



EUROPEAN CENTRAL BANK

EUROSYSTEM

# 5. Q&As on ECB Add-ons

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ECB-PUBLIC  
FINAL



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# ECB instructions – where to find them

- Relevant information relating to reporting:

[https://www.ecb.europa.eu/stats/financial\\_corporations/insurance\\_corporations/html/data\\_reporting.en.html](https://www.ecb.europa.eu/stats/financial_corporations/insurance_corporations/html/data_reporting.en.html)

- Unofficial reporting templates 2.8.0

[https://www.ecb.europa.eu/stats/money/icpf/shared/pdf/Unofficial\\_reporting\\_templates\\_including\\_ECB\\_add-ons\\_1.zip](https://www.ecb.europa.eu/stats/money/icpf/shared/pdf/Unofficial_reporting_templates_including_ECB_add-ons_1.zip)

- Instructions for ECB add-ons

[https://www.ecb.europa.eu/stats/money/icpf/shared/pdf/Instructions\\_for\\_ECB\\_add-ons\\_2.8.0.zip](https://www.ecb.europa.eu/stats/money/icpf/shared/pdf/Instructions_for_ECB_add-ons_2.8.0.zip)

- EIOPA Q&A on regulation related to ECB Add-ons

[https://www.ecb.europa.eu/stats/money/icpf/shared/pdf/eiopa\\_qna\\_ecb\\_add-ons.en.pdf](https://www.ecb.europa.eu/stats/money/icpf/shared/pdf/eiopa_qna_ecb_add-ons.en.pdf)

## E.04.01 and S.12.02 connection (1)

**“The information on income gains and expenses attributed to policyholders are part of life TPs and shall be reported for all countries reported in the current S.12.02 submission.”**

**Could you please confirm that both QRTs are not to be reported as defined by the materiality thresholds in EIOPA taxonomy?”**

Answer: E.04.01 always has to be reported. The reference to S.12.02 merely relates to the split of material and non-material countries. If all business is in the home country, then only cells relating to home country thus ER0010 should be filled. If cross-country business exists, countries which are material in S.12.02 should be reported in row E.04.01 ER0040. Countries which are not material in S.12.02 should be reported in E.04.01 ER0020, ER0030.

## E.04.01 and S.12.02 connection (2)

**Question: Is the QRT E.04.01 due if we have 100% home country?**

Answer: E.04.01 always has to be reported. If all business is in the home country, then only cells relating to home country thus ER0010 should be filled. If cross-country business exists, countries which are material in S.12.02 should be reported in row E.04.01 ER0040. Countries which are not material in S.12.02 should be reported in E.04.01 ER0020, ER0030.

## E.04.01 and S.12.02 connection (3)

**Question: ECB-QRT E.04.01 requires information on the geographical breakdown of technical provisions in life insurance in respect of investment income and investment expenses attributable to individual policyholders and in respect of investment income and investment expenses in life and non-life insurance not attributable to individual policyholders. Reference is made to the information in QRT S.12.02, which is not reported by us, however, as the insurance business is conducted exclusively in Germany. In QRT SE.01.01 (Content ECB), there is unfortunately no option to indicate that there is no business outside the home country. Here, a short-term adjustment makes sense.**

## E.04.01 and S.12.02 connection (3 continued)

Answer: E.04.01 always has to be reported. If all business is in the home country, then only cells relating to home country thus ER0010 should be filled. If cross-country business exists, countries which are material in S.12.02 should be reported in row E.04.01 ER0040. Countries which are not material in S.12.02 should be reported in E.04.01 ER0020, ER0030. Therefore, there is no need to amend the content of the submission.

## E.04.01.16.03 to be filled by all companies

**Question: Investment revenues and expenses - part of excess of assets over liabilities - E.04.01.16.03: Clarification is requested regarding criteria/thresholds for completing the QRT. Specifically, it is requested if the part identified with E.04.01.16.03 is to be filled out only by companies that sell products outside the home country or by all companies.**

Answer: The template E.04.01 should always be reported, even if all business is in the home country. In E.04.01.16.03 ER0050 all business has to be reported, without a country breakdown.

# Life and non-life business reporting in E.04.01

**Question: Is E.04.01 to be reported also for non-life insurance or only for life Insurance?**

Answer: E.04.01 shall be reported only for **life** for investment revenues and expenses **attributed to policyholders** (E.04.01.16.01, E.04.01.16.02) and for **life and non-life** for investment revenues and expenses - **part of excess of assets over liabilities** (E.04.01.16.03)

## E.04.01 and S.29.02

**Question: Could you confirm if the check between E.04.01 and S.29.02 is referred to investment revenues and expenses not attributed to policyholders or to overall investment revenues and expenses?**

Answer: The instructions have been updated.

Under the assumption that non-life products with profit participation do not exist, the following holds:

- Investment revenues of S.29.02.01 C0010 R0040 equals the sum of all rows of E.04.01 EC0020, EC0030 and EC0060
- Investment expenses of S.29.02.01 C0010 R0050 equals the sum of all rows in E.04.01 EC0040, EC0050 and EC0070

## E.04.01 - Investment revenues/expenses in TP (1)

**Question: EC0060 - Investment revenues: Confirmation is requested on the criteria for calculating the amounts to be included, particularly if the "attributed to policyholder" part refers only to projected investment earnings and expenses in the BEL.**

Answer: Yes, attributed to policyholder (E.04.01.16.01 and E.04.01.16.02) refers to all investment revenues and expenses that are part of TP.

## E.04.01 - Investment revenues/expenses in TP (2)

**Question: I have a question regarding the nature of investment revenues/expenses in the E.04.01. We are talking here about the provisioned share of the investment revenues/expenses allocated to policyholders in the TP and not the paid share, right?**

Answer: Yes, E.04.01.16.01 and E.04.01.16.02 only refer to investment revenues/expenses that are part of TP.

# General guidance on E.04.01

**Question: E.04.01.16 – We are waiting for further guidance from the ECB on how to report data "attributed to policyholders."**

Answer: The LOG files were updated in August 2023 with issued raised through EIOPA's Q&As and again in October 2023 to clarify issues during the public event. If further questions arise, please contact your NCB for instructions.

# General guidance on E.04.01

**Question: E.04.01.16 – We are waiting for further guidance from the ECB on how to report data "attributed to policyholders."**

Answer: The LOG files were updated in August 2023 with issues raised through EIOPA's Q&As and again in October 2023 to clarify issues during the public event. If further questions arise, please contact your NCB for instructions.

## **E.04.01 - What does attribution to policyholders really mean (1)**

**Question: What does attribution to policyholders really mean? Do you mean discretionary benefits, but also guaranteed interest rates paid to policies.**

**Does that include also possible revenues from UL-business. Are UL-revenues also considered as allocated to policyholders.**

## E.04.01 - What does attribution to policyholders really mean (2)

Answer: This relates only to investment income (dividends, interest, rent) as reported in both S.09.01 and S.29.02 and expenses as reported in S.29.02. E.04.01 mainly tries to split these investment income and expenses into whether they are part of TP (attributed to policyholder) or part of excess of assets over liabilities.

All investment income including discretionary benefits and guaranteed interest rate should be included when reporting E.04.01. All investment income that are part of unit linked contracts should also be included.

# SE.17.01 – E.04.01 movements in valuation

**Question: Revenues in accounting does not include all investment returns, is it really helpful to include only revenues, and not the movements of valuation. Because normally whole return is the base when deciding discretionary benefits. It's not clear what is really wanted to report with E.04.**

Answer: This relates only to investment income (dividends, interest, rent) as reported in both S.09.01 and S.29.02 and expenses in S.29.02. E.04.01 mainly tries to split these investment income and expenses into whether they are part of TP (attributed to policyholder) or part of excess of assets over liabilities. Indeed, movements of valuation should not be considered.

## SE.17.01 – differentiation based on underwriting date

**Question: Gross claims paid in the current quarter relating to risks covered before the current reporting period**

- **ER0421 Gross claims paid in the current quarter relating to risks covered in the current reporting period**
- **ER0422: Clarification is requested on the content of the field.**

**Specifically, it is requested if it is required to differentiate payments on the basis of policy underwriting date, and if this should be applied also on the basis of renewals and new business.**

## SE.17.01 – differentiation based on underwriting date (continued)

Answer: The instructions have been changed to say that the cells refer to

- ER0421 Gross claims paid in the current financial year relating to claims incurred before the current financial year and
- ER0422 Gross claims paid in the current financial year relating to claims incurred in the current financial year.

The policy underwriting date is thus irrelevant for the reporting of these ECB Add-ons but rather whether the claims incurred in the current or the previous financial year.