 248(4) of directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance¹ (hereinafter 'Solvency II Directive') these Coordination arrangements have been concluded for the establishment and functioning of the college of supervisors for VIENNA INSURANCE GROUP.

These arrangements do not create any additional legally binding obligations on members and participants which are not specified in the Solvency II Directive or in Commission Delegated Regulation 2015/035. Third-country participants are bound by their own national laws and regulations.

These arrangements will take effect between members and participants as stated in Annex A, all together referred to in these arrangements as the college of supervisors.

The group supervisor, the other members and participants recognise the need to cooperate in the supervision of VIENNA INSURANCE GROUP on the basis of mutual understanding and cooperate wherever necessary in supervising VIENNA INSURANCE GROUP, within the framework of the EIOPA Guidelines on the operational functioning of colleges of supervisors.

In order to enhance the efficiency of the group supervision, members and participants can decide jointly to cooperate on an ad-hoc basis with competent authorities which cannot be invited as participants, for third-country authorities subject to conditions of equivalence of professional secrecy rules, as specified in paragraph 7 of these arrangements.

All annexes are part of these arrangements.

1. Definitions

The following definitions will apply to these arrangements:

- a. Group supervisor: the supervisor responsible for the coordination and exercise of group supervision in accordance with Article 212(1)(d) of the Solvency II Directive and appointed in accordance with the procedure of Article 247 of the Solvency II Directive;
- b. Supervisory authority: the national authority or authorities empowered to supervise insurance or reinsurance undertakings in accordance with Article 13(10) of the Solvency II Directive;
- c. Third-country supervisory authority: the national authority or authorities in a non-EEA country empowered to supervise insurance or reinsurance undertakings;

¹ OJ L 335, 17.12.2009, p.1.

- d. Members: members of the college of supervisors identified in Article 248(3) of the Solvency II Directive, including:
 - the group supervisor;
 - EEA supervisory authorities of subsidiaries;
 - EIOPA,
- e. Participants:
 - supervisory authorities allowed to participate in the colleges of supervisors identified in Article 248(3) of the Solvency II Directive, subject to the group supervisor inviting them pursuant to Article 354 Commission Delegated Regulation 2015/035 including:
 - o EEA supervisory authorities of significant branches;
 - o EEA supervisory authorities of related undertakings other than subsidiaries;
 - o third-country supervisory authorities of related undertakings including subsidiaries.
 - pursuant to Article 252 of the Solvency II Directive, and subject to the group supervisor inviting them, authorities responsible for the supervision of credit institutions and investment firms that are part of the group.
- f. Group: a group of undertakings as defined in Article 212 of the Solvency II Directive;
- g. College: a college of supervisors as defined in Article 212(1)(e) of the Solvency II Directive;
- h. Specialised team: a team composed of members and participants, established by the group supervisor in consultation with the college of supervisors for carrying out some activities of the college of supervisors;
- i. Helsinki plus list: a list of all EEA insurance groups and its EEA and third-country subsidiaries and branches, with contact details of the supervisory authorities involved in the supervision of the group and basic supervisory information. The list is administered by EIOPA.
- j. IGCP: Insurance Group Communication Platform - Tool for secure Data-Exchange;
- k. Supervisory Authorities concerned: Supervisory authorities in the meaning of Directive 2009/138/EC, directly affected by decisions.

2. Scope, objectives and principles

2.1. Scope and objectives

These arrangements lay out the basis for the cooperation between members and participants and the practical organisation of supervisory activities concerning VIENNA INSURANCE GROUP as follows:

- a) the list of the members and participants of the college;
- b) the role and responsibilities of the group supervisor;
- c) the role and responsibilities of the other members and participants;
- d) the exchange of information and professional secrecy;
- e) the cooperation among the group supervisor and the other members and participants during on-going supervision and in time of crisis;
- f) the consultation and the decision making process among the group supervisor and the other members and participants;
- g) the college work plan;
- h) the sharing and delegation of tasks;
- i) the setting up of specialised teams within the college;
- j) the organisation of joint on-site examinations;
- k) the assessment of compliance of the group with the requirements on solvency, risk concentration and intra-group transactions;
- l) the decision making process in general and in relation to the application for the group internal model pursuant to Article 231 of the Solvency II Directive;
- m) the process for determining the imposition of a group capital add-on;
- n) the choice of the calculation method of the group solvency and the determination of the proportional share;
- o) the application of the centralised risk management provisions;

in order to:

- a) facilitate and foster the exchange of essential and relevant information, views and assessments among members and participants and effective supervision of VIENNA INSURANCE GROUP, including the avoidance of duplication of tasks and timely action in going concern and emergency situations;
- b) enable members and participants, in line with their supervisory responsibilities, to form a shared view on the risk profile and solvency position of VIENNA INSURANCE GROUP and on the impact thereof on individual undertakings that are part of the group;
- c) achieve coordination of supervisory activities, including supervisory review and risk assessment;
- d) establish the college work plan and arrange allocation of tasks and on-site examinations;
- e) coordinate major decisions to be taken by individual supervisory authorities as far as possible and to strive to reach consensus where appropriate;

- f) support members and participants when exercising their respective supervisory tasks.

2.2. Principles

The following principles apply to these arrangements:

- a) The activities of the supervisory college have to be proportionate to the nature, scale and complexity of the risks inherent in the Group's business, structure as well as to the cross border dimensions of the Group;
- b) the college operates as an on-going cooperative structure not limited to college meetings or teleconferences;
- c) the college plays a key role in enhancing supervisory cooperation as well as coordinating supervisory activities and major decisions to be taken by individual supervisory authorities, striving to reach consensus where appropriate;
- d) the cooperation between members and participants mainly takes place through the college, whose organisation reflects the activities and legal structure of VIENNA INSURANCE GROUP as well as the risks to which VIENNA INSURANCE GROUP and undertakings that are part of the group are or may be exposed;
- e) if not otherwise stated in these arrangements the working language for cooperation and consultation will be English.
- f) All relevant deadlines are summarized within chapter 8.11

3. Group Supervisor

Members and participants recognise that AUSTRIAN FINANCIAL MARKET AUTHORITY is the group supervisor of VIENNA INSURANCE GROUP and therefore responsible for the coordination and exercise of group supervision of VIENNA INSURANCE GROUP as stated in these arrangements.

4. Description of the group

VIENNA INSURANCE GROUP whose participating insurance or reinsurance undertaking, insurance holding company or mixed financial holding company is Wiener Städtische Wechselseitiger Versicherungsverein - Vermögensverwaltung - Vienna Insurance Group has its registered office in an EEA Member State and has related undertakings and branches in the EEA Member States and third countries as described in the Helsinki plus list.

The group structure and description is presented in Annex B.

5. Contact details of members and participants

The contact details of members and participants are stored in the directory hosted by EIOPA (Helsinki plus list).

Any updates of the contact details of members and participants will be provided by the group supervisor to EIOPA, which will update the EIOPA directory accordingly.

College Members and Participants shall review the directory at least on a half year basis and report any changes to the Group Supervisor as soon as practically possible (for deadline see chapter 8.11).

All information required from the individual undertaking should be provided to the Group Supervisor, who is responsible for updating and sending the list to EIOPA.

EIOPA will upload it as soon as practically possible on the restricted area of its website.

Third country College Participants shall inform the Group Supervisor immediately on relevant changes in the responsibility of supervision for the subsidiary within their jurisdiction (for deadline see chapter 8.11).

6. Responsibilities of members and participants

The effective functioning of the college for VIENNA INSURANCE GROUP depends on the contribution of the group supervisor and the other members and participants to activities of the college. This contribution is based on sufficient knowledge of the group and supervisory expertise.

6.1. Group supervisor

In accordance with Article 248 of the Solvency II Directive, the group supervisor is responsible for:

- a) coordination of gathering and dissemination of relevant or essential information for going concern and emergency situations;
- b) the supervisory review and assessment of the financial situation of the group;
- c) the assessment of compliance of the group with the rules on solvency and the assessment of risk concentration and intra-group transactions;
- d) the assessment of the system of governance of the group and the assessment of fitness and propriety of the members of the administrative, management or supervisory body of the participating undertaking;
- e) planning and coordinating, through regular meetings held at least annually or through other appropriate means, supervisory activities for going concern and emergency situations, in cooperation with members and participants concerned and taking into account the nature, scale and complexity of the risks inherent in the business of all undertakings that are part of the group;
- f) other tasks, measures and decisions assigned to the group supervisor, in particular leading the process for validation of an internal model at group level and leading the process for reaching a joint decision on the application to be subject to the rules laid down in Articles 238 to 240 of the Solvency II Directive.

In order to fulfil the above tasks, the group supervisor takes the lead in the college's activities, chairs its meetings and establishes appropriate mechanisms to facilitate its operational functioning. To this end, among other activities, the group supervisor:

- g) updates the contact details of members and participants whenever changes occur on the basis of the reviews sent by the other members and participants;
- h) informs members and participants that a college meeting will be held (for deadlines see chapter 8.11), without prejudice to ad-hoc or emergency situations;

- i) prepares the agenda of the college meetings with clearly defined objectives;
- j) records minutes of the college meetings;
- k) formalises and follows up the action points agreed upon by members and participants;
- l) develops the college work plan in cooperation with members and participants;
- m) performs supervisory review and assessment of the financial situation of the group and, in order to facilitate this task, consults the other members and participants;
- n) reviews the organisational structure and the coordination arrangements with a view to maintaining efficient group supervision;
- o) engages in a discussion regarding the need to designate a new group supervisor in case a modification of the group structure could lead to such a decision.
- p) The group supervisor keeps members and participants informed where relevant of material actions and measures taken by members, participants and the group supervisor itself against supervised entities. (For deadlines see chapter 8.11).

6.2. Members and participants

The responsibilities of college members and participants are defined hereafter, which include but are not limited to:

- a) Each member expresses its opinion regarding topics and procedures that require a joint decision, consultation and/or agreement. When a member chooses not to provide a contribution, it is understood that there are no major comments and the college could act in line with the views communicated.
- b) All members of the college, except EIOPA, vote when required.
- c) Participants express their opinion as a contribution to the consultation and decision making process where required by the group supervisor.
- d) College Members and Participants keep the Group Supervisor informed where relevant of material actions and measures taken by members and participants against supervised entities. (for deadlines see chapter 8.11)
- e) Members and Participants provide the data outlined in chapter 5 (Contact details)
- f) Members and Participants participate in College Work following the agreed procedures set in chapters 7 to 9 of the Coordination Arrangement.

7. Confidentiality, secured communication channels and information exchange

7.1. Confidentiality

Further to professional secrecy requirements provided for in the Solvency II Directive or other relevant Union law, the supervisory authorities confirm that any confidential information shared between them shall be used only for lawful supervisory purposes related to supervision of VIENNA INSURANCE GROUP and fall under members and participants' obligation of professional secrecy and conditions and procedures for the exchange of information among supervisory authorities.

Participants from the third-country jurisdictions can only be a party to confidential information sharing, provided that they have legislative provisions on professional secrecy which are equivalent to those in the relevant Union law.

Participants from third countries acknowledge that they have made available to members and participants their own local rules of confidentiality and professional secrecy. Members and participants acknowledge that they have been informed of these local rules, and that they have assessed that the rules of professional secrecy of the participants from third countries are at least equivalent to their own professional secrecy obligations, if the equivalence has not already been positively verified.

Before a new third-country supervisory authority becomes formally a participant of the college, members and participants carry out the above mentioned assessment, if the equivalence has not already been positively verified by each member and participant.

If the assessment for a potential third-country participant has a negative outcome or is still under review, the college organisation will be adapted accordingly to ensure that the college still meets professional secrecy requirements in all circumstances.

Members and participants inform the group supervisor without any delay of any changes in the guarantees of confidentiality and professional secrecy applying to information transmitted to participants from third countries. Subsequently the group supervisor informs the other members and participants about such confidentiality or professional secrecy issue which may have a negative impact on the assessment of a third-country supervisory authority's professional secrecy regime previously considered equivalent.

7.2. Secured communication channels

The college agrees to use within the college the following channels for communication: the Insurance Groups Communication Platform (IGCP), e-mail, paper, telephone.

All confidential and sensitive information is shared via the most secured communication channel.

7.3. Information exchange

The scope of information exchanged within the college reflects the needs of members and participants. The college complies with the following procedures:

- a) the group supervisor is responsible for the gathering and dissemination of information;
- b) a dataset of qualitative and quantitative information at group and individual undertaking level is exchanged annually between members and participants (see Annex C);
- c) the dataset in Annex C has been agreed upon taking into account Article 357 of Commission Delegated Regulation 2015/035 and the Guidelines on exchange of information on a systematic basis within colleges. The college assesses the appropriateness of the set of information outlined in the Guidelines on exchange of information on a systematic basis within colleges with reference to Article 357 of Commission Delegated Regulation 2015/035. Where this set is not considered appropriate, the dataset in Annex C specifies which additional information is relevant to be exchanged on a systematic basis or which information from this set should not be exchanged on a systematic basis, based

on the nature, size and complexity of the group. The dataset in Annex C is also part of the inbound information for the group supervisory review process. For third-country participants, the dataset is based on information which is comparable with that referred to in Article 357 of Commission Delegated Regulation 2015/035;

- d) additionally, where appropriate, ad-hoc information is exchanged between members and participants.
- e) When a request for information from the group supervisor or other college members or participants does not require preliminary analysis, but only data, it will be responded within a certain timeframe (for deadline see chapter 8.11). When the request for information requires preliminary analysis, the deadline is extended (for deadline see chapter 8.11).

8. Functioning of the college

8.1. In on-going supervision

The college meets face to face or by telephone conference at least once a year.

Any member or participant which participates in bilateral discussions informs the college and shares any relevant information resulting from these discussions with the college.

Members and participants will be informed about the meeting in advance of the meeting (for deadline see chapter 8.11).

The draft agenda for the meeting/ teleconference will be sent to members and participants in advance of the planned meeting/ teleconference (for deadline see chapter 8.11).

The final agenda and all relevant documents will be sent to members and participants in advance of the meeting/ teleconference (for deadline see chapter 8.11).

8.2. In time of crisis

The competent supervisory authorities are responsible for assessing whether a crisis situation is affecting the undertaking under their supervision.

In line with the definition in the emergency plan for the college, added as Annex E to these arrangements, and the CEIOPS Guidelines on preparation for and management of a financial crisis², an insurance undertaking in crisis can be defined as potentially being partially or totally unable to settle its claims and to pay to its policyholders their benefits.

For the cooperation in the case of a crisis, members and participants of the college shall follow the principles and procedures stipulated in the approved emergency plan.

² Guidelines on preparation for and management of a financial crisis in the Context of Supplementary Supervision as defined by the Insurance Groups Directive (98/78/EC) and the Memorandum of Understanding on Cooperation between the Financial Supervisory Authorities, Central Banks and Finance Ministries of the European Union on Cross-Border Financial Stability, CEIOPS-DOC-15/09, 26 March 2009.

Members and participants will cooperate closely, whenever necessary and in accordance with their national law, with other relevant authorities (e.g. EU institutions, central banks, Ministries of Finance) involved in the crisis management process.

8.3. General procedures for consultation and decision making

Members, and participants to the extent provided for in sub-paragraph 3 of this paragraph, follow the procedures listed below unless the process relates to the decision on the application for the group internal model as referred to under paragraph 8.7 below or to a matter specified in the Union law.

For each procedure, the supervisory authorities concerned may be different depending on the issue.

Participants express their opinion as a contribution to the consultation and decision making process where required by the group supervisor at any stage of the process.

The group supervisor informs the other members and participants of the outcome of the consultation and decision making procedures.

The group supervisor proposes procedures for consultation and for the decision making process in the college. The college shall follow the consultation and decision making procedures as described in Annex F.

The college will document decisions and record them on the IGCP.

8.4. College work plan, sharing and delegation of tasks and specialised teams

The members discuss and agree in the college on the annual college work plan following the procedure in paragraph 8.3.

The college work plan coordinates the main types of supervisory activities including the key college meetings and major examinations and will be updated as soon as circumstances require.

The college work plan will be coordinated by the group supervisor and reviewed annually.

The group supervisor includes in the college work plan the relevant aspects of the group supervisory plan, including:

- a) a description of the main risks to which the group is exposed being focused on, based on the outcome of the Group Risk Assessment Framework;
- b) a description of and rationale for the activities that the college will carry out based on the group supervisory plan;
- c) an identification of the relevant entities within the group and their supervisory authorities that the group supervisor is likely to seek input from.

The group supervisor takes into account the supervisory plans of the individual supervisors in order to coordinate the group and solo work plans where appropriate.

When members and participants share or delegate tasks, a clear sharing or delegation of tasks, including the fulfilment of the shared or delegated tasks and the timeframe in which the tasks are to be fulfilled, is agreed upon within the college in accordance with the EIOPA Guidelines on operational functioning of colleges of supervisors and according to the consultation and decision making process described in paragraph 8.3.

The college work plan reflects agreed sharing and delegations of tasks. The group supervisor should be informed of any sharing and delegation of tasks between the other members and participants. Members and participants which are not part of sharing or delegation of tasks should be adequately informed. Where specialised teams are created, members and participants which are not part of these teams are regularly informed of the developments at least during the annual college meeting and, if needed, more frequently via secure information channel.

8.5. Joint on-site examinations

The college work plan includes a list of all relevant planned on-site examinations of entities that are part of VIENNA INSURANCE GROUP at individual and group level. For the purpose of preparing the college work plan, members and participants inform the group supervisor about any relevant planned on-site examinations in undertakings that are part of VIENNA INSURANCE GROUP. The group supervisor informs the other members and participants about any relevant planned on-site examinations in the participating insurance or reinsurance undertaking, the insurance holding company or the mixed financial holding company or in any other individual undertaking of the VIENNA INSURANCE GROUP.

Whenever a topic is identified as relevant for the supervision of the VIENNA INSURANCE GROUP (or several entities of the group situated in different jurisdiction) each member or participant can make a proposal for a joint on-site examination and inform the group supervisor or competent individual supervisory authorities indicating the reason(s) for and scope of the joint on-site examination. The group supervisor then notifies EIOPA as well as the other members and participants that may be affected by or interested in participating in the on-site examination or its outcome. Once the participating supervisors have been identified, they discuss and agree on the final scope, purpose, structure and allocation of tasks of the examination, including who will be leading the on-site examination³.

The number of supervisory authorities participating in joint on-site examinations is kept to an efficient size.

The group supervisor will be kept informed on the progress and findings of the joint on-site examination and ensures appropriate dissemination of information on the joint on-site examination.

8.6. Assessment of compliance of the group with requirements on solvency, risk concentration and intra-group transactions

When assessing the risk profile of the VIENNA INSURANCE GROUP, the systemic risk posed by the group and its undertakings will be taken into account. While assessing the risk profile of the group, market-wide risks, financial sector developments and vulnerabilities also have to be taken into account.

VIENNA INSURANCE GROUP will report intra-group transactions as decided upon by the group supervisor after consulting the other members and participants concerned and provided for in Annex G

³ See also Guideline 21 in EIOPA Guidelines on the operational functioning of colleges of supervisors for further procedures and communications.

VIENNA INSURANCE GROUP will report risk concentrations as decided upon by the group supervisor after consulting the other members and participants concerned and provided for in Annex G.

8.7. Decision making process on the group internal model application and preparation of the joint decision

This part of the coordination arrangements aims to clarify the responsibilities of the group supervisor and the other supervisory authorities concerned when reaching a joint decision on the group internal model once the assessment of the application has been concluded.

The Implementing Technical Standards on the joint decision process for group internal models set out the process that the supervisory authorities concerned, as defined in these Implementing Technical Standards, have to follow in order to reach a joint decision on the group internal model. In particular in accordance with Article 3(1) of the Implementing Technical Standards, the supervisory authorities concerned have to decide on the process to reach a joint decision, including timelines, main steps and deliverables.

The EIOPA Guidelines on the operational functioning of colleges of supervisors include further provisions that have to be followed by the supervisory authorities, in particular the setting up of the college work plan to be followed by the supervisory authorities during the approval process with the aim of reaching a decision.

1. According to Article 4(3) of the Implementing Technical Standards, the group supervisor has to draft a proposal for a joint decision on the basis of the inputs received from the other supervisory authorities concerned.

These inputs consist of the following:

- (a) compliance or non-compliance of the group internal model with the tests and standards and other relevant requirements in respect of the Solvency Capital Requirement (hereinafter 'SCR') of the related undertaking they supervise (including the adequacy or inadequacy of the reflection by the group internal model of the risk profile of this related undertaking), and the rationale for this;
- (b) whether they would approve or reject the group internal model for the calculation of the SCR of the related undertaking they supervise.

The opinions referred to in Article 4(6) of the Implementing Technical Standards by the other supervisory authority concerned to the proposal of the group supervisor and their final views on the application as set out in Article 4(7) of these Implementing Technical Standards are related to the issues included in (a) and (b) above.

2. The group supervisor's contribution to the joint decision, to be included in its proposal for this decision, consists of the following:
 - (a) the compliance or non-compliance of the group internal model with the tests and standards and other relevant requirements in respect of the consolidated group SCR (including the adequacy or inadequacy of the reflection by the group internal model of the overall risk profile of the group), and the rationale for this;

- (b) if applicable, compliance or non-compliance of the group internal model with the tests and standards and other relevant requirements in respect of the SCR of the parent undertaking or the related undertaking it supervises (including the adequacy or inadequacy of the reflection by the group internal model of the risk profile of the participating undertaking or the related undertaking), and the rationale for this;
- (c) whether it would approve or reject the group internal model for the calculation of the consolidated group SCR;
- (d) whether it would approve or reject the group internal model for the calculation of the SCR of the parent undertaking or the related undertaking it supervises.

8.8. Choice of the calculation method of the group SCR and determination of the proportional share

The group supervisor consults the other supervisory authorities concerned and the group before deciding whether the exclusive application of the accounting consolidation-based method would not be appropriate.

The group supervisor consults the other supervisory authorities in order to decide the proportional share to be taken into account in the cases laid down in Articles 221(2) (a), (b), (c) of the Solvency II Directive.

8.9. Communication on the imposition of a capital add-on under Article 232 of the Solvency II Directive

The group supervisor will communicate to the college any capital add-ons he has applied, amended or removed and he plans to apply, amend or remove at group level, to ensure that the supervisory authorities of related insurance or reinsurance undertakings have an understanding of the risks at group level.

The supervisory authorities communicate to the group supervisor any capital add-ons they have applied, amended or removed and they plan to apply, amend or remove to a related insurance or reinsurance undertaking.

8.10. Application for centralised risk management under Article 238 and 239 of the Solvency II Directive

Where a parent undertaking submits an application to subject any of its subsidiaries to the rules laid down in Articles 238 and 239 of the Solvency II Directive, the complete application shall be forwarded without delay by the supervisory authority that received that request to the other supervisory authorities within the college.

The group supervisor shall then propose a meeting to the supervisory authorities from which permission has been sought in order to discuss whether the permission should be granted and the terms and conditions that should apply to it.

The procedures for the consultation and decision making process described in paragraph 8.1 are to be applied among the supervisory authorities concerned.

The group supervisor assures that all other supervisory authorities within the college are kept informed.

8.11. Major Deadlines for group supervisor, members and participants

In the following table major deadlines are summarized and organized following their chapters of appearance:

Task	Responsibility	Frequency (Standard/Ad hoc)	Deadline	Reference (chapter.CA)
Review of Helsinki Plus List	Members	Half Year/asap	as soon as practically possible	5
Transmitting Data Helsinki Plus List to EIOPA	Group Supervisor	Half Year/asap	4 weeks	5
Update Contacts from College Participants	Participants	Half Year/asap	2 weeks	5
Inform members and participants that a college meeting will be held	Group Supervisor		8 weeks before meeting	6.1.h
Distribution of information on supervisory actions and measures taken by members, participants or the Group Supervisor to the College	Group Supervisor		3 weeks	6.1.p
College Member Inform the Group Supervisor on supervisory action and measures taken by members and participants	Members, Participants		3 weeks	6.2.d
Information on changes regarding professional secrecy	Members, Participants		Without delay	7
Request for Information (Data only) from members, participants, group supervisor	Members, Participants, Group Supervisor		2 weeks	7.3.e
Request for Information (Analysis) from members, participants, group supervisor	Members, Participants, Group Supervisor		4 weeks/ individual agreement	7.3.e
Information on the date of College of Supervisors	Group Supervisor	at least yearly	8 weeks before meeting	8.1.
Information on Draft Agenda for Supervisory College Meeting	Group Supervisor	at least yearly	3 weeks before meeting	8.1.
Dissemination of relevant documents, final agenda for Supervisory College Meeting	Group Supervisor	at least yearly	1 week before meeting	8.1.
Response to consultation	Members, Participants		4 weeks/ individual agreement	8.3.
Response to proposed decisions	Members		4 weeks/ individual agreement	8.3.

9. Miscellaneous provisions

These coordination arrangements enter into force on 31st March 2015. It remains in force for an indefinite period of time unless and until there is no longer legal basis for the operation of the college.

However, any participant may give a written notice with a 30-day notice period to the group supervisor of its intention to terminate its cooperation under the coordination arrangements. The group supervisor informs the other members and participants in writing. Even after termination, information obtained under these coordination arrangements will be kept confidential as agreed in these coordination arrangements.

Without prejudice to paragraph 7, when a new member or participant joins the college, only the new supervisory authority will sign the existing coordination arrangements.

These coordination arrangements may be amended and further developed as necessary, for example to reflect significant changes of VIENNA INSURANCE GROUP (e.g. overall group structure, risk profile). It may also be amended, if needed, to remain compatible with national law of any member or participant, unless these changes are contrary to Union law. If the changes are not compatible with the third-country participants' national law, the third-country participant may decide to terminate its cooperation under the coordination arrangements in accordance with the conditions stated in this paragraph.

Each change and/or amendment of the Coordination Arrangement has to be agreed upon by each College Member and Participant.

The Annexes A to F may be changed and/or amended following the procedures for consultation and decision making stipulated in paragraph 8.3 of this agreement and have to be agreed by each College Member and Participant. In this context, however, the regular and necessary update of the annexes A, B, C, C2, C3, F and G shall not affect the validity of the arrangements.

If the group supervisor, after consulting the college, finds it appropriate, the coordination arrangements may also set out procedures for consultation with regards to Articles 213 to 217, 219 to 221, 227, 244 to 246, 250, 260 and 262 of the Solvency II Directive. It is up to each group supervisor to decide whether it wants to include the procedures for consultation on decisions referred to in these articles into the coordination arrangements. This decision should be reviewed when the coordination arrangements are updated.

In the case of an institutional change carried out in the relevant jurisdiction, implying the transfer of supervisory powers to another supervisory authority, the latter authority shall notify in writing the college about the entry in the rights and obligations of each predecessor stipulated by the relevant national law. Such notification shall be made within 30 days from the entry into force of the institutional change.

A summary/copy of the coordination arrangements will not be provided to the group.

The terms of these arrangements have been understood and accepted by the members and participants and signed by their duly authorised representatives. For the supervisory authorities of Croatia, Czech Republic and Estonia these arrangements enter into force as of the date the Directive 2009/138/EC is implemented into their national laws

Annexes

Annex A: Members and participants of the college; involved parties to the arrangements

Annex B: Group structure and main activities of the group

Annex C: Data set to be systematically exchanged

Annex C2: Information_Exchange_Template

Annex C3: Risk Assessment Template

Annex D: Emergency plan template

Annex E: List of information that may need to be exchanged within the college in a crisis situation

Annex F: Procedures for Consultation and Decision making within VIENNA INSURANCE GROUP College

Annex G: Reporting of risk concentrations and intra-group transactions

Signature(s)

for
Financial Market Authority (FMA),
Austria

26.03.2015

Date

P. Braumüller

Peter Braumüller
Managing Director Insurance and
Pension Companies Supervision

for
Financial Supervision Commission (FSC),
Bulgaria

26.03.2015

Date

Nikolay Petkov
Head of department Supervisory Policy
and Analysis



for
Croatian Financial Services Supervisory Agency (HANFA),
Croatia

26.03.2015.
Date



Gordana Letica
Deputy President of the Board

for
Czech National Bank (CNB),
Czech Republic

26-03-2015
Date

David Rozumek
Executive Director

for
Estonia Financial Supervision Authority,
Estonia

MARCH 26, 2015
Date

Kilvar Kessler
Chairman of the Management Board

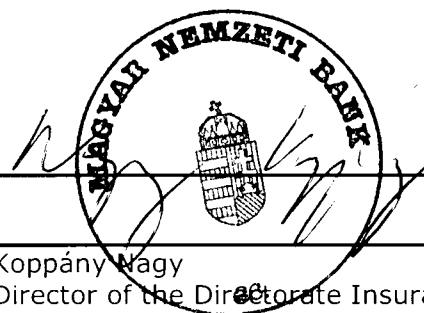
for
Federal Financial Supervisory
Authority (BaFin),
Germany

26/03/2015
Date

Thomas Schmitz-Lippert
Executive Director of International Policy
and Affairs / Abteilungspräsident

for
The Central Bank of Hungary (MNB),
Hungary

26/03/2015
Date



Koppány Nagy
Director of the Directorate Insurance,
pension funds, financial enterprises and
intermediaries supervision

for
Istituto per la Vigilanza sulle
Assicurazioni (IVASS),
Italy

26/03/2015
Date

Alberto Corinti
Executive Board Member

for
Financial Market Authority (FMA),
Liechtenstein

26 03 2015
Date

Alexander Imhof
Head of the Insurance and Pensions
Funds Division/ Deputy Chief Executive
Officer

for
Bank of Lithuania,
Lithuania

150326
Date

Vytautas Valvonis
Executive Director of Supervision Service

for
Financial Supervision Authority (KNF),
Poland

26.03.2015
Date

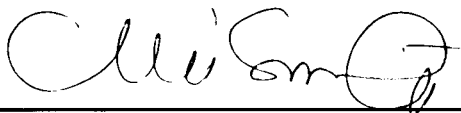
KOMISJA
NADZORU FINANSOWEGO
Pl. Powstańców Warszawy 1
00-030 Warszawa
(5)



Damian Jaworski
Director of Analyses and International
Cooperation Department

for
Financial Supervisory Authority (FSA),
Romania

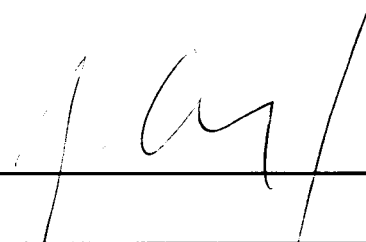
26/03/2015
Date



Misu Negritoiu
President

for
National Bank of Slovakia (NBS),
Slovakia

26.3.2015
Date



Júlia Čilíková
Director of Regulation department

for
European Insurance and Occupational Pensions Authority (EIOPA)

24 March 2015

Date



Gabriel Bernardino
Chairman



Annex A: Members and Participants of the College (VIG)

Country	Authority	Member/ Participant/ Group Supervisor
Austria	Austrian Financial Market Authority (FMA)	Group Supervisor
Bulgaria	Financial Supervision Commission (FSC)	College member
Croatia	Croatian Financial Services Supervisory Agency (HANFA)	College member
Czech Republic	Czech National Bank (CNB)	College member
Estonia	Financial Supervision Authority	College member
Germany	Federal Financial Supervisory Authority (BaFin)	College member
Hungary	The Central Bank of Hungary (MNB)	College member
Italy	Istituto per la Vigilanza sulle Assicurazioni (IVASS)	College participant
Liechtenstein	Financial Market Authority (FMA)	College member
Lithuania	Bank of Lithuania	College participant
Poland	Financial Supervision Authority (KNF)	College member
Romania	Financial Supervisory Authority (FSA)	College member
Slovakia	National Bank of Slovakia (NBS)	College member
EIOPA	European Insurance and Occupational Pensions Authority (EIOPA)	College member



Following supervisory authorities of Non EEA-countries agreed on the coordination arrangements and the respective annexes before the formal signing of the agreements by the EEA college members and participants. A formal signing of the coordination arrangements by these authorities is expected during 2015, following the procedures stipulated within the coordination arrangement.

Country	Authority	Member/ Participant/ Group Supervisor
Albania	Financial Supervisory Authority	College participant
Macedonia	Insurance Supervision Agency	College participant
Montenegro	Insurance Supervision Agency of Montenegro	College participant
Serbia	National Bank of Serbia	College participant

This Annex is subject to regular revision and may be changed over time to reflect the current needs of the College. Any amendment thereto shall be agreed upon by the College following the procedures for consultation and decision making predicted by paragraph 8.3 of this agreement. A formal signature by the College Members and Participants is not required and the coordination arrangement is not required to be resigned.



Annex B: Group structure and main activities of the group

VIENNA INSURANCE GROUP, whose ultimate parent company Wiener Städtische Wechselseitiger Versicherungsverein - Vermögensverwaltung - Vienna Insurance Group has its registered office in Austria, is mainly focused on insurance business.

VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe is a licensed insurance company with its registered office in Austria and is the operative insurance holding of VIENNA INSURANCE GROUP. VIENNA INSURANCE GROUP AG Wiener Versicherung Gruppe is listed on the stock markets in Vienna and in Prague.

VIENNA INSURANCE GROUP has insurance and reinsurance subsidiaries and insurance branches in following EEA and NON EEA countries:

- Albania
- Austria
- Belarus
- Bosnia and Herzegovina
- Bulgaria
- Croatia
- Czech Republic
- Estonia
- Georgia
- Germany
- Hungary
- Italy (branch)
- Kosovo (branch)
- Latvia (branch)
- Liechtenstein
- Lithuania (branch)
- Macedonia
- Moldova
- Montenegro
- Poland
- Romania
- Serbia
- Slovakia
- Slovenia (branch)
- Turkey
- Ukraine

The group structure of Vienna Insurance Group is presented by the group supervisor during the supervisory college meetings. The respective presentations including a simplified diagram of the group and the major changes in the group structure are available on the communication platform IGCP.

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agreement. A formal signature by the College Members and Participants is not required and the coordination arrangement is not required to be resigned.

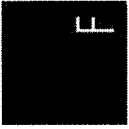


Annex C - List of Ratios/Selected Data for information exchange in Colleges on a systematic basis

The supervisory college of VIENNA INSURANCE GROUP will decide on a set of ratios/selected data for the exchange of information on a systematic basis for the time when Solvency II regulation is in force. This decision will be based on the EIOPA Guidelines on exchange of information on a systematic basis within colleges and will follow the decision and the consultation process described in paragraph 8.3 of the coordination arrangements.

Additionally the regular data exchange within the college will be based on the data exchange templates in Annex C2 (Information exchange Template) and Annex C3 (Risk assessment template).

This Annex is subject to regular revision and may be changed over time to reflect the current needs of the College. Any amendment thereto shall be agreed upon by the College following the procedures for consultation and decision making predicted by paragraph 8.3 of this agreement. A formal signature by the College Members and Participants is not required and the coordination arrangement is not required to be resigned.









Annex C2_Information Exchange Template for the Supervisory College of VIENNA INSURANCE GROUP

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INFORMATION EXCHANGE TEMPLATE SUPERVISORY COLLEGE VIENNA INSURANCE GROUP



Read me

-  Please complete this information collection form with all the relevant information regarding the supervised entities or subgroup(s) within your jurisdiction.
-  The information provided will then be disseminated to all participants of the Supervisory College (including 3rd country undertakings) before the meeting.
-  At the Supervisory College each supervisor will make a brief presentation on the information provided (with focus on local key issues, key risks, supervisory activities in 201X and planned activities in 201X).
-  Figures are reported in Euro please provide the exchange rate used per slide.
-  Please feel free to provide additional information when you consider it of interest for the other participants.
-  Please return the completed form to **the IGCP**

<https://webhost.fma.gv.at/IGCP/frmLogin.aspx?ReturnUrl=%2fIGCP>

by XXX at the latest

We are looking forward meeting you at the Supervisory College. In the meantime thank you for your contribution which will help make the event a success.

Definitions used within the Template

NL	GWP	Gross Written Premium Non Life
NL	Combined Ratio	(Gross expenses for claims + underwriting and administrative expenses) / gross premiums earned regarding Non Life
L/NL	Net Result	Net Result (EBT) in absolute numbers for Life and Non Life
L/NL	Return on Investments	Net investment income (or losses) / average Investment (arithmetic average of the period) for Life and Non Life
L/NL	Total Balance Sheet	Total Balance Sheet Sum Life and Non Life
L/NL	Technical Provisions	Gross technical provisions Life and Non Life
L	GWP	Gross Written Premium Life
L	Cost Ratio	(Underwriting + administrative expenses)/ premiums earned regarding Life
L	Benefit Ratio	(Gross expenses for insurance benefits + Change of technical reserves) / gross premiums earned
	Currency Units	Please use a thousand Euro as unit of account
H	Health	Please add existing health business to the non life part



Structure

(please fill in your country)

Supervised entity	Branch/subsidiary	Business activity (life/non life/composite)	Market share %
-------------------	-------------------	--	-------------------

Please comment on the above figures taking into account the following key questions:

- Was there any significant change in shareholder structure/capital (e.g. capital increase/decrease/ mergers/acquisitions...)?
- Did you observe significant changes in governance system (e.g. changes in management or key functions, restructuring, portfolio transfers...)?



Solvency

(please fill in your country)

Thousand Euro				
Supervised entity	Eligible Own Funds	Eligible Own Funds 31.12.2013	Solvency Requirement 30.06.2014	Solvency Requirement 31.12.2013
	30.06.2014			
				Solvency Ratio (30.06; 31.12)

Please comment on the above figures taking into account the following key questions:

- Please provide the most actual solvency Ratio
- Did you observe any significant change or trend regarding the solvency figures over the last years?
- Would you like to mention any special topics regarding solvency figures (restricted use of certain own fund items, solvency measures in place,...)

Intragroup Transactions

(please fill in your country)

Please comment on intragroup transactions taking into account the following key questions:

- *Short description of material intragroup transactions regarding*
 - *Loans*
 - *Guarantees*
 - *Reinsurance*
 - *Others*
- *Did you observe any new/extraordinary Intragroup transactions?*
- *Do you have reasons to doubt, that the arms-length principle is being maintained with the above transactions*



Key Figures company A*

(please fill in your country)

Thousand Euro		30.06.2014 (if available)	31.12.2013	31.12.2012	Delta 2013-2012
NL	GWP				
NL	Combined Ratio				
NL	Net Result				
NL	Return on Investments				
NL	Total Balance Sheet				
NL	Technical Provisions				
L	GWP				
L	Cost Ratio				
L	Benefit Ratio				
L	Net Result				
L	Return on Investments				
L	Total Balance Sheet				
L	Technical Provisions				

*** For additional companies add a new sheet**



Key Figures company A*

(please fill in your country)

Thousand Euro	30.06.2014 (if available)	31.12.2013	31.12.2012	Delta 2013-2012
Asset Allocation				
Bonds				
<i>hereof</i>				
<i>government bonds</i>				
Equity Investments				
Cash, Deposits in				
Banks				
Participations				
Mortgages and				
Loans				
Real Estate				
Investmentfunds				
Assets covering				
unit and indexlinked				
products				
Others				

*** For additional companies add a new sheet**

Governance System
(please fill in your country)

Supervisors assessment of the overall quality of	Very High	High	Moderate	Low
Corporate Governance				
Risk Management				
Internal Control System				

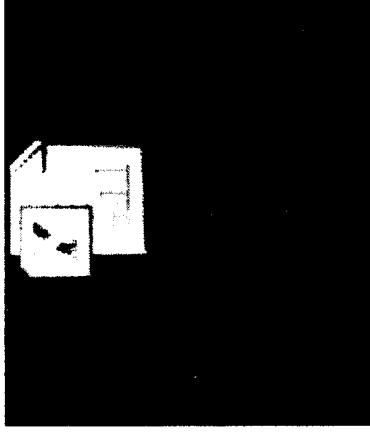
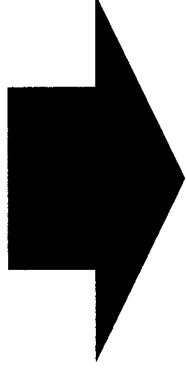
Please comment your assessment



Risk-assessment

(please fill in your country)

Please fill out the attached Risk Assessment Template provided





Complaints (please fill in your country)

Please provide a feedback on the current status of complaints-level against the companies

- .
- .
- .



Supervisory Activities

(please fill in your country)

Topic of On-Site (what?) When? Key findings?

Please provide Input for working plan for the following year (planned upcoming supervisory activities)

-
-
-

Status of Solvency II process in local undertakings

-
-

Questions/Issues

(please fill in your country)

Questions to the group management

-
-
-
-



ANNEX - Additional Information

(please fill in your country)

-
-
-
-
-
-
-

ANNEX C3 Risk Assessment Template

This Annex is subject to regular revision and may be changed over time to reflect the current needs of the College. Any amendment thereto shall be agreed upon by the College following the procedures for consultation and decision making predicted by paragraph 8.3 of this agreement. A formal signature by the College Members and Participants is not required and the coordination arrangement is not required to be resigned.

F

STEP 1

NSA

This template was created to ease the risk assessment process performed within Austrian colleges. Before you begin describing the risks and strengths regarding the entities under your supervision, it is necessary to set some common definitions for the varying degrees of a risk's impact and likelihood. All fields highlighted in light orange need to be filled in by the respective

STEP 2

Please look at the definitions used regarding Risk Impact and Likelihood

Definitions 'IA1

STEP 3

Please fill in the following information

RISK ASSESSEMENT TOOL												Help 1	
Filled in by:													Help 2
Filled in on:													Help 3
Country: AT													Help 4
Undertakings covered:													Help 5
Part of Group:													

STEP 4

Please perform the Risk&Strength Assessment under Step 1

2	Read through the risks section	Risks
3	Perform the risk assessment	Risk Assessment
4	If help needed look at the Help section	Help

Content!A1

The following definitions regarding Risk Impact and Risk Likelihood are being used throughout that sheet

Risk Impact is measured using the following Scale

Very High	Undertakings financial and operational health is severely threatend in the immediate and long term. Example givens are: non compliance with Supervisory Rules (Solvency, Coverage of TP), continuing lack of profitability, interests of policy holders threatend,
High	Undertakings financial and operational health is in the immediate term significantly reduced or impacted, long term operations are potentially impaired. Threats regarding the long term development might occur.
Moderate	Undertakings financial and operational health will be affected. Long term impact is regarded neglectable. Actions need to be implemented to avoid further adverse impact.
low	Impact on the undertakings financial and operational health is limited to short-term consequences with few or no long-term effects. Minimal changes to current operations.
Cannot Estimate	Please click that option if you are not able to provide an estimate on the risk impact

Riks Likelihood is measured using the following Scale

Very High	Certain to occur
High	Almost certain to occur
Moderate	May occur within the next 1-3 years
low	Not likely to occur within the next 3 years
Cannot Estimate	Please click that option if you are not able to provide an estimate on the risk likelihood

Ты.уча.сво.:

Group	Link to specific undertakings	Short description	Year of 1st identification	Description	Year of 1st identification	Year of 1st identification	Mitigation of risks by	Overall Score after Mitigation
MACROECONOMIC RISK	0							
	0							
	0							
	0							
LEGAL RISK	0							
	0							
	0							
	0							
INVESTMENT RISK	0							
	0							
	0							
	0							
INSURANCE PORTFOLIO RISK	0							
	0							
	0							
	0							
GOVERNANCE RISK	0							
	0							
	0							
	0							
ANY OTHER RISK	0							
	0							
	0							
	0							

Number	Description	Back to origin
Help 1	Please fill in the National Supervisory Authority	Content!A1
Help 2	Please fill in the date of fill in	Content!A1
Help 3	Please fill in your country	Content!A1
Help 4	Please enter all undertakings in your market	Content!A1
Help 5	Please pick the respective Group	Content!A1
	Your are asked to provide at a maximum the top 5 risks per risk category. Please provide in that column a one to three words description of the risk as it will be shown in a graph later	
Help 6		Risk Assessment!A1
Help 7	Please provide a short description of the risk stated	Risk Assessment!A1
	Assess the impact of the stated risks and rate into the categories provided	
Help 8		Risk Assessment!A1
	Asses the likelihood of the stated risks and rate into the categories provided	
Help 9		Risk Assessment!A1
	Please provide if possible an estimate in EURO on the impact of the risk	
Help 10		Risk Assessment!A1
	Please provide a 1-3 words description of the undertakings strength	
Help 11		Strength Assessment!A1
Help 12	Please provide a short description of the stated strength	Strength Assessment!A1
Help 13	Assess the ability of the strength to mitigate risks	Strength Assessment!A1
	Pick out of the list of risks mentioned before whether mitigation is possible	
Help 14		Strength Assessment!A1
	Please provide, if you have discussed the mentioned risk with the undertaking	
Help 15		Risk Assessment!A1
	After having filled in the single risks, provide an assessment (Very High, High, Moderate, Low) of the overall effect of this risk category	
Help 16		Risk Assessment!A1
Help 17	Please add the year you first identified the risk	Risk Assessment!A1
	Please describe by which measures/processes/facts the risk is mitigated	
Help 18		Risk Assessment!A1
Help 19	Please enter the final risk score after mitigation effects	Risk Assessment!A1

<p>See also Macroeconomic risk questions</p> <p>Taking into consideration the following topics:</p> <ul style="list-style-type: none"> - Development of interest rates vs. guarantees given by an undertaking (spread between investment returns and guaranteed rates) - GDP development - Government dept - Changes in Ratings (Up- / Downgrades) from gov. Bonds, Insurance Undertakings, other relevant Undertakings - Development of the inflation level over the last years - Austerity Measures implemented by governments - Stimulus Programms introduced for boosting GDP-Development - Considerations/preparations concerning deflation szenarios - Property and mortgage markets - Unemployment/Youth unemployment - General development of the insurance market - Effects on renewal or lapse rates - Others 	Risk Assessment'!A1
<p>See also Legal risk questions</p> <p>Taking into consideration the following topics:</p> <ul style="list-style-type: none"> - Introduction and changes of regulatory surrounding (e.g. tax, contract, insurance, banks etc.) - Changes regarding corporate taxes planned (e.g. financial sector tax, financial transaction taxes) - Linkage of certain products with tax eases - Changes in law regarding the possibility for new business (e.g. Health business) or regulation of existing business conducted (e.g. MTPL) - Rulings of high courts having an impact - Legal Proceedings against the Undertaking - Changes in social insurance (also planed changes) - Others 	Risk Assessment'!A1
<p>See also Investment risk questions</p> <p>Taking into consideration the following topics:</p> <ul style="list-style-type: none"> - Investment concentration in one asset class or linked asset classes - Investments considered risky or with a certain probability of default (ABS, PIIGS etc.) - Investment mostly in assets of one or more linked counterparties - Increase of less liquid investments to compensate low interest rates (e.g. infrastructure projects) - Are derivatives used? If yes for which purpose? - Any other alternative investments (private equity, hedgefunds) - Changes in investments according to changes in policy holder behavior (lapse rates, decreasing Premiums, etc.) - Others 	Risk Assessment'!A1
<p>See also Insurance Portfolio risk questions</p> <p>Taking into consideration the following topics:</p> <ul style="list-style-type: none"> - Comparison of product pricing in comparison to the market? - Industry/large risks within the insurance portfolio - Appropriate reinsurance cover in place - Risks related to guarantees or options within products? Can they be fulfilled by undertaking in the future? - Changes in guarantees (new products) - Mortality tables - Coverage of disaster/catastrophe in the portfolio (flood, hail, storm) - General changes in the portfolio (premium growth, new products, etc.) - Profitability of segments - Are there any new life products beeing developed? - Lines with high claim expenses ? - How is the level of provisions paid to the market? - How are the sales channels structured? Is there dependency on one or more partners? - Complaints - Others 	Risk Assessment'!A1
<p>Taking into consideration the following topics:</p> <ul style="list-style-type: none"> - Failure of internal control processes (e.g. fraud etc.) - Is a clear business strategy in place for the local undertaking - Fit and Proper status of management - Sufficiency of implemented risk management processes in the local undertakings - Coverage of major risk drivers like assets, insurance portfolio, operational risks by risk management - IT Resources (hardware, software, persona) - Automatisisation level of processes (e.g. many manual based interfaces etc.) - Are the systems and methods implemented considered state of the art - Problems regarding data quality (e.g. of reports to supervisors) - Others 	Risk Assessment'!A1

Annex D - Emergency plan

Emergency plan for colleges of supervisors

College of supervisors	
Supervised group:	Group supervisor:
VIENNA INSURANCE GROUP	Austrian Financial Market Authority

Information Regarding this Document:

History of changes to the emergency plan				
Version number	Date change of	Responsible group supervisor	Supervisory Authority	Reason for change
0.1	31 st March 2015	AUSTRIA	AUSTRIAN FINANCIAL MARKET AUTHORITY (FMA)	Conclusion of the Emergency plan based on the EIOPA template
1.0				

Introduction

This emergency plan will support the management of an emerging crisis by the group supervisor and the college of supervisors. It specifically aims at:

- facilitating the exchange of confidential information on short notice within the college;
- creating transparency with regard to the group structure;
- securing a successful early crisis alert in order to maximise time for coordination and cooperation;
- securing effective and efficient information within the college and to the public in case undertakings that are part of the group encounter difficulties.

This emergency plan defines the means for crisis handling of the VIENNA INSURANCE GROUP. Furthermore it complements the general qualitative guidelines and instructions for handling emergency cases, which are already laid down in several EIOPA documents.

The content of this document shall ensure that every college member and participant has an overview of how the group is structured in order to better assess the cross-border implications of an (emerging) crisis. It will secure quick and confidential handling of information flows between members and participants or with the undertaking, on the basis of the updated contact list referred to in paragraph 1.1 and via predefined secure communication channels.

In an emergency situation a common understanding of the division of tasks regarding communication to the public of the measures taken, outcomes and current status information is crucial. This plan describes therefore a basic pattern which may be adapted to fit the special needs in an emergency situation.

1. Coordination and cooperation in emergency situations

Supervisory authorities

Contact persons for all the supervisory authorities involved in the supervision of this group, including their alternates, are identified in the Helsinki plus list. This list also includes contact details (see paragraph 5 of the coordination arrangements template and Annex 1.A thereof) of the above mentioned persons, including contact details for an emergency situation, if different.

The Helsinki plus list complements the EIOPA Members and Observers CRISIS Contact list¹.

Emergency alert

The supervisory authority, which becomes aware of the emergence of a potentially serious financial disturbance or is aware of facts or events that may give rise to significant problems at the group or individual undertaking level, informs the group supervisor as soon as possible.

The group supervisor will immediately inform all impacted members and participants and EIOPA about the emergence of a potentially serious financial disturbance at group level or any facts or events that may give rise to significant problems for the group or any related undertakings.

¹<https://eiopa.europa.eu/restricted-area/infohub/directories/members-observers-crisis-contactlist/index.html>

In the following cases an emergency alert should be given:

Emergency situation at the individual undertaking level:

- non-compliance or risk of non-compliance with the Minimum Capital Requirement;
- significant non-compliance or risk of significant non-compliance with the Solvency Capital Requirement;
- major violation of legal requirements, including governance requirements;
- risk of failure of a reinsurer (external or internal to the group);
- risk of insolvency;
- public investigation against the Administrative, Management and Supervisory Body of an undertaking (e.g. fraud);
- macro-economic and financial developments as well as insurance sector specific developments which may impact the undertaking's or group's financial soundness (e.g. contagion risk);
- breakdown of a crucial IT system;
- threat of a major claims or major mis-selling.

Emergency situation at group level:

- non-compliance or risk of non-compliance with the minimum consolidated group Solvency Capital Requirement;
- significant non-compliance or risk of non-compliance with the group Solvency Capital Requirement;
- major violation of legal requirements, including governance requirements;
- unbalanced distribution of own funds: indicator for problems of an individual undertaking;
- liquidity problems caused by the holding structure;
- risk of insolvency of important undertakings that are part of the group;
- major downgrading of the rating of the parent undertaking or a significant undertaking that is part of the group where relevant;
- major fall in share price of listed entities that are part of the group or their main shareholders of the parent undertaking;
- macro-economic and financial developments as well as insurance sector specific developments which may impact the financial soundness of the group (e.g. contagion risk);
- breakdown of a crucial IT system.

Crisis assessment

The group supervisor assesses the nature of the financial crisis and its implications in cooperation with the members and participants concerned and EIOPA in order to reach a common understanding of the crisis within the college as soon as possible.

The objective of the assessment phase is to assess the overall impact of the crisis, including systemic implications, and provide a basis for the decision of whether to intervene, and if so, how to intervene. Systemic implications may occur if an event, such as a failure of an undertaking to meet its obligations, triggers a chain reaction leading to loss of economic value and of confidence in the financial system that has significant adverse effects on the economy.

The assessment of the crisis shall be based on the common analytical framework for assessing systemic implications of a financial crisis established by the Memorandum of understanding on cooperation between the financial supervisory authorities, central banks and finance ministries of the European Union on cross-border financial stability (Brussels ECFIN/CEFCPE (2008) REP/53106 Rev)² (hereinafter: 'Memorandum of understanding on cross-border financial stability').

An intensive and regular exchange of information between the group supervisor and the members and participants concerned is essential during the assessment of the crisis. In order to take into account confidentiality, information shall only be exchanged via secure communication channels.

Crisis management

It is the task of the group supervisor to plan and coordinate the supervisory activities in close cooperation with the members and participants concerned, coordinate the management of the situation and inform EIOPA about the activities and the progress made.

A cross-border systemic financial crisis within the meaning of the Memorandum of understanding on cross-border financial stability may require to take actions at the ministries level as well as the involvement of other parties. Crisis management in such cases may differ from the procedures laid down in this emergency plan. Based on a common assessment of the crisis, the group supervisor and the supervisory members and participants concerned will analyse the need, scope and conditions for any supervisory actions to be taken towards the insurance group or any undertaking that is part of this group. Supervisory actions and information sharing should be coordinated and aligned within the college in order to ensure efficiency and avoid inconsistencies. Another area of useful college preparation would extend to maintaining a log of available powers, time constraints on action and the operation of Insurance Guarantee Schemes, if available.

External communication

The group supervisor coordinates the communication to the public at each stage of the crisis. Hereby, it ensures that the supervisory authorities concerned take into consideration the communication made to the public by the group supervisor.

Communication towards the public is handled in a coordinated fashion at all stages of the crisis, taking into account the possibility of exercising discretion regarding information that should (or should not) be disclosed in order to maintain market confidence.

² <https://www.ecb.europa.eu/pub/pdf/other/mou-financialstability2008en.pdf>

The members and participants concerned prepare joint public statements even in the case where only one supervisory authority has to make such a statement, when it may have impact on other supervisory authorities concerned.

If it is necessary, in exceptional circumstances members and participants concerned may issue separate statements. However, they shall inform the group supervisor as soon as possible about the issuance of a public statement.

Communication between the supervisory authorities and the supervised undertakings

Communication at group and individual entity level is prepared and coordinated with all the impacted supervisory authorities. The group supervisor is responsible for communication with the participating insurance or reinsurance undertaking or the insurance holding company or the mixed financial holding company on the crisis situation regarding possible supervisory actions, keeping the other relevant supervisory authorities informed on the communication with the group. The supervisors of the individual entities involved in the crisis communicate with these individual entities, keeping the group supervisor up to date of the communication. The group supervisor then informs the other involved supervisory authorities where relevant.

The group supervisor will distribute and receive confidential information in an emergency situation via its secure email infrastructure. This infrastructure should be tested regularly by the group supervisor, the other members and participants.

Specialised emergency team

In a crisis situation, the college can be organised to offer a combination of different levels of association of members and participants, depending on their specific situation³. The group supervisor may wish to establish a smaller supervisory team within the college for handling the emergency situation. This may be especially useful if only a part of the group is impacted. In case of a bigger crisis the group supervisor would coordinate the supervisory measures of supervisors of significant entities that are part of the group. The group supervisor informs the college of the establishment of such a team and ensures that the exchange of relevant and essential information within the college is not impaired.

Information to be exchanged in crisis situations

All college members and participants are able to produce on short notice the updated information included in Annex E: List of information that may need to be exchanged in a crisis situation.

Control mechanism for the emergency plan

The group supervisor is allowed to test the functioning of this emergency plan once a year in order to constantly improve the process of emergency handling in the college. The results of this testing will be discussed within the college.

³ Principle 1 of the Colleges of Supervisors – 10 Common Principles, 27 January 2009, CEIOPS-SEC-54/08.

This emergency plan will be updated at least every 12 months. This includes the verification of all items of this document.

Annex E – List of information that may need to be exchanged within the college in a crisis situation

GS = Group supervisor

IS = Individual undertaking supervisory authority

RSR = Relevant Supervisory Authority = relevant Supervisory Authority other than the insurance supervisory authority

	Type of information	Description	Source
Crisis information and impact assessment			
1	Impacted entities and supervisors thereof	The undertaking in crisis and undertakings with exposures to the undertaking in crisis or likely to be impacted through the possible contagion channels.	IS, GS
2	Description of the crisis	The cause of the problem which requires intervention of supervisory authorities. Is the crisis a generic crisis potentially affecting the financial system as a whole or is the crisis specific to the group and/or one of its undertakings?	IS, GS
3	Size of the undertaking(s)	Size of the undertaking(s) in crisis: total assets and premium income.	IS, GS
4	Significance of the impacted entity(ies)	Is the undertaking(s) significant for the group and/or material in the local market (see criteria in Guideline 2 of the Guidelines on the operational functioning of colleges of supervisors)?	IS, GS
5	Deficiency issues	Description of the failures that may have caused or may exacerbate the crisis (e.g. fraud, problems with IT systems, legal or regulatory issues).	IS, GS
6	Financial Market impact	Is the crisis affecting the financial markets? Holdings of shares, bonds etc. Market price data on the undertaking that is part of the group (including the parent undertaking). If the undertaking that is part of the group (including the parent undertaking) must sell part of its assets, may it lead to or strengthen a downward cycle in the financial markets (procyclicality)?	IS, GS
7	Systemic assessment results	Outcome of the assessment of the systemic nature of the financial crisis.	GS, IS
Actions and resolution measures			
8	Measures and recovery actions by the group	Measures and actions taken and planned by the undertaking/group, and its impact on the solvency and financial position.	GS, IS
9	Actions taken by supervisors	Description of the action, its purpose and effect.	RSR, GS, IS
10	External communication	Information on communication made without involving all supervisors.	RSR, IS, GS

11	Legal powers	Description of the powers of the supervisory authorities including restrictions, transfer of capital, and non-compliance with regulatory requirements.	RSR, IS, GS
12	Existing national safety net arrangements	State guarantees or insurance guarantee schemes, extent of coverage, level, source of funds.	GS, IS
13	Public disclosure requirements	Information of relevant public disclosure requirements applicable for the group other than the ones foreseen in the Solvency II Directive.	RSR, IS, GS
Business			
14	Ownership and legal and organisational structure	Developments/changes in the ownership structure and legal and organisational structure, including where applicable holdings in related undertakings.	SFCR, and RSR following pre-defined events. IS, GS
15	Material lines of businesses and material geographical areas	Description of the undertaking(s) material lines of businesses and material geographical areas where business is written.	SFCR. IS, GS
16	Recent mergers, takeovers and acquisitions	Information on implications on the undertaking's business, system of governance, risk profile and solvency and financial position.	RSR following pre-defined events, IS, GS
17	Changes in the business strategy	Reasons for the change or delay in implementing strategies of which supervisory authorities are aware of.	RSR following pre-defined events, IS, GS
18	Intra-group transactions (IGT)	Information on relevant operations and transactions within the group, with a special focus on very significant intra group transactions.	SFCR and RSR following pre-defined events, GS
Governance			
19	Significant governance failures	Information on significant governance failures if not already previously described, including information on the impact of the failure on the undertaking(s) and the action taken in response to it. Where applicable reference to crisis management and contingency plans.	RSR following pre-defined events, IS, GS
20	Outsourcing	Information on the outsourcing of any critical or important operational functions or activities and the jurisdiction in which the service providers of such functions or activities are located.	SFCR, GS, IS
21	ORSA	Information on eventual additional ORSA's on account of significant change in risk profile	RSR following

		including proposed management actions considered necessary and planned capital measures.	pre-defined events, IS, GS
Risk information			
22	New, emerging internal or external risks of a material nature	Details on emerging risks and information on their actual or potential impact as well as identified mitigation plans (whether planned or already in place).	RSR following pre-defined events, IS, GS
23	Prudent person principle	Concerns on the compliance with the prudent person principle (e.g. risk of a negative overall return).	RSR, IS, GS
24	Liquidity risk	Concerns on liquidity problems. Information on the liquidity position, the sources of liquidity and short term liabilities.	RSR, IS, GS
25	Risk sensitivity	Information on relevant stress tests and scenario analysis.	RSR, IS, GS
Solvency and Financial Condition			
26	Balance sheet, own funds and capital requirements	Last reported templates on balance-sheet and own funds	Quantitative Reporting Templates, IS, GS
27	Changes in own funds levels, MCR, SCR, technical provisions and/or other balance sheet items	Amount and reason for the changes and consideration of any potential or actual consequence of those changes. In relation to technical provisions, information can include details on emergence of any future claims that have not been included in previous reported technical provisions.	RSR following pre-defined events, IS, GS
28	Availability of capital	A description of any item deducted from own funds and a brief description of any significant restriction affecting the availability and transferability of own funds within the undertaking or group. Capital ability to absorb the impact of the crisis. Group's ability to raise additional capital and an indication where it may be able to source this capital from.	SFCR and RSR, GS, IS
29	Allocation of capital and possibility of transferability	If available, how the capital is allocated within the group and discussion on the possibility of transferring the capital within the group (e.g. through intra-company loans, reinsurance dividends).	RSR: GS



ANNEX F Procedures for Consultation and Decision making within VIENNA INSURANCE GROUP College

In 8.3. "Procedures for consultation and decision making" of the Coordination Arrangement the supervisory college of VIENNA INSURANCE GROUP agreed, that the group supervisor shall propose consultation and decision making procedures described as follows:

Consultation (Procedures for Comments)

1. To prepare decisions, relevant documents for approval need to undergo a consultation within the supervisory authorities concerned. Feedback on the documents shall be communicated by the supervisory authorities concerned within three weeks, provided that the college does not decide otherwise.
2. It is the Group Supervisors responsibility to put proposals forward for consultation to the supervisory authorities concerned.
3. It is the responsibility of supervisory authorities concerned to inform the Group Supervisor on issues, relevant for consultation and provide the relevant substantiation.
4. Documents regarding the subject of a future decision will be circulated by the Group Supervisor to the supervisory authorities concerned. The documents needed, consist of at least:
 - A proposal in writing stating clearly the proposed decision
 - All necessary documents supporting the decision making
 - Deadline for Comments
5. Comments shall be received in written form within four weeks from the supervisory authorities concerned.
6. Where diverging views occur, Supervisory authorities concerned explain their reasoning through written comments by mail or by IGCP and foster the discussion with the other Supervisory authorities. If no comment is sent by an authority within four weeks, it is assumed that no major concerns exist.
7. Where applicable a written proposal is sent to the ultimate participating undertaking by the Group Supervisor or in case of a national insurance undertaking by the competent national authority allowing the Group or the individual undertaking to respond within an agreed timeframe.
8. A meeting is organised to discuss the relevant issues if deemed necessary by any supervisory authority concerned
9. The Group Supervisor communicates the outcome of the consultation process to the college in writing stating all major comments and highlighting how they were considered and distributes it to the supervisory authorities concerned before any final decisions or adoption of papers takes place.

Decisions (Procedures for decisions)

10. The Group Supervisor shall consider and identify items where a decision will be necessary.
11. Supervisory authorities concerned aim at reaching consensus on a decision to be made
12. On proposal of the Group Supervisor, decisions may be taken by the Supervisory authorities concerned. Therefore the proposed decision is circulated in written form, via the IGCP. Documents needed, consist of at least:
 - A proposal in writing stating clearly the proposed decision
 - All necessary documents supporting the decision making
 - Deadline for decision
13. Decisions shall be taken by written procedures via email.
14. Supervisory authorities concerned need to send within four weeks a clear answer (We agree/We disagree/We abstain) via Email provided that the college does not decide otherwise.
15. A failure to reply within the deadline will be considered a vote for a proposal.
16. Where diverging views occur, Supervisory authorities concerned explain their reasoning through written comments by mail or by IGCP and foster the discussion with the other Supervisory authorities

17. After the Voting Procedure has taken place, the Group Supervisor sends a summary of the vote to Supervisory authorities concerned and to the other college members and participants of the supervisory college
18. The group supervisor communicates the final decision to the college in writing, stating the full reasoning and any significant diverging opinions in case of a majority decision or a decision which had to be taken only by the group supervisor.
19. If a supervisory authority concerned needs more time for comments and decision, it will inform the Group Supervisor and a new timeframe will be agreed.

Annex G Reporting of risk concentrations and intra-group transactions

According to Art. 8.6 VIENNA INSURANCE GROUP will report significant intra-group transactions and the very significant intra-group transactions above certain thresholds. VIENNA INSURANCE GROUP will report significant risk concentrations above certain thresholds.

Those thresholds will be implemented and decided by the Group Supervisor after consultation of the college members and participants concerned and will be accompanied by adequate information to form an opinion according to the consultation and decision making procedure as described in section 8.3 of the Coordination Arrangements.

The outcome of the decision on the reporting thresholds of intra-group transactions and risk concentration will be uploaded by the group supervisor on the data exchange platform IGCP.

The regular information exchange on intra group transactions and risk concentrations between the group supervisor and the college members and participants reflects the needs of the college members and participants and is stipulated in Annex C.

