Solvency and Financial Condition Report (SFCR)

Year ended 31 December 2025

Introduction

This report covers the Cigna Europe Group of Cigna Myrtle Holdings Ltd (Myrtle) and its subsidiaries, which include Cigna Elmwood Holdings N.V. (Elmwood) and two insurance companies, Cigna Life Insurance Company of Europe S.A./N.V. (CLICE) and Cigna Europe Insurance Company S.A./N.V. (CEIC). The report contains the narrative in respect of the Solvency and Financial condition report (SFCR) required by articles 290-303 and 359-371 of Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 (the "Delegated Acts") supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking up and pursuit of the business of Insurance and Reinsurance (Solvency II).

In this report, the term "the Company" refers to the Cigna Europe Group, being Cigna Myrtle Holdings Ltd (Myrtle) and its subsidiaries, unless otherwise stated.

Summary

Myrtle is the parent of Elmwood and several other subsidiaries, including the two insurance companies CLICE and CEIC. The ultimate parent of Myrtle is The Cigna Group.

The Cigna Group is a global health company committed to improving health and vitality. We relentlessly challenge ourselves to partner and innovate solutions for better health. Our global workforce of approximately 67,700 colleagues work through Cigna Healthcare and Evernorth Health Services providing services to the 185 million customers we serve in more than 30 markets and jurisdictions. The Cigna Group includes products and services marketed under Evernorth Health Services, Cigna Healthcare, and its subsidiaries

The Cigna Group's mission to improve the health and vitality of those we serve has never been more relevant. We create a seamless, intuitive, and personalised health experience that helps customers to stay healthy and well, based on deep relationships with our customers, and navigate people quickly and easily to care. We continue to solve for market needs that are ever evolving, including those of our customers and employers, as well as governments and healthcare providers.

To deliver on our mission, we know we must continually strengthen and evolve our capabilities and it's why we put innovation at the heart of everything we do at The Cigna Group. Across Evernorth Health Services and Cigna Healthcare, we are driving new solutions, improving patient outcomes, and delivering for those we serve.

Business and Performance

The table below presents the financial results for CLICE and CEIC for the years ended 31 December 2025 and 2024. The purpose of the table is to provide an accurate reflection of the Myrtle data which is attributable to the insurance companies in the group.

(EUR'000)	CLICE		CEIC		Myrtle [1]	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Income Statement Data						
Gross Earned Premium	1,041,180	964,865	435,609	398,171	1,476,789	1,363,036
Claims Incurred	794,780	771,782	282,480	296,044	1,077,260	1,067,826
Expenses Incurred	188,012	182,448	96,612	93,634	284,624	276,082
Net Investment Income	17,254	15,324	7,191	8,199	24,445	23,523
Balance Sheet Data						
Total assets	906,611	878,428	456,861	412,391	1,363,472	1,290,819
Total liabilities	652,722	641,445	295,189	282,119	947,911	923,564

Summary of financial performance

1. Unaudited Consolidated figures

System of Governance

The Company is committed to ensuring strong corporate governance practices on behalf of its shareholders. The Cigna Group's practices, together with the charters of its Audit, Corporate Governance, Finance, People Resources and Executive Committees, establish a framework of policies and practices for effective governance across the Enterprise.

The principles of The Cigna Group's practices, which are available at https://www.thecignagroup.com/our-impact/esg/healthy-company/corporate-governance, are followed in Europe as articulated in the Company's various supporting policies. These address Board of Directors structure and leadership, director qualifications, director independence, and committee structure and roles. The governance policies and practices of the Company are regularly reviewed in the light of developments in corporate governance and are updated when deemed appropriate.

These arrangements are supplemented by the European System of Governance to ensure effective oversight and governance of the European Group. A self-assessment of the System of Governance is conducted annually with actions taken to address any weaknesses identified.

The primary role of the Board of Directors is oversight of management of the Company's business affairs and assets (including at European group level for responsibilities delegated from Myrtle and Elmwood). To fulfil their responsibilities, Cigna's European Boards, both directly and through their specialized committees, regularly engage with management to ensure management accountability and review the most critical issues that face the Company. Among other things, the Boards review the Company's strategy and mission, its execution on financial and strategic plans, and succession planning.

The Board also oversees risk management and approves executive compensation. All directors play an active role in overseeing the Company's business strategy at Board and committee levels.

The company has in place a Risk Management System (RMS), the primary objective of which is to identify, measure, monitor, manage and report the risks that the Company is exposed to on at least a quarterly basis. The RMS comprises the strategies, processes and reporting procedures to meet this objective. The Company has identified five key material risk exposures which form the basis of the Risk Profile: Reputational, Strategic, Financial, Compliance, and Operational risk. Each of these key risks is defined in the Risk Universe which includes all sub risk components. The Risk Universe also defines the primary method adopted internally to identify, assess and measure each material risk.

Health and Life Insurance risks emerge from the Company's core business functions. The Company has a low exposure to Investment Risk as it has a limited investment portfolio which is mainly composed of high quality, medium maturity and low volatility bonds with strong concentration thresholds. The Company is exposed to credit risk due to the possible failure of one or more internal or external counterparties.

Risk Profile

The Company's Risk Universe provides the basis for all risk assessments conducted by management and the control functions. By utilising the risk universe as a benchmark, it ensures that management considers all material risks within the scope of business operations in a consistent manner. Management can then prioritise the key risk exposures from the Risk Universe and identify and assess the risks relative and most prominent to the business model and operations. For each of these risks, the exposure, the concentration, the mitigation techniques and the sensitivity to stress tests scenarios is analysed in this report.

The development of sophisticated quantitative and qualitative risk assessment tools has been primarily driven through the risk-based European regulatory requirements of the Solvency II Directive. In order to meet Solvency II requirements, the Company developed a Partial Internal Model (PIM) for the two insurance companies, CLICE and CEIC, which received regulatory approval in 2015. This includes an internally developed risk module for key exposures where the Standard Formula is deemed insufficiently accurate to reflect Cigna Europe's specific risk exposures. This PIM was also approved for use and deployed at the holding company level in 2017.

As outlined in the Solvency II Directive, the risk measure is the Value at Risk (VaR) of the basic own funds (BOF) of the Company subject to a confidence level of 99.5% over a one-year period. The components of Cigna Europe's Solvency Capital Requirement (SCR) are detailed in the following table.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Solvency Capital Requirement	**146,943**	**141,966**	**86,684**	**83,635**	**224,812**	**214,555**
Market risk	57,605	52,031	38,298	35,034	97,776	89,138
Counterparty risk	32,493	31,747	24,095	19,120	50,713	50,463
Health underwriting risk	72,192	72,611	44,854	46,274	108,108	103,454
Life underwriting risk	2,740	3,896	Not applicable		2,740	3,896
Non-Life Underwriting risk	Not applicable		826	966	826	966
Diversification between risks	-46,693	-45,503	-30,897	-28,193	-73,704	-71,150
Operational risk	31,421	29,144	13,068	11,945	44,489	41,089
Loss absorbing effect of deferred taxes	-2,815	-1,958	-3,562	-1,511	-6,137	-3,300

Cigna Europe's Risk profile

Geopolitical risk

Recent years have seen an increase in geopolitical risks and this has continued in 2025 and 2026. For example, international tariffs create risks for the company including potential inflation, foreign exchange, revenue and investment impacts. In addition, reductions in US government aid funding could have an impact on the budgets of Cigna's inter-governmental organisation clients and therefore knock-on impact on the company.

Ongoing conflicts, such as those in the Middle East and Ukraine, can represent heightened risk for the company. This includes the war with Iran which commenced in February 2026. Whilst there has been no significant direct impact from this conflict on the Company to date, the situation continues to present a number of potential indirect risks, including geopolitical volatility, market and investment impacts, supply chain disruption, sanction developments and broader macroeconomic effects that could affect the company over time.

Cigna continues to monitor potential impacts to ensure we can respond to any issues that emerge.

Climate change risk

Climate change constitutes a serious risk for society, including insurance and reinsurance undertakings, with potential impacts emerging over extended time horizons rather than through immediate shocks. Cigna has embeded climate related considerations in the risk management processes for a number of years. This includes quantitative analysis of detailed scenarios which concluded that the impact could be managed within the solvency limits of the company.

We will continue to refine our approach in the future as further details of potential effects and market practices evolve.

Regulatory requirements in relation to climate change and sustainability are increasing in the locations the company does business and is expected to include, in particular, reporting under the Corporate Sustainability Reporting Directive from 2028.

Capital Management and Solvency

The Solvency II balance sheet is prepared in compliance with the Solvency II requirements. Assets and liabilities are valued on a 'fair value' basis assuming that the company will pursue its business as a going concern.

Economic adjustments have been made where the valuation methodology on a statutory basis differs to the valuation methodology requirements under Solvency II.

The table below illustrates the Own Funds and the Solvency Capital Requirements for years ended 2025 and 2024.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Own Funds and SCR/MCR						
Own Funds	253,889	236,983	161,672	130,272	481,407	384,903
Solvency Capital Requirement (SCR)	146,943	141,966	86,684	83,635	224,812	214,555
Minimum Capital Requirement (MCR)	40,289	41,646	21,671	21,238	58,407	62,883
Ratio of Eligible own funds to SCR	173%	167%	187%	156%	214%	179%
Ratio of Eligible own funds to MCR	691%	569%	746%	613%	824%	612%

Own Funds and Solvency Capital Requirements for year end 2025 and 2024

The Company continues to hold a strong capital base under Solvency II driven by the desire to sustain business growth and reinforce value, strength and security brought to all stakeholders. The Company continues to seek opportunities which offer a good return on solvency capital.

Business and Performance

A. Business and Performance

A.1. Business

A.1.1. Legal Group Structure

Cigna Europe is fully compliant with the Solvency II regime at both local Belgium and overall European group levels.

Two European holding companies own the shares in CLICE, CEIC and the other European Cigna entities:

- Cigna Myrtle Holdings, Ltd (“Myrtle”), a Maltese company, is the European holding company of the Cigna Europe entities; and
- Cigna Elmwood Holdings N.V. (“Elmwood”, ref. 0543.609.378), is the Belgian holding company of the Cigna Europe entities.

Myrtle is the parent of Elmwood and all underlying subsidiaries, including:

- The insurers CLICE and CEIC;
- Cigna European Services (UK) Ltd (“CESL” ref. 00199739) which is a service company to support the Group on a pan-European basis;
- Cigna International Health Services BV (“CIHS” ref. 0414.783.183) which is an intermediary that also provides products and services to the European Group.

CLICE is the Responsible Entity for Cigna Europe with most key matters for group supervision being delegated to CLICE through a cascade of delegation from Myrtle to Elmwood and Elmwood to CLICE.

CLICE has active branches in Spain, UK, Italy, France and Bahrain. CEIC has active branches in Switzerland, UK and Singapore. In addition to these active branches, CLICE has a branch in Germany which is dormant.

The current Group governance structure has been in place since January 1, 2015 and enables Solvency II related responsibilities to be allocated between the companies (Pillar II to Elmwood and Pillar III to Myrtle) while the life (CLICE) and non-life (CEIC) insurance companies are the risk carriers by which business is written and strategic objectives are met through the established global branch structures.

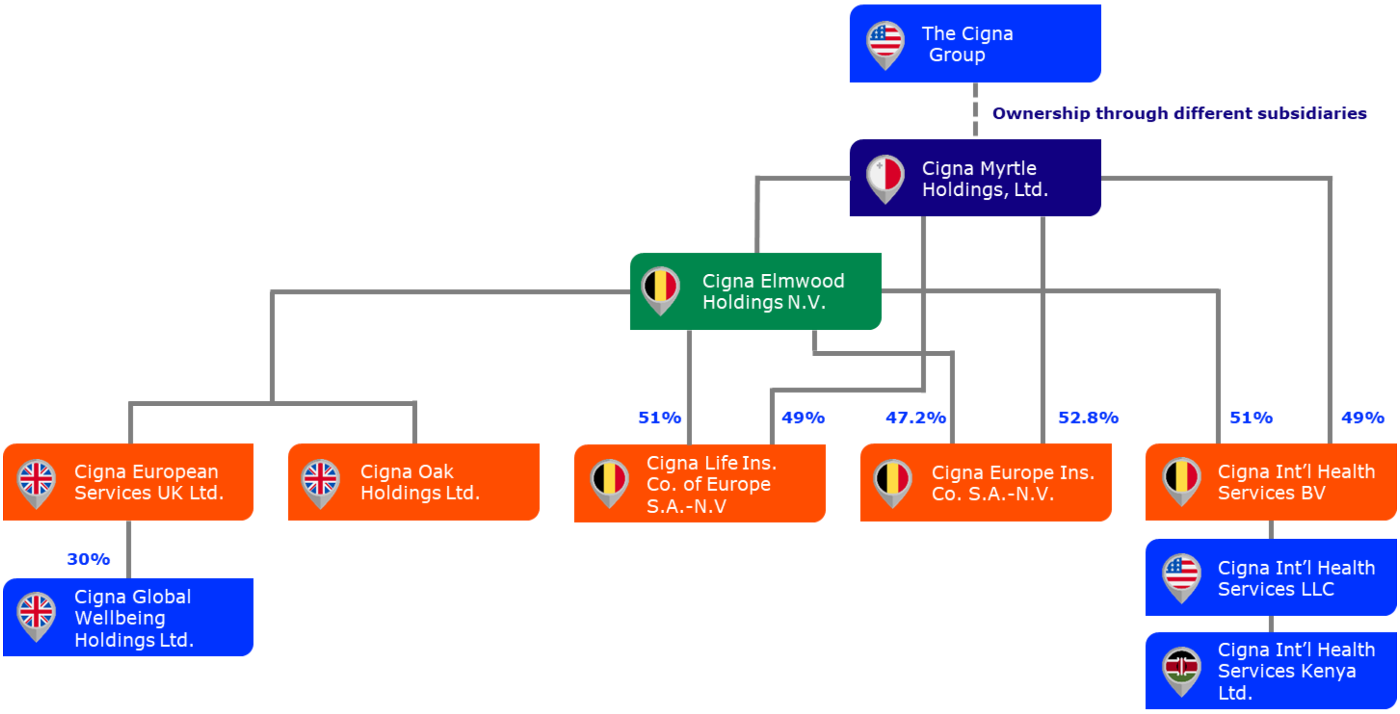

Exhibit A.1: Simplified Group Structure of Cigna Europe at YE 2025

CLICE was incorporated on February 18, 1981 and CEIC was founded on March 27, 2001. Their registered offices are located at Plantin en Moretuslei 309, 2140 Antwerp. Both are registered with the Crossroad Bank for Enterprises under numbers 0421.437.284 and 0474.624.562 respectively. The subscribed capital of CLICE at Year End 2025 amounts to €127.5 million, and for CEIC €104.4 million.

The shareholders of the insurance entities CLICE and CEIC are:

SHAREHOLDER	CLICE	CEIC
Cigna Elmwood Holdings N.V., Plantin en Moretuslei 309, 2140 Antwerp	**51%**	**47.2%**
Cigna Myrtle Holdings, Ltd, 171 Old Bakery Street, Valletta VLT 1455, Malta	**49%**	**52.8%**

Exhibit A.2: YE 2025 Shareholders CLICE and CEIC

A.1.2. Regulator and External Auditor

Elmwood, CLICE and CEIC are supervised by the National Bank of Belgium ("NBB"), Boulevard de Berlaimont 14, 1000 Brussels, Belgium, and the Financial Services and Markets Authority of Belgium (FSMA). Myrtle is supervised by the Malta Financial Services Authority ("MFSA"), which has delegated its supervisory responsibilities to the NBB.

The external auditor for Myrtle is Ernestino Riolo, Forvis Mazars, The Watercourse, Level 2, Mdina Road, Zone 2, Central Business District, Birkirkara CBD2010, Malta. For CLICE, CEIC and Elmwood, the external auditor is Forvis Mazars (Belgium), represented by Elisabeth Limbioul, Manhattan Office Tower, Avenue du Boulevard 21/b8, 1210 Brussels.

A.1.3. Business Structure

The Cigna Group is one of the largest publicly owned employee benefits organisations in the United States. With more than 67,000 employees, the Cigna Group and its subsidiaries serve millions of people worldwide. In Europe, the Company provides specialist individual and group healthcare, both within Europe and globally.

As shown in Exhibit A.3 below, the Company operates through five business units. The diagram illustrates the operational geographies, business units and the Solvency II products.

Business Units	SPEH	GHB	IOH	GIH	RUN-OFF
Geographical Footprints	Spain	Europe, Singapore	Global	Europe, Singapore	UK, Europe
Solvency II Products	Medical Expenses	Medical Expenses	Medical Expenses incl. Life Protection	Medical Expenses	Medical Expenses Income Protection Misc. NL. Legal

Exhibit A.3: Cigna Europe Structure – Products/Lines of Business

A.1.4. Business Units

Cigna's European business operates primarily from the UK, Spain and Belgium, with global service centres in Malaysia, Kenya, India and the US. The European business includes the following Business Units:

- Global Health Benefits (GHB): healthcare coverage for expatriates from major corporate groups with globally mobile employees.
- IGO, NGO and Governmental Health (IOH): cross-border medical insurance and employee benefit programs and products for Intergovernmental Organisations (IGO), Non-Governmental Organisations (NGO) and Governmental Organisations across the globe.
- Spain Employer Health (SPEH): domestic healthcare coverage in Spain for corporate groups and individuals.
- Global Individual Health (GIH): healthcare coverage for individual expatriates and high net worth individuals.

- Run-off (UKEH / CISEL / HLA): UK domestic healthcare coverage for corporate groups and a very small number of individuals. Individual health and accident products sold in selected European markets (HLA), and travel and protection insurance sold through affinity partners in the UK market by CISEL.

A.1.5. Key changes during 2025

There have been no significant changes to the business during 2025.

A.2. Underwriting Performance

The appendix includes a link to the information by line of business and by country where business is written, in accordance with the Solvency II Quantitative Reporting Template (QRT) S.05.01.02 'Premiums, claims and expenses by line of business'.

The following table summarizes the underwriting performance in 2025 on a gross of reinsurance basis, together with the prior year comparison, for the legal entities and for those countries where the volume of business written is material.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Premiums Earned	1,041,180	964,865	435,609	398,171	1,476,789	1,363,036
Claims Incurred	794,780	771,782	282,480	296,044	1,077,260	1,067,826
Expenses Incurred	188,012	182,448	96,612	93,634	284,624	276,082

Exhibit A.4: Underwriting Performance by Legal Entity

CLICE

CLICE writes business mainly in UK, Belgium, Spain, France, Germany, the Netherlands, Austria and Italy. The detailed underwriting performance information per country can be found in QRT S.04.05.21 in the Appendix.

At total CLICE level Premiums Earned have increased by 7.9% (€76.3 million) driven primarily by new business wins and positive rate actions in the GHB and SPEH segments, alongside strong persistency and favorable rate actions in IOH. GIH revenues also benefited from strong persistency.

Claims Incurred have increased by 2.9% (€23.0 million), with improvements in Loss Ratio seen across most businesses. Exceptions include higher Loss Ratio in SPEH due to high claims pressure within this segment.

CEIC

CEIC writes business mainly in Singapore, the UK and Switzerland. The detailed underwriting performance information per country can be found in QRT S.04.05.21 in the Appendix.

At total CEIC level, Premiums Earned have increased by 9.4% (€37.4 million), primarily reflecting positive rate actions, new business growth, and increased in-group volumes across the GHB, GIH, and Singapore segments. Claims Incurred have decreased by 4.6% (€13.6 million) with improvements in Loss Ratio evident for GHB and GIH segments.

MYRTLE

Myrtle only underwrites insurance business through CLICE and CEIC and therefore Myrtle underwriting results reflect CLICE and CEIC combined. The detailed underwriting performance information per country can be found in QRT S.05.02.04 in the Appendix.

A.3. Investment Performance

The Company holds operating cash and short-term investments to meet the immediate liquidity obligations of the European Group, taking due consideration of liquidity, diversification and yield requirements for the insurance, intermediary and service entities. Where a cash surplus exists for the insurance businesses beyond this requirement, investment activity is undertaken in the longer-term portfolio, with internal and external asset management oversight, based on Board of Directors approved appetite towards currency risk, concentration risk, interest rate risk and credit rate risk. The Group only holds assets in the investment classes of bonds and investment funds. Statutory investment income and management expenses are detailed in the following table.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Investment Income by Class						
Bonds	13,758	10,384	5,381	5,261	19,139	15,645
Other Investments	4,092	2,586	(149)	146	3,943	2,732
Cash & Deposits	1,191	2,462	1,884	3,129	3,075	5,591
Realized Capital Gains/ losses	(1,787)	(108)	76	(337)	(1,711)	(445)
Net Investment Income	**17,254**	**15,324**	**7,191**	**8,199**	**24,445**	**23,523**
Investment Expenses	317	207	196	208	513	415
Unrealized Gains and Losses	(702)	(5,737)	2,403	(454)	1,701	(6,191)

Exhibit A.5: Investment income/expense and unrealized gains and losses – Statutory Basis

A.4. Performance of other activities

There have been no significant activities undertaken by the Company during the period other than its insurance and related activities.

A.5. Any other information

No other relevant information.

System of Governance

B. System of Governance

The Company is committed to ensuring strong corporate governance practices on behalf of its shareholders. The Cigna Group's practices, together with the charters of its Audit, Corporate Governance, Finance, People Resources and Executive Committees, establish a framework of policies and practices for effective governance. These are supplemented by the European System of Governance to ensure effective oversight and governance of the European Group.

B.1. General Information on the System of Governance

The System of Governance is a collection of key components which combine to provide an integrated system of oversight and control. The key components include:

- Organisational Structure (as disclosed in section A Exhibit A.1 and A.2);
- Governance, sub-committee structure, and supporting policies;
- Functions of Control;
- Fit and Proper arrangements;
- Risk Management System; and
- Internal Control System.

B.1.1. Governance, sub-committee structure, and supporting policies

The principles of Cigna Corporation's Practices, which are available at https://www.thecignagroup.com/our-impact/esg/healthy-company/ are followed within Europe as articulated in the Regulatory Supervisory Report and the various supporting policies. These address Board of Directors structure and leadership, director qualifications, director independence, and, sub-committee structure and roles. The governance policies and practices of the Company are regularly reviewed in light of developments in corporate governance and the Regulatory Supervisory Report and charters of the Board of Directors (sub) committees are updated when deemed appropriate for the Company.

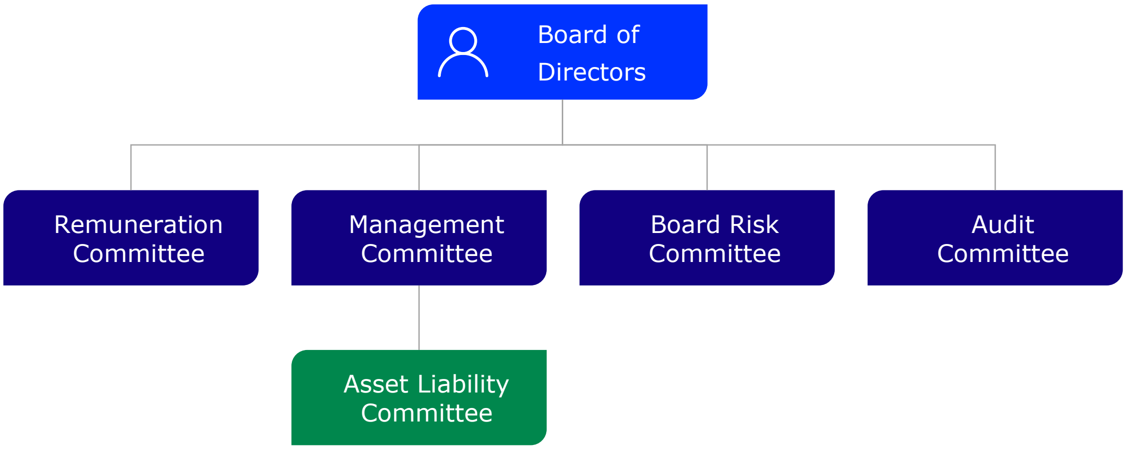

Exhibit B.1: The Company Committee Structure

Exhibit B.1 shows the Governance structure adopted by the Company. The following sections describe the roles and responsibilities of these different bodies which form the overall System of Governance.

B.1.2. Board of Directors

The Board of Directors is composed of three Executive Directors and four Non-Executive Directors, two of whom are independent. If necessary, the number of Directors will be modified to reflect the business and regulatory requirements. The Board of Directors appoints a chairman who is chosen from the Non-Executive Directors, after consultation with the NBB. This Board structure, including the separation of the roles of its Chairman and the Chief Executive Officer, helps to ensure independent oversight of the Company and the management team, and contributes to strong governance practices.

The primary role of the Board of Directors is oversight of the management of the Company's business affairs and assets (including at group level for responsibilities delegated from Myrtle and Elmwood). To fulfil their responsibilities, Cigna's European Boards, both directly and through their specialised committees, regularly engage with management, ensure management accountability and review the most critical issues that face Cigna Europe. Among other things, the Boards review the Company's strategy and mission, its execution on financial and strategic plans, and succession planning. The Board also oversees surveillance of activities, risk management, people matters, governance, training, and determines executive compensation. All directors play an active role in overseeing the Company's business strategy at the Board and committee levels.

Two new independent non-executives joined the Board of Directors during 2025 to replace two non-executives whose tenures had come to an end.

B.1.2.1. Audit Committee

The Audit Committee is made up of at least 2 members and must have a majority of independent directors within the meaning of Article 15, 94° of the Belgian Solvency II Act of 13 March 2016. All the other members must be non-executive. The members shall have collective expertise in the activities of the Company as well as in the fields of financial management, financial reporting, accounting and audit.

One of the two independent directors is the chairperson of the Audit Committee. The Audit Committee reports to the Board of Directors on its proceedings and makes whatever recommendations it deems appropriate on any area within its remit. Members of the Audit Committee are appointed by the Board of Directors, in consultation with the Chairman of the Audit Committee.

The responsibilities of the Audit Committee are detailed in the Audit Committee Charter and summarized below:

- To monitor the integrity of the financial reporting of the Company;
- To monitor and review the effectiveness of the Company's:
    - Internal controls and risk management systems;
    - Internal Audit function;
    - External Audit function;
    - Compliance function;
    - Actuarial function; and
- To monitor the whistle blowing policy.

B.1.2.2. Board Risk Committee (BRC)

The Board Risk Committee requires at least four members, all of whom must be non-executive directors. The chairman of the BRC is an independent non-executive director of the Board of Directors. The guests who are invited to attend the BRC regularly are the Chief Risk Officer, European Compliance Officer, Internal Audit function holder, Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, and EU Legal Counsel.

The Committee's main responsibilities are to:

- Advise the Board on the risk implications of strategic options that impact the future direction of the business;
- Provide guidance on risk management framework, policy, reporting and other risk mechanisms;
- Recommend to the Board of Directors the risk appetite for the Company, and the metrics to target and monitor the overall risk tolerance of the organisation;
- Monitor the current risk profile of the Company;
- Monitor the prospective view of the capital intensity of the business;
- Review the Own Risk Solvency Assessment (ORSA) process, and report and summarise to the Board;
- Express an opinion and risk-based recommendations on key initiatives (risk/return analysis) for Board sign off;
- Monitor the implementation of Solvency II; and
- Review reports or information supplied to it through the Chief Risk Officer related to lower-level risk forums.

B.1.2.3. Nomination and Remuneration Committee

The Company has a Remuneration Policy in place which reflects both the NBB requirements and the philosophy of the Cigna Group in terms of Remuneration. The Company's remuneration philosophy reflects its desire to strengthen its financial position and to invest in its people, who, through their skills, competencies and abilities, advance the Company in the competitive marketplace. The Nomination and Remuneration Committee consists of three Non-Executive Directors who are independent of the business. In addition, two of the members are Independent Non-Executive Directors. The chairman of the Board of Directors is also the chairman of the Nomination and Remuneration Committee.

B.1.2.3.1. Remuneration principles

Non-Executive Directors of the Board of Directors are not remunerated by the Company as they are employees of other Cigna group entities. Independent Directors are remunerated for their roles with an annual fee which is agreed on a yearly basis. They are not part of the remuneration policy and do not receive any stock options or long-term incentive plan.

The Remuneration Policy is applicable to all employees and Executive Directors. Cigna's 'Rewards for Contribution' approach means the remuneration package each employee earns represents the value they return to the Company and its shareholders. The reward package consists of a competitive base pay and a performance-based variable pay. The remuneration package is also indirectly based on seniority and promotion. Remuneration related to such seniority is set in a multi-year framework to ensure that the overall assessment process is based on longer term performance.

Competitive Base Pay

The fixed remuneration, represented in the competitive base pay, is established at an appropriate level and constitutes a sufficiently high proportion of the total remuneration so that the employees should not have to fully rely on the variable component of the remuneration.

There are Company retirement benefit plans in place for employees, and members of the Management Committee (Executive Directors) have plans for self-employed individuals which are designed to mirror the company plans. The non-executive members of the Board of Directors do not have a Retirement Plan offered by the Company.

No lump sum contributions are paid by the Company to either individual or all employees, or to Executive Directors.

Variable Pay

In addition to the Competitive Base Pay, the individual contribution to the organisational and the Company goals by each employee may be recognised through the differentiation of the variable pay components which can take the form of a cash bonus or a participation in a stock (options) plan which constitutes a Long-Term Incentive Plan.

B.1.2.3.2. Employee Assessment

The assessment of the performance may be based on a combination of the assessment of the performance:

- Of the individual;
- Of the business unit concerned; and
- Of the overall results of the Company.

The final level of variable pay awarded to senior management takes into account each of these 3 factors.

B.1.2.3.3. Variable Pay Claw Back

To the extent lawful in a particular jurisdiction, the Company's Board of Directors shall be able to require the Executive Directors and the other employees who have received variable pay to repay all or part of the variable pay if this payment resulted from their fraudulent activities or where the variable pay has been awarded for performance based on data which has subsequently proven to be manifestly incorrect or misleading.

B.1.2.3.4. Independent Control Functions

Staff members engaged in independent control functions (including actuaries, compliance officers, risk managers and internal auditors) are compensated in accordance with the achievement of the objectives linked to their functions, independent of the performance of the business areas they control.

B.1.3. Management Committee

The Management Committee comprises three executive members of the Board of Directors ("Executive Directors") and the Chief Finance Officer, and is therefore composed as follows:

- the Chief Executive Officer;
- the Chief Operations Officer;
- the Chief Risk Officer; and
- the Chief Finance Officer.

The Management Committee is chaired by the Chief Executive Officer. The Company ensures that the Management Committee is composed of at least 3 Executive Directors. No legal entity "management company" can be a member of the Management Committee. The collective and individual skills and competencies of the Management Committee and its individual members are subject to an annual assessment. If needs are identified, appropriate measures are taken to provide training.

The duties and responsibilities of the Management Committee are detailed in the Internal Regulations of the Management Committee and key responsibilities can be summarised as the following:

Advising the Board of Directors

- Advise the Board of Directors on general policies and develop proposals to the Board on the business strategy and business development of the Company; and
- Report at least annually to the Board of Directors in relation to internal audit and compliance.

Day-to-Day Management

- Within the strategic guidelines and policy frameworks set by the Board, ensure the leadership of the Company and its general management; and
- Ensure that an adequate framework is in place for the appropriate functioning of the independent control functions.

Risk Management

- Ensure that the risk framework defined, and the risk management policy approved, by the Board of Directors are implemented through processes and procedures;
- Ensure that the risks of the Company are identified, measured, managed, controlled and reported adequately through reports of the independent control functions;
- Ensure that an appropriate risk management system is put in place including, among other things, the overall risk governance structure and the risk reporting; and
- Implement the necessary measures to ensure that risks are monitored and controlled.

Internal Control and Governance

- Perform annually a governance self-assessment and communicate the report to the Board of Directors, the external auditor, and the NBB;
- Implement adequate internal control and risk management systems within the guidelines approved by the Board and monitor their effectiveness at least annually, based on the annual report of the internal audit department, monthly reports from the Risk Management Function, the annual System of Governance self-assessment report and other sources such as reports and/or notes of the different departments and business units. The review relates to all aspects of internal control such as the objectives, the means that are implemented, the methods that are used, the shortcomings that are found and the adequate character and efficiency of the internal control; and
- Ensure, based on the reporting to be made at least every six months by the Internal Audit Department, that the latter adequately follows-up whether its investigative findings and recommendations are complied with.

Reporting

- Report in writing annually to the NBB, the statutory auditor and the Board of Directors, through the Audit Committee, in relation to internal control; in particular, the minutes of the meetings of the Management Committee shall stipulate the deliberations relating to the status of the internal control and its assessment;
- Submit the declaration on prudential reporting and the representative assets reporting to the NBB, the statutory auditor and the Board of Directors on a half-yearly basis; and
- Ensure that the Company permanently disposes of an adequate compliance function and assess the compliance function at least annually.

Policy Implementation

- Implement the Integrity Policy and update it regularly;
- Implement the Remuneration Policy and update it regularly;
- Implement the Outsourcing Policy and update it regularly;
- Implement the Investment Policy and update it regularly;
- Implement the Reserving Policy and update it regularly;
- Implement the Asset and Liability Management Policy and update it regularly;
- Implement the Underwriting Policy and update it regularly;
- Implement the Deferred Tax Policy and update it regularly; and
- Ensure the adequacy and application of internal policies.

Without prejudice to its own powers and duties, the Board of Directors vests the Management Committee with the authority that is adequate and necessary to the proper exercise of its duties and responsibilities, within the wider framework of the general strategy and policies outlined by the Board of Directors. While the members of the Management Committee report individually to the Chief Executive Officer on their areas of responsibility, the Management Committee as a whole is collectively accountable to the Board on all matters entrusted to it by the Board.

The Asset Liability Committee (ALCO) reports to the Management Committee by assisting it in fulfilling its responsibilities related to the management of the Company's assets relative to its liabilities, and to the oversight of the Company's Investment Managers in accordance with the Company's risk management practices (including the Company's Risk Appetite) and any other related policies.

B.2. Fit and proper requirements

The Persons responsible for the governance, oversight and management of the Company provide strategic leadership that influences the financial position and future direction. The Company recognises that the people in these roles must have the expertise and professional integrity required for their positions that will allow them to perform their duties and carry out their responsibilities in the most effective manner.

The Company has put in place a Fit and Proper Policy which contains the requirements in terms of fitness and propriety of the Key Responsible Persons which have been identified by the Company based on the regulatory and supervisory requirements "the Key Responsible Persons".

The Key Responsible Persons include, at least, the members of the Board of Directors and the Management Committee, the Heads of the Independent Control Functions and the foreign branches legal representatives.

B.2.1. Description of the Fit and Proper requirements

The assessment of a person's suitability is described as assessing whether they are "fit and proper":

- A person is considered to be fit for a specific position when the person has knowledge and experience, skills and the professional behaviour required for the position in question; and
- Propriety relates to a person's honesty and integrity.

B.2.1.1. Fitness requirements

Competency and capability are demonstrated by a person who possesses the relevant knowledge, experience, skills and professional behaviour to understand the technical requirements of the business, the inherent risks and the management process required to perform his role in a key function in the relevant capacity effectively.

The Company has a description of the specific knowledge, experience, skills and professional behaviour required for each position of a Key Responsible Person as detailed in the job descriptions/profile functions.

B.2.1.2. Propriety assessment

Key Responsible Persons must carry out their duties honestly, faithfully, independently, ethically and with integrity. They must not have been convicted or have been prohibited from carrying out their profession on the ground of an offence against relevant provisions of financial laws.

B.2.1.3. Fit and Proper Assessment Process

Key Responsible Persons must, at any time, be skilled and act with professional integrity. As a consequence, the assessment of suitability shall take place:

- Before the Key Responsible Person takes up their position and then on an annual basis;
- Each time a Key Responsible Person changes their position or is re-appointed for a further term; and
- When any information which is likely to influence a Key Responsible Person's fit and proper status arises during the holding of the position or if facts or circumstances raise doubts about the suitability.

The Company has a Remuneration and People Resources Committee set up as a sub-committee of the Board of Directors who is responsible to implement the Fit and Proper Policy principles together with the Head of the Compliance function.

B.2.1.4. Fit and Proper Declaration

During the performance of the position, each Key Responsible Person will be asked to sign a declaration annually which will serve as the basis to consider that there are no relevant, significant changes in relation to the compliance by the Key Responsible Person with the fit and proper standards.

B.2.1.5. NBB prior approval and information

The Company informs the NBB in advance of any proposed appointment, reappointment or termination of the Key Responsible Persons. Any proposed appointment of the Key Responsible Persons is subject to the NBB prior approval.

B.3. Risk Management System Including the Own Risk and Solvency Assessment

The primary objective of the Risk Management System (RMS) is to identify, measure, monitor, manage and report the risks that the Company is exposed to. The Risk Management System comprises the strategies, processes and reporting procedures put in place to meet this objective. The diagram below provides an overview of the Risk Management System and illustrates the processes and organisational structure which contribute to the business' decision-making process. The same top-down approach to risk is used to manage the risks at group level as well as at a solo level.

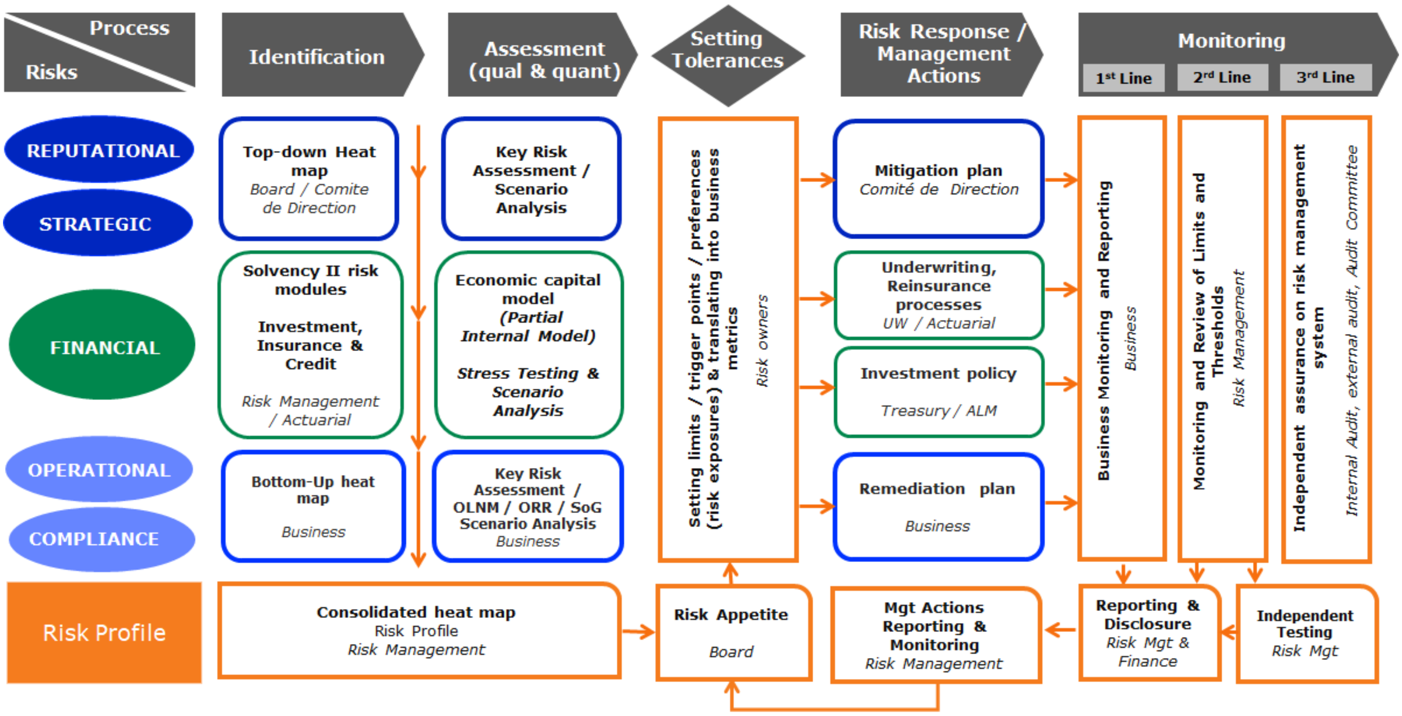

Exhibit B.2: The Company Risk Management System

B.3.1. Risk Management Objectives, Strategies, Process and Reporting Procedures for Each Category Of Risk

The Risk Strategy is directly linked with the corporate strategy and business requirements for a strong financial rating. This has driven the implementation of a Risk Appetite Framework to align risk preference with corporate strategy to ensure the business is assuming and constraining risk exposures in a consistent manner to achieve strategic objectives.

The Risk Appetite framework sets triggers and thresholds for each category of risk (Financial, Operational, Compliance, Reputational and Strategic) which subsequently defines the reporting and escalation criteria for risk exposures deemed to be in breach of those thresholds. Risk exposures are reported on a monthly, quarterly and annual basis as part of the standardised risk reporting but also on an ad-hoc basis when immediate review from the Management Committee or the Board of Directors is required (e.g. underwriting referrals for large concentration risk).

B.3.2. Own Risk and Solvency Assessment (ORSA)

The Own Risk and Solvency Assessment (ORSA) brings together each of the key processes that comprise the Company's Risk Management System.

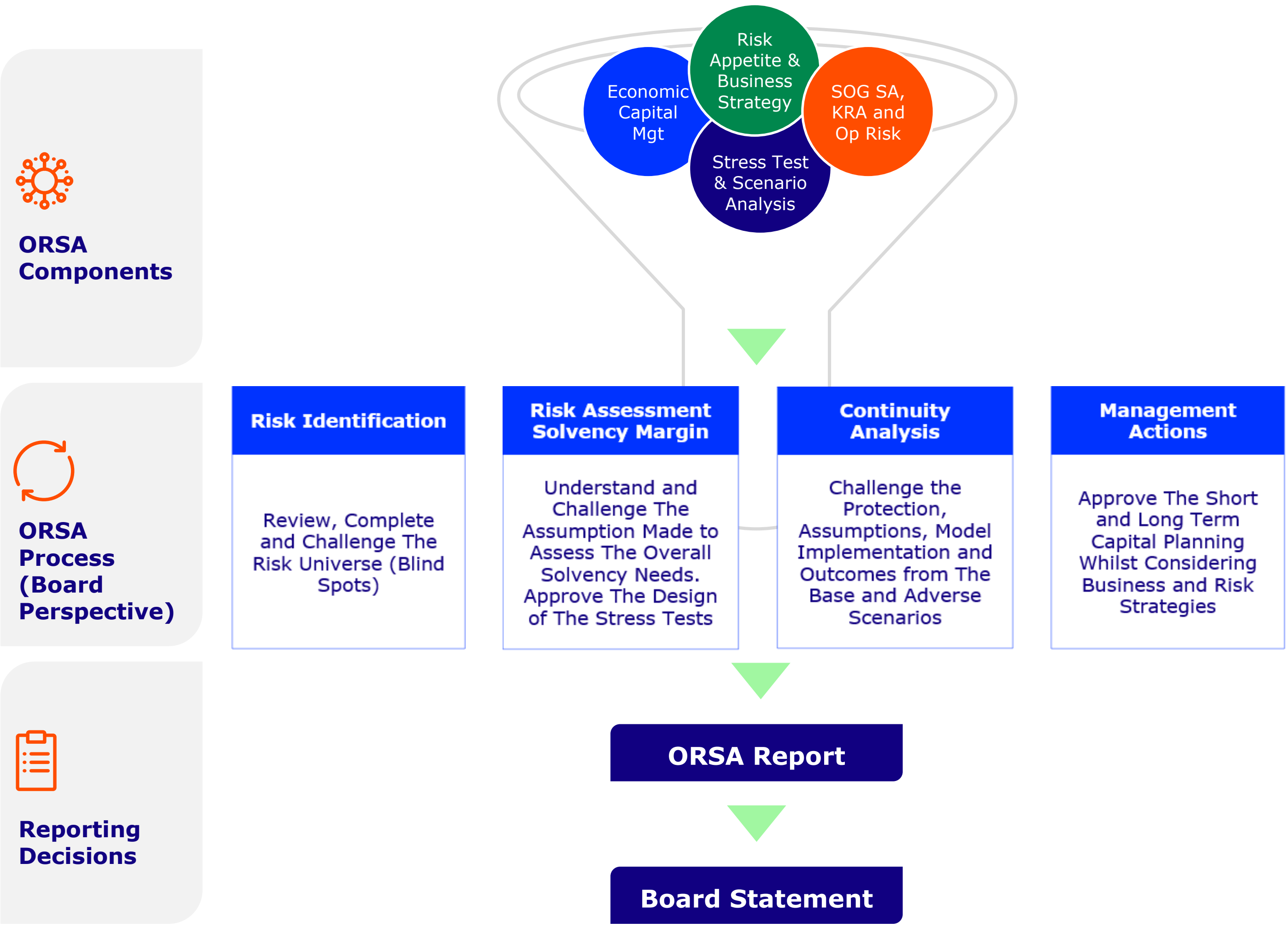

Exhibit B.3: Own Risk & Solvency Assessment

The ORSA is underpinned by the following 4 risk-based processes:

- Risk Strategy and Risk Appetite;
- Economic Capital Management;
- Qualitative Risk Assessments (Key Risk Assessment, System of Governance Self-Assessment, Operational Risk Report and Operational Loss and Near Miss process; and
- Stress Testing and Scenario Analysis.

The Company developed a Partial Internal Model (PIM) to calculate the Solvency Capital Requirements, in line with the Solvency II Directive. This was approved in December 2015 for application from 1 January 2016 for CLICE and CEIC. Approval to use the PIM for the group was given in 2017 for application from 1 January 2018. The decision to develop a PIM was based on consideration of the multiplicity of markets where Cigna Europe operates and the specialization in niche products, which subsequently limits the application of the Standard Formula (SF).

The Company performs the ORSA holistically at the level of Cigna Europe and the individual insurance companies, with consideration of the underlying entities. This results in one ORSA Report covering the European Group. This combines the outputs from the four risk-based processes above, considers the capital, regulatory and operational implications, and evaluates the potential impact on the organisation.

The ORSA is a key tool in making recommendations and providing risk-based information to the Board to facilitate fully informed decision making, e.g.:

Providing assurance regarding material and foreseeable future risks;

- Ensuring solvency needs are sufficiently aligned to business and corporate objectives;
- Ensuring the continuous compliance with the capital requirements and the requirements on technical provisions;
- Approving the Risk Profile of the organisation;
- Assessing the significance of any deviation from the risk profile;
- Aligning Capital, Risk and Business Strategy; and
- Ensuring the Company has the capacity to absorb losses in the case of adverse scenarios.

The ORSA process includes two sets of documentation: ORSA Record and ORSA Report. These documents evidence the overall ORSA process, outcomes and actions, give consideration to business strategy and are signed off by the Board of Directors.

The ORSA is conducted annually and may also be triggered on an ad-hoc basis following any significant changes in business profile, external business environment, or at the request of the regulator to ensure the process is an accurate reflection of the organisation’s risk profile.

B.3.3. Risk Universe

The Company has identified five key material risk exposures which form the basis of the Risk Profile: Financial, Operational, Compliance, Reputational and Strategic risks. Each of these key risks is defined within the Risk Universe and includes all sub risk components. The Risk Universe also discloses the primary method adopted internally to identify, assess and measure each material risk.

RISK UNIVERSE

Financial Risks
- Financial Flexibility
- Investment Credit Risk
- Investment Market
- Financial Reporting
- Taxes

Operational Risks
- Cyber Security
- IT Governance
- IT Service Delivery
- IT Service Support
- IT Strategic Mgt
- Network (Provider)
- Physical Security
- Product Risk / Product Development
- Sales and Marketing
- Service Delivery & Patient Care
- Set-up & Administration
- Software Development Lifecycle
- Third Party Management

Compliance Risks
- Corruption & Sanctions
- Employee Conduct / Workplace Environment
- Governance
- Legal
- Privacy & Data
- Regulatory Compliance

Reputational Risks
- Corporate Image
- Corporate Social Responsibility
- Public Relations

Strategic Risks
- Business Continuity
- Business Expansion
- Communication
- External Environment
- Human Capital
- Market Dynamics
- Planning & Resource Allocation

Exhibit B.4: Risk Universe

B.4. Internal Control System

The Internal Control System is a combination of the processes and responsibilities which provide operational control throughout the organisation, and the governance framework which establishes segregation, review, reporting and independence. This is based on the externally recognised 3 lines of defence model:

1. First Line of Defence - Management Oversight;
2. Second Line of Defence – Independent control functions (Risk Management, Compliance and Actuarial functions); and
3. Third Line of Defence - Independent Assurance.

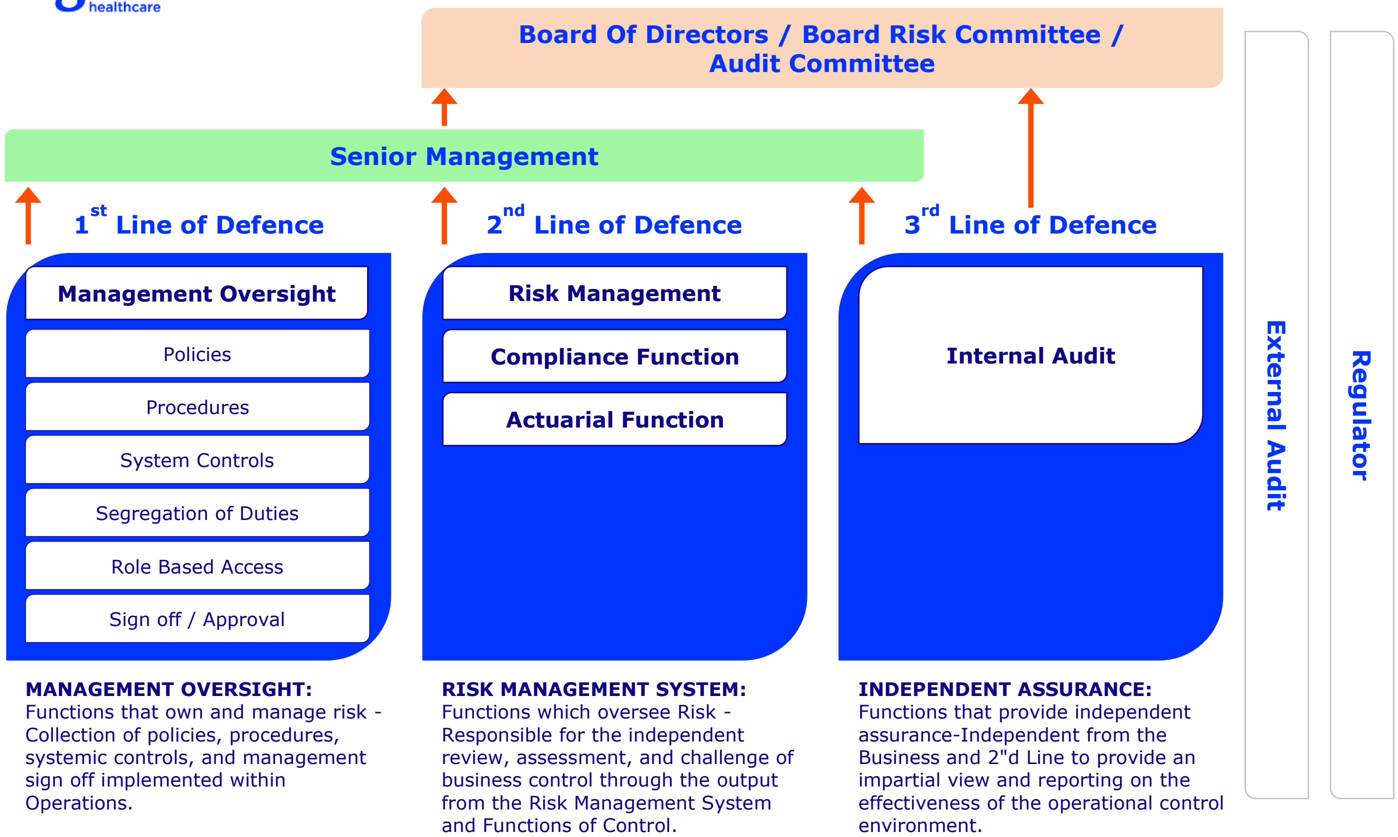

Exhibit B.5: Lines of Defence

B.4.1. First Line of Defence - Management Oversight

The first line of defence is Management Oversight, which includes the control activities (operational policies and procedures) applied by staff within the Business Lines and service areas. Internal Controls are implemented within the operational processes and procedures of the Company and ensure the regularity, security and validity of the operations.

Monitoring and review of the effectiveness is the responsibility of senior management of each business line or function. Senior management of each business provide the critical link between operational controls and the second line of defence and have a duty to assess the internal control environment on a regular basis. Management has defined several functions of oversight in the first line which monitor the implementation of controls and provide assurance that these are operating.

B.4.2. Second Line of Defence - Risk Management, Compliance and Actuarial

The second line of defence consists of the three functions of control, being the Risk Management Function, Compliance Function and Actuarial Function.

B.4.2.1. Risk Management Function

The Risk Management Function is responsible for designing and implementing the Risk Management System, as described in section B.3 of this report.

B.4.2.2. Compliance Function

The Compliance function is placed within the second line of defence and has the responsibility for monitoring the regulatory and statutory environment of the Company's operations. The Compliance Function overlaps within the Operational Risk Management controls where recording compliance breaches and determining mitigation actions should improve the effectiveness of the internal control environment.

B.4.2.3. Actuarial Function

The Actuarial Function provides the final component of the second line of defence and the allocated tasks and responsibilities are fully disclosed in Section B.6 of this report.

B.4.2.4. Third Line of Defence - Independent Assurance

Independent Assurance is provided through Internal Audit, the Audit Committee and the Board of Directors. All output from the qualitative risk processes is shared with Internal Audit to ensure that what is being identified and assessed is consistent with their interpretation of the controls environment throughout the internal audit engagements. Internal Audit retain independence and the right to challenge all risk based information provided from the business based on experience, information and past audits. The full approach from Internal Audit is disclosed in Section B.5 of this report.

B.5. Internal Audit Function

As for the other independent control functions, internal audit is established at the Company level but is entrusted to carry out internal audit tasks at all other companies under Myrtle.

B.5.1. Mission statement

IH Internal Audit is an independent, objective assurance and consulting function designed to add value and improve the organization’s operations. It helps the organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

The objectives of the IH Internal Audit function are to assist all levels of the Company's management and the Audit Committee in the effective discharge of their responsibilities in these areas by furnishing them with analyses, appraisals, recommendations, counsel, and information concerning the activities reviewed and investigated, and by promoting effective risk management and control at reasonable cost.

The scope of the IH Internal Audit function encompasses, but is not limited to, the examination and evaluation of the adequacy and effectiveness of the governance, risk management and internal controls as well as the quality of performance in carrying out assigned responsibilities to achieve the Company’s stated goals and objectives.

B.5.2. Audit Cycle

Annually, the Internal Audit Senior Manager for Europe develops a risk informed annual audit plan taking account of all the Company’s activities and its entire governance system. The European annual audit plan is discussed with the Management Committee and submitted to the European Audit Committee for approval. It includes a summary of the audit, their schedule and the budgeted man-hours. The audit plan also includes time for additional assurance or advisory engagements.

The annual audit plan is developed based on broad consultation of companies’ executives, control functions and stakeholders across the organization, the audit coverage of the past 5 years and a prioritisation of the audit universe using a risk informed approach on existing and emerging risks to align with the significant risks to the company identified by the European Risk Management function. The audit plan aims to cover all significant activities of the Company and the entire governance system of the Company within a reasonable timeframe (at most every five years) and includes specific process audits, procedure reviews, IT audits and assignments that are a combination of all three.

European Internal audits are undertaken by the IH Internal Audit function in coordination with the US audit team using shared staff/management or external resources where relevant in order to share knowledge and experience across the enterprise, manage pooled resources and access specialist skills (e.g. IT audit).

Internal audit reports covering each audit and any findings with their respective management action plans, are distributed to the Company’s and the audited entity’s leadership at the conclusion of each audit assignment. Copies of all audit reports and audit plans are shared with the external auditors.

The status and closure of all audit findings and their respective management action plans are monitored by Internal Audit and reported to entity leadership. The IH Internal Audit Senior Manager for Europe keeps management informed on the progress of the audit plan and the status of the open audit findings, and respective management action plans, via the Management Committee meetings. Additionally, Internal Audit issues a quarterly report of all open and closed audit findings per management action plan to the Senior Leadership Team.

B.5.3. Reporting

The IH Internal Audit Senior Manager for Europe reports quarterly to the European Audit Committee on Internal Audit activities including:

- The status and results of the annual audit plan; and
- The resolution status of the management action plan per audit findings.

Annually, the IH Internal Audit Senior Manager provides the Board of Directors with a report on internal audit personnel and internal audit activities that includes a listing of Internal Audits performed since the previous year.

B.5.4. Methodology

Cigna's global risk based internal audit methodology complies with guidance from the International Professional Practices Framework (IPPF) of the Institute of Internal Auditors (IIA) and ensures consistency of audit planning, execution and reporting. A process is in place to continue refinement of the methodology on a global level which the IH team is linked into.

An annual Quality Assurance programme is in place across the Internal Audit function. This is carried out on a sample basis by members of the department who are independent of the assignment being reviewed. In addition, an external quality assessment is conducted of the Internal Audit function to assess conformance of the department with the IIA standards every 5 years (latest conducted in 2023 where Cigna Internal Audit conformity was confirmed).

B.5.5. Preservation of Independence

The Company's Internal Audit function is independent from business activity and occupies the 3rd line of defence, providing independent assurance to the Board of Directors. The Internal Audit function remains independent from the business through a centralised structure across the Business Units. Internal Audit reports to the highest level in the Company to strengthen its objectivity and confirm its independence. A close and continuous link is established with the European Audit Committee.

In accordance with the European Internal Audit Charter, no member of the Internal Audit team holds any other key functions. The internal auditors shall have no direct operational responsibility or authority over any of the activities they review. Additionally, they shall not develop or install systems or procedures, prepare records, or engage in any other activity that would normally be audited but shall participate in an advisory capacity on such matters.

B.6. Actuarial Function

The Actuarial Function of Cigna Europe is led by the European Head of Actuarial Function and is independent from the Actuarial Department. The Actuarial Function's responsibilities are to:

- Coordinate the calculation of technical provisions and review the results;
- Ensure the appropriateness of the methodologies, models and assumptions in the calculation of technical provisions;
- Assess the sufficiency and quality of the data used in the calculation of technical provisions;
- Compare best estimates against experience;
- Inform the Board of the reliability and adequacy of the calculation of technical provisions;
- Oversee the calculation of Technical Provisions where approximations are applied;
- Express an opinion on the adequacy of reinsurance arrangements;
- Express an opinion on underwriting policy; and
- Contribute to the effective implementation of the risk-management system.

A key deliverable of the Actuarial Function to address each of the above responsibilities is the production of the annual Actuarial Function Activity Report prepared by the European Head of Actuarial Function. The opinions formulated in this report are communicated to the Management Committee and to the Board of Directors on a yearly basis.

B.7. Outsourcing

The Company has in place an Outsourcing Policy with general guidelines on outsourcing as well as a document describing the operational procedures followed when considering outsourcing of activities or processes. This is called the "Third Party Management Policy" and has been approved by the Board of Directors. Outsourcing means the recourse to third parties in order to carry on activities or carry out processes which are intrinsic to the Company. Outsourcing of processes includes the development of such processes where this is material to the Company or for their strategic development. Outsourcing may cover a variety of services and functions, for example services to policyholders (e.g. a call centre), administrative functions (e.g. accounting, pricing, acceptance of risk, premium collection, claims handling and payment, investment policy, etc.), services where (medical) sensitive data is involved and specialist functions, such as IT, internal audit and data management. In the Company's daily operations, regular reference is made to both "external entities" and "third party management". These entities and providers and their management come within the definition of outsourcing. When engaging in outsourcing activity, the Company takes into consideration that the outsourcing arrangement cannot:

- Severely compromise the quality of the Company's governance system;
- Unduly increase the operational risk;
- Compromise the ability of the regulators (in particular the National Bank of Belgium) to supervise that Cigna Europe is fulfilling its obligations under the Solvency II Law; or
- Hamper the ongoing provision of a satisfactory level of service with regard to policyholders, insured parties and beneficiaries of insurance contracts or persons concerned by the execution of reinsurance contract.

External outsourcing is managed by a dedicated team (Third Party Management team) which is responsible for the independent assessment, monitoring and review of the outsourced activities or functions. In the outsourcing process, Cigna Information Protection, Legal and Compliance are involved. Necessary information duties and / or prior approval from the NBB are provided / sought when required by the regulatory provisions. All outsourcing which is critical for the Company is listed in the table below.

Service Provided	Organisation (location)
Intra Cigna Group Subcontracting	
Shared Service Centre - Sales, Underwriting, Claims Handling, HR, IT and Real Estate	Internal Organisation (UK)
Sales, Client Management, Underwriting, Claims Handling (Regulated intermediary)	Internal Organisation (Belgium)
Internal Reinsurance Program	Internal Organisation (Bermuda)
Independent Control Functions	Internal Organisation (Belgium)
Claims Handling	Internal Organisation (Malaysia)
Claims Handling	Internal Organisation (Kenya)
Claims Handling	Internal Organisation (India)
External to Cigna Group Subcontracting	
Management of investments including discretion to manage portfolio creation and credit underwriting (Europe).	Subcontractor providing European wide service (UK)
Management of investments including discretion to manage portfolio creation and credit underwriting for below investment grade assets (Europe).	Subcontractor providing European wide service (USA)
Management of investments including discretion to manage portfolio creation and credit underwriting (Singapore).	Subcontractor providing European wide service (Hong Kong)
Provision of a single, integrated platform for refined Management Information (Sales, Customer Service, Business Analysis)	Subcontractor providing European wide service (USA)
Evacuations and assistance with remote provider services	GHB (Global)

Exhibit B.6: Main Subcontractors List

B.8. Any Other Information

All material facts regarding the Company's system of governance are covered in the sections above. As demonstrated quantitatively in Section E, the SCR for the insurance entities CLICE and CEIC makes up more than 90% of the Group SCR thus covering the material financial risks within the Company. All risks not in the scope of the regulatory SCR are captured through the Own Risk and Solvency Assessment (ORSA) process for the individual insurance companies as well as the non-insurance entities.

As part of the regulatory System of Governance (SOG) requirements, the Company conducts an annual self-assessment exercise of the key control components in the SOG. This includes a large number of individual checks across all operational Business Units and Functions of Control, including the operation of the key governance bodies, and is designed to be proportionate and adequate to the nature, scale and complexity of the risks inherent to the Company. The assessment process is revised and updated each year to adjust for any changes in the company or regulatory requirements. Some areas of improvement have been identified and updates are regularly monitored by the Management Committee.

Risk Profile

C. Risk Profile

The Company's Risk Universe provides the basis for all risk assessments conducted by the management and control functions. By utilising the risk universe as a benchmark, it ensures that management considers all material risks within the scope of business operations in a consistent manner. Management can then prioritise the key risk exposures from the Risk Universe and identify and assess the risks relative and most prominent to the business model and operations. Risk exposure is classified into five broad categories: strategic, operational, compliance, financial and reputational risk. For each of these risks, the exposure, the concentration, the mitigation techniques and the sensitivity to stress tests scenarios is analysed in this section.

The development of sophisticated quantitative and qualitative risk assessment tools has been primarily driven through the risk-based European regulatory requirements of the Solvency II Directive. In order to meet Solvency II requirements, the Company uses a Partial Internal Model (PIM) for the two insurance companies CLICE and CEIC (approved in 2015), with internally developed risk modules for key exposures where the Standard Formula is deemed insufficiently accurate in reflecting Cigna Europe's specific risk exposures. This PIM has also been deployed at the holding insurance company level following approval in 2017. Cigna Europe has thus transitioned from a Deduction & Aggregation method towards a Full Consolidated approach, the latter method being applied since January 1, 2018.

As outlined in the Solvency II Directive, the risk measure is the Value at Risk (VaR) of the basic own funds (BOF) of the Company subject to a confidence level of 99.5% over a one-year period. The components of Cigna Europe's Solvency Capital Requirement (SCR) are detailed in the following table.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
SCR	**146,943**	**141,966**	**86,684**	**83,635**	**224,812**	**214,555**
Market Risk	28.0%	25.3%	31.9%	29.5%	32.3%	30.3%
Credit Risk	12.3%	12.4%	16.3%	12.5%	12.5%	13.3%
Life Underwriting Risk	0.7%	1.0%	0.0%	0.0%	0.4%	0.7%
Health Underwriting Risk	39.6%	42.1%	40.5%	45.2%	37.6%	38.0%
Non-life Underwriting Risk	0.0%	0.0%	0.3%	0.3%	0.1%	0.1%
Operational Risk	21.4%	20.5%	15.1%	14.3%	19.8%	19.2%
Loss Absorbing Effect of Deferred Taxes	-1.9%	-1.4%	-4.1%	-1.8%	-2.7%	-1.5%

Exhibit C.1: Cigna Europe's Risk profile

Risk Not Captured Within SCR

Two risks are not assessed through the PIM: liquidity risk and business risks, for all three entities. These risks are considered within the implemented risk management system and are assessed using other tools such as scenario analysis or key risk assessment.

In the context of Myrtle, the operational risk capital charge is also not completely captured within the SCR. The ancillary services companies provide mainly business support for internal clients CLICE and CEIC. Consequently, operational risk stemming from these ancillary companies is included when considering underlying premiums for CLICE and CEIC.

In addition, the Company is required to challenge the regulatory framework with an own assessment of risks for which, taking the business plan into account, the future capital margins are highlighted, and a number of sensitivities are applied. From this analysis, management has concluded that the Company holds the capital margins required to absorb significant shocks.

The Risk Identification and Assessment processes enable the business and Board to discuss known and generally well understood risk exposures. Stress Testing and Scenario Analysis broaden the risk profile beyond the scope of the unknown and aim to identify Low Probability/High Impact events which, though unlikely, would have the potential to threaten the Solvency Position of the organisation.

The Company dynamically evaluates the impact of those scenarios on the regulatory solvency II position over the business planning time period. Those scenarios have been internally designed and tailored to the Company specificities, allowing for the application of simultaneous stress parameters. These are generally significantly stronger than the Standard Formula and common industry stress tests.

C.1. Underwriting Risk

Underwriting risk refers to all insurance risk of loss arising from fluctuations in the timing, frequency and severity of claim payments (including expenses) compared to underlying assumptions made at the beginning of the policy.

Life risk includes mortality risk, longevity risk, disability/ morbidity risk, lapse, expense risk and revision risk while Health and Non-Life risks include reserve risk, premium risk, lapse risk and catastrophe risks.

Reserve risk is related to outstanding claims, while premium risk is related to future claims from which catastrophe claims are excluded. Catastrophe risk is related to claims arising from catastrophic events: either natural and epidemiologic disasters or man-made events.

Lapse risk is related to a risk of loss in the value of insurance liabilities, resulting from changes in the rates of policy lapses. From the Company standpoint this risk is thus related to future premiums included in the premium provision where an expected profit is foreseen. Lapse risk is the risk that more lapses will occur than expected, generating less profit than foreseen.

C.1.1. Risk Exposure

Underwriting risks are those which emerge from the Company's core business functions. Premium, Reserving and Catastrophe risk are inherent risks to the business. Under Solvency II requirements, Life Underwriting Risk is modelled through the Standard Formula as it accurately reflects Cigna Europe's risk profile, while Premium, Reserving and Pandemic Risks are internally assessed to better reflect the Company's specific risk profile and related entities.

The Company has also defined an Underwriting and Reserving Strategy which outlines the core processes and procedures which underpin Cigna Europe's internal approach.

The management of the Underwriting risk at the Company level is made in accordance with the Company's risk appetite through local and Board Risk Committees.

The underwriting strategy is continuously monitored by each concerned entity and overseen by the Risk Management function using a risk dashboard providing specific limits per type of business.

C.1.2. Risk Concentration

As the Company sells medical and non-medical (death benefits, disability benefits, etc.) group insurance to the employer segment, there is a risk of having many people located in one building at the same time, resulting in a concentration of accidental deaths, disabilities and injuries in the event of a catastrophic scenario such as terrorism, nuclear explosion or natural disaster.

Even though the calculation of regulatory capital requirements under Solvency II already captures such concentration risk, the Company has developed an additional concentrated catastrophe scenario where both claims and expenses are impacted. This is considered both at solo entity (CLICE and CEIC) level and at group level. In the example, Myrtle benefits from the mitigation effect brought by the different subsidiaries. The Company actively monitors this risk in respect of tailored risk appetite limits determined at solo entity and group levels. Specific governance processes are in place within each business line and each legal entity to ensure the immediate identification of any potential source of risks.

C.1.3. Risk Mitigation

Where appropriate, the Company utilises reinsurance to mitigate against significant financial impact of material risk exposures i.e. catastrophic concentration risk, underwriting concentration and earnings volatility. The main objective of reinsurance is to reduce volatility in capital requirements and earnings, and hence reduce the uncertainty associated with the risk in the insurer's valuation.

The Company's reinsurance program includes coverage on an individual event basis and an aggregate basis. Reinsurers are selected based primarily on pricing and counterparty default risk considerations. Underwriting guidelines set the limits to be respected with regards to underwriting value of the business, in terms of expected margin targets.

The reinsurance committee ensures the continued effectiveness of the reinsurance program through monitoring of both current reinsurance strategy and results, along with the shape of future reinsurance requirements based on expected risk profile of the business.

To this end, regular analysis is performed including monitoring of the performance of treaties, adequacy and appropriateness of reinsurance placements from a profitability and risk/return point of view, and assessment of the capital efficiency of reinsurance through the Partial Internal Model.

C.1.4. Risk Sensitivity

The following exhibit provides an overview of Cigna Europe's sensitivity to underwriting risk. It covers the scenario of an increase in loss ratio of 1% in the calculation of the Best-Estimates.

	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Solvency position						
Increase in Loss Ratio of 1%	-5.3%	-4.9%	-4.0%	-1.6%	-5.7%	-4.0%

Exhibit C.2: Cigna Europe's sensitivity to underwriting risk scenarios

The sensitivity of the solvency position to loss ratio movements has increased compared to last year as a result of a more significant impact of the loss absorbing capacity of the deferred taxes.

C.2. Market Risk

Like any other financial institution, the Company is exposed to investment and other market risks. Those risks arise from changes in values caused by potential adverse changes in the value of assets and liabilities due to movements or volatility of market prices. These encompass:

- Interest rate risk which stems from the risk of a change in value caused by deviation of the term structure of interest rate or interest rate volatility,
- Equity risk which is defined as the risk of loss arising from a change in the level and/ or in the volatility of market prices of equities,
- Spread risk which is the risk of change in value of financial instruments impacting the level of credit spreads over the risk-free interest rate term structure even if the credit quality (rating) remains unchanged,
- Market concentration risk which arises from an accumulation of exposures with the same counterparty or from large exposure to default risk by a single issuer of securities or a group of related issuers,
- Currency risk which relates to the sensitivity of assets and liabilities to changes in the level or volatility of currency exchange rates.

The Company sets multiyear objectives in terms of investment profitability. Performance is tracked against plan on a monthly basis and aligned with the risk budget. The investment portfolio is managed through internal benchmarks which are monitored for any breach in risk taking activity. This approach to investment is governed through a number of related policies to ensure investments operate within the risk appetite budget, are appropriate to the nature and complexity of the organisation, and the impact to the overall risk appetite of the Company is understood. These complementary policies ensure effective monthly and quarterly monitoring of the overall quality, security and profitability of the investment portfolios ensuring full reporting of performance to the Management Committee and ultimately the Board in case of changes in the investment portfolios against risk appetite or subsequent impacts on the overall Risk Profile. The Company has a medium exposure to Investment Risk as its investment portfolio is mainly based on high quality, medium duration bonds with limited concentration, combined with high quality investment funds.

C.2.1. Risk Exposure

Interest, equity, concentration and spread risk are modelled through the Standard Formula. This investment strategy is in line with the Company's risk appetite.

Currency risk is assessed internally to allow for exchange rate dependencies and adequately reflect the international nature of our business. Currency risk mainly impacts CEIC due to its various non-EEA branches.

The management of the investment portfolio is the responsibility of the Asset Liability Committee (ALCO) and is monitored through the processes outlined in the Investment Management Policy and Asset and Liability Management policy. The ALCO is responsible for the management and monitoring of liquidity, equity, currency, interest, concentration and spread risk.

C.2.2. Risk Concentration

Diversification of sources of investments by issuer, by sector and by country is key for Cigna Europe. This allows the Company to better monitor potential concentration of risks, at legal entity level and for the group.

The main source of concentration risk within Market Risk stems from investments in Great Britain Pounds (GBP), Dollar (USD) and Singapore Dollar (SGD). Both solo entities (CLICE and CEIC) accept currency mismatches arising from ownership of local operating companies in non-euro currencies as a consequence of being an international group. However, at the consolidated entity level, the Company aims for a natural hedge of its Solvency II position against exchange rate volatility.

C.2.3. Risk Mitigation

The Company does not sell insurance embedding investment products. The Company's exposure to market risk is further minimised through policies on investment, liquidity and Asset and Liability risk including selection, diversification and continuous monitoring of investment and cash exposures. This monitoring is performed in accordance with the limits set up by the risk appetite framework. Those metrics cover currency, interest rate, spread, concentration and counterparty risks. The continued adequacy and effectiveness of these metrics are ensured thanks to the annual review of policies and update of the Risk Appetite framework.

C.2.4. Risk Sensitivity

Sensitivity and scenario testing are regularly performed to assess the strength of the Company to abnormal market movements and hence provide additional information about market risks alongside the information embedded in the Standard Formula.

The table below provides an overview of the following sensitivities applied on the solvency II position:

- an upward shift in the Spreads of 100 bps,
- an upward shift in the yield curves of 100 bps,
- a relative increase of the currency volatilities of 10%.

	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Solvency position						
Upward shift on spreads of 100bp	-7.2%	-9.7%	-8.4%	-5.8%	-8.4%	-8.8%
Movement in IR of 100bps	-8.9%	-10.7%	-9.3%	-4.0%	-10.4%	-10.1%
Movement in Currency	-2.7%	-1.3%	-8.2%	-4.4%	-6.7%	-3.6%

Exhibit C.3: Cigna Europe's sensitivity to market scenario

The results of the sensitivity analysis evolved in line with the evolutions of the investment portfolios and the currency mix, with deferred taxes amplifying the overall impact.

C.3. Credit Risk

Credit risk stems from the potential of losses due to the non-payment or the unexpected failure of a given counterparty to meet its contractual obligations in accordance with agreed terms. The Company is exposed to credit risk due to the possible failure of one or several internal/external counterparties. The scope of credit risk within the Company encompasses both internal contagion risk and external counterparty default risk.

Contagion risk is the risk of experiencing losses due to belonging to a large insurance conglomerate, including financial distress across the group as a result of the ownership structure and related actions, or over-reliance on group capital to support local operations. This encompasses for example an internal reinsurer default or non-payment of intercompany obligations.

Intercompany transactions relate primarily to the allocation and recharging of operating expenses between Cigna companies. Cigna operates a centralised expense model, with expenses initially incurred by specific service entities before being recharged on an arm's length basis to other Cigna companies. The majority of such recharges are physically settled within 30 days, with a policy of a maximum outstanding period of 90 days before settlement. Intercompany transactions and reconciliations are closely monitored by various levels of Cigna Europe management.

Any default risk on intercompany exposure is mitigated by the diversification of this balance across numerous different entities, limiting any individual exposure and the presence of wider Cigna group capital funding leading to the very low risk of any intercompany balance not being recoverable.

The external counterparty default risk might be caused by the propagation of the effect of a failure or financial distress of an external institution in a sequential manner to other institutions or markets. This includes for instance cash at bank exposures, external reinsurance arrangements or receivables from policyholders and intermediaries.

C.3.1. Risk Exposure

In respect of the assessment of the credit risk, the Company has adopted the Standard Formula risk mapping:

- Type 1 credit risk encompasses reinsurance mitigation risk and cash at bank.
- Type 2 credit risk refers to account receivables' exposures.
- Type 1 and Type 2 include both internal and external sources of credit risks.

The Company has implemented a sound and robust Risk Management Framework at solo entity level to monitor credit risk. Each solo undertaking has also defined Reinsurance and Liquidity Risk strategies which outline the core processes and procedures which underpin Cigna Europe's credit risk approach. This ultimately benefits the group.

C.3.2. Risk Concentration

The account receivables of the IOH business are the main contributor to the credit default risk of CLICE. Cash exposure at Myrtle level is not only driven by CLICE and CEIC, as all the other subsidiaries also have significant cash needs. The Company actively monitors this risk in respect of tailored risk appetite limits, at solo and at group levels. Specific governance processes are in place to ensure the immediate identification of any potential source of risks. In case of breach and related magnitude, a set of management actions have already been set up.

C.3.3. Risk Mitigation

The Company minimises this risk through policies on counterparty and bank selection, collateral requirements, diversification and close monitoring of credit exposures. The credit rating applied by the Company is based on ratings provided by external rating agencies.

Specific policies provide guidelines for the proper utilization of reinsurance and ensure that, amongst others review and authorization requirements, reinsurance purchases are appropriate, security meets internal requirements, contractual terms & conditions are reasonable, and the risk strategy is supported by Cigna Europe management. In particular, contracting guidelines clearly define satisfying criteria for a reinsurer to be approved in a partnership, including the need to have an AM BEST rating of at least A- or equivalent.

This risk related to cash exposures is managed through limits which take into account the credit quality and the expected period of holding, and through regular monitoring and early warning systems. Cigna Europe also simulates a scenario for the default of the largest single bank exposures.

The continued adequacy and effectiveness of the risk mitigation techniques detailed above are ensured through an annual review of policies and Risk Appetite framework.

C.3.4. Risk Sensitivity

The table below shows the impact on the Solvency II position from scenarios affecting credit risk. The first scenario assumes the bankruptcy of the bank with most concentrated cash exposure. The second scenario provides the sensitivity to a loss of 5% of the Accounts Receivable balance.

	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Solvency position						
Bank default	-5.4%	-6.8%	-11.2%	-18.6%	-12.1%	-18.9%
5% Loss of Accounts Receivable	-3.1%	-3.2%	-2.4%	-2.7%	-2.6%	-3.0%

Exhibit C.4: Credit risk sensitivity

As a result of decreased cash concentration, the impact of a bank failure has reduced compared to prior year. The sensitivity of the Accounts Receivable balance shows comparable results.

C.4. Liquidity Risk

Liquidity risk is the risk of loss arising from the illiquidity of the assets held to meet the cash flow requirements and also due to insufficient funds being available to meet cash outflow commitments as they fall due.

Two sources of liquidity risk have been identified within the Company:

- Market liquidity risk is the risk of not selling assets at their fair value due to adverse market conditions,
- Underwriting liquidity risk is the risk of not having sufficient amount of cash to settle liabilities as they fall due.

The principal objective of liquidity management is to be able to fund the Company and to enable the core business activities to continue to generate cash, even under adverse circumstances.

C.4.1. Risk Exposure

The risk exposure is relatively remote for the Company as:

The investment portfolio of the covering assets is well balanced over high-quality bonds with relatively short maturities and money market funds.

- The nature of Cigna Europe's business does not trigger unexpected massive cash reimbursement:
  - ➢ limited risk of change in policyholder behaviour i.e. more lapses resulting in less profits being generated than foreseen,
  - ➢ limited risk in case of large claim as half of the claim payments are paid by the internal reinsurer.
- The Company manages liquidity risk at different levels:
  - ➢ management review of Asset and Liability Management indicators on a monthly basis,
  - ➢ at the Asset and Liability Committee on a quarterly basis.

C.4.2. Risk Concentration

Risk concentration is not applicable to liquidity.

C.4.3. Risk Mitigation

As stated in section C.4.1, liquidity risk is limited by the nature of the investments (mostly high-quality bonds with relatively short maturities) and the nature of the business that does not trigger unexpected massive cash reimbursement. Liquidity is managed through the monitoring of key exposures and tests performed at Asset and Liability Committee level.

The Company further minimises this risk through policies on liquidity risk and investment including identification, assessment, measurement and monitoring of liquidity risk on a continuous basis. These policies are reviewed on an annual basis to ensure their continued effectiveness. The Liquidity risk limits are established by the risk management function and are validated by the Asset and Liability Committee, with ultimate Board of Directors' review and approval.

Moreover, a cash pooling account has been implemented which allows Cigna European entities to assure liquidity at all times.

C.4.4. Risk Sensitivity

The Company models Liquidity Risk through scenario analysis, e.g. by analysing the time needed to raise liquidity in case of a potential severe large claims.

	Immediate	0-3 months
Availability of funds CLICE	22.3%	77.7%
Availability of funds CEIC	41.6%	58.4%
Availability of funds Myrtle	29.4%	70.6%

Exhibit C.5: Cigna Europe's availability of own funds

C.5. Operational Risk

The Company is subject to operational risks defined as 'the risk of loss arising from inadequate or failed internal processes, or from personnel and systems, or from external events (including legal risk)'.

The Company has classified its potential sources of operational risks as follows:

- Regulatory risk is generally defined as the risk of having the 'licence to operate' withdrawn by a regulator, or having conditions applied (retrospectively or prospectively) that adversely impact the economic value of an enterprise;
- Human capital risk can be defined as events and employee behaviours that occur both within and outside the workplace that can affect employee productivity and/or otherwise affect the organization's operational and financial results;
- Integrity generally refers to violations of law, regulations, internal policies and market expectations of ethical business conduct including fraud;
- Process risk is the risk of failing to implement, monitor and manage internal processes and procedures through a strong internal control environment;
- IT Risk incorporates the many different risks that are associated with Information Technology. These include resource availability, resource utilisation, and architecture/delivery.

C.5.1. Risk Exposure

Qualitative risks are inherently subjective and therefore cannot be accurately modelled via historical internal or external data. For operational risks, the Company has developed internal risk management frameworks to provide the business with tools to identify and assess risk exposures, evaluate the internal control environment, determine residual risk rating and subsequently the prioritisation of management actions. This toolkit includes monthly data collection, quarterly risk assessments and annual review of the internal control environment.

Although an inherently qualitative risk, Operational Risk is quantitatively modelled through the PIM and has a capital requirement based upon industry best practice. For the purposes of assessing and managing Operational Risks, the Company deploys two key processes as described in the Risk Management Framework section.

At Group level, unlike at Solo entity, there is an operational risk exposure associated with the activities of the insurance intermediaries providing a series of services for internal (i.e. entities within Cigna Europe) and external clients including Third Party Administration services.

C.5.2. Risk Concentration

Through the toolkit mentioned above, the Company has not specifically identified any operational exposures which could threaten its Solvency position. However, through the active monitoring of risk and control exposures, the Company has identified a collection of operational risks which could combine across each business line and present a material risk exposure at European Group level. These risks are assessed as qualitative risk scenarios in our ORSA.

In 2025, the Board reviewed the current qualitative scenarios approved from prior years and possible additional scenarios. It was agreed that the following qualitative scenarios would be included in the ORSA this year:

1. Disaster Recovery
2. Hacking / Cyber security threat

Disaster Recovery is a known risk exposure for any organization and the reliance on technology, solutions and innovations to provide services and products to members, clients, partners and vendors makes recovery of operational processes an essential component of the control environment. Failure to adequately recover systems and processes in event of significant disruption could result in significant risk exposure for the business from an operational, commercial, financial, reputational and possibly regulatory perspective.

In 2025, an emerging trend of lower probability but higher impact ransomware attacks has been noted. A number of high-profile events have materialised across various industries. This risk is particularly pertinent for Cigna due to the rapidly evolving nature of technological development which creates increased sources of risk, combined with risk exposures from collection, storage and processing of sensitive data across our global business model..

C.5.3. Risk Mitigation

The nature of operational risk, inherent external exposures and the scenario analysis undertaken is such that these risks will never be fully mitigated, but the aim is to ensure the Board is fully aware of the potential worst-case scenarios. The Company therefore breaks each scenario into key risk exposures or internal control components to ensure the business is taking steps to reduce either the likelihood of the risk occurring, or the impact it would have on the business and to provide assurance on this to the Board. Accordingly, a mixture of action plans and monitoring have been put in place for the risks related to these scenarios.

C.5.4. Risk Sensitivity

For the purposes of Solvency II and ORSA reporting, two qualitative scenarios of Disaster Reocovery and Cyber Security Breach were considered to be potentially material enough to threaten the solvency of the company in a worst case scenario. The outcome of these scenarios was that the Board agreed that it would approve capital deployment to support the running of the business if necessary.

C.6. Other Material Risks

The Qualitative Risk Toolkit mentioned above is not limited in scope to Operational Risk but is implemented to include Business Risk also to ensure the full scope of the Company risk exposure is considered within the implemented risk management system. Business risk is defined as ‘Risk of loss arising from Legal/political conditions to which the Company is subject, changes in the economic, social and political environment, as well as changes in the business profile and the general business cycle’. This can include strategic implementation and initiatives, 3rd party dependency, customer experience, or external environment. Although these risks are not deemed sufficiently material to breach the threshold and form part of the ORSA Stress Testing, they are considered material from a quarterly risk profile perspective and are thus reported to the Board for ongoing monitoring.

Examples of such risks include:

- People risk
- Operational performance
- Technology – currency projects
- Branch management
- Medical Network Management
- Data Privacy Management
- Fraud Management
- Legal, Compliance and Regulatory Risk
- Inflation Risk
- Strategic initiatives

C.7. Any other information

No other information to be disclosed.

Valuation for Solvency Purposes

D. Valuation for Solvency Purposes

Cigna Europe has applied the (full) consolidation method to value the assets, technical provisions, other liabilities and own funds of the Group. The Full consolidation method calculates the group solvency as the ratio between the sums of the consolidated own funds in the group and the consolidated solvency capital requirements in the group. The Full consolidation method follows International Financial Reporting Standards and thus no longer includes two entities, Cigna Global Wellbeing Holdings Limited and Cigna Global Wellbeing Solutions Limited at 30%, but instead includes them as investments. This also means that any balances and transactions relating to these entities are not eliminated as they are not consolidated.

The group consolidated assets, liabilities and own funds have been calculated as described in the following paragraphs. The basis of the consolidation is from the individual financial statements of the entities in the group, each of which were prepared in accordance with their local GAAP. The below table provides a summary of the statutory basis and functional currency under which the financial statements for each individual Company within the group have been prepared. For each entity, the table also shows the ultimate ownership percentages within the Group.

Entity	Domiciled	Statutory basis of Financial Statements	Functional Currency	Total Group Ownership
Cigna Myrtle Holdings Limited	Malta	IFRS	USD	100%
Cigna Elmwood Holdings N.V.	Belgium	BE GAAP	EUR	100%
Cigna Life Insurance Company of Europe S.A-N.V.	Belgium	BE GAAP	EUR	100%
Cigna Europe Insurance Company S.A-N.V.	Belgium	BE GAAP	EUR	100%
Cigna International Health Services BV	Belgium	BE GAAP	EUR	100%
Cigna International Health Services LLC	USA	US GAAP	USD	100%
Cigna International Health Services Kenya	Kenya	IFRS	KES	100%
Cigna European Services (UK) Limited	UK	UK GAAP	GBP	100%
Cigna Oak Holdings Limited	UK	UK GAAP	GBP	100%
Cigna Willow Holdings Limited	UK	UK GAAP	GBP	100%
Cigna Legal Protection UK Limited	UK	UK GAAP	GBP	100%
Cigna Insurance Services Europe Limited	UK	UK GAAP	GBP	100%
First Assist Administration Limited	UK	UK GAAP	GBP	100%

Exhibit D.1: Entities within Cigna Europe Group

Note: Indented entities have both individual financial statements and group consolidated financial statements available under their parent, Cigna Oak Holdings Limited.

The individual entities' statutory results have been converted to the group's Solvency II reporting currency of Euros using recognized, publicly available exchange rates as at 31st December 2025. Euros have been determined to be the Group's chosen reporting currency as it is the currency in which the majority of the Group's transactions are conducted, and in which the majority of the Group's assets and liabilities are held.

The individual financial statements of each operating entity have recorded their investments in other group entities at historical cost less any impairment. In order to form a consolidated group position, all investments in other entities have been removed through a participation interest adjustment.

Intra-group receivables and payables as well as intra-group profit and loss transactions have also been eliminated from the consolidation with this approach resulting in accurate assets, liabilities, and own funds disclosures consistent with the Solvency II guidance.

Economic adjustments have been made where the valuation methodology on a statutory basis differs to the valuation methodology requirements under Solvency II. A comparison and analysis of the differences between the Solvency II and statutory valuation bases is provided in section D1 for assets, section D2 for technical provisions and section D3 for other liabilities.

The individual results, participation adjustments and economic adjustments for all entities have been consolidated with the exception of Cigna Global Wellbeing Solutions Limited and Cigna Global Wellbeing Holdings Limited in which the European Group only has a 30% holding. These have therefore not been consolidated and rather have been assigned a value as per the value of the investment in the immediate parent Company’s signed statutory financial statements. This is in line with International Accounting Standards.

Seven of the 13 consolidated entities included in the Myrtle Group are subject to an annual external audit:

- Cigna Life Insurance Company of Europe S.A – N.V (“CLICE”);
- Cigna Europe Insurance Company S.A – N.V (“CEIC”);
- Cigna International Health Services BV (“CIHS Belgium”);
- Cigna International Health Services Kenya Ltd (“CIHS Kenya”);
- Cigna Elmwood Holdings N.V. (“Elmwood”);
- Cigna European Services UK Ltd. (“CESL”); and
- Cigna Myrtle Holdings Ltd (“Myrtle”).

D.1. Assets

D.1.1. Summary of Assets by Class

The tables below show the composition of assets in the balance sheet as at 31 December 2025 measured on a Solvency II basis (as per the Quantitative Reporting Templates ("QRTs")) and, for comparison, as measured on a statutory basis.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Government Bonds	90,166	41,804	79,884	67,493	170,050	109,297
Corporate Bonds	289,271	381,702	105,445	97,451	394,716	479,153
Investment funds	113,308	105,450	18,439	4,593	185,537	157,860
Total Investments	**492,745**	**528,956**	**203,768**	**169,537**	**750,303**	**746,310**

Exhibit D.2a: Summary of assets by class for CLICE, CEIC and Myrtle – SII Basis

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Government Bonds	92,602	44,821	78,376	67,468	170,979	112,289
Corporate Bonds	287,538	384,422	104,550	97,930	392,087	482,352
Investment funds	115,868	105,450	18,439	4,593	188,098	157,860
Total Investments	**496,008**	**534,693**	**201,365**	**169,991**	**751,164**	**752,501**

Exhibit D.2b: Summary of assets by class for CLICE, CEIC and Myrtle – Statutory Basis

D.1.1.1. CLICE Assets

CLICE Solvency II Assets are prepared as of December 31, 2025 in compliance with the Solvency II Regulations. Assets are valued based on the assumption that the Company will pursue its business on a going concern basis. Please note that there may be some differences compared to the Solo Solvency II submission due to the removal of intra-European group balances.

(EUR'000)	Solvency II Basis			Statutory Basis		
	31-Dec-25	31-Dec-24	Methods and main assumptions	31-Dec-25	31-Dec-24	Methods and main assumptions
Intangible assets	-	-	Historic cost less amortisation	-	-	Historic cost less amortisation
Deferred tax assets	-	-	Fair value	-	-	Fair value
Pension benefit surplus	-	-	Fair value	-	-	Fair value
Property, plant & equipment held for own use	28	14	Historic cost less depreciation	28	14	Historic cost less depreciation
Property (other than for own use)	-	-	Historic cost less impairment	-	-	Historic cost less impairment
Participations	-	-	Fair value	-	-	Historic cost less impairment
Bonds	379,437	423,506	Market value	380,140	429,243	Historic cost/market value
Deposits other than cash equivalents	185	204	Fair value	185	204	Fair value
Collective Investments Undertakings	113,308	105,450	Historic cost less impairment	115,868	105,450	Fair value
Reinsurance recoverable	149,512	132,281	Fair value	179,786	176,653	Fair value
Insurance & intermediaries receivables	108,378	109,912	Fair value	108,378	109,912	Fair value
Reinsurance receivables	6,919	8,297	Fair value	6,919	8,297	Fair value
Receivables (trade, not insurance)	-	-	Fair value	-	-	Fair value
Cash and cash equivalents	81,080	21,086	Nominal value	81,080	21,086	Nominal value
Any other assets, not elsewhere shown	16,654	24,565	Fair value	16,654	24,565	Fair value
Total Assets	**855,501**	**825,315**		**889,038**	**875,424**	

Exhibit D.3: Summary of Assets for CLICE

D.1.1.2. CEIC Assets

CEIC Solvency II Assets are prepared as of December 31, 2025 in compliance with the Solvency II Regulations. Assets are valued based on the assumption that the Company will pursue its business on a going concern basis. Please note that there may be some differences compared to the Solo Solvency II submission due to the removal of intra-European group balances.

(EUR'000)	Solvency II Basis			Statutory Basis		
	31-Dec-25	31-Dec-24	Methods and main assumptions	31-Dec-25	31-Dec-24	Methods and main assumptions
Intangible assets	-	-	Historic cost less amortisation	-	-	Historic cost less amortisation
Deferred tax assets	-	-	Fair value	-	-	Fair value
Pension benefit surplus	-	-	Fair value	-	-	Fair value
Property, plant & equipment held for own use	36	55	Historic cost less depreciation	36	55	Historic cost less depreciation
Property (other than for own use)	-	-	Historic cost less impairment	-	-	Historic cost less impairment
Participations	-	-	Fair value	-	-	Historic cost
Bonds	185,329	164,944	Market value	182,926	165,398	Historic cost/market value
Deposits other than cash equivalents	6,547	8,527	Fair value	6,547	8,527	Fair value
Collective Investments Undertakings	18,439	4,593	Historic cost less impairment	18,439	4,593	Fair value
Reinsurance recoverable	74,503	71,352	Fair value	98,126	89,362	Fair value
Insurance & intermediaries receivables	69,700	72,868	Fair value	69,700	72,868	Fair value
Reinsurance receivables	1,851	2,279	Fair value	1,851	2,279	Fair value
Receivables (trade, not insurance)	134	152	Fair value	134	152	Fair value
Cash and cash equivalents	92,453	77,668	Nominal value	92,453	77,668	Nominal value
Any other assets, not elsewhere shown	5,195	4,251	Fair value	5,195	4,251	Fair value
Total Assets	**454,187**	**406,689**		**475,407**	**425,153**	

Exhibit D.4: Summary of Assets for CEIC

D.1.1.3. Myrtle Group Assets

Myrtle Solvency II Assets are prepared as of December 31, 2025 in compliance with the Solvency II Regulations. Assets are valued based on the assumption that the Company will pursue its business on a going concern basis.

(EUR'000)	Solvency II Basis			Statutory Basis		
	31-Dec-25	31-Dec-24	Methods and main assumptions	31-Dec-25	31-Dec-24	Methods and main assumptions
Intangible assets	-	-	Historic cost less amortisation	153	326	Historic cost less amortisation
Deferred tax assets	-	-	Fair value	3,571	6,095	Fair value
Pension benefit surplus	-	-	Fair value	-	-	Fair value
Property, plant & equipment held for own use	5,457	7,376	Historic cost less depreciation	5,457	7,376	Historic cost less depreciation
Property (other than for own use)	-	-	Historic cost less impairment	-	-	Historic cost less impairment
Participations	-	-	Fair value	-	-	Historic cost
Bonds	564,766	588,450	Market value	563,066	594,641	Historic cost/market value
Deposits other than cash equivalents	7,242	9,801	Fair value	7,242	9,801	Fair value
Collective Investment Undertakings	185,537	157,860	Historic cost less impairment	188,098	157,860	Fair value
Reinsurance recoverable	224,014	203,633	Fair value	277,911	266,016	Fair value
Insurance & intermediaries receivables	189,589	199,244	Fair value	189,589	199,244	Fair value
Reinsurance receivables	8,770	10,576	Fair value	8,770	10,576	Fair value
Receivables (trade, not insurance)	27,262	41,981	Fair value	27,262	41,981	Fair value
Cash and cash equivalents	240,014	173,628	Nominal value	240,014	173,628	Nominal value
Any other assets, not elsewhere shown	29,259	28,486	Fair value	29,259	28,486	Fair value
Total Assets	**1,481,910**	**1,421,035**		**1,540,392**	**1,496,030**	

Exhibit D.5: Summary of Assets for the Myrtle Group

D.1.2. Differences between statutory valuation and the approach used for Solvency II

The significant differences between the statutory reporting basis and Solvency II in relation to assets are:

- The valuation of investments at market value under Solvency II instead of at historic cost for bonds on a statutory basis. An exception to this is the limited amount of preference stocks held within the bond portfolio of the Company that are already included at market value under Belgium GAAP.
- Intangible assets such as IT licenses and software have been included within the financial statements of Cigna International Health Services B.V. and Cigna European Services (UK) Limited. Under the Solvency II guidelines intangible assets have no value.
- Loans held between entities within the Cigna Group are held at book cost in the statutory accounts of Cigna European Services (UK) Limited and Cigna Europe Insurance Company SA/NV as per relevant local generally accepted accounting principles. However, under Solvency II these loans are required to be disclosed at market value. Consequently, adjustments are made to ensure the loans are shown at market value for Solvency II.
- The pension benefit assets (and liabilities in section D3 below) are currently being measured under UK GAAP and BE GAAP requirements which calculate the net defined benefit asset/liability to be the net total of:
  - the present value of the defined benefit obligation at the end of the reporting period
  - minus the fair value at the reporting date of plan assets (if any) out of which the obligations are to be settled directly
  - minus any unrecognized past-service costs.
- For Solvency II purposes, pension benefit assets (and liabilities) are to be measured under IAS 19, which also includes any actuarial gains (less any actuarial losses) not recognized due to the corridor approach (IAS 19 para 54). Cigna Europe has made no adjustment to take into account the actual gains and losses due to the corridor approach as it deems this economic adjustment to be immaterial in nature.
- Following implementation of the updated Deferred Tax Policy, deferred taxes recognized in the statutory accounts of a legal entity are only recognized under Solvency II if they amount to a net Deferred Tax Liability (DTL). In the event of a net Deferred Tax Asset (DTA), deferred taxes are considered to be nil.

D.1.3. Key changes since previous reporting period

There have been no changes during 2025 to the approach for valuing assets.

D.2. Technical Provisions

D.2.1. Summary of Technical Provisions

The following table shows the Technical Provisions (TP) for the Company split by Solvency II Line of Business (LoB).

(EUR'000)	Medical Expenses	Income Protection	Other(1)	Life	Total
CLICE					
Gross of Reinsurance	239,446	49,829	Not applicable	16,347	305,622
Reinsurance Ceded	112,811	31,893	Not applicable	4,807	149,512
Net of Reinsurance	126,635	17,936	Not applicable	11,540	156,111
Risk Margin	7,644	1,591	Not applicable	522	9,757
Total Net TP	**134,279**	**19,527**	**Not applicable**	**12,062**	**165,868**
CEIC					
Gross of Reinsurance	144,657	346	942	Not applicable	145,946
Reinsurance Ceded	74,105	44	354	Not applicable	74,503
Net of Reinsurance	70,552	302	588	Not applicable	71,443
Risk Margin	4,142	10	27	Not applicable	4,179
Total Net TP	**74,694**	**312**	**615**	**Not applicable**	**75,622**
Myrtle					
Gross of Reinsurance	392,078	50,176	942	16,347	459,543
Reinsurance Ceded	186,916	31,937	354	4,807	224,014
Net of Reinsurance	205,162	18,238	588	11,540	235,528
Risk Margin	12,490	1,601	27	522	14,640
Total Net TP	**217,652**	**19,839**	**615**	**12,062**	**250,168**

Exhibit D.6: Best Estimate Liability YE 2025

1. Other includes Legal expenses, miscellaneous financial loss and non-proportional health reinsurance.

D.2.2. Methodology

D.2.2.1. Introduction

Solvency II Technical Provisions comprise a Best Estimate Liability (BEL) and a Risk Margin (RM). The BEL is calculated gross of any reinsurance with a separate calculation for the reinsurance portion.

For non-life business, the BEL is calculated separately for the following two components:

- claims provisions: representing the expected present value of cash-flows from claim events that have occurred before the valuation date; and
- premium provisions: relating to claim events occurring after the valuation date and during the remaining in-force period of cover.

For life business, the BEL is calculated as the prospective value of future expected cashflows on a policy-by-policy basis, allowing for premiums, claims, expenses and lapses. Negative reserves are permitted.

Since the 2018 year-end, Cigna Europe has performed the annual reset of assumptions underlying the SII BEL calculations at year end on an off-cycle basis, and assumptions are modified during non-off cycle when a material deviation from existing assumption is observed and can be justified.

D.2.2.2. Reinsurance

The Company operates a comprehensive reinsurance program to manage insurance risks. The program is a combination of internal and external reinsurance treaties, including quota share and excess of loss catastrophe cover. The impact of reinsurance on the Technical Provisions is shown in the summary tables above.

D.2.2.3. Non-Life Claim Provision Methodology

Claims are projected to ultimate using standard actuarial techniques such as Chain Ladder or Bornheutter-Ferguson. The most important point in producing cashflows is to arrive at a best estimate liability, rather than the method of producing the cashflows themselves.

The resulting cashflows are then discounted using risk free rates generated from EIOPA published yield curves which are dependent on the currency of the cashflows. Finally, a loading is applied to the cashflows to allow for claims administration expenses to obtain the best estimate claim provision. Best estimates are calculated gross of reinsurance and for reinsurance recoveries with the latter further adjusted to take account of expected loss due to counterparty default.

Due to the off-cycle methodology, Statutory Claim Provisions are calculated at year end then SII/Statutory ratios from end Q3 full valuation are applied to the year-end Statutory Claim Provisions to generate year end Solvency II Claim Provisions. In a scenario where a material deviation is observed between actual experience and the off-cycle assumption set based on Q3 data, the assumptions can be re-set in course of the year to ensure best estimate liabilities remains appropriate and reasonable.

D.2.2.4. Non-Life Premium Provision Methodology

The best estimate of premium provisions corresponds to cashflows relating to claim events occurring after the valuation date but before the end of the remaining in force period for all in force business. In practice the expected claims ratio simplification has been applied to calculate the best estimate. Similar to claims provisions, best estimates are calculated gross of reinsurance and also for reinsurance recoveries with the latter further adjusted to take account of expected loss due to counterparty default.

Due to the off-cycle methodology, UPR and PVFP are calculated at year end then Loss Ratios, Expense Ratios etc. from Q3 update are applied to the yearend UPR and PVFP to calculate the Premium Provision, gross of Reinsurance. For Reinsurance ceded, the Q3 Loss Ratio and year end Ceding Commission Ratio are applied to ceded year end UPR and ceded year end PVFP. Assumptions may be updated during non-off cycle to represent a revised best estimate provided appropriate justification.

D.2.2.5. Life Provision Methodology

The BEL for life insurance business is calculated on a policy-by-policy basis as the present value of:

claim outflows + expense and commission outflows – premium cash inflows

The present value of these cashflows should allow for lapse and be further discounted for interest, generated using EIOPA published yield curves. Similar to non-life, best estimates are calculated gross of reinsurance and also for reinsurance recoveries with the latter further adjusted to take account of expected loss due to counterparty default.

In contrast with the Non-Life Provision, no implementation of off-cycle methodology for the Solvency II Life Provisions.

D.2.2.6. Un-Modelled Business

The vast majority of Best Estimate Liability is calculated using the methodology described in the 3 sub-sections above. For the remaining un-modelled business, a simplified conservative approach, typically Statutory Technical Reserves, is taken as a proxy for Solvency II BEL.

D.2.2.7. Risk Margin Methodology

As noted above, the BEL is calculated on a best-estimate basis whereas GAAP reserves include a margin for prudence. To ensure that adequate reserves are held, the Technical Provisions under Solvency II include an explicit Risk Margin to allow for the uncertainty in the best estimate.

The Risk Margin should be calculated by determining the cost of providing an amount of eligible own funds equal to the Solvency Capital Requirement (SCR) necessary to support the insurance and reinsurance obligations over their expected future lifetime. The rate used in determining this cost is called the Cost of Capital Rate; this is a long-term average rate and is currently set at 6%. The Risk Margin should guarantee that the Technical Provisions are sufficient to allow the whole insurance (and reinsurance) portfolio to be transferred to another Insurer.

The method for calculating the Risk Margin can in general be expressed as the discounted value of all projected SCRs multiplied by the Cost of Capital Rate where discounting is at risk free rates of return. Note that, unlike the BEL which is calculated separately gross of reinsurance and for reinsurance ceded, the Risk Margin is calculated only on a net of reinsurance basis.

D.2.3. Assumptions

The key assumptions underlying each category of BEL methodology are as described below. In general, these assumptions have been derived from past experience of the Company business, at the appropriate level of granularity.

D.2.3.1. Claim Provisions

The key assumptions are the actuarial techniques applied to calculate projected cashflows for sufficiently developed claims including choice of link ratios, the expected loss ratio or average cost per claim to apply to months with insufficient claims, the assessment of when claims are sufficiently developed and the loading applied to best estimate claim provision to generate the claim expense component.

All assumptions underlying the calculation of Claim Provisions have the additional aim of ensuring that the margin of Statutory claim provisions (net of expense) over Solvency II best estimate claim provisions (net of expense) is in the range consistent with the Company's Reserve Policy. This should be the most important factor in determining the most appropriate set of assumptions to calculate the Claim Provisions.

D.2.3.2. Premium Provisions

Since the claims ratio simplification method has been used to calculate the best estimate premium provision, the following are the key assumptions required to complete the calculation:

- Loss Ratio including claims handling cost;
- Operating Expense Ratio;
- Acquisition Expense Ratio;
- Gross Commission Ratio;
- Ceding Commission Ratio.

In general, a combination of the historic actual experience plus consideration of forecasted expected ratios have been assessed to set these assumptions. The Ceding Commission Ratio is set at contractually agreed terms per the reinsurance treaties.

D.2.3.3. Life Provisions

The key assumptions used to generate the projected cashflows required to calculate the best estimate provision are for expected mortality, expense loadings and lapse.

D.2.3.4. Risk Margin

Since the Hierarchy of Simplifications approach is adopted to calculate the Risk Margin, and the EIOPA supplied formulae and models have been used to produce the Risk Margin, there are no explicit assumptions to be assessed other than consistent use of yield curves for discounting cashflows for both BEL and Risk Margin.

D.2.4. Expert Judgement

The application of expert judgement is required throughout the production of Technical Provisions from the assessment of data quality to the choice of methodology to apply, to the setting of assumptions underlying the calculations, through to the final assessment that the Technical Provisions are accurate and sufficient to meet future expected liabilities.

D.2.5. Uncertainty in Technical Provisions

There are a number of factors that can influence the level of technical provisions and this uncertainty is described below for the different components.

D.2.5.1. Uncertainty in Non-Life Claim Provision

Analysis shows that the best estimate reserve is sensitive to the choice of assumptions with regards the choices of link ratio and the ultimate loss ratio (ULR). Hence, these assumptions are set based on the recent experience and at a granular market level to minimise any deviation. The adequacy of the provision set is regularly compared against the actuals. Any material deviation is addressed immediately.

Please note that, the BEL is not sensitive to varying claim expense reserve assumptions and discounting of cash flows is not important for setting the reserve due to the short tail nature of this business.

D.2.5.2. Uncertainty in Non-Life Premium Provision

Small changes to the assumptions to calculate the Premium Provision can have a significant impact on the resulting reserve particularly for CLICE. For example, an increase in Loss Ratio will increase the reserve both gross and net of reinsurance. Increasing the Operating Expense Ratio has a similar impact on the gross reserve and here there is no reinsurance relief because a share of expenses is not passed on to the reinsurers. The impact of changing assumptions for Acquisition Expenses or Commission ratio is not so significant since not all Business Units are impacted by this change. CEIC behaves similarly although the financial impact is considerably lower, due to a lower volume of PVFP.

Choice of ratios and indeed estimation of PVFP (in relation to allowance for persistency and tacit renewals) is therefore very important in the final reserve balance.

D.2.5.3. Uncertainty in BEL Life Provision

For death benefits, the most financially significant impact is a change to the mortality experience assumption where a 10% strengthening would increase the gross reserve by €0.7.m and therefore have 43% impact relative to the base gross reserve for Death benefit. The remaining sensitivities are much less significant and impact the base gross reserve by no more than 4%.

For the survival benefit, the most financially significant impact is a change to the mortality experience assumption where a 10% strengthening would increase the gross reserve by €0.8m and therefore have around 5.3% impact relative to the base gross reserve for Survival benefit. Other sensitivities - changes to the operating expense has a 1% increase in gross reserve, and a 10% reduction in yields used in discounting has a just over 3.7% increase in gross reserve.

D.2.5.4. Uncertainty in Risk Margin

The Risk Margin is determined based on a full calculation of all future projected SCRs with some simplifications. Therefore, the choice of some of the simplifying proportional factors (such as the evolution of the net best estimate liability) could drive some uncertainty in the Risk Margin.

D.2.6. Differences between valuation approach for Solvency II and Belgium GAAP

As noted above, the BEL is calculated on a best-estimate basis whereas GAAP reserves include a margin for prudence. To ensure that adequate reserves are held, the Technical Provisions under Solvency II then include an explicit Risk Margin to allow for the uncertainty in the best estimate. A further key difference is the PVFP component of the Non-Life Premium Provisions.

A high-level comparison of Solvency II reserves with those used in the financial statements is shown in the tables below.

(EUR'000)	Solvency II (SII)	SII / Statutory	Statutory
CLICE			
Total Gross BEL	305,622	85.9%	355,885
Total Net BEL	156,111	97.8%	159,679
Risk Margin	9,757		
Total Net TP	**165,868**	**103.9%**	**159,679**
CEIC			
Total Gross BEL	145,946	76.0%	191,910
Total Net BEL	71,443	76.1%	93,864
Risk Margin	4,179		
Total Net TP	**75,622**	**80.6%**	**93,864**
Myrtle			
Total Gross BEL	459,543	82.7%	555,770
Total Net BEL	235,528	90.1%	261,517
Risk Margin	14,640		
Total Net TP	**250,168**	**95.7%**	**261,517**

Exhibit D.7: Best Estimate Liability SII vs. Statutory

The Myrtle table above is the sum of the CLICE and CEIC tables plus claims handling reserves in the service entities CIHS and CISL for an amount of €8.0 million.

The key differences between Statutory and Solvency II Technical Provisions are the profit generated on future premiums plus removal of margins on Statutory Claim Provisions and UPR, offset to some extent by the addition of Risk margin. The other differences are much less significant.

For Life business the key difference between Statutory and Solvency II Technical Provisions is the removal of mortality reserve margin in the Statutory TP again offset to some extent by the addition of Risk Margin.

D.2.7. Key Changes Since Previous Reporting Period

There have been no changes in methodology used in calculating Technical Provisions relative to the prior reporting period. The assumptions applied are based on up to date and credible information and reflect the expected experience over the full lifetime of the obligations.

D.2.8. Other Disclosures

- Volatility adjustment and Transitional Risk-Free Rates are not applicable.
- Transitional deduction has not been applied.

D.3. Other Liabilities

D.3.1. Summary of Other Liabilities

The tables below show the composition of Other Liabilities in the balance sheet as at 31 December 2025 measured on a Solvency II basis (as per the Quantitative Reporting Templates ("QRTs")) and, for comparison, as measured on statutory basis.

D.3.1.1. CLICE Other Liabilities

CLICE Solvency II Other Liabilities are prepared as of December 31, 2025 in compliance with the Solvency II Regulations. Liabilities are valued based on the assumption that the Company will pursue its business on a going concern basis. Variances may exist when compared to the Solo Solvency II submission due to the removal of intra-European group balances.

(EUR'000)	Solvency II Basis			Statutory Basis		
	31-Dec-25	31-Dec-24	Methods and main assumptions	31-Dec-25	31-Dec-24	Methods and main assumptions
Provisions other than technical provisions	-	-	Fair value	-	-	Fair value
Pension benefit obligations	-	-	Actuarial valuation	-	-	Actuarial valuation
Deposits from reinsurers	167,789	171,338	Fair value	167,789	171,338	Fair value
Deferred tax liabilities	2,815	1,959	Fair value	-	-	Nominal value
Debts owed to credit institutions	-	-	Nominal value	-	-	Nominal value
Insurance & intermediaries payables	59,725	67,770	Fair value	59,725	67,770	Fair value
Reinsurance payables	14,602	17,154	Fair value	14,602	17,154	Fair value
Payables (trade, not insurance)	29,359	23,266	Fair value	29,359	23,266	Fair value
Any other liabilities, not elsewhere shown	6,901	6,598	Fair value	6,901	6,598	Fair value
Total Liabilities	**281,191**	**288,085**		**278,376**	**286,126**	

Exhibit D.8: Summary of Other Liabilities for CLICE

D.3.1.2. CEIC Other Liabilities

CEIC Solvency II Other Liabilities are prepared as of December 31, 2025 in compliance with the Solvency II Regulations. Liabilities are valued based on the assumption that the Company will pursue its business on a going concern basis. Variances may exist when compared to the Solo Solvency II submission due to the removal of intra-European group balances.

(EUR'000)	Solvency II Basis			Statutory Basis		
	31-Dec-25	31-Dec-24	Methods and main assumptions	31-Dec-25	31-Dec-24	Methods and main assumptions
Provisions other than technical provisions	-	-	Fair value	-	-	Fair value
Pension benefit obligations	-	-	Actuarial valuation	-	-	Actuarial valuation
Deposits from reinsurers	86,649	84,604	Fair value	86,649	84,604	Fair value
Deferred tax liabilities	3,562	1,511	Fair value	-	-	Nominal value
Debts owed to credit institutions	-	-	Nominal value	-	-	Nominal value
Insurance & intermediaries payables	6,480	5,010	Fair value	6,480	5,010	Fair value
Reinsurance payables	7,224	9,242	Fair value	7,224	9,242	Fair value
Payables (trade, not insurance)	18,933	12,540	Fair value	18,933	12,540	Fair value
Any other liabilities, not elsewhere shown	8,296	7,207	Fair value	8,296	7,207	Fair value
Total Liabilities	**131,144**	**120,114**		**127,582**	**118,603**	

Exhibit D.9: Summary of Other Liabilities for CEIC

D.3.1.3. Myrtle Group Other Liabilities

Myrtle Solvency II Other Liabilities are prepared as of December 31, 2025 in compliance with the Solvency II Regulations. Liabilities are valued based on the assumption that the Company will pursue its business on a going concern basis.

(EUR'000)	Solvency II Basis			Statutory Basis		
	31-Dec-25	31-Dec-24	Methods and main assumptions	31-Dec-25	31-Dec-24	Methods and main assumptions
Provisions other than technical provisions	-	49,668	Fair value	-	49,668	Fair value
Pension benefit obligations	-	-	Actuarial valuation	-	-	Actuarial valuation
Deposits from reinsurers	254,437	255,943	Fair value	254,437	255,943	Fair value
Deferred tax liabilities	6,377	3,470	Fair value	-	-	Nominal value
Debts owed to credit institutions	11,371	11,581	Nominal value	11,371	11,581	Nominal value
Insurance & intermediaries payables	66,204	72,780	Fair value	66,204	72,780	Fair value
Reinsurance payables	21,826	26,397	Fair value	21,826	26,397	Fair value
Payables (trade, not insurance)	137,434	124,993	Fair value	137,434	124,993	Fair value
Any other liabilities, not elsewhere shown	23,547	23,272	Fair value	23,547	23,272	Fair value
Total Liabilities	**521,196**	**568,104**		**514,819**	**564,634**	

Exhibit D.10: Summary of Other Liabilities for Myrtle Group

D.3.2. Differences between statutory valuation and the approach used for Solvency II

There are no material differences for the valuation of other liabilities between the statutory basis used in financial statements and the Solvency II valuation approach except for the inclusion of a deferred tax liability on a Solvency II basis, which is the expected future tax effect of the profit and loss impact from valuing the balance sheet on an economic basis as opposed to the statutory basis used for Belgium tax purposes.

D.3.3. Key changes since previous reporting period

There have been no changes during 2025 to the approach for valuing other liabilities.

D.4. Alternative Methods for Valuation

The key areas which require mark to model techniques are the valuation of investments (fixed maturities and equity securities) and loans held between Cigna Europe entities (fixed maturity).

For any investments in fixed maturities and equity securities, the fair value is classified as level 2 due to the lower trading activity of these investments. Recent trades or pricing models are therefore used to determine fair value. When utilising pricing models, these models calculate fair values by discounting future cash flows at estimated market interest rates. Typical inputs and assumptions to pricing models include, but are not limited to, a combination of benchmark yields, reported trades, issuer spreads, liquidity, benchmark securities, bids, offers, reference data, and industry and economic events.

D.5. Any Other Information

All material facts regarding the valuation of assets and liabilities are covered in the relevant sections above. In particular, the nature of the Company's business means that no assumptions need to be made about future management actions. Similarly with policyholder's behaviour, the only assumption is the lapse rate, and this is described in the section above on the valuation of Technical Provisions.

The Company has not used the counter-cyclical premium or matching premium adjustments.

Capital Management

E. Capital Management

Until year-end 2015, supervision was based on Solvency I requirements. Since 1st January 2016, the Company has been supervised based on the Solvency II framework on a statutory basis, allowing for the use of a Partial Internal Model for the calculation of its regulatory Solvency Capital Requirement. This follows the NBB's formal approval in 2015 for CLICE and CEIC and in 2017 for Myrtle. The management of own funds is considered over the business planning period i.e. 3 years alongside the Company's risk appetite. Those policies cover the following objectives:

- Maintain a level of capital in adequacy with the Company's Risk Appetite,
- Identify the key components of own funds and planning of future composition of capital,
- Outline measures in the event that their solvency ratio declines rapidly or falls below the critical limit in respect, and
- Set out the roles and responsibilities of each participant.

E.1. Own funds

The following tables are as at 31 December 2024 and 31 December 2025 and are shown on a Solvency II basis. Under Solvency II, the excess of assets over liabilities is called "Own Funds" and all excess is classified as Tier 1 in the own funds structure as detailed below. The differences between "Own Funds" (here from an economic perspective) and Shareholder's Equity under BE GAAP as shown in the Company's financial statements are due to the "reconciliation reserve" that comprises:

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Reconciliation reserve	**4,154**	**-496**	**17,003**	**4,646**	**16,728**	**-3,122**
Total best estimate impact	19,989	17,735	22,341	10,599	42,330	28,334
Claims provision, net of reinsurance (1)	*8,840*	*16,196*	*3,835*	*4,578*	*12,675*	*20,774*
Premium provision, net of reinsurance (2)	*8,673*	*-455*	*18,506*	*6,021*	*27,179*	*5,566*
Life provision, net of reinsurance (3)	*2,475*	*1,994*	*0*	*0*	*2,475*	*1,994*
Risk margin (4)	-9,757	-10,536	-4,179	-3,988	-14,640	-15,374
Investment (5)	-3,263	-5,737	2,403	-454	-860	-6,191
Other Economic Adjustments linked to Service Companies (6)					-3,725	-6,421
Tax impact on valuation differences	-2,815	-1,958	-3,562	-1,511	-6,377	-3,470

Exhibit E.1: Cigna Europe's Reconciliation reserves

1. Removal of prudence in best-estimate Solvency II reserves
2. Profit margin in next year's future premiums
3. Difference in valuation assumptions due to best estimate versus inclusion of prudence
4. Explicit allowance under Solvency II (in excess of best estimate) for capturing intrinsic market consistent value
5. Market value of bonds under Solvency II versus book value under Solvency I
6. For the non-insurance entities, the contribution to the reconciliation reserve is the removal of intangibles, the deferred tax assets, and the exclusion of software reported in the "Property, plant & equipment held for own use" line of the balance sheets.

Own Funds Structure

Solvency II classifies the available capital into three main groups according to its availability and liquidity, i.e. from Tier 1, which contains the highest quality of own funds that can fully absorb losses, to Tier 3.

The Eligible Capital held to meet the Solvency II requirement (SCR) is the available economic capital satisfying Tier 1, 2 and 3 conditions, including:

- Tier 2 and Tier 3 funds are limited to 50% of the SCR; and
- Tier 3 is limited to 15% of the SCR.

The split of available capital between the different Tiers together with their capital requirements is shown in the following tables for the respective Companies:

(EUR'000)	Tier	CLICE		CEIC		Myrtle	
		31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24	31-Dec-25	31-Dec-24
Basic own funds	**T1**	**253,889**	**236,983**	**161,672**	**130,272**	**481,407**	**384,903**
Ordinary share capital		124,078	124,078	102,401	102,401	556,052	493,993
Share premiums		8,551	8,551	0	0	0	62,058
Other reserves from accounting balance sheet (1)		12,747	12,747	7,062	5,610	43,441	40,767
Retained earnings		104,359	92,104	35,205	17,614	159,586	122,012
Reconciliation reserve		4,154	-496	17,003	4,646	16,728	-3,122
Participation adjustments		Not applicable		Not applicable		-294,400	-330,805
Unpaid capital, initial fund not paid-up	**T2**	**0**	**0**	**0**	**0**	**0**	**0**
Deferred Tax Assets	**T3**	**0**	**0**	**0**	**0**	**0**	**0**
Eligible capital to cover SCR		**253,889**	**236,983**	**161,672**	**130,272**	**481,407**	**384,903**
Eligible capital to cover MCR		**253,889**	**236,983**	**161,672**	**130,272**	**481,407**	**384,903**

Exhibit E.2: Cigna Europe's Own Funds structure

1. Legal reserve

E.2. Solvency Capital Requirement and Minimum Capital Requirement

At 31 December 2025, the solvency II position of the Group stood at 214% of the SCR (31 December 2024: 179%) and at 824% of the required minimum (31 December 2024: 612%).

The Company continues to hold a strong capital base under Solvency II driven by the continuous drive to sustain business growth and reinforce value, strength and security brought to all stakeholders.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25 (1)	31-Dec-24	31-Dec-25 (1)	31-Dec-24	31-Dec-25 (1)	31-Dec-24
Solvency Capital requirement (Partial Internal Model)						
Eligible capital to cover SCR	253,889	236,983	161,672	130,272	481,407	384,903
SCR	146,943	141,966	86,684	83,635	224,812	214,555
Solvency position	**173%**	**167%**	**187%**	**156%**	**214%**	**179%**
Minimum Capital requirement						
Eligible capital to cover MCR	253,889	236,983	161,672	130,272	481,407	384,903
MCR (2)	36,736	41,646	21,671	21,238	58,407	62,883
Solvency position	**691%**	**569%**	**746%**	**613%**	**824%**	**612%**

Exhibit E.3: Cigna Europe's required capital and solvency positions

1. Solvency Capital Requirement is still subject to final approval by the auditor.
2. The Minimum Capital requirement for Myrtle is calculated as the sum of the MCRs of CLICE and CEIC, where the latter have been individually calculated based on the PIM framework.

The evolution in eligible own funds from year end 2024 to year end 2025 is mainly driven by a combination of retained earnings and distribution of dividends, reduced unrealised losses on investments and higher unrealised gains on reserves.

The Solvency Capital Requirement is calculated based on an internal approach as set out in section C and E.4. The risk profile of the Company is split over the different risk categories as follows:

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25[(1)]	31-Dec-24	31-Dec-25[(1)]	31-Dec-24	31-Dec-25[(1)]	31-Dec-24
Solvency Capital Requirement	**146,943**	**141,966**	**86,684**	**83,635**	**224,812**	**214,555**
Market risk	57,605	52,031	38,298	35,034	97,776	89,138
Counterparty risk	32,493	31,747	24,095	19,120	50,713	50,463
Health underwriting risk	72,192	72,611	44,854	46,274	108,108	103,454
Life underwriting risk	2,740	3,896	Not applicable		2,740	3,896
Non-Life Underwriting risk	Not applicable		826	966	826	966
Diversification between risks	-46,693	-45,503	-30,897	-28,193	-73,704	-71,150
Operational risk	31,421	29,144	13,068	11,945	44,489	41,089
Loss absorbing effect of deferred taxes	-2,815	-1,958	-3,562	-1,511	-6,137	-3,300

Exhibit E.4: Cigna Europe's risk profile

1. Solvency Capital Requirement is still subject to final approval by the auditor.

In respect of the calculation of the risk-modules and sub-modules of the standard formula, the Company does use simplified calculations for the Life expense and Life catastrophe risk.

The Company does not use any undertaking specific parameters.

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

The Company does not apply the duration-based equity risk –sub-module.

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

The following table shows the Solvency II position under respectively the Partial Internal Model and the Standard Formula.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25(1)	31-Dec-24	31-Dec-25(1)	31-Dec-24	31-Dec-25(1)	31-Dec-24
Partial Internal Model						
Eligible capital to cover SCR	253,889	236,983	161,672	130,272	481,407	384,903
Solvency Capital Requirement	146,943	141,966	86,684	83,635	224,812	214,555
Solvency position	**173%**	**167%**	**187%**	**156%**	**214%**	**179%**
Standard Formula						
Eligible capital to cover SCR	253,220	235,789	170,386	130,114	480,821	383,806
Solvency Capital Requirement	161,156	166,583	88,452	84,950	243,607	247,463
Solvency position	**166%**	**142%**	**193%**	**153%**	**197%**	**155%**

Exhibit E.5: Cigna Europe's Partial Internal Model vs. Standard Formula solvency positions

1. Solvency Capital Requirement is still subject to final approval by the auditor.

The Company has developed a PIM at solo entity and at group level. The PIM is embedded within the organisation and provides a basis for management to take fully informed, risk-based decisions on both the operational and strategic business environment. More specifically, the Company has embedded the PIM throughout standardised business practices including Business and Capital Planning exercises, underwriting discipline, investment and market risk monitoring, input into the Company Rating review process and reviews of Reinsurance arrangements.

The proposed approach to use a PIM at solo entity level was approved by the Board of Directors'. It has been decided in early 2011 to internally model four risks and to integrate these results into standard formula results using the default integration techniques as stated in Article 245 of the Delegated Acts. The SCR modelled internally covers all quantifiable risks relating to existing and renewal / new business expected to be written in the forthcoming 12 months:

Premium and reserve risks: the Company developed a simulation-based approach allowing to produce a full probability distribution.

Pandemic risk: the Company designed a stochastic scenario generator for pandemic risk based on Monte-Carlo simulations.

Currency risk: the Company built a currency scenario generator simulating scenarios for all currency exposures over a one-year period, accounting for their own dependencies. Each of these simulations is therefore applied on the relevant exposure and then the model aggregates all exposures to drive a different possible outcome.

All lines of business are considered in the scope of the PIM for the Company to avoid any form of cherry picking. Materiality thresholds determine whether a business segment is internally modelled versus through the standard formula approach.

The Partial Internal Model consists of different risk components which are separately calculated and aggregated via the SF default integration technique at the highest level. The probability distribution forecast is thus calculated for each component that is internally modelled.

The following table outlines the main differences between Standard Formula and Partial Internal Model.

(EUR'000)	CLICE		CEIC		Myrtle	
	31-Dec-25[1]	31-Dec-24	31-Dec-25[1]	31-Dec-24	31-Dec-25[1]	31-Dec-24
Solvency Capital Requirement						
Partial Internal Model [2]	**146,943**	**141,966**	**86,684**	**83,635**	**224,812**	**214,555**
Impact of internal model on:						
Market risk	2,772	4,140	-1,009	-2,163	4,581	-6,566
Counterparty risk	385	452	945	893	222	270
Health underwriting risk	14,464	25,126	2,473	2,841	19,143	44,502
Life underwriting risk	0	0	Not applicable		0	0
Non-Life Underwriting risk	Not applicable		-177	-206	-177	-206
Diversification between risks	-3,585	-5,413	-492	-73	-5,087	-5,309
Loss absorbing effect of deferred taxes	177	312	28	23	113	216
Standard Formula	**161,156**	**166,583**	**88,452**	**84,950**	**243,607**	**247,463**

Exhibit E.6: Impact of internal model

1. Solvency Capital Requirement is still subject to final approval by the auditor.
2. The scope of the PIM encompasses both Insurance Companies within Cigna Europe and is split through the modular approach per CLICE (Counterparty, Market, Operational, Health and Life) and CEIC (Counterparty, Market, Operational, Health and Non-Life). Cigna Europe calculates the Group Capital Requirements for Cigna Myrtle Holdings through the use of the Consolidation Methodology after consolidating the scope of the two solo entities with the ancillary service companies.

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

There is no non-compliance with the MCR or SCR for the undertaking.

E.6. Any other information

There is no additional information related to the capital management of the undertaking.

Glossary

Beechwood	Cigna Beechwood Holdings MTS
CEIC	Cigna Europe Insurance Company S.A./N.V.
CESL	Cigna European Services (UK) Ltd
CIHS	Cigna International Health Services BV
CISEL	Cigna Insurance Services (Europe) Limited
CLICE	Cigna Life Insurance Company of Europe S.A./N.V.
Elmwood	Cigna Elmwood Holdings N.V.
GHB	Global Health Benefits
GEP	Gross Earned Premium
GIH	Global Individual Health
HL&A	Health, Life & Accident
IG	Intra Group
IGT	Intra Group Transaction
IOH	IGO Health, NGO Health and Government Health
KRA	Key Risk Assessment
MCR	Minimum Capital Requirements
Myrtle	Cigna Myrtle Holdings Limited
NBB	National Bank of Belgium
Op Risk	Operational Risk Management
ORSA	Own Risk and Solvency Assessment
QRT	Quantitative Reporting Templates
SCR	Solvency Capital Requirements
SFCR	Solvency and Financial Condition report
SOG SA	System of Governance Self-Assessment
SI	Solvency I
SII	Solvency II
SPEH	Spain Employer Health
UKEH	UK Employer Health

Appendix – Reporting Templates

The following Quantitative Reporting Templates (QRTs) for Myrtle, CLICE and CEIC are available by clicking on the links given below.

Click Here for CLICE QRTs

- QRT S.02.01.02 specifying balance sheet information using the valuation in accordance with Article 75 of Directive 2009/138/EC.
- QRT S.04.05.21 specifying information on premiums, claims and expenses by country using the valuation and recognition principles used in the undertaking's financial statements.
- QRT S.05.01.02 specifying information on premiums, claims and expenses using the valuation and recognition principles used in the undertaking's financial statements, for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35.
- QRT S.12.01.02 specifying information on the technical provisions relating to life insurance and health insurance pursued on a similar technical basis to that of life insurance ('health SLT') for each line of business as defined in Annex I to Delegated Regulation (EU) 2015/35.
- QRT S.17.01.02 specifying information on non-life technical provisions, for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35.
- QRT S.19.01.21 specifying information on non-life insurance claims in the format of development triangles for the total non-life business.
- QRT S.23.01.01 specifying information on own funds, including basic own funds and ancillary own funds.
- QRT S.25.05.21 specifying information on the Solvency Capital Requirement calculated using the standard formula and a partial internal model.
- QRT S.28.02.01 specifying the Minimum Capital Requirement for insurance undertakings engaged in both life and non-life insurance activity.

Click Here for CEIC QRTs

- QRT S.02.01.02 specifying balance sheet information using the valuation in accordance with Article 75 of Directive 2009/138/EC.
- QRT S.04.05.21 specifying information on premiums, claims and expenses by country using the valuation and recognition principles used in the undertaking's financial statements.
- QRT S.05.01.01 specifying information on premiums, claims and expenses using the valuation and recognition principles used in the undertaking's financial statements, for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35.
- QRT S.17.01.02 specifying information on non-life technical provisions, for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35.
- QRT S.19.01.21 specifying information on non-life insurance claims in the format of development triangles for the total non-life business.

- QRT S.23.01.01 specifying information on own funds, including basic own funds and ancillary own funds.
- QRT S.25.05.21 specifying information on the Solvency Capital Requirement calculated using the standard formula and a partial internal model.
- QRT S.28.01.01 specifying the Minimum Capital Requirement for insurance and reinsurance undertakings engaged in only life or only non-life insurance or reinsurance activity.

Click Here for Myrtle QRTs

- QRT S.32.01.22 specifying information on the undertakings in the scope of the group.
- QRT S.02.01.02 specifying balance sheet information using the valuation in accordance with Article 75 of Directive 2009/138/EC.
- QRT S.05.01.02 specifying information on premiums, claims and expenses, using the valuation and recognition principles used in the consolidated financial statements for each line of business as defined in Annex I of Delegated Regulation (EU) 2015/35.
- QRT S.05.02.04 specifying information on premiums, claims and expenses by country, using the valuation and recognition principles used in the consolidated financial statements.
- QRT S.23.01.22 specifying information on own funds, including basic own funds and ancillary own funds.
- QRT S.25.05.22 specifying information on the Solvency Capital Requirement calculated using the standard formula and a partial internal model.