Consumer Trends Report 2022 – Statistical Annex

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European Insurance and
Occupational Pensions Authority

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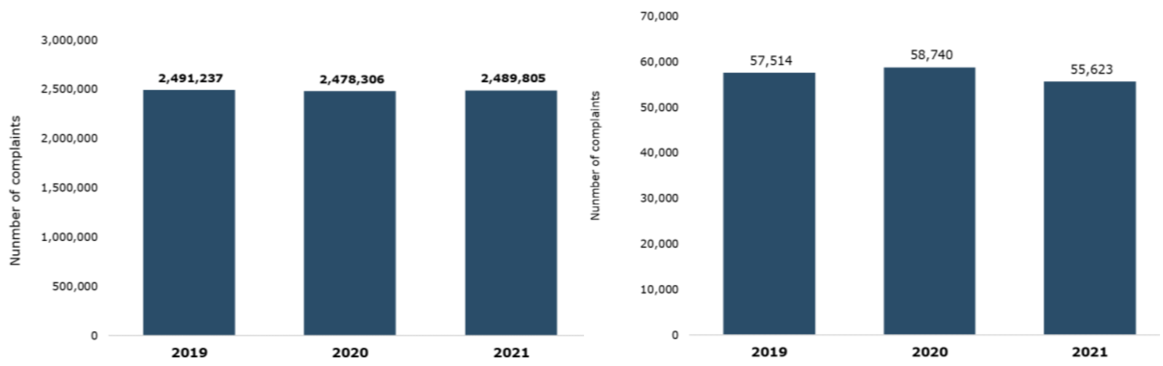
ANNEX I – COMPLAINTS

1.1. INSURANCE

For the 2022 Consumer Trends Report, EIOPA adopted the same approach towards the collection of complaints data it did in 2021.

- To increase data comparability it differentiated between data on complaints received and managed by insurance undertakings and data on complaints received by entities other than insurance undertakings. These in most instances include Ombudsmen, or similar alternative dispute resolution bodies, and/or NCAs which either handle complaints and/or receive complaints and take supervisory actions as needed in line with their collective consumer protection mandate;
- To collect more granular data on products by closely matching the data requested with the data available at NCAs, for those NCAs which provided data on complaints received and managed by insurance undertakings, it differentiated between complaints reported by products and complaints reported by insurance classes.

Figure 1 - Total number of complaints reported by undertakings (left) and by authorities (right) – 2021, 2020, 2019



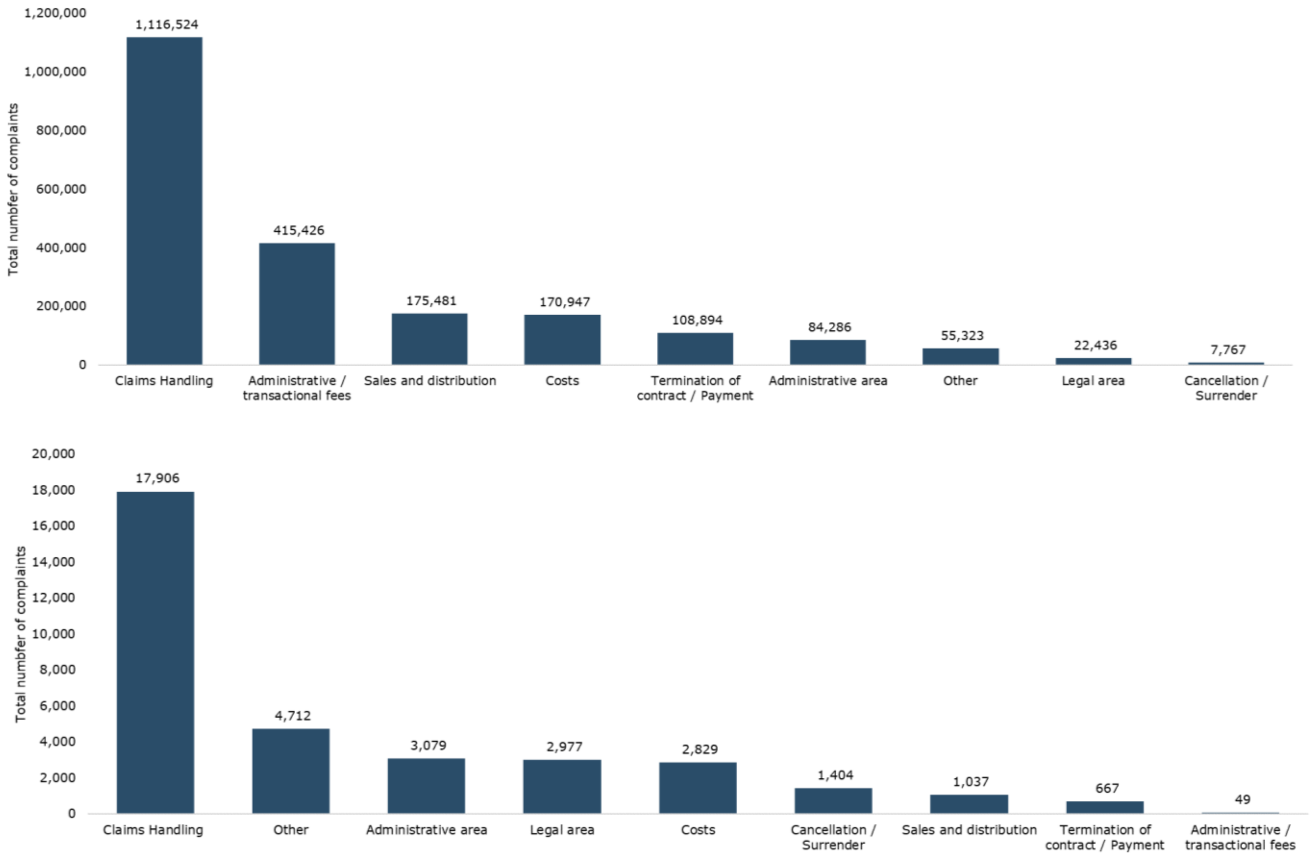
Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[1]

Complaints reported by undertaking have been steady over the past 3 years, with a slight decrease in 2020, possibly due to forbearance measures that were put in place by several insurance undertakings and insurance intermediaries. However in 2021, complaints reported by undertakings

[1] 21 NCAs respondents for complaints reported by undertaking: AT, BG, HR, CZ, EE, FR, EL, HU, IE, IT, LV, LI, LT, LU, MT, NL, PL, PT, RO, SL, SI / 18 NCAs respondents for complaints reported by Authorities: BE, BG, HR, CZ, EE, DE, EL, HU, IE, IT, LV, LI, LT, LU, MT, PL, PT, RO

rose slightly to reach pre-pandemic levels (i.e. 2019). An inverse trend is verifiable when looking at the complaints reported by authorities, while the complaints slightly increased from 2019 to 2020, it dropped by over 3000 complaints from 2020 to 2021.

Figure 2 – Breakdown of life and non-life complaints by cause for both undertaking level (above) and authority level (below) – 2021



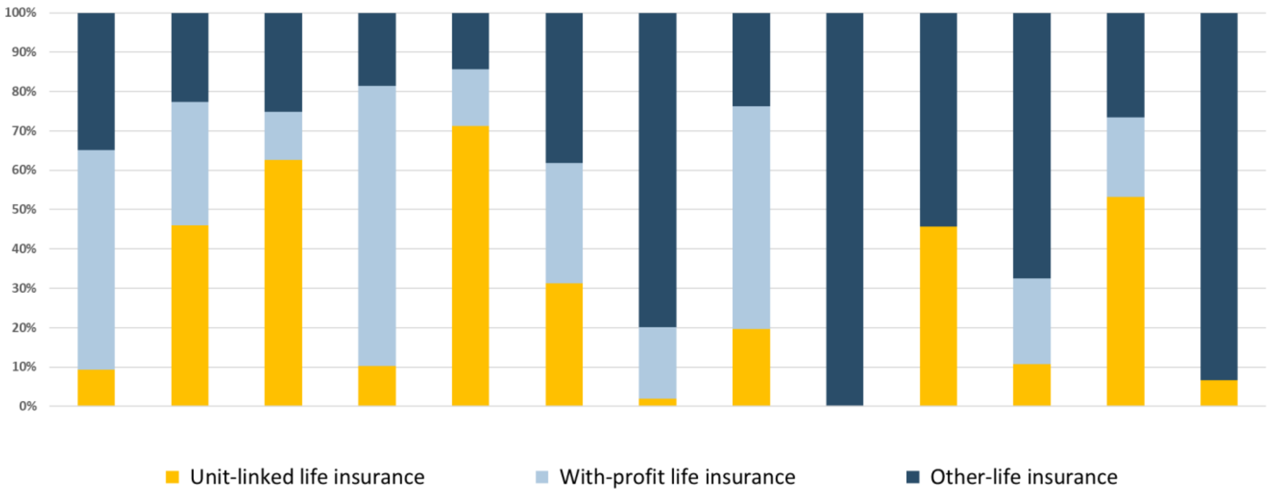
Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[2]

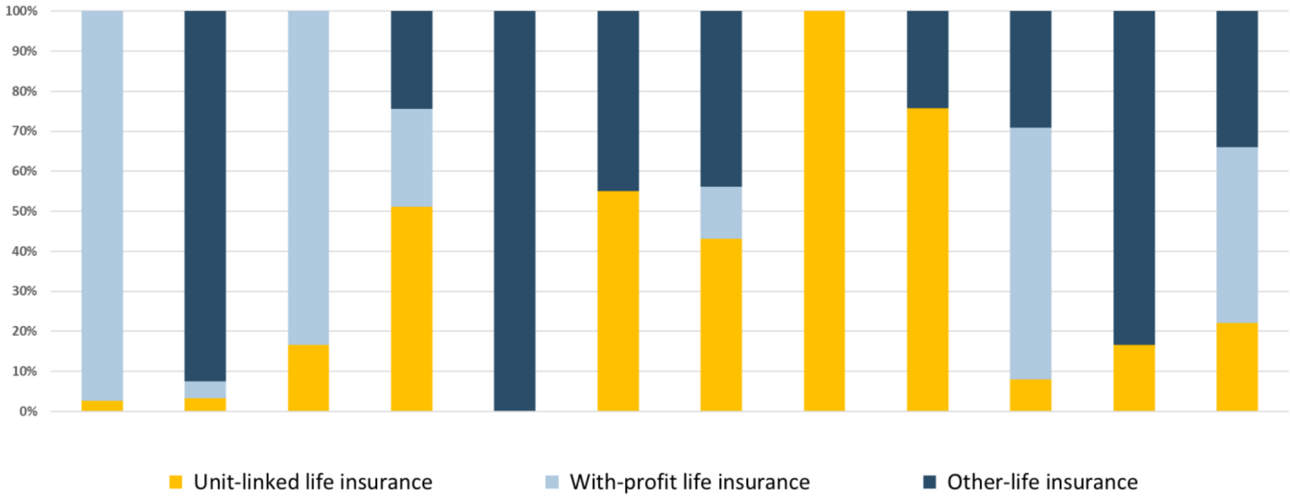
As reported in previous consumer trends report, claims handling remains the highest source of complaints for both complaints reported by undertakings and by authorities. Further, 7 NCAs reported claims handling as the cause of complaints with the highest increase in 2021, while another 8 NCAs noted a decrease in claims handling complaints. One NCA reported a strong increase in complaints relating to sales and distribution, whereby the distributors did not adequately present the pre-contractual information and did not inform adequately consumers on the main features of the products being advised on.

[2] 20 NCAs respondents for complaints reported by undertaking: AT, BG, HR, CZ, EE, FR, EL, HU, IE, IT, LI, LT, LU, MT, NL, PL, PT, RO, SL, SI / 14 NCAs respondents for complaints reported by Authorities: BE, BG, HR, DE, EL, HU, IE, LI. LT, LU, MT, PL, PT, RO

The below figures show the proportion of complaints for life products (Figure 3) and non-life products (Figure 4) in Member States.

Figure 3 – Proportion of life complaints by product in each Member States as reported at undertaking level (above) and at authorities' level (below) – 2021

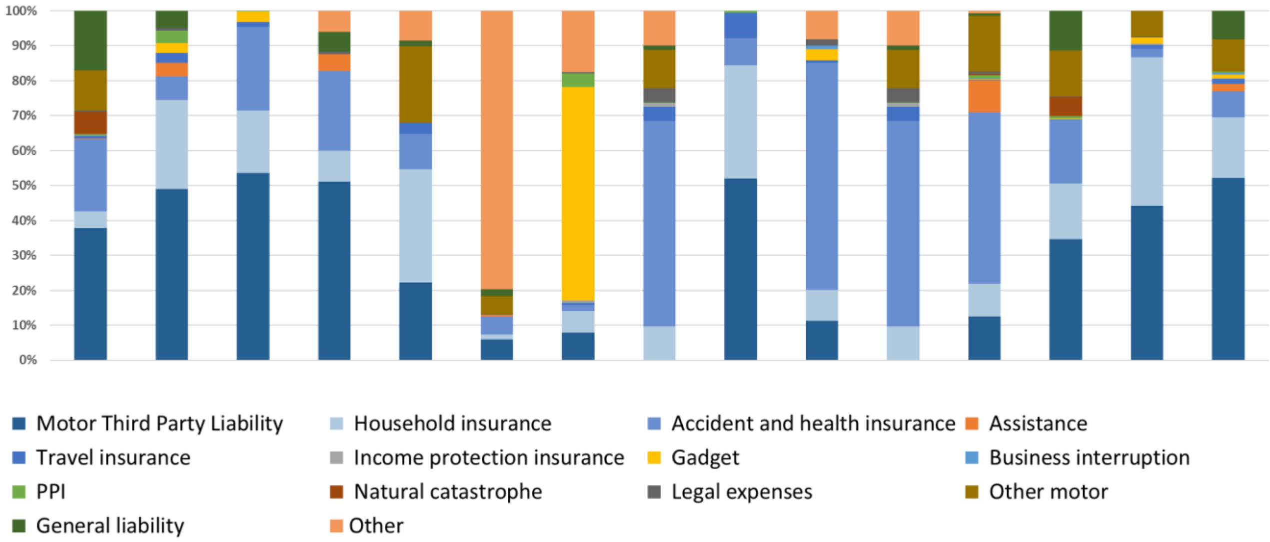


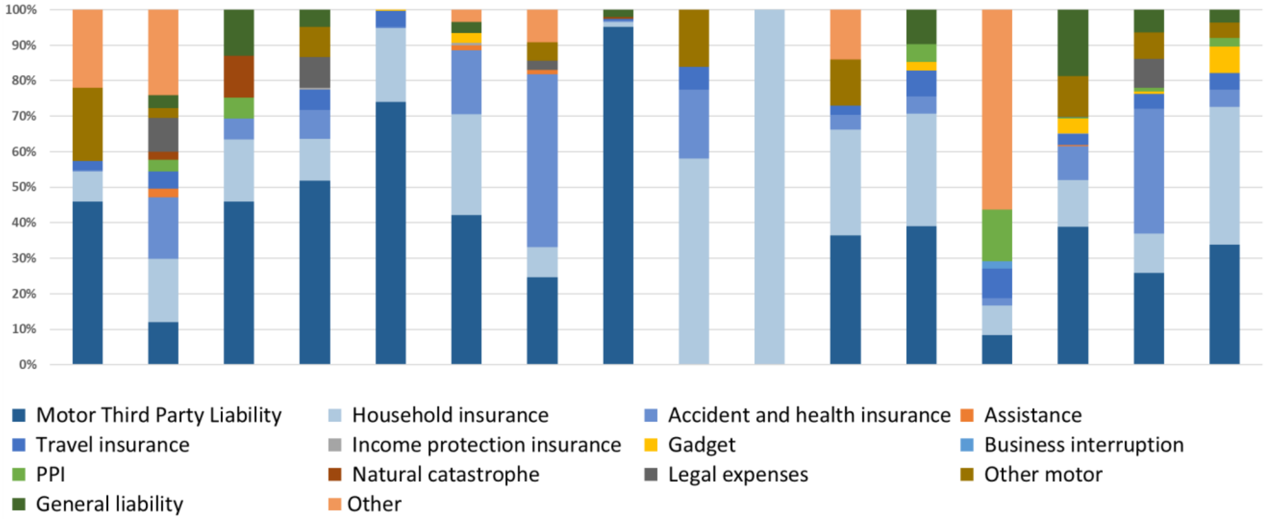


Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[3]

[3] 13 NCAs respondents for complaints reported by undertaking: HR, CZ, EE, EL, HU, IT, IE, LT, LU, MT, PL, SI, NL / 16 NCAs respondents for complaints reported by Authorities: BE, BG, HR, CZ, EE, DE, EL, HU, LV, LI, LT, LU, MT, PL, PT, RO

Figure 4 - Proportion of non-life complaints by product in each Member States as reported at undertaking level (above) and at authorities' level (below) – 2021





Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[4]

When asked to provide representative examples of complaints in their respective markets, NCAs reported the below:

- For life: examples of complaints reported by NCAs relate to the surrender value, delays in payments, as well as a lack of understanding by consumers of terms and conditions,

[4] 14 NCAs respondents for complaints reported by undertaking: HR, CZ, EE, FR, EL, HU, IT, IE, LT, LU, MT, PL, SI, NL / 16 NCAs respondents for complaints reported by Authorities: BE, BG, HR, CZ, EE, DE, EL, HU, LV, LI, LT, LU, MT, PL, PT, RO

including of the performance and costs of products, due to poor explanation during the distribution phase.

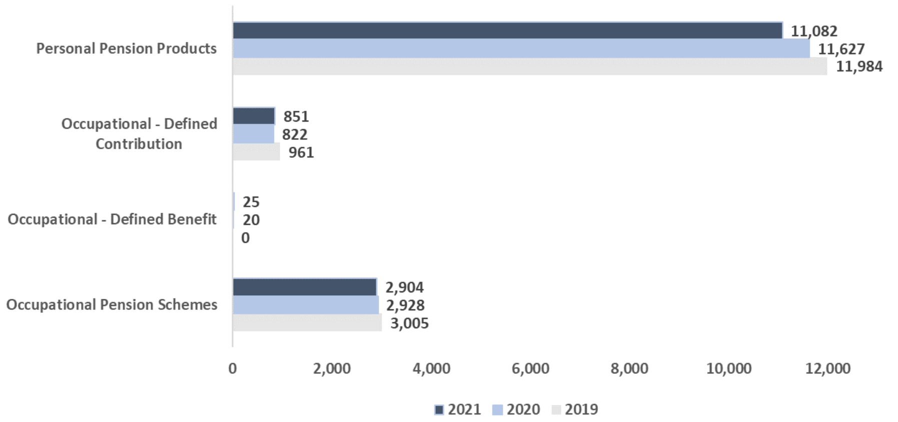
- For non-life: NCAs reported complaints examples related to the handling of MTPL claims with consumers not agreeing with claim settlement amounts or consumers experiencing delays, both related to the time to settlement as well as to general help in the claims process.

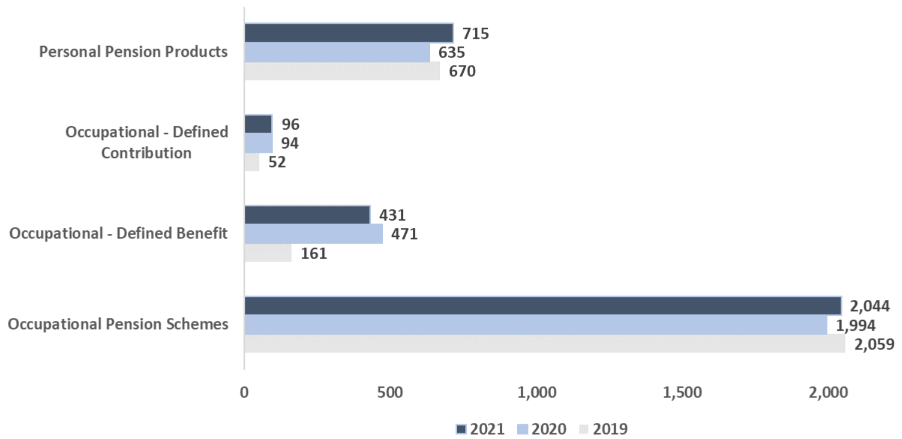
1.2. PENSION

Similarly than for the insurance sector, EIOPA collects data on pensions complaints from two sources:

- Complaints received and managed by pension providers.
- Those collected by entities acting like a mediating body and/or ADR.

Figure 5 - Number of complaints reported by pension providers (above) and mediating body and/or ADR (below) for IORPs and PPPs, 2021, 2020, 2019

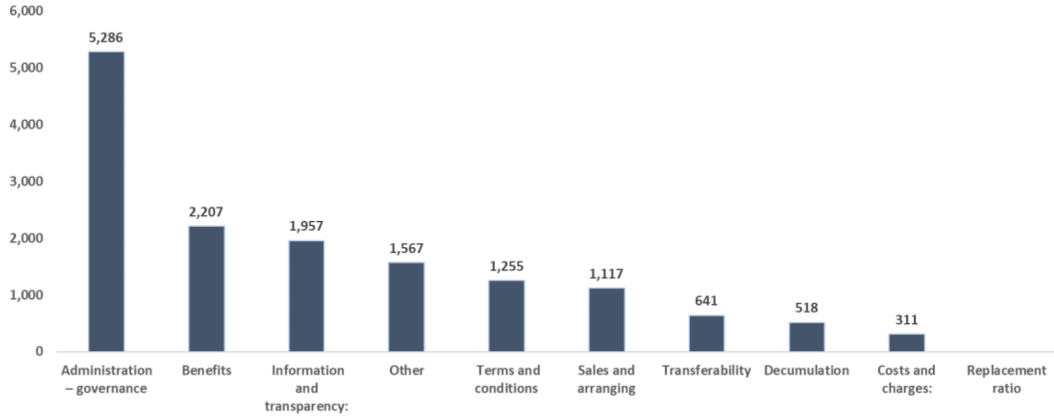


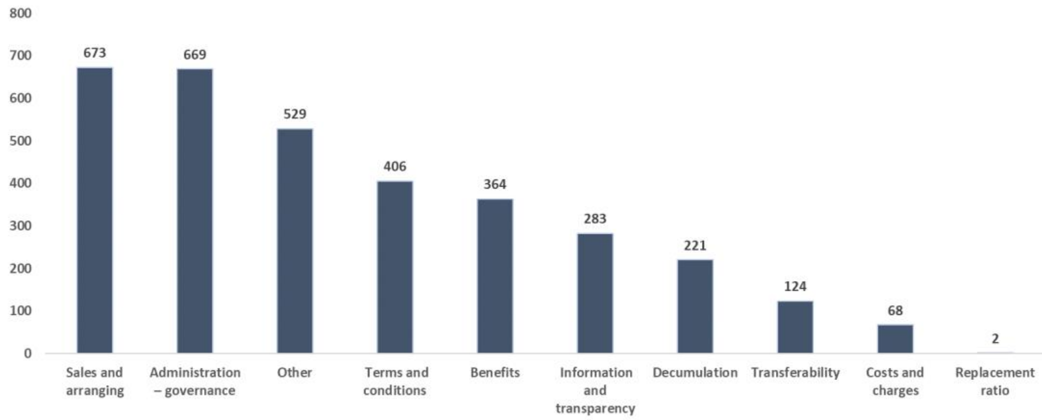


Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[5]

When looking at the complaints reported by pension providers, for both occupational pension schemes and personal pension products a slight decreasing trend since 2019 is visible. This trend is however not verifiable for complaints reported by authorities.

Figure 6 - Breakdown of pension complaints by cause as reported by pension providers (above) and by mediating body and/or ADR (below) – 2021





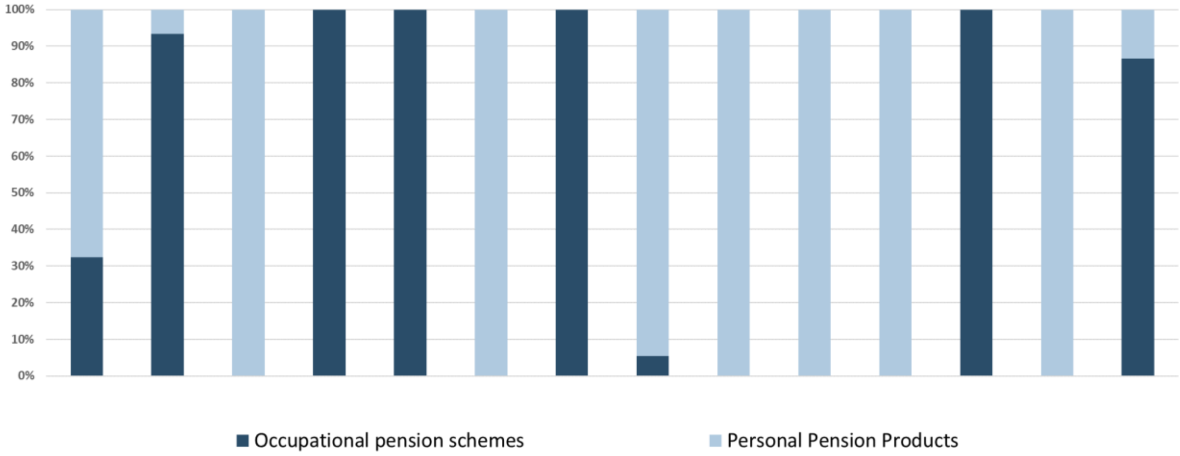
Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[6]

The below figures show the proportion of complaints related to occupational pension schemes and to personal pension products in Member States (Figure 7) .

[5] 14 NCAs respondents for complaints reported by undertakings: LV, IE, HU, RO, NL, IT, SI, CZ, BE, MT, SK, LI, LT, HR / 14 NCAs respondents for complaints reported by mediating body and/or ADR: LV, PL, IE, HU, NL, PT, CZ, DE, BE, BG, MT, SK, LT, HR

[6] 14 NCAs respondents for complaints reported by undertakings: LV, IE, HU, RO, NL, IT, SI, CZ, BE, MT, SK, LI, LT, HR / 12 NCAs respondents for complaints reported by mediating body and/or ADR: LV, HU, NL, PT, IE, CZ, DE, BE, BG, MT, LT, HR

Figure 7 - Proportion of pensions complaints by product in each Member States as reported by pension providers (above) and by mediating body and/or ADR (below) – 2021[7]



Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[8]

When asked to provide representative examples of pension complaints in their respective markets, NCAs reported the below:

- For occupational pensions: examples reported by NCAs relate to complaints about the amount of the retirement income being too low, or the income being late, as well as the inefficacy of the investment strategies.

[7] Please note that the proportion of complaints by Member State is influenced by the type of pension product available in their respective markets.

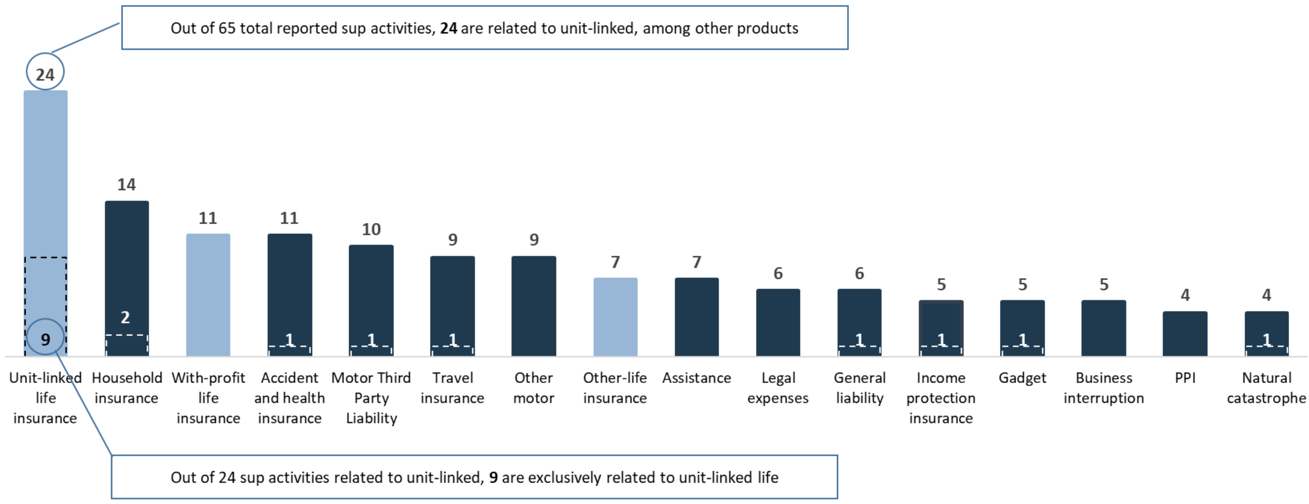
[8] 14 NCAs respondents for complaints reported by undertakings: LV, IE, HU, RO, NL, IT, SI, CZ, BE, MT, SK, LI, LT, HR / 14 NCAs respondents for complaints reported by mediating body and/or ADR: LV, PL, IE, HU, NL, PT, CZ, DE, BE, BG, MT, SK, LT, HR

ANNEX II – NCAS SUPERVISORY ACTIVITIES

2.1. INSURANCE

EIOPA requests input yearly to NCAs on their top 3 insurance conduct-related supervisory activities, and more particularly on the types of products concerned by these activities, on the area of these activities and on the type of activities.

Figure 8 – Number of supervisory activities carried out by NCAs in relation to insurance products-2021

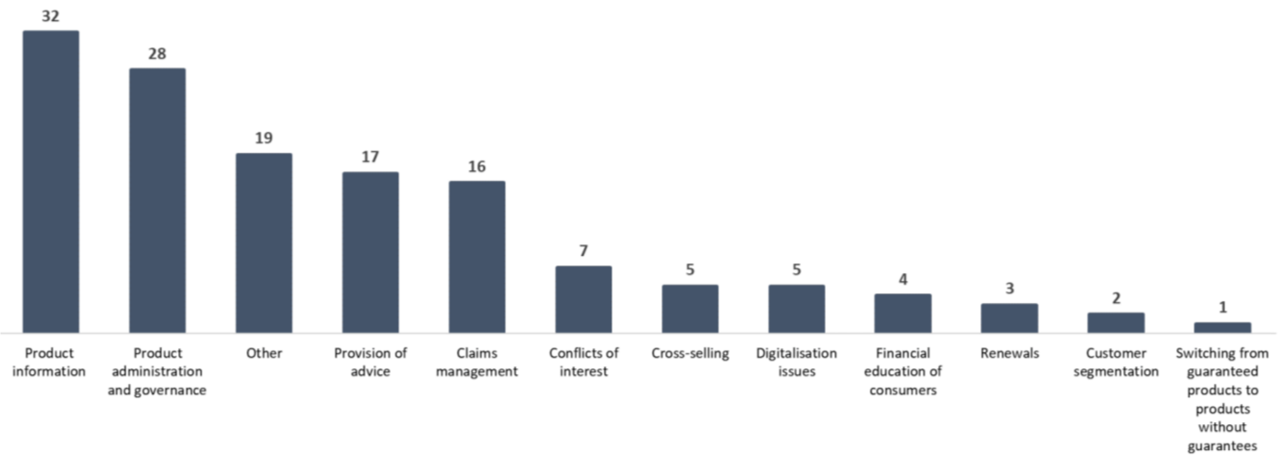


Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[9]

In 2021, NCA reported a total of 65 conduct-related insurance supervisory activities (note: one activity can relate to multiple products, tools used and topics investigated). In terms of products concerned by these activities, life products are a priority as 2 life insurance products (unit-linked, with profit) are in the first 3 (Figure 8). This is in line with the value for money trend outlined in part 3.1.1 of the main report, and the continuing concerns in relation to the complexity and return of these products. This is also confirmed by the fact that 9 supervisory activities exclusively related to unit linked products, marking their importance in NCAs' conduct supervision (Figure 8). In terms of non-life products, NCAs' activities focus is distributed, with particular attention on household insurance, accident and health insurance and motor third party liability.

[9] 26 NCAs respondents: SI, RO, IE, FI, DE, EE, PL, PT, HU, CZ, AT, NL, EL, BG, SK, ES, SE, LI, LT, LV, MT, BE, LU, HR, IT, FR

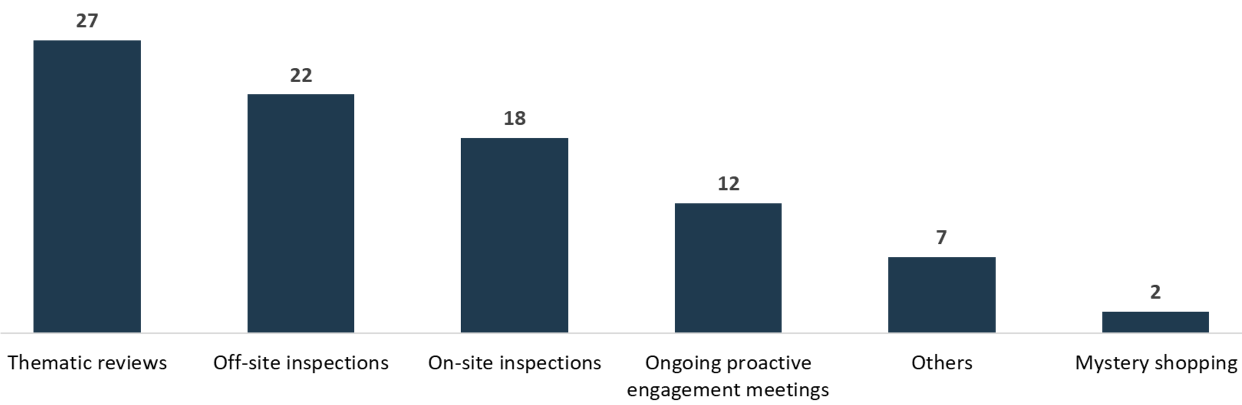
Figure 9 – Number of insurance supervisory activities carried out by NCAs in relation to their area of focus – 2021



Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[10]

In terms of the areas tackled by NCAs top 3 supervisory activities (Figure 9), the majority of NCAs activities focused on product-related areas such as product information (32 activities) and product administration and governance (28 activities). In this respect, NCAs assessed compliance with POG requirements for both life and non-life products and compliance of product disclosure (pre-contractual, periodic and website disclosure). NCAs also conducted activities in relation to the provision of advice (17 activities) where they assess compliance by distributors, including digital ones, in relation to the suitability assessment and demands and needs tests, notably for IBIPs. One NCA further investigated advice related to add on insurance and potential risk to consumers stemming from it.

Figure 10 – Number of NCAs' insurance-related supervisory activities by type of tool used – 2021



[10] 26 NCAs respondents: SI, RO, IE, FI, DE, EE, PL, PT, HU, CZ, AT, NL, EL, BG, SK, ES, SE, LI, LT, LV, MT, BE, LU, HR, IT, FR

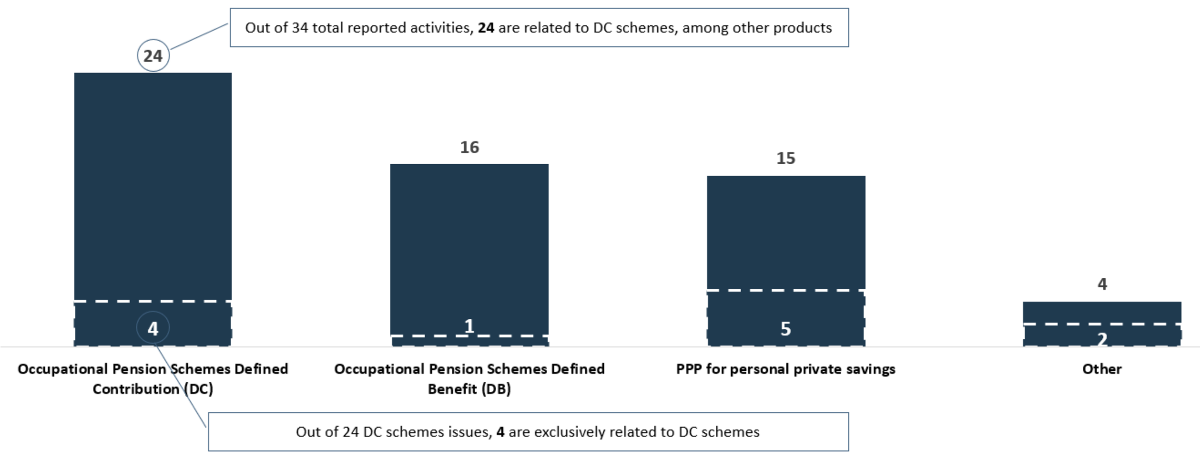
Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[11]

In relation to the tools used in their top 3 supervisory activities, NCAs have in large part conducted thematic reviews (27 activities), closely followed by off-site (22 activities) and on-site (18 activities) inspections. The prevalence of off-site inspections might be due to the lasting covid restrictions, which made on-site inspections not possible or less preferable. NCAs also reported engagement meetings (12 activities), as well as 2 mystery shopping exercises (Figure 10).

2.2. PENSION

Similarly than for insurance, EIOPA requests input yearly to NCAs on their top 3 pension conduct-related supervisory activities, and more particularly on the types of products/schemes concerned by these activities, on the area of these activities and on the type of activities.

Figure 11 – Number of supervisory activities carried out by NCAs in relation to pension products/schemes - 2021

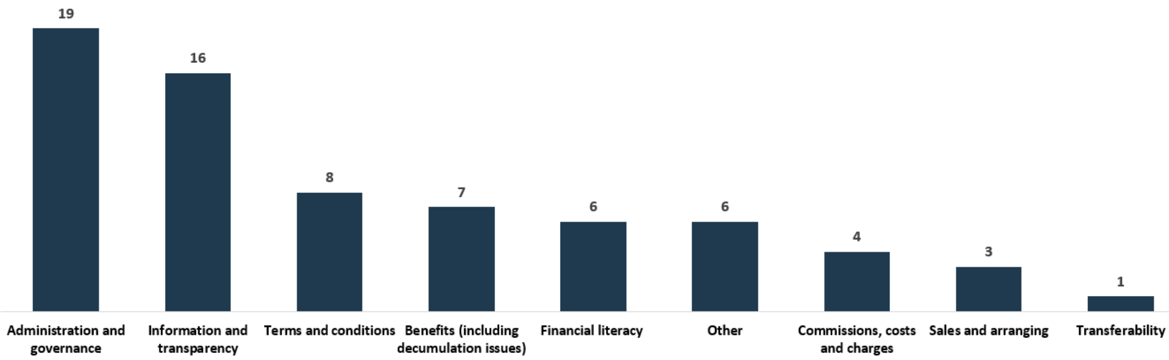


Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[12]

In 2021, NCA reported a total of 34 conduct-related pension supervisory activities (note: one activities can relate to multiple products, tools used and topics investigated). In terms of products/schemes concerned by these activities, occupational pension schemes are a priority with 24 supervisory activities conducted on defined contribution schemes and 16 supervisory activities conducted on defined benefit schemes. 15 activities were also reported for personal pension products for personal savings (PPPs).

[11] 26 NCAs respondents: SI, RO, IE, FI, DE, EE, PL, PT, HU, CZ, AT, NL, EL, BG, SK, ES, SE, LI, LT, LV, MT, BE, LU, HR, IT, FR
[12] 23 NCAs respondents: AT, BE, BG, HR, CZ, EE, FI, DE, HU, IE, IT, LV, LI, LT, LU, MT, NL, PL, PT, SK, SI, ES, SE

Figure 12 – Number of pension supervisory activities carried out by NCAs in relation to their area of focus – 2021



Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[13]

In terms of the areas tackled by NCAs top 3 pension supervisory activities (Figure 12), a large number of NCAs activities focused on administration and governance (19 activities) and on information and transparency (16 activities). In this respect, NCAs assessed the quality of pension administration and the quality of the information as well as the communication for consumers/beneficiaries. Two other NCAs reported activities aimed at helping IORPs to prepare for compliance with IORP II.

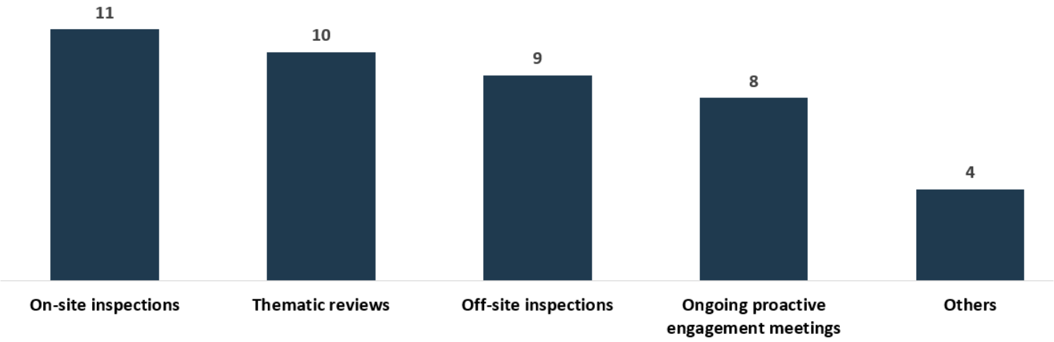
Among the 6 activities carried out in relation to financial literacy, an NCA reported a financial literacy initiative that takes place annually and which covers both pensions and insurance sector. It aims to give students an overview of the three-pillar model of pension and developments in the insurance market.

Other activities reported by NCAs include investigating compliance with national legal provisions, investigating IORPs' readiness in relation to sustainability risks and sustainability-related disclosures, continued monitoring of COVID-19 impact.

In terms of tools used by NCAs to carry out their activities onsite and offsite inspections are the most common tools, with thematic reviews and engagement meetings coming closely after (Figure 13).

[13] 23 NCAs respondents: AT, BE, BG, HR, CZ, EE, FI, DE, HU, IE, IT, LV, LI, LT, LU, MT, NL, PL, PT, SK, SI, ES, SE

Figure 13 – Number of NCAs' pension-related supervisory activities by type of tool used - 2021



Source: EIOPA's Committee on Consumer Protection and Financial Innovation in 2022[14]

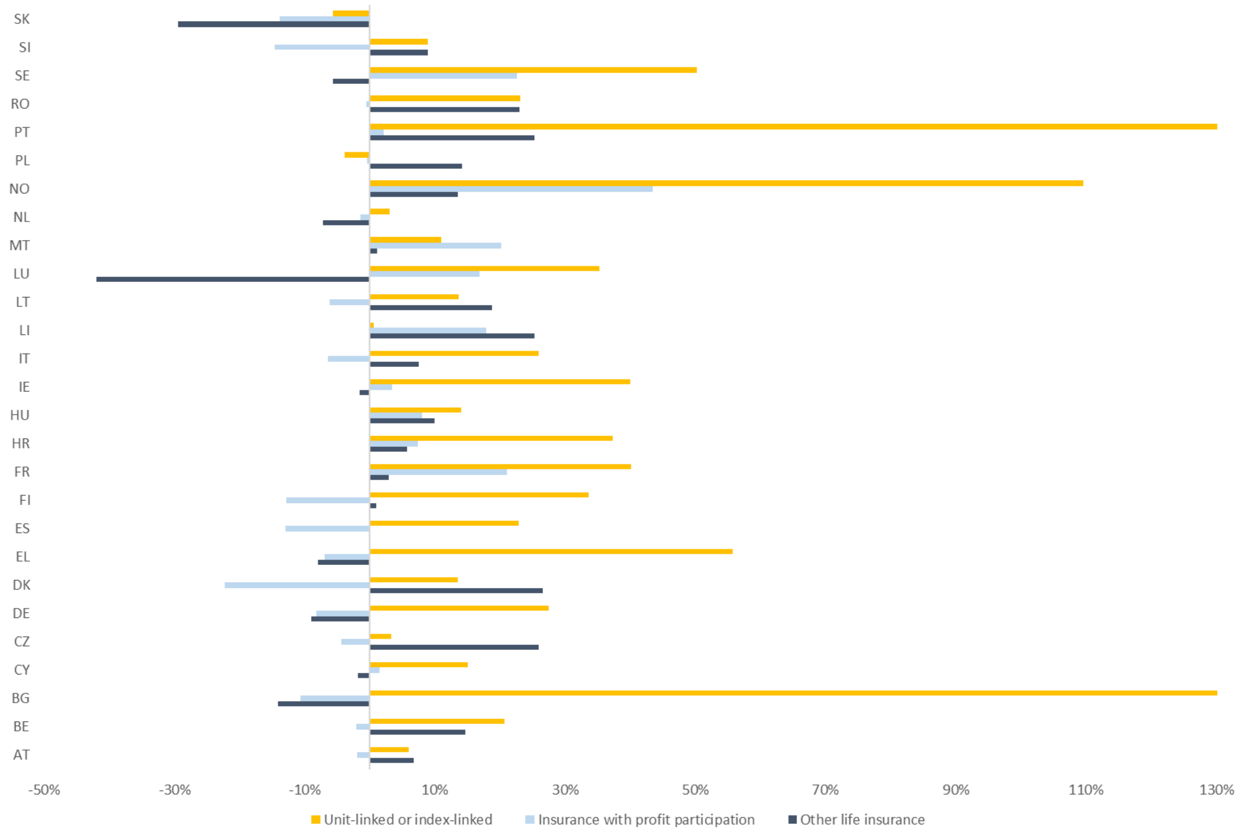
[14] 23 NCAs respondents: AT, BE, BG, HR, CZ, EE, FI, DE, HU, IE, IT, LV, LI, LT, LU, MT, NL, PL, PT, SK, SI, ES, SE

ANNEX III — RETAIL RISK INDICATORS AND INSURANCE LINES OF BUSINESS

In this Annex are reflected graphs based on EIOPA's Solvency II database and the Retail Risk Indicators methodology[15] that were not included in the main body of the report but that were used to inform its drafting.

LIFE

Figure 14 – GWP year on year growth for life lines of business by Member State – 2021, 2020

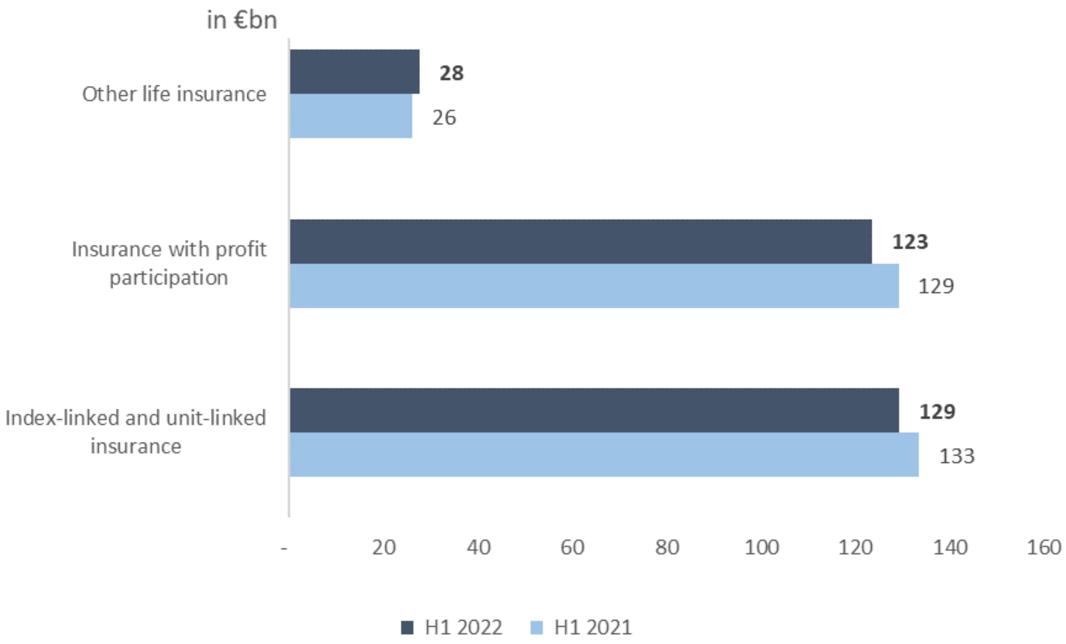


Source: EIOPA Solvency II Database (S.05.01)[16]

[15] Retail risk indicators: methodology update | Eiopa (europa.eu)

[16] For SK: 2 insurance undertakings in Slovakia transformed their portfolios into 2 Czech insurance undertakings and started operating foreign branches in Slovakia as of 2021, therefore they did not report their 2021 GWP volume in SII QRTs. By removing those 2

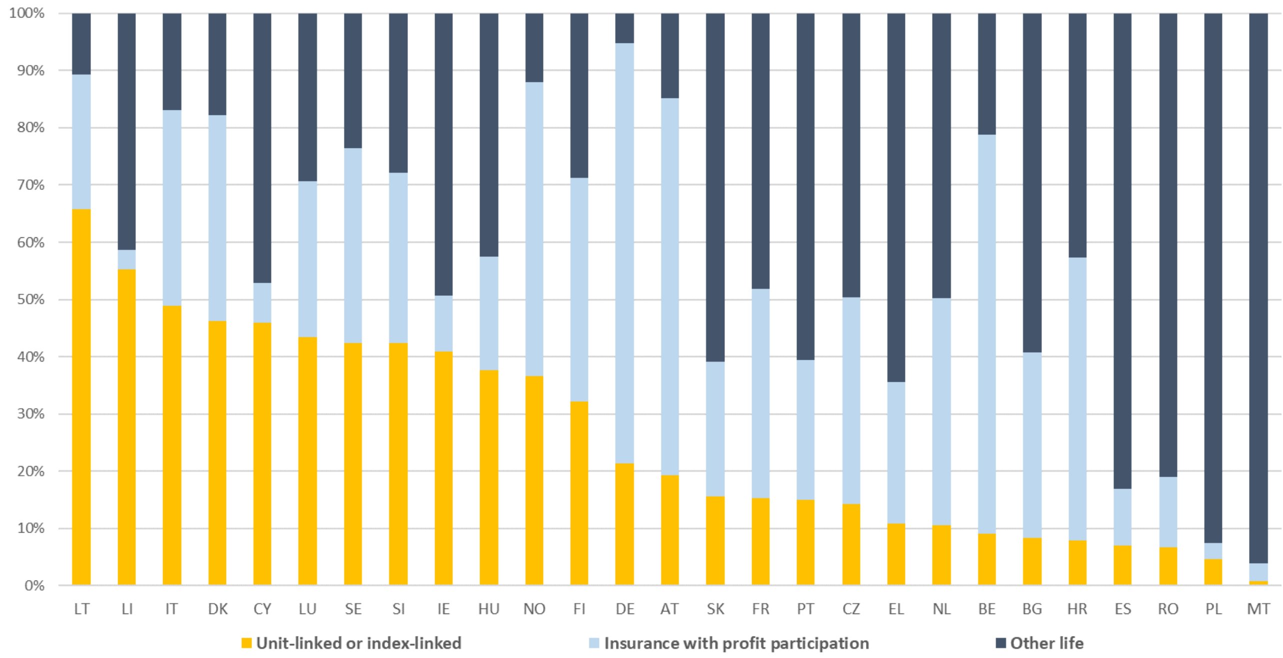
Figure 15 - GWP by life line of business – H1 2022, H1 2021



Source: EIOPA Solvency II Database (S.05.01)

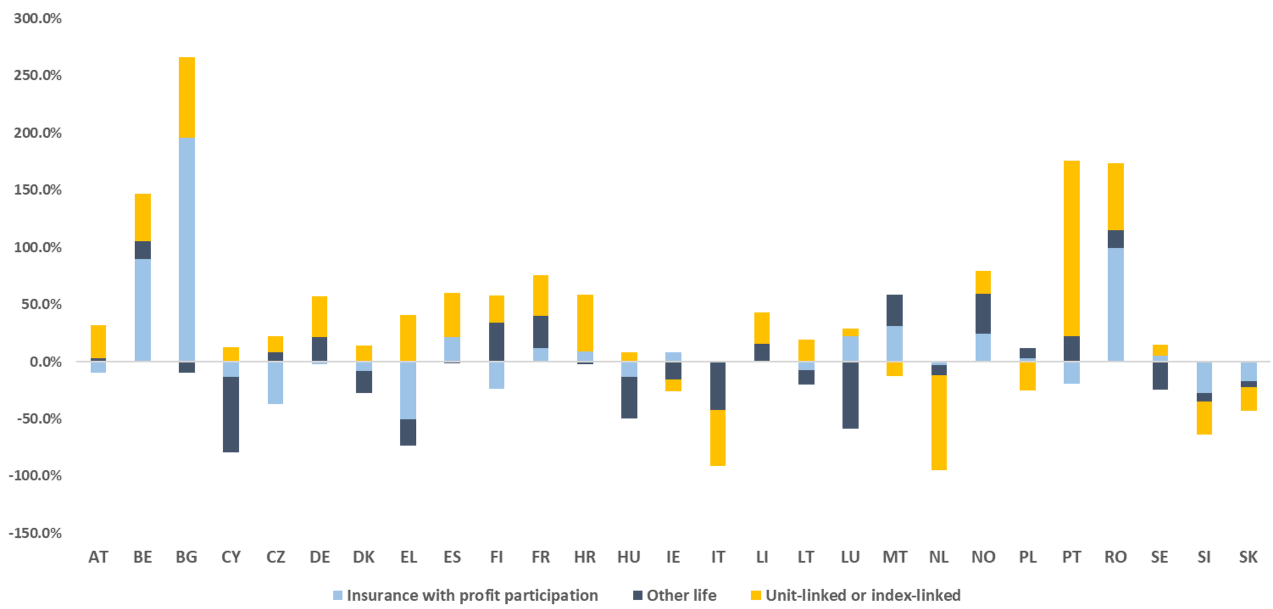
Figure 16 – Weight of life lines of business contracts in each Member State – 2021

insurance undertakings also from 2020 QRTs, the SK insurance market would report an increase in annual GWP annual growth for both life (0.3%) and non-life (2.9%).



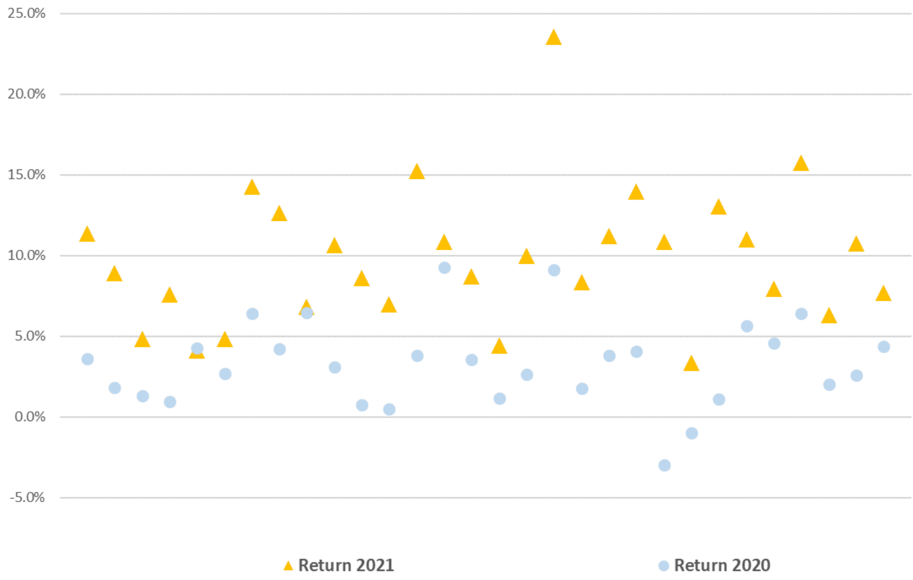
Source: EIOPA Solvency II Database (S.14.01)

Figure 17 – Growth in new contracts per line of business in each Member State – 2021



Source: EIOPA Solvency II Database (S.14.01)

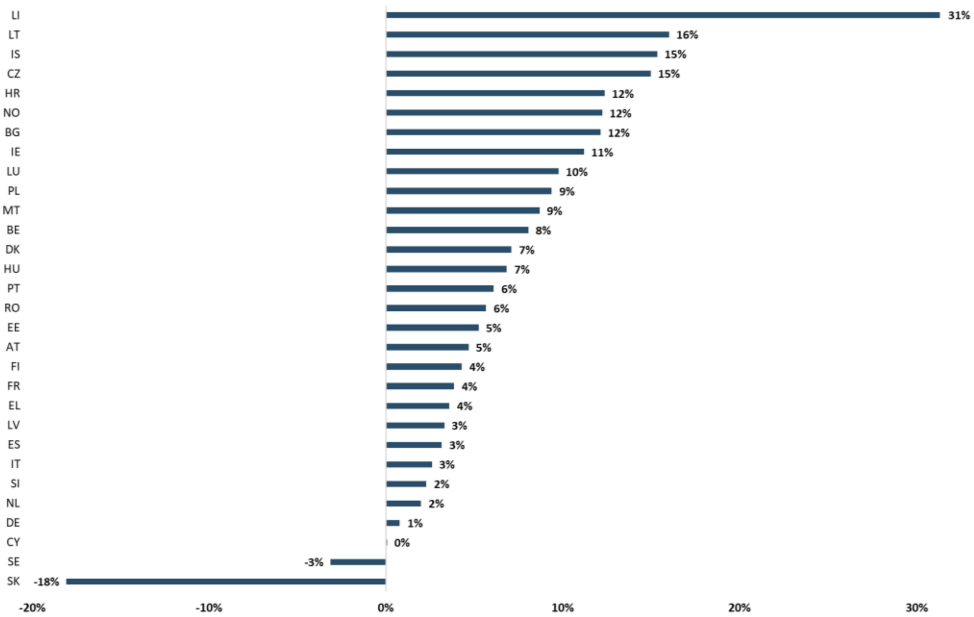
Figure 18 – Return ratio for unit-linked or index-linked insurance line of business – by Member State– 2021, 2020



Source: EIOPA Solvency II Database (S.09.01, S.02.01)

NON-LIFE

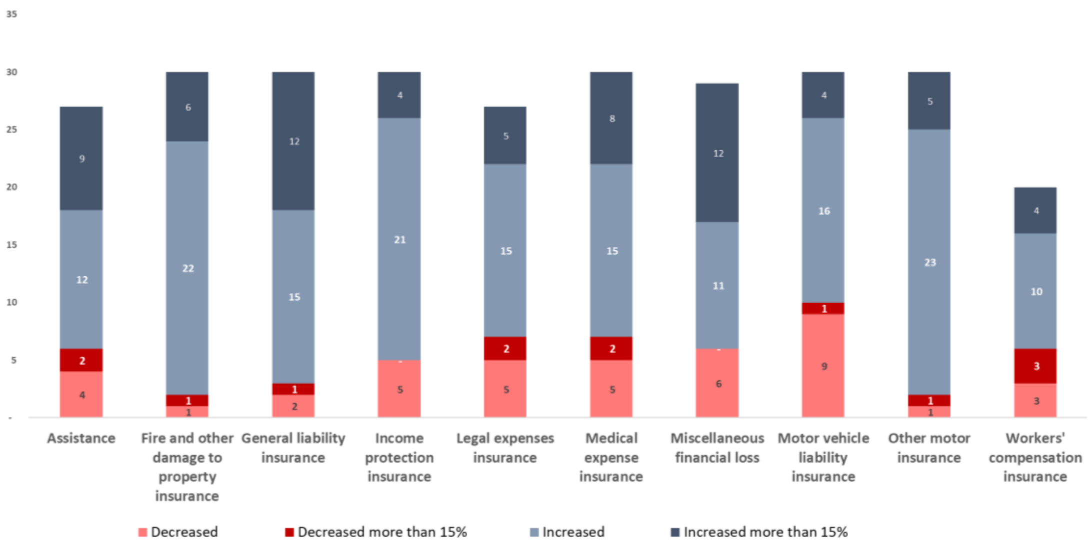
Figure 19 - GWP year on year growth for non-life by Member State – 2021, 2020



Source: EIOPA Solvency II Database (S.05.01) [17]

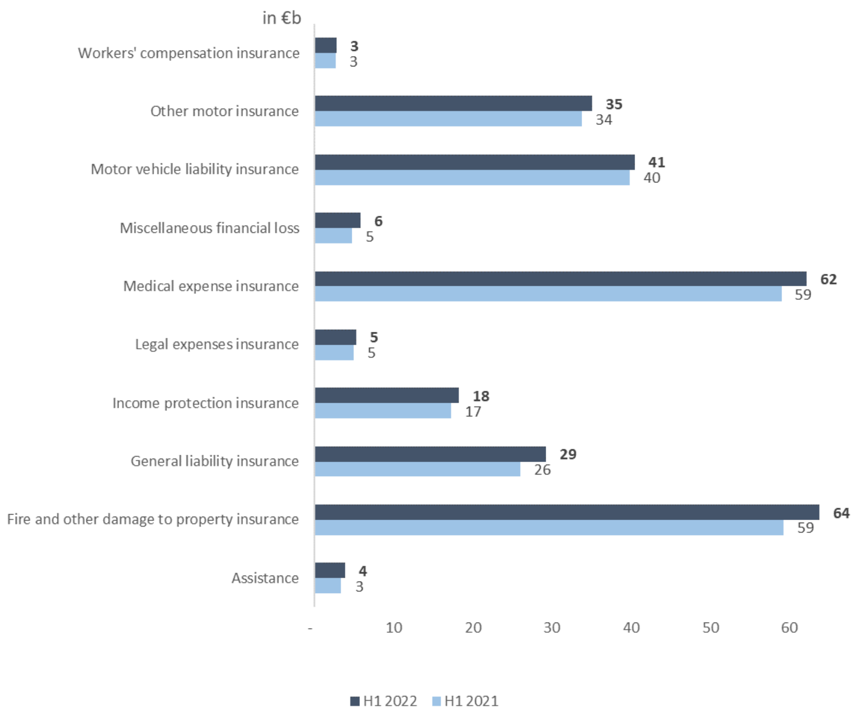
[17] For SK: 2 insurance undertakings in Slovakia transformed their portfolios into 2 Czech insurance undertakings and started operating foreign branches in Slovakia as of 2021, therefore they did not report their 2021 GWP volume in SII QRTs. By removing those 2 insurance

Figure 20 – Non life insurance GWP growth by number of Member states – 2021, 2020



Source: EIOPA Solvency II Database (S.05.01)

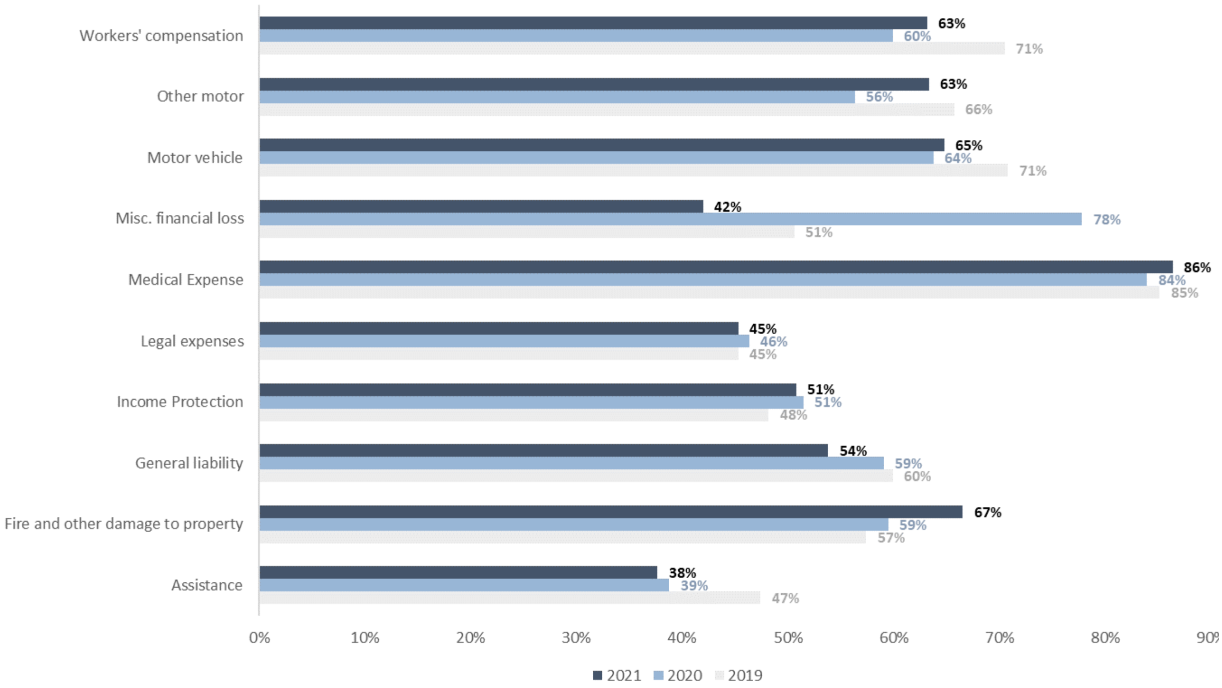
Figure 21 - GWP by non-life line of business – H1 2022, H1 2021



undertakings also from 2020 QRTs, the SK insurance market would report an increase in annual GWP annual growth for both life (0.3%) and non-life (2.9%).

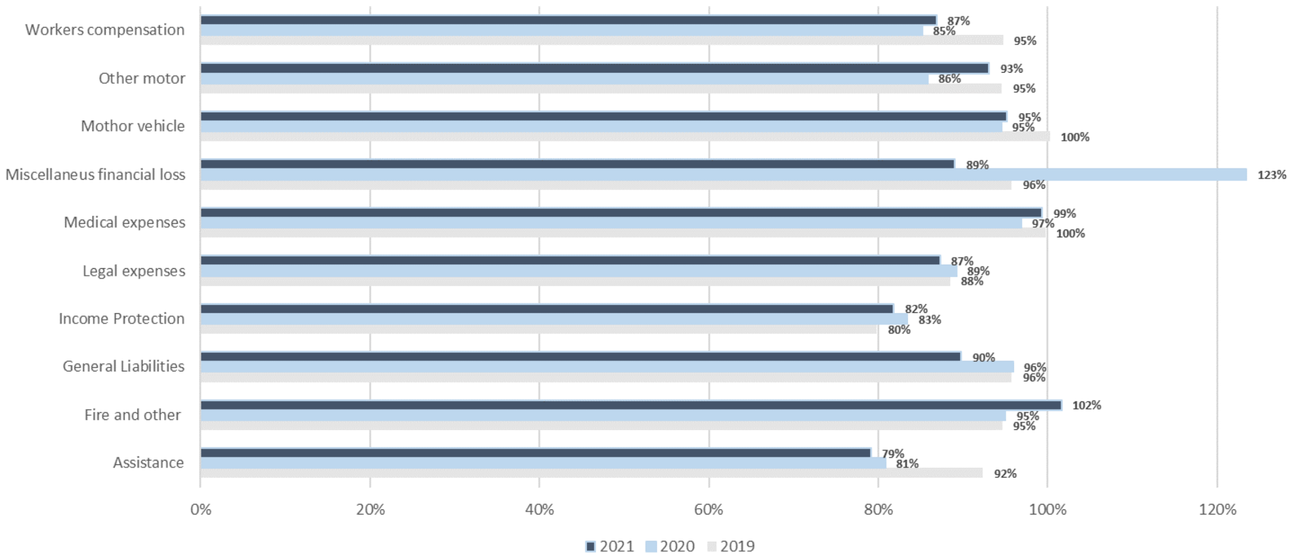
Source: EIOPA Solvency II Database (S.05.01)

Figure 22 – Claims ratio by non-life line of business – 2021, 2020, 2019



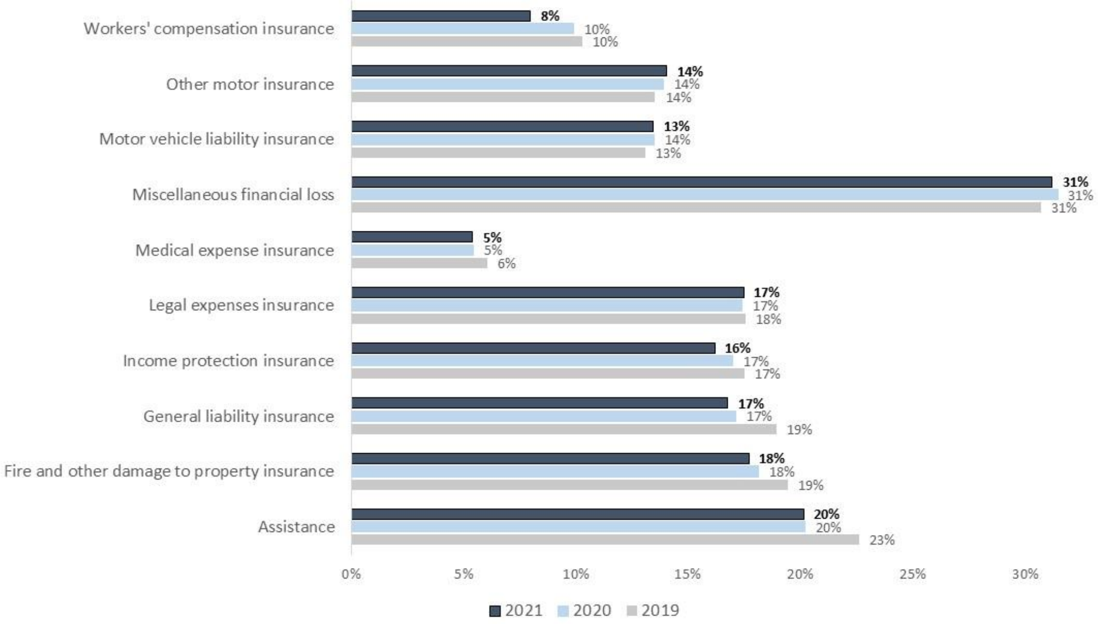
Source: EIOPA Solvency II Database (S.05.01)

Figure 23 – Combined ratio by non-life line of business – 2021, 2020, 2019



Source: EIOPA Solvency II Database (S.05.01)

Figure 24 – Non-life insurance commission rates – 2021, 2020, 2019



Source: EIOPA Solvency II Database (S.05.01)

Figure 25 – Claims ratio by Line of business by Member state

Member States	Assistance	Fire and other damage to property insurance	General liability insurance	Income protection insurance	Legal expenses insurance	Medical expense insurance	Miscellaneous financial loss	Motor vehicle liability insurance	Other motor insurance
AT	25%	87%	59%	51%	37%		40%	57%	77%
BE	33%	76%	63%	41%	43%	71%	49%	52%	53%
BG	45%	22%	36%	21%	13%	47%	14%	60%	45%
CY	0%	16%	22%	28%		42%	39%	62%	45%
CZ	36%	64%	43%	32%	6%	28%	64%	46%	56%
DE	52%	85%	45%	30%	56%	42%	67%	60%	76%
DK	17%	56%	40%	56%	63%	93%	65%	61%	52%
EE		65%	38%	44%		71%		62%	69%
EL	1%	34%	22%	8%	10%	65%	23%	46%	40%
ES	52%	63%	53%	30%	24%	75%	29%	71%	60%
FI		62%	79%	28%	54%	59%	157%	45%	70%
FR	43%	62%	62%	63%	28%	81%	24%	85%	62%
HR	48%	47%	43%	17%	-13%	54%	14%	56%	61%
HU	10%	36%	10%	21%	13%	45%	25%	39%	61%
IE	36%	54%	61%	48%	62%	74%	33%	54%	57%
IS		59%	79%	64%		3%		85%	76%
IT	25%	57%	42%	37%	20%	79%	21%	67%	56%
LI		46%	46%	28%		84%	92%	89%	121%
LT		40%	41%	35%		79%	44%	62%	66%
LU	30%	48%	57%	31%	32%	57%	95%	69%	63%
LV	33%	52%	21%	33%		75%	118%	72%	72%
MT	48%	60%	68%	22%	30%	89%	19%	60%	42%
NL	34%	46%	71%	68%	47%	97%	44%	80%	46%
NO	25%	63%	74%	61%		72%	67%	50%	64%
PL	43%	43%	51%	23%	12%	37%	15%	55%	63%
PT	11%	50%	33%	21%	1%	72%	60%	77%	42%
RO	17%	29%	37%	5%		58%	16%	87%	70%
SE	41%	65%	47%	129%	79%	61%	60%	33%	66%
SI	61%	40%	26%	31%	0%	86%	59%	46%	61%
SK	31%	29%	30%	26%		12%	10%	62%	54%
EEA	38%	67%	54%	51%	45%	86%	42%	65%	63%

Source: EIOPA Solvency II Database (S.05.01)

SOLVENCY II LINES OF BUSINESS

Non-life lines of business	Definition [18]
(1) Medical expense insurance	Medical expense insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
(2) Income protection insurance	Income protection insurance obligations where the underlying business is not pursued on a similar technical basis to that of life insurance, other than obligations included in the line of business 3.
(3) Workers' compensation insurance	Health insurance obligations which relate to accidents at work, industrial injury and occupational diseases and where the underlying business is not pursued on a similar technical basis to that of life insurance.
(4) Motor vehicle liability insurance	Insurance obligations which cover all liabilities arising out of the use of motor vehicles operating on land (including carrier's liability).
(5) Other motor insurance	Insurance obligations which cover all damage to or loss of land vehicles (including railway rolling stock).
(7) Fire and other damage to property insurance	Insurance obligations which cover all damage to or loss of property other than those included in the lines of business 5 and 6 due to fire, explosion, natural forces including storm, hail or frost, nuclear energy, land subsidence and any event such as theft.
(8) General liability insurance	Insurance obligations which cover all liabilities other than those in the lines of business 4 and 6.
(10) Legal expenses insurance	Insurance obligations which cover legal expenses and cost of litigation.
(11) Assistance	Insurance obligations which cover assistance for persons who get into difficulties while travelling, while away from home or while away from their habitual residence.

[18] Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 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), pages 227 and 228, Link.

(12) Miscellaneous financial loss	Insurance obligations which cover employment risk, insufficiency of income, bad weather, loss of benefit, continuing general expenses, unforeseen trading expenses, loss of market value, loss of rent or revenue, indirect trading losses other than those mentioned above, other financial loss (non-trading) as well as any other risk of non-life insurance not covered by the lines of business 1 to 11.

Life insurance lines of business	Definition
(29) Health insurance	Health insurance obligations where the underlying business is pursued on a similar technical basis to that of life insurance, other than those included in line of business 33
(30) Insurance with profit participation	Insurance obligations with profit participation other than obligations included in line of business 33 and 34.
(31) Index-linked and unit-linked insurance	Insurance obligations with index-linked and unit-linked benefits other than those included in lines of business 33 and 34.
(32) Other life insurance	Other life insurance obligations other than obligations included in lines of business 29 to 31, 33 and 34.

ANNEX IV — PENSIONS: DEFINITION AND SCOPE

The *Consumer Trends Report* covers both occupational and personal pension plans and products **under the direct supervision of EIOPA Member States** [19].

However, EIOPA Member States were invited to provide, on a best effort basis, data on every type of **privately managed pension plan, pension product and/or pension provider registered in their respective jurisdictions**, including all insurance products having a clear objective of retirement provision according to inter alia national social and labour law (SLL) and/or fiscal legislation and excluding the 'Pillar I' pensions managed by the State or public entities (**Pillar I-bis pensions in countries in central and eastern Europe are also included**). Therefore, all insurance related non-public pension plans/products could be included in principle, irrespective of whether they are occupational or personal. Plans/products that are defined in the legislation but are not yet actually offered to the public (and/or have not yet collected any members) should also be included. 'Pure' annuities (i.e. that are not linked to an accumulation phase) and PPPs other than insurance products are not considered pensions for the purpose of this exercise.

This last approach would align the scope of this exercise, with the exception of the pension schemes that are not under the direct supervision of EIOPA Member States, with that of **EIOPA's pensions' database** [20], being the definitions included therein that are relevant to the present report.

Data sources and data quality

The analysis performed is based on the IOPRs data reporting - 2021 is the second complete reporting year, following the "Decision on EIOPA's regular information requests towards NCAs regarding the provision of occupational pension's information"[21]. The analysis is complemented with answers obtained through the surveys distributed to Members. The data reported before 2020 was collected by EIOPA from the Members "States on a voluntary basis and the data has a different structure. Efforts were made to reconcile the information comprehensively. This dataset covers IORPs which comply with the European definition of an institution for occupational retirement provision (IORP) and criteria pinpointed in the aforementioned IORP II Directive[22].

[19] This would mean that pension plans such as the 'book reserves' and pay-as-you-go schemes are out of scope.
[20] EIOPA, Database of pension plans and products in EEA: Guide for compilation and methodology, December 2014, Link
[21] EIOPA, Decision on EIOPA's regular information requests towards NCAs regarding the provision of occupational pension's information, Link.
[22] Directive (EU) 2016/2341 of the European Parliament and of the Council of 14 December 2016 on the activities and supervision of institutions for occupational retirement provision (IORPs)

Nevertheless, it does not provide the global picture for the European Occupational Pensions sector, given that other occupational pension schemes can be offered by providers employers other than IORPs.

In some jurisdictions, the current number of occupational pension schemes is mainly state funded, and thus, does not qualify as IORPS under EIOPA's remit. In some others, occupational pensions can also be managed by insurance companies, and for countries such as Belgium they even take care of the largest part of the member of an occupational pension.

Sweden finalised the IORP II legislation in January 2020, and the process of granting licences is still ongoing. Therefore, the figures regarding the number of IORPs are not stable yet and the sample is expected to change in the coming year. Traditionally, occupational pensions have been mainly provided by life insurance companies, but a shift from life insurance to occupational retirement provision undertakings is expected in light of the new legislation. Some changes have already been identified in the global landscape, and the flow is foreseen to be intensified in the upcoming years.

ANNEX V — OCCUPATIONAL PENSIONS LANDSCAPE – STRUCTURE AND DESIGN, COUNTRY ANALYSIS23

Country	Type of providers and plans[24]	Membership and Freedom of choice on the pension product/plan provider	Taxation
AT	▪ Pensionskassen ▪ Direct commitments (Direktzusagen) ▪ Direct insurance (Direktversicherung) ▪ - Support funds (Unterstutzungskasse)	▪ Voluntary. ▪ Before a pension fund contract can be signed, the employer and the employees have to decide via „Betriebsvereinbarung“ (a contract signed by the representatives of the employees of a certain firm and the firm) or via model contract on the specific contributions and the fulfilment of obligations. ▪ Employers with more than 1000 employees in their firm can establish their own pension fund.	▪ EET treatment[25] - principle is just realised for the employers` contributions to the pension funds, not for the contributions of the employees. ▪ Income Tax Act states a premium for contributions paid to a pension fund, an additional pension insurance, and voluntary higher payments to the public pension insurance or a pension investment fund made by an employee of up to EUR 1.000.
BE	▪ Instellingen voor bedrijfspensioenvoorziening, or institutions de retraite professionnelle, or institutions for occupational retirement ▪ Group life insurance schemes	▪ Voluntary ▪ There is no obligation for employers to set up supplementary schemes for employees.	▪ Employer contributions might be tax-deductible under certain circumstances.

[23] Data source: Database of pension plans and products in the EEA and IORPs Repository

[24] Providers and schemes design for occupational pension plans.

[25] EET system: A form of taxation of pension plans, whereby contributions are exempt, investment income and capital gains of the pension fund are also exempt and benefits are taxed from personal income taxation.

	▪ Individual pension savings account	▪ If there is a plan in place, employees immediately become members of the plan upon entry into service.	▪ Benefits are taxed as incomes, but retirees do receive tax credits. ▪ Favourable tax treatment of lump sums payments.
BG	▪ Voluntary pension funds under occupational schemes (VPFOS)	▪ Automatic enrolment, if the occupational scheme is established by a collective bargaining agreement, it applies automatically to all members of the trade unions, and all employees who are not members of the trade union can join; if the occupational scheme is established by a collective agreement, its coverage depends on that agreement and could be automatic enrolment and/or voluntary joining the scheme by submitting the application by the respective employee.	▪ EEE treatment[26] in which contributions[27], investment income and benefits are exempt from taxes.
CY	▪ Occupational Pension Funds ▪ Provident Funds ▪ Class VII group pension schemes	▪ Mandatory or voluntary ▪ Participation is often based on collective or individual agreements with the employers. ▪ If the employer has a plan in place, the employee becomes a member a few months after employment.	▪ Tax exemption on the amount of contributions made by the employer and employee. ▪ Tax deductions on investments, upon to a certain amount.

[26] EEE system: “Exempt-Exempt-Exempt” regime, where contributions, returns on investment and pension income are all tax-exempt

[27] The contributions are not taxable up to a certain amount.

CZ	▪ Personal Pension Plan	▪ Voluntary	▪ Tax incentives are available
DE	▪ Direktzusage ▪ Unterstützungskasse ▪ Direktversicherung ▪ Pensionskassen ▪ Pensionsfonds	▪ Voluntary system. However, employees have a right to deferred compensation. Additionally, there are collective agreements in some areas providing for obligatory occupational retirement provision or financial incentives for employees for deferred compensation	▪ EET treatment[28]
DK	▪ Company pension funds ▪ Public sector pension funds ▪ General pension funds ▪ Specialised life insurance companies ▪ Pension funds held in life insurance companies ▪ Supplementary earnings-related pension Scheme (ATP) ▪ Special pension savings scheme (SP) ▪ Public-sector employee capital pension fund (LD Pensions)	▪ Occupational Mandatory Pensions (ATP) – participation in ATP is mandatory for all employees over age 16. Self-employed can optionally participate in the ATP-pension scheme. ▪ Occupational Quasi-Mandatory Pensions – despite there is no statutory requirement for additional occupational pension provision, plans that that have been introduced by collective agreement by the employer associations and union are compulsory for all companies covered by the agreement with only limited opt-out options.	▪ ETT treatment[29]

[28] The Occupational Pensions Strengthening Act (*Betriebsrentenstärkungsgesetz*), which came into effect on 1 January 2018, is expected to further encourage employers to pay occupational pension contributions.

[29] ETT taxation – contributions are tax exempt (Deductible), while investment return and pension benefits are taxed.

EE	▪ There are no occupational pension schemes in Estonia.		
EL	▪ Occupational insurance funds ▪ Occupational pension plans	▪ Voluntary ▪ Mandatory (only to occupational insurance funds) ▪ Currently not widespread in Greece.	▪ ETT treatment ▪ Returns on investment are taxed. ▪ The tax treatment of pension benefits varies. For example, regarding occupational insurance funds, annuity benefit is taxed but the lump-sum benefit is not included in taxable income.
ES	▪ Pension funds: occupational plans (Fondos de pensiones: planes de empleo) ▪ Mutual pension provident entities (entidades de prevision social or mutualidades de prevision social) ▪ Collective pension insurance plan (seguro colectivo) ▪ Non-autonomous funds (fondos de pensiones internos)	▪ Voluntary	▪ Tax incentives available, with some ceilings and caps in place.
FI	▪ The earnings-related statutory pension provisions for private sector workers, farmers and self-employed persons ▪ The earnings-related statutory pension provision for public sector workers ▪ Company pension funds and industry-wide pension funds ▪ Group pension insurance contracts in life insurance companies ▪ Book reserve pension plans	▪ Compulsory occupational pension scheme (TyEL), established through collective bargaining. ▪ Voluntary – In addition to the TyEL plan, some employers offer additional pension schemes, which usually supplement TyEL.	▪ Tax benefits available, with some ceiling on age and base income.
FR	3 types of PER (plan d'épargne retraite) : ▪ The « plan d'épargne retraite individuel (PERI) » (independent worker) ▪ The « plan d'épargne retraite d'entreprise collectif (PERE collectif)	▪ The « plan d'épargne retraite d'entreprise obligatoire (PERE obligatoire) » => is mandatory ▪ PERI (independent worker) and PERE	▪ Mandatory: ETT treatment ▪ Voluntary schemes: it depends on the earnings at the payout phase..

	▪ The « plan d'épargne retraite d'entreprise obligatoire (PERE obligatoire)	(collectif) => is voluntary	
HR	▪ Occupational pension funds (closed ended voluntary pension funds)	▪ Voluntary: there is no obligation for employers to set up supplementary schemes for employees, nor obligation for employees to participate.	▪ Contributions paid by the employer to voluntary pension funds up to a limit of HRK 6,000 per year per person are exempt from income tax. ▪ Pension payments made from closed-ended pension funds are not taxed.
HU	▪ Occupational pension plan	▪ Voluntary	▪ EEE treatment
IE	▪ Occupational pension plans ▪ Retirement annuity contracts	▪ Voluntary	▪ Tax relief on contributions. ▪ No tax on gains and investment income. ▪ Benefits are taxed.
IS	▪ Occupational pensions funds	▪ Mandatory	▪ Employee contributions up to 4% are tax-deductible, while there is no tax deduction ceiling on public-sector employer contributions. ▪ Pension investment income is not taxed, while pension payments are.
IT	▪ Contractual pension funds (fondi pensione negoziali) ▪ Open pension funds (fondi pensione aperti) ▪ Pre-existing autonomous pension funds (fondi pensione preesistenti autonomi) ▪ Pre-existing non-autonomous pension funds (fondi pensione preesistenti non autonomi)	▪ Voluntary - due to the reliance on the public pension scheme, occupational pension schemes are essentially voluntary.	▪ Contributions are tax-deductible up to certain levels. ▪ The taxation of the net investment income of the plan varies depending on the asset allocation.

			▪ More favorable conditions on the pension benefits.
LI	▪ Occupational pension provisioning is based on funded schemes. As a rule, major companies have in-house pension schemes that manage the occupational pensions of their employees, and may also do this for other companies. Smaller companies tend to join a collective foundation. In these, each member employer represents an independent pension scheme. Different pension plans tend to exist in a collective foundation.	▪ Mandatory – employers are obliged to conclude an agreement with a pension institution domiciled in Liechtenstein.	▪ ETT treatment, but lump sum payments are taxed at a preferential rate.
LT	▪ Since July 2006, it is possible to set up occupational pension funds, but until last year no entities offer this type of product.	▪ Voluntary	▪ ETT treatment
LU	▪ Association d'Épargne-Pension (ASSEP) and Société d'Épargne-Pension à Capital Variable (SEPCAV) ▪ Pension funds ▪ Group insurance contracts (traditional and unit-linked)	▪ Voluntary ▪ The minimum age for admission is usually 25.	▪ Tax benefits under certain circumstances. ▪ Investment income is tax-exempt.
LV	▪ Occupational pension scheme ▪ Personal pension scheme	▪ Voluntary participation – employees, with participation being based on collective agreements	▪ Tax benefits under certain circumstances.
MT	▪ Retirement scheme or a long-term contract of insurance that fulfils the requirements of these rules and which is approved by the Commissioner)	▪ Voluntary	▪ Corporate tax incentives available to employers in the form of declaration for tax purposes of up to 3,000 Euros per employee per annum, plus a further tax credit of up to 750 Euros per employee per annum. ▪ A personal tax credit for employees of up

			to 750 Euros per annum on personal contributions.
NL	▪ Sector- or industry-wide pension plans ▪ Company pension funds ▪ Pension funds for professions ▪ Other pension funds ▪ Pension funds not under supervision ▪ Insured occupational plans	▪ Mandatory ▪ Employers may opt out of a sectoral plan if they offer a provision that promises equal or better benefits.	▪ Employer contributions are tax-deductible and employee contributions are not considered taxable income. ▪ Taxations levels depend on benefit levels.
NO	▪ Bank ▪ Life insurance company ▪ Pension fund ▪ Defined contribution pension enterprises ▪ Management companies for securities funds	▪ Mandatory	▪ Favourable tax relief on the contributions. ▪ The entire amount of a pension is taxed as income when paid out.
PL	▪ Employee pension plans (PPE)	▪ Voluntary	▪ TEE treatment
PT	▪ Fundos de Pensões Fechados (closed pension funds) ▪ Fundos de Pensões Abertos (open pension funds) ▪ Pension insurance contract: collective insurance	▪ Voluntary – the occupational pension market is negligible	▪ Tax benefits available under certain circumstances
RO	▪ Fund manager companies, authorized by the State.	▪ The employer decides whether or not to propose to the employee an occupational pension scheme. ▪ The occupational pension is absolutely optional for the employees.	▪ Employees' contributions will be tax-deductible and investment income tax-exempt. ▪ Pension benefits will be subject to ordinary taxation.
SE	▪ Pension foundations (pensionsstiftelser) ▪ Occupational pension undertakings ▪ Life insurance companies ▪ Occupational pension plans: book reserves	▪ Mandatory - in case the employer has a collective agreement. Automatic enrolment in those cases. ▪ Voluntary – in cases where there is no	▪ ETT treatment: contributions are tax exempt (Deductible), while investment return is taxed (on a flat-fee basis) and

		collective agreement, the employer can take out another solution.	pension benefits are taxed.
SI	▪ Pension companies ▪ Insurance companies ▪ Banks	▪ Mandatory for two groups: workers in arduous and hazardous occupations, and civil servants. ▪ For all other workers in Slovenia, occupational retirement savings schemes are voluntary. If a company has a representative trade union, that trade union decides on whether a pension plan would be included in employees' contracts.	▪ Supplementary pensions in payment are subject to taxation, but not to social contributions.
SK	▪ Supplementary pension management companies defined as the pension companies within an occupational pension system, as well as a personal pension system (voluntary participation, voluntary employer contributions).	▪ Voluntary	▪ The "EEE" tax regime is applied for 2nd pillar which could be described as quasi-mandatory pension system (1bis pillar system). ▪ tTE treatment for 3rd pillar. Within 3rd pillar, there are contributions paid by employers and contributions paid by employees or individuals. <u>Employer´s contributions are treated as employee's income and therefore they are taxed at the employee's marginal rate</u> (the income tax represents 19%). Employer´s contributions to supplementary pension plans are also

			subject to health insurance contributions (but not to social insurance contributions). Individual contributions are paid from net, after-tax income. So, there is a taxation and also health insurance and social insurance contributions (including pillar 2 mandatory contributions) are levied on these contributions. ▪ Returns on investment within supplementary pension system are taxed upon withdrawal (taxed is a yield gained during the accumulation phase as well as the pay-out phase). A flat tax rate of 19% applies. Regarding the supplementary pension benefits the part of the assets originated from contributions is tax-free (as it was mentioned only the part originated from returns on investment is taxed at 19%). ▪ In supplementary pension system are also applied financial incentives for supplementary saving. ▪ Therefore, it is not capital "T" for taxation

			of contributions in all cases. Individual´s contributions into supplementary pension plans are tax favored up to EUR 180 (this tax relief brings down the tax base and applies only in relation to the participants who opts for new pay-out conditions valid from 2014 - a participant can save on these incentives up to 35 EUR yearly). Excess contributions are taxed at the marginal rate of income tax. Employer´s contributions are also tax incentivized up to the 6 % of the employee´s gross salary.

ANNEX VI — IORP SECTOR SIZE, BASED ON NUMBER OF MEMBERS[30]

Country (figures in millions)	IORP II	IORP art.4	SII	CRD	UCITS	No EU Law applicable
AT	0.89	-	N.A.	-	-	N.A.
BE	2.26	-	2.79	-	-	N.A.
BG	0.01	-	-	-	-	0.64
CY	0.1	0.0006	-	-	-	-
CZ	-	-	-	-	-	4.40
DE	9.55	-	N.A.	N.A.	N.A.	N.A.
DK	0.002	-	N.A.	-	-	3.28
EE	-	-	N.A.	-	-	0.08
EL	0.03	-	N.A.	-	-	0.09
ES	2.16	-	9.74	-	-	7.81
FI	0.01	-	-	-	-	-

[30] Data source: Database of pension plans and products in the EEA and IORPs Repository, for the latest data submitted

Number of Members by each type of occupational pensions providers, based on the applicable EU regulation

FR	1.36	N.A	N.A.	N.A.	N.A.	N.A.
HR	0.044	-	0.001	-	-	2.46
HU	0.26	-	-	-	-	1.16
IE	0.52	-	0.31	-	-	-
IS	-	-	-	-	-	0.34
IT	5.85	-	-	-	-	0.4
LI	0.003	N.A	-	-	-	-
LT	-	-	N.A.	-	-	N.A.
LU	0.03	-	N.A.	-	-	-
LV	0.05	-	N.A.	-	-	N.A.
MT	0.001	-	-	-	-	N.A.
NL	16.66	-	N.A.	-	-	N.A.
NO	0.46	-	2.10	N.A.	0.78	N.A.
PL	0.03	-	0.09	N.A.	0.52	N.A.
PT	0.19	-	1.73	-	-	0.68
RO	-	-	-	-	-	8.36
SE	8.38	-	N.A.	N.A.	N.A.	-
SI	0.24	0.68	0.68	0.05	-	-
SK	0.89	-	-	-	-	1.63

ANNEX VII — IORP SECTOR SIZE, BASED ON AUM[31]

Country (figures in EUR bn)	IORP II	IORP art.4	SII	CRD	UCITS	No EU Law applicable
AT	28.4	-	N.A.	-	-	N.A.
BE	43.1	-	69.6	-	-	N.A.
BG	0.0	-	-	-	-	0.7
CY	2.7	0.111	-	-	-	-
CZ	-	-	-	-	-	20.7
DE	286.3	-	N.A.	N.A.	N.A.	N.A.
DK	8.8	-	195.8	-	-	118.7
EE	-	-	N.A.	-	-	0.2
EL	0.16	-	N.A.	-	-	1.5
ES	36.8	-	37.6	-	-	84.4
FI	4.3	-	-	-	-	-
FR	47.8	N.A.	N.A.	N.A.	N.A.	N.A.

[31] Data source: Database of pension plans and products in the EEA and IORPs Repository, based on the latest data submitted

AuM by each type of occupational pensions providers, based on the applicable EU regulation

HU	0.001	-	-	-	-	5.4
HR	0.2	-	3.20	-	-	18.8
IE	124.4	-	8.0	-	-	-
IS	-	-	-	-	-	38.1
IT	172.0	-	-	-	-	1.4
LI	0.8	N.A.	-	-	-	-
LT	-	-	N.A.	-	-	6.1
LU	2.5	-	N.A.	-	-	-
LV	0.19	-	N.A.	-	-	5.1
MT	0.1	-	-	-	-	6.6
NL	1847.9	-	N.A.	-	-	N.A.
NO	45.8	-	171.2	34.1	4.0	N.A.
PL	0.5	-	0.7	N.A.	12.9	N.A.
PT	21.5	-	16.2	-	-	6.9
RO	-	-	-	-	-	18.7
SE	217.5	-	N.A.	N.A.	N.A.	-
SI	1.4	3.8	3.8	1.1	-	-
SK	2.67	-	-	-	-	10.3

ANNEX VIII — ADDITIONAL INFORMATION ON PPP[32]

Country	Definition and Main Features
AT	PPPs are state-sponsored retirement provision (Prämienbegünstigte Zukunftsvorsorge), a form of pension insurance, under which, upon reaching a defined retirement age, a life-long annuity is paid out. Usually a survivor's provision is also arranged, such that following the death of the insured person an annuity continues to be paid to the insured's widow(er). A particular feature of state sponsored retirement provision is the existence of a capital guarantee and a state premium. The product also has preferential tax treatment, with no insurance tax, no capital yield tax and no income tax being accrued.
BE	Under Belgian insurance law, PPPs are insurance pension savings belonging to the 3rd pension pillar. They can be concluded either as unit-linked insurance products, profit participation products or as hybrid products. With the exception of the Belgian Tax Law, there is no specific legal framework for PPPs. The legal framework is the one applicable to all life insurance (i.e. mainly the Law of 4 April 2014 on insurance and the Royal Decree on Life Insurance).
BG	PPPs are non-IBIPs – UPF, PPF, VPF. The most common types of PPS are other products different from banking products, UCITs and AIF products. In 2021 the pay-off phase from the UPFs was normatively defined through the transfer of the funds from the individual accounts into payment funds. The payment funds are not categorized as pension funds, and it should be mentioned that in 2021 a total of 12508 individual accounts were transferred to the payment funds, and respectively the same number of contracts for payments has been concluded.
CY	There is no particular legislation in place, on national level, regarding the provision of third Pillar personal pensions. There is though, in place and under implementation, on a European level basis, the EU Regulation 2019/1238 on the Pan-European Personal Pension Product (PEPP). Based on the information we have, none of the IORPs, which are under our supervision or the Insurance Companies, which are supervised by the Superintendent of Insurance, are currently offering/marketing any PEPP. Some Life Insurance Companies do offer some IBIPs, which are marketed as Pension Products with the aim of providing a retirement benefit, but they are not pure personal pension products, as they have some other characteristics, like the option to

[32] Data source: Committee on Consumer Protection and Financial Innovation – NCAs' Questionnaire (Q1 and Q2) Costs and Past Performance Survey

	surrender early the policy at any time before reaching normal retirement, which do not comply with the characteristics of pure PPPs.
CZ	N.A
DE	In addition to the IBIPs sold with the aim of providing a retirement benefit, there are also 7 additional personal pension products categories, namely Riester products following Altersvorsorgeverträge-Zertifizierungsgesetz (AltZertG). These are voluntary, individual-based and have a DB feature. They are state subsidized pension products which were introduced in Germany in 2001 and are not insurance specific. They may comprise: classic private pension schemes, bank savings plan, funds-related pension scheme; internal and external investment funds, funds savings plan, direct insurances and pension funds, 'Wohn-Riester' (home owner) - a contract of loan to buy or build privately used real estate and cooperative shares. Combinations are also possible. The information provided below refer to the IBIPs sold with the aim of providing retirement benefit.
DK	N.A.
EE	A supplementary or a voluntary pension fund is a common fund with the objective to provide unit-holders additional income during their retirement years. Voluntary pension funds are pools of assets established and managed by licensed pension fund managers. They are at large very similar to pillar II funds, but the legislation covering the product is less comprehensive, meaning that the fund managers have a greater flexibility to decide on fees, redemption policies and portfolio allocations. The amount and frequency of contributions as well as their suspension is decided by the investor and the money can be taken out, as a whole or in part, before reaching the retirement age. In addition, pillar III account can be opened for a person below the age of 18, as contributions to the fund are voluntary and can be made by other people, e.g. parents or employers. Employers have no obligation to make contributions, but many opt to do so on behalf of or in addition their employees, often including it in the motivational package offered to the employees. Additionally, employers can create a pension fund that is only for their employees, i.e. occupational retirement pension fund, but this is not a common market practice at the time. Other alternatives are pension insurance with guaranteed interest rate and pension insurance with investment risk.
EL	N.A.
ES	Pension scheme whose sponsor or sponsors undertakings are a financial institution and the members are natural persons. PPP may only be DC in nature.

	Main features - DC, voluntary principles (not compulsory), complementary to public pensions, no discrimination, capitalization, irrevocability of contribution, recognition of existing rights and compulsory integration of the pension scheme in a pension fund.
FI	N.A.
FR	N.A.
HU	Voluntary pension funds offer an institutional form for retirement support, introducing additional capital in the market that can support long term investment. Members can join the funds voluntarily on individual basis. Members are the owners of the pension funds. They are supplementary pension products designed to substantially improve the amount of the state pension. In case of PPPs which are also IBIPs, these products are life insurance products where the insurance event is the retirement of the client. Usually tax refund can be claimed, but only after the accumulation phase. These contracts have a separate, dedicated account, where also the tax benefits are credited, and which cannot be surrendered in a flexible way. In case of early surrender the tax benefit has to be paid back entirely (Act CXVII of 1995 on Personal Income Tax).
HR	Personal Pension products Pillar III consist of voluntary DC pension arrangements. Regarding personal DC arrangements, these are open-ended pension funds, offered commercially by a pension fund management companies, open to any natural person residing in Croatia. Accounts can also be sponsored by employer contributions. A new legislation that entered into force on January 1st, 2019, brought innovation in terms of retirement age in voluntary pensions, both occupational and personal. The minimum pay-out age is increased and now it is 55 years. It also brought innovations for prospective and current members, in terms of abolishing entrance fees and lowering management fees.
IE	There are two forms of personal pension contracts used to save for retirement: Personal Retirement Savings Accounts (PRSAs) and Retirement Annuity Contracts (RACs). PRSAs can also be used by people in pensionable employment who wish to make Additional Voluntary Contributions (AVCs). RACs are used mainly by the unincorporated self-employed, but also to a much lesser extent by employees in non- pensionable employment. There is a third type of retirement contract, Personal Retirement Bonds or ‘buy out bonds’ which are designed only to accept transfers from occupational pension schemes in lieu of maintaining a preserved benefit in the scheme. Generally, individuals can take a tax-free lump sum from a PRB and use the remaining funds to buy an annuity (pension) or invest in an Approved Retirement Fund (ARF).

IS	N.A.
IT	Pillar III products include “PIPs” (Piani individuali pensionistici di tipo assicurativo) and open pension plans (so called “fondi pensione aperti”) with individual adhesion. PIPs are individual pension plans implemented through life insurance contracts offered by insurance companies; they can be either Page 46/75 in the form of with-profit (traditional policies) or unit-linked policies and they only support personal plans. Open pension funds are promoted by banks, insurance companies, asset management companies. They support both occupational plans (collective adhesion) and personal plans (individual adhesion). In both PIPs and open pension funds the assets of the products are required to be segregated by those of the provider and they do not have legal personality. In Italy private pension products have a specific legal regime and have the same fiscal treatment of occupational pension funds which is more favorable compared to other financial and insurance products. They have the same rules for adhesions, disclosure and benefits payment of occupational pension funds. Italian private pension products are not considered IBIPs and are not subject to the PRIIPs regulation
LI	Life insurance (classes I and III of Annex II to Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II))
LT	3rd pillar pension funds in Lithuania refer to supplementary voluntary pension accumulation with the objective to build reserve for future retirement in addition to social insurance and 2nd pillar funds. Voluntary pension funds are established and managed by licensed pension fund managers. Compared to 2nd pillar funds, 3rd pillar pension funds managers have a greater flexibility to decide on fees and portfolio allocations. Participants decide on the amount of money, frequency of contributions, as well as how and when to receive payments (contributions can be suspended, money can be taken out, as a whole or in part, before reaching the retirement age). Contributions can be transferred by participants themselves or by their employers (usually as a motivational package offered to the employees), also by other third parties. Participants become entitled to a pension benefit once they are five years within the established age for old-age pension.
LU	The national market has some fiscal product called 111bis which is Pillar III.
LV	Personal pension products are established by licensed pension funds. This is an opportunity for people to make individual contributions, which they will be able to withdraw when they reach the age of 55. Accumulated capital can also be inherited.

MT	The Retirement Pensions Act, 2011, defines a Personal Retirement Scheme as a Retirement Scheme which is not an Occupational Scheme and to which contributions are made for the benefit of an individual. The MFSA is also currently working on a proposal which will regulate local Maltese insurance undertakings which are distributing insurance products which have a pension element. Some of these insurance products are structured similar to insurance based investment products, however they do not fall under the definition of IDD since they are approved by the Commissioner of Inland Revenue as pension products, under Maltese national law and have some specific features such as annual withdrawals which render them pension products. The aim of this new regime is to clarify the prudential requirements, and most importantly the conduct of business requirements which such undertakings are required to comply with.
NL	Individual retirement savings that are tax deductible. Predominantly bank and insurance products (savings and investment products). The best estimate of the size of the market is around 10% of pension savings in total.
NO	N.A.
PL	IKZE (Individual retirement savings account) and IKE (Individual retirement account) are personal saving accounts that facilitate saving for the future retirement need.
PT	Pillar III products include individual membership of open pension funds and retirement saving schemes (Plano Poupança Reforma – “PPR”), the latter which can be financed by life insurance contracts, pension funds or investment funds. The reimbursement of the accumulated amount from PPR is possible at any time, but a tax penalty applies. Withdrawals from PPRs are not subject to penalties in the following cases: (i) at retirement age, (ii) permanent disability of the participant or any member of his household, (iii) at the age of 60, (iv) severe illness of the participant or any member of his household, (v) from payment of installments of credit guaranteed by mortgage on the participant’s own residence, and (vi) long-term unemployment of the participant or any member of his household.
RO	Pillar 3 consists of 10 voluntary pension funds, managed by 8 PMCs. All Pillar 3 pension funds are DC, but some of them are DC with guarantees. These pension funds do not offer investment options to their members, but some PMCs offer a choice between their medium or high risk pension funds.

	Contributions can be made both by the employer and the member. Pillar 3 is regulated through a separate, national law. Retirement conditions are set out in this law and do not vary among pension funds.
SE	N.A.
SI	PPPs are life cycle products based on the rules set for occupational pensions. In such products the investment strategy of the product is more aggressive at inception to be then shifted to more Page 48/75 moderate investment strategy (middle age group) and finally for older contributors it is moved to an investment return guarantee strategy.
SK	The supplementary pension scheme (third pillar) is governed by the Act No. 650/2004 Coll. of 26 October 2004 on the supplementary pension scheme (hereinafter “Act No. 650/2004 Coll.”) in Slovakia. The Directive (EU) 2016/2341 of the European Parliament and of the Council of 14 December 2016 on the activities and supervision of institutions for occupational retirement provision (Directive IORP II) has been fully transposed into the Act No. 650/2004 Coll. In according to the Act No. 650/2004 Coll. the supplementary pension management companies are joint stock companies incorporated in the Slovak Republic whose scope of business is the establishment and management of supplementary pension funds as part of the supplementary pension scheme, and on the basis of an authorization issued by National Bank of Slovakia (hereinafter “NBS”). The supplementary pension management companies are entities with legal personality (nature), and the supplementary pension fund have no legal personality (nature). The supplementary pension management companies shall establish and manage at least one contributory supplementary pension fund and one distribution supplementary pension fund. The supplementary pension scheme is in Slovakia a voluntary scheme (enrolment is compulsory only for people working in certain risky occupations), defined contribution scheme based on the collection of contributions from participants and employers and funded scheme whose purpose is to earn returns on the contributions paid into the scheme and then pay participants supplementary pension benefits in old age. A participant under the third pillar is an employee or other natural person who is at least 18 years of age and has concluded a supplementary pension scheme agreement (hereinafter "participant agreement") with a supplementary pension management company. The participants can decide in which supplementary pension management company and which supplementary pension fund or funds will be participate with specific investment strategy appropriate to their risk appetite and their expected potential return. The employer can conclude (it is compulsory only for employer in certain risky works) with a supplementary pension company an employer agreement in which the employer shall

	undertake to pay and transfer contributions under the conditions, in the amount, by the due date, and in the manner stipulated in the agreement for those of its employees who are participants and to fulfil its other obligations arising from the employer agreement, and the supplementary pension company shall undertake to fulfil its obligations towards the employer arising from this agreement.

ANNEX IX — LIST OF NATIONAL COMPETENT AUTHORITIES

Austria	AT	Financial Markets Authority (FMA) Federal Ministry for Digital and Economic Affairs with Trade Authorities	Italy	IT	Istituto per la Vigilanza sulle Assicurazioni (IVASS) Commissione di Vigilanza sui Fondi Pensione (COVIP)
Belgium	BE	Financial Services and Markets Authority (FSMA)	Latvia	LV	Financial Capital Market Commission
Bulgaria	BG	Financial Supervision Commission	Liechtenstein	LI	Financial Market Authority (FMA)
Croatia	HR	Croatian Financial Services Supervisory Authority (HANFA)	Lithuania	LT	Bank of Lithuania
Cyprus	CY	Ministry of Finance Insurance Companies Control Service (ICCS) Ministry of Labour, Welfare and Social Insurance; Registrar of Occupational Retirement Benefit Funds	Luxembourg	LU	Commissariat aux Assurances
Czechia	CZ	Czech National Bank	Malta	MT	Malta Financial Services Authority
Denmark	DK	Financial Supervisory Authority (Danish FSA)	Netherlands	NL	Financial Supervisory Authority (AFM)
Estonia	EE	Estonian Financial Supervision Authority	Norway	NO	Financial Supervisory Authority of Norway
Finland	FI	Finnish Financial Supervisory Authority (FIN-FSA)	Poland	PL	Financial Supervision Authority (KNF)
France	FR	Autorité de Contrôle Prudentiel et Resolution (ACPR)	Portugal	PT	Insurance and Pension Funds Supervisory Authority (ASF)
Germany	DE	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	Romania	RO	Financial Supervisory Authority (ASF)
Greece	EL	Bank of Greece Hellenic Ministry of Labour, Social Security and Social Solidarity	Slovakia	SK	National Bank of Slovakia
Hungary	HU	Central Bank of Hungary	Slovenia	SI	Insurance Supervision Agency
Iceland	IS	Financial Supervisory Authority (FME)	Spain	ES	Ministry of Economy — Directorate-General of Insurance and Pension Funds
Ireland	IE	Central Bank of Ireland Pensions Authority	Sweden	SE	Finansinspektionen (FI)

ANNEX X — METHODOLOGY

The Consumer Trends Report methodology was adopted in 2012 and revised in 2013 and 2020 to produce more robust Consumer Trends Reports and adapt to the availability of new data to improve the robustness of the report. In terms of data source:

- As far as the **quantitative information** is concerned, the main database that are leveraged are the Solvency II database and, starting from 2020 the IORPs database.

  The Solvency II reporting framework represents the most comprehensive database on the European insurance sector to date. Among other features, it collects premiums, claims and costs data from insurance undertakings on a line of business basis, which has been used in the present report. However, given its prudential nature, Solvency II's lines of business are risk categories and not product categories, meaning that, for example, part of the premiums collected through motor insurance policies can be distributed through different lines of business. It also captures data without distinction between premiums gathered from individual retail consumers and from corporate. Although data quality checks are regularly performed by NCAs and EIOPA, the quality of the data as well as the value that can be extracted from it (e.g. trends in the indicators over time) is improving over the years. Still, in particular when product-by-product information is used, the conclusions should be interpreted cautiously. The analysis of the Solvency II data is mainly performed using a list of Retail Risk Indicators (RRI)[33].

  The quantitative data for the pension section have been sourced from the IORPs database; a detailed description of the pension data and sources is reported in Annex II.

- The **qualitative data** are mainly sourced from the Members' Survey, the stakeholders' survey and this year, the EU-wide Eurobarometer survey.

  NCAs were requested to fill in four surveys: four for insurance including: (1) the top three consumer issues, positive development and supervisory activities, (2) focus topics, (3) information on complaints and (4) financial innovation; and four for pension: (1) the top three consumer issues, positive development and supervisory activities, (2) focus topics, (3) information on complaints and (4) market overview and size.

  In addition to the Members' contribution, EIOPA gathered inputs from other stakeholders (Insurance Europe, Pensions Europe, the European Federation of Insurance Intermediaries —

[33] The Retail Risk Indicators methodology has been revised in November 2021: [Retail risk indicators: methodology update | Eiopa (europa.eu)]

BIPAR, the Federation of European Risk Management Associations, the European Consumer Organisation — BEUC and the Nordic Financial Union), which answered directly through a questionnaire. Additionally EIOPA received input from its two stakeholders groups, the IRSG and the OPSG. EIOPA also regularly meets stakeholders to discuss concrete insurance and pensions issues. Their feedback is particularly relevant to refine some of the conclusions of the report, in particular with regard to those aspects for which a straightforward interpretation of the data is not possible.

In 2022 EIOPA contracted Ipsos European Public Affairs to carry out a EU-wide Eurobarometer survey covering:

- **EU citizens, aged 18 and over:** a representative sample of EU citizens, aged 18 and over, in each of the 27 Member States of the EU was interviewed. Between 22 June and 30 June 2022, 25 880 interviews were conducted via computer-assisted web interviewing (CAWI), using Ipsos online panels and their partner network.
- **EU Small and medium-sized companies**: a representative sample of small and medium-sized companies (SMEs) in manufacturing (NACE category C), industry (NACE categories B, D, E, F), retail (NACE category G) and services (NACE categories, H, I, J, L, M, N, R, S) was interviewed. Interviews took place with SMEs managers or representatives with decision-making responsibilities (managing director, general manager, CEO, financial director), employers leading the commercial activities (commercial manager, sales manager, marketing manager) or legal officers. All interviews were carried via Computer-Assisted Telephone Interviewing (CATI). Between 15 June and 1 July 2022, 9 067 interviews were conducted.

The survey aimed at gathering consumers and SMEs experience with insurance and pension related services as well as to assess their, own perception, of their financial health from an insurance and pension perspective.

ANNEX XI — ABBREVIATIONS

AI	artificial Intelligence
ADR	alternative dispute resolution
CAGR	compound Annual Growth Rate
CFA	Call for Advice
DB	defined benefit
DC	defined contribution
EEA	European Economic Area
EIOPA	European Insurance and Occupational Pensions Authority
ESAs	European Supervisory Authorities
GWP	gross written premium
IBIPs	insurance-based investment products
IDD	Insurance Distribution Directive
MTPL	motor and third party liability
NATCAT	natural catastrophe
NCAs	National Competent Authorities
POG	product oversight and governance
PP	profit participation insurance
PPI	payment protection insurance
PRIIPS	packaged retail and insurance-based investment products
SFDR	Sustainable finance disclosure regulation
UL	unit-linked insurance

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