

Report on Supervisory Activities in 2023

EIOPA(2024)0019466
Supervisory Processes Department
EIOPA REGULAR USE
EIOPA-24/BoS-017
19 April 2024



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European Insurance and
Occupational Pensions Authority

EXECUTIVE SUMMARY

EIOPA's supervisory convergence plan identifies the annual priorities to enhance supervisory convergence by ensuring a high, effective and consistent level of supervision across the EU, with the aim of guaranteeing a similar level of protection for policyholders and beneficiaries across jurisdictions, preventing supervisory arbitrage and guaranteeing a level playing field.

This Report on EIOPA Supervisory Activities presents how EIOPA contributed during 2023 to enhance the common European supervisory culture and promote consistent supervisory practices both from a prudential and conduct of business supervision perspective.

An important aspect of supervisory convergence work is EIOPA's own Oversight work aiming at ensuring a high, effective and consistent level of supervision across Europe supporting and, where necessary, challenging NCAs. For this purpose, EIOPA engages with the NCAs on their day-to-day supervision through bilateral engagements including country visits to ensure consistency and to build a comprehensive view on how NCAs carry out prudential and conduct supervisory activities.

In the insurance sector, companies can operate cross-border through the freedom of providing services (FoS) or freedom of establishment (FoE). In other words, once an insurer has a license in one EU member state it can sell insurance in all EU member states without establishment in those member states. In some cases this results in issues, where hosts member states express concerns about the activities of the insurer. The cross-border issues which come to EIOPA's attention are generally those which could not be solved at national level or through enhanced cooperation between home and host NCAs only. In these cases EIOPA can do a supervisory assessment of the issues at stake, and collaboration platforms between home and host NCAs can be established under the coordination of EIOPA.

Of concern is that EIOPA's activities in the collaboration platforms have not always led to a successful mitigation of the main risks to European policyholders. Timely and decisive interventions by the supervisory community are essential to fulfil the core mandate of the European System of Financial Supervision and to maintain the trust of citizens in the functioning of the internal market. Despite the use of the full set of powers available to EIOPA, required actions at the national level were not always (fully) taken, leaving European policyholders vulnerable to additional detriment.

The existing legal powers and tools at EIOPA's disposal have not been sufficient to address some issues in an effective and timely manner. In cases where home NCAs do not act conclusively towards the company or where the protection of consumers throughout the EU requires a coordinated action of host NCAs, the European supervisory community should be in a stronger position to intervene through both NCAs and EIOPA.

EIOPA's work on collaboration platforms is not visible to the public, equal to the supervisory work at national level. However, key public milestones in 2023 in this context were the independent own technical assessment of the valuation of Technical Provisions (gross and net of reinsurance) for the motor third party liability portfolio of an insurance undertaking, the Opinion on a delegation agreement, which marks the first use of this tool, and the issuance of an Opinion under Article 17 (Breach of Union Law) under the EIOPA Regulation.

In 2023, EIOPA also monitored the status of implementation of the Union-wide Strategic Supervisory Priorities (USSP) defined for the period 2021-2023 in its third year of application and

prepared the identification of the priorities of the next cycle. The USSP priorities were considered by all NCAs in their supervisory priorities and approaches in 2023. The outcome of the supervisory review indicates that the financial and solvency position as well as the liquidity of the European insurance market remained overall quite stable despite the unfavorable macro-economic environment and despite challenges arising from new trends in digitalisation and cyber and value for money in unit-linked business.

The participation of EIOPA in the colleges of supervisors and the close dialogue with the group supervisors continues to be key to ensure a good functioning of the colleges both from a governance perspective and regarding the relevance of the topics discussed.

The work on supervisory convergence goes well beyond EIOPA's own oversight work and is based on the continuous building of a common supervisory culture and the development of common benchmarks for supervisory practices and a common implementation of the supervisory review process.

In 2023, EIOPA published two Supervisory Statements:

- A statement on differential pricing practices in non-life insurance lines of business that aims at eliminating price-setting strategies, which lead to the unfair treatment of consumers;
- A statement on the use of governance arrangements in third countries that aims to ensure appropriate supervision and monitoring of the compliance of insurance undertakings and intermediaries with the requirements of the relevant EU legislation in relation to their governance arrangements in third countries.

Furthermore, EIOPA consulted on two supervisory convergence tools to improve the supervisory convergence in the area of the prudential supervision:

- Draft Opinion on supervision of captive insurance and reinsurance undertakings, with a focus on intra-group transactions and some pillar II requirements (i.e. the Prudent Person Principle (PPP) and governance-related aspects);
- Draft Supervisory statement on supervision of reinsurance concluded with third country insurance and reinsurance undertakings, which set out supervisory expectations to mitigate the risks stemming from regimes that have not been deemed equivalent to Solvency II.

Regarding internal models, EIOPA finalised three studies to compare outputs in the risk calibration of market and credit risk, non-life underwriting risk and on diversification in internal models with relevant findings and follow-up actions. In addition, two additional studies on life underwriting risk and on operational risk were initiated.

Concerning conduct of business supervision, EIOPA monitored how NCAs implemented the EIOPA methodology to assess value for money in the unit-linked market. Furthermore, EIOPA launched a public consultation on its proposed methodology for setting value-for-money benchmarks for unit-linked and hybrid insurance products. Following the "Warning to insurers and banks on Credit Protection insurance products" to address consumer protection issues related to the sale of credit protection insurance products, EIOPA and NCAs developed follow-up activities to address the identified risks to consumers arising from poor underwriting and sales practices as well as insufficient safeguards to avoid conflicts of interest. EIOPA also looked at emerging conduct risks and published a progress report on its advice to the European Commission on greenwashing and

an Opinion for public consultation on how to tackle greenwashing. Finally, EIOPA concluded the first peer review in the area of conduct of business supervision to assess how national supervisors are supervising the application of product oversight and governance (POG). The peer review showed that, although most NCAs adapted their internal processes to supervise the new requirements, significant progress is expected in the follow-up phase.

In addition, in 2023, EIOPA carried on working on its Supervisory Handbook chapters. In particular, EIOPA developed three new chapters on the “IORP conditions of operation and conflict of interest management”, “Calibration in Internal Models” and on “conduct risk assessment”. EIOPA also revised in 2023 the section of the business model analysis in the EIOPA Supervisory Handbook “Business Model Analysis including Digitalisation”.

EIOPA continued to work on the use of technology by supervisors to deliver innovative and efficient supervisory solutions that in turn will support a more effective, flexible and responsive supervisory system. During 2023, EIOPA approved the second SupTech program, including the identification of two new SupTech projects (to be started in 2024) on data quality and the use of natural language processing (NLP) on the Solvency Financial Condition Report (SFCR). Also a pilot SupTech tool to analyse the information included in the PRIIPs KID was implemented.

As far as the supervision of emerging risks is concerned, regarding IT security and governance related risks, including cyber risk, the three ESAs worked jointly on the development of the various policy mandates prescribed by DORA. Moreover, the ESAs have published in September 2023 their technical advice on the criticality criteria for the designation of critical ICT third-party service providers (CTPPs) and on the oversight fees as a response to the European Commission’s call for advice. The ESAs also delivered reports in relation to the upcoming implementation of a pan-European systemic cyber incident coordination framework (EU-SCICF). In addition to the policy work, the ESAs also started preparing for the upcoming implementation of the Oversight Framework on critical ICT third-party service providers (CTPPs). In this regard, EIOPA also implemented the internal process to exchange information regarding cybersecurity and cyberattacks with the NCAs based on Article 29 of its regulation.

In view of the Artificial Intelligence (AI) Act negotiations no sectorial specific policy work was pursued at European level. In 2023, EIOPA undertook preparatory work to assess the gaps and overlaps between the requirements included in the AI Act and the existing ones in insurance sectorial legislation. EIOPA also organised a workshop on generative AI in insurance, which provided useful insights into the state-of-play of this nascent technology in the insurance sector. At international level EIOPA co-lead the AI workstream of the Fintech Forum of the IAIS, which developed a members-only thematic review on the regulation and supervision of the use of AI in insurance.

In 2023, the European Forum for Innovation Facilitators (EFIF) continued providing a platform for NCAs and the three ESAs to regularly share experiences from their engagement with firms through innovation facilitators, to exchange technological expertise, and to try and reach common views on the regulatory treatment of innovative products, services and business models. Also in 2023, EIOPA launched a public consultation on open insurance use case by publishing a Discussion Paper, that examines the key features of an insurance dashboard with the aim to give consumers an overview of all their insurance policies in one place.

EIOPA launched a survey on access to cyber insurance by Small and Medium Enterprises (SMEs) to collect information on some critical aspects of the coverage, such as exclusions in general liability policies, terms and conditions of cyber coverage policies, types of incidents covered and so on.

The figure below presents an overview of the main deliverables:

IMPLEMENTATION OF THE COMMON SUPERVISORY CULTURE AND FURTHER DEVELOPMENT OF SUPERVISORY TOOLS

- ▶ Launched and coordinated the first multi countries' mystery shopping exercise;
- ▶ Concluded the peer review on requirements on Product Oversight and Governance (POG);
- ▶ Launched a public consultation on a proposed methodology for setting value-for-money benchmarks for unit-linked and hybrid insurance products;
- ▶ Implemented a Supervisory Technology (SupTech) pilot tool to analyse PRIIPs KID IBIPs products and approved the second SupTech program (on data quality and the use of natural language processing on the SFCR);
- ▶ Published the annual Consumer Trends Report;
- ▶ Finalised the EIOPA Supervisory Handbook chapter on conduct risk assessment;
- ▶ Concerning climate-related risks, EIOPA performed an internal assessment on all EU insurance groups with major exposure to such risk, covering both assets and liabilities and both transition and physical risk;
- ▶ As part of conduct oversight, EIOPA collected data on ESG products and performed analyses on performance and costs of products with sustainability features reported in EIOPA's Cost and Past Performance Report;
- ▶ Launched a public consultation on Opinion addressed to NCAs on the supervision of captive insurance and reinsurance undertakings;
- ▶ Finalised the comprehensive analysis on targeted EIOPA tools and powers vis-à-vis the respective NCAs.

RISKS TO THE INTERNAL MARKET AND TO THE LEVEL PLAYING FIELD

- ▶ Regarding internal models, finalised three comparative studies on Market and Credit Risk (MCRCS), Non-life underwriting risk (NLCS) and a study on diversification. Launched two studies on life underwriting risk and operational risks;
- ▶ Finalised a new chapter on the IORPs Supervisory Handbook "IORP conditions of operation and conflict of interest management";
- ▶ Launched a public consultation on the Supervisory statement on supervision of reinsurance concluded with third country insurance and reinsurance undertakings.

SUPERVISION OF EMERGING RISKS

- ▶ Regarding DORA ESAs worked jointly on the development of the various policy mandates prescribed by DORA. The policy work includes the publication and dissemination to the European Commission of the first batch of policy mandates (on 17 January 2024, after a public consultation during the summer 2023) and the publication of the consultation papers of the second batch (08 December 2023);
- ▶ Published a supervisory statement on differential pricing practices in insurance;
- ▶ Revised the section of the business model analysis section in the EIOPA Supervisory Handbook business model analysis including digitalisation.

OVERSIGHT ACTIVITIES

Next to the cooperative work together with the NCAs, EIOPA performed the following supervisory convergence activities via its oversight function (in the area of both prudential and conduct supervision):

- ▶ 58 active participations in cross-border Colleges and 8 third country College of Supervisors meetings;
- ▶ 5 active Collaboration Platforms, involving 17 NCAs;
- ▶ Monitoring the status of the implementation of Union-wide Strategic Supervisory Priorities (USSP) in 2023 and assessment of the next three years' cycle (2024-2026);
- ▶ 1 independent own technical assessment of the valuation of Technical Provisions (gross and net of reinsurance) for the motor third party liability portfolio of an insurance undertaking;
- ▶ 1 technical assistance regarding internal model approval finalised, 2 further technical assistance projects initiated;
- ▶ 4 prudential country field visits, 4 conduct country field visits and 1 pension country field visit;
- ▶ 2 internal model country field visits.

SUPERVISORY CONVERGENCE ACTIVITIES IN 2023

EIOPA's Supervisory Convergence Plan identifies, in line with EIOPA's mandate, EIOPA's annual priorities to enhance supervisory convergence by ensuring a high, effective and consistent level of supervision across Europe, with the aim of guaranteeing a similar level of protection of policyholders and beneficiaries across jurisdictions, preventing supervisory arbitrage and guaranteeing a level playing field.

EIOPA confirmed supervisory convergence as one of its main strategic goals for the years to come in its Supervisory Convergence Plan for 2023.¹

This Report on Supervisory Activities presents how EIOPA contributed during 2023 to enhance the common European supervisory culture and promoted consistent supervisory practices both from a prudential and conduct of business supervision perspective.

EIOPA addresses supervisory convergence from different perspectives depending on the issue and risks at stake. In particular, EIOPA uses different building blocks, each with its own specific tools, to support supervisory convergence and to protect policyholders, while keeping room for flexibility to allow both EIOPA and NCAs to respond to emerging and future challenges.

The following tools were available to achieve supervisory convergence:

- a) EIOPA worked on building common benchmarks for supervisory practices;
 - b) EIOPA performed peer reviews on the activities, with regard to specific topics of the NCAs, aiming to further strengthen convergence and effectiveness of supervisory outcomes;
- and
- c) some areas were addressed through EIOPA's own oversight work.

1.1 BUILDING COMMON BENCHMARKS FOR SUPERVISORY PRACTICES

1.1.1. PRACTICAL IMPLEMENTATION OF THE COMMON SUPERVISORY CULTURE AND FURTHER DEVELOPMENT OF SUPERVISORY TOOLS

Risk assessment framework (RAF) and application of proportionality [Supervisory convergence plan reference: 1a]

Considering the dependency of the new proportionality framework from the legislative changes being discussed under the Solvency II Review, the work has been paused in 2023 due to the negotiation process. In parallel, EIOPA initiated the review of the EIOPA Guidelines on the Supervisory Review Process (SRP). These aim to improve the quality, effectiveness, and consistency of supervision by NCAs, considering the lessons learned from the supervision of Solvency II

¹ [Supervisory convergence plan for 2023](#)

requirements, emerging trends in the macro-economic environment, and digitalisation. In 2023, EIOPA developed a project plan to define the scope and timeline of the review, and initiated a gap analysis to identify the areas that would require further improvements, including the reference to the new proportionality framework.

Common benchmarks for the supervision of internal models

[supervisory convergence plan reference: 1b]

EIOPA updated and released the tool on Internal Model On-Going Appropriateness Indicators (IMOGAPIs) with year-end 2022 data in 2023 and continued discussions on on-going IMOGAPIs for the monitoring of internal models over time and across undertakings. The main objective is to support local supervisory tasks and activities with a common supervisory tool for the follow-up of developments of internal models (e.g. to identify potential outliers). IMOGAPIs will be replaced in the near future with a new tool that will make use of the information to be reported under the new internal model reporting templates.

EIOPA finalised the Supervisory Handbook Chapter on calibration of Internal models. This chapter sets out the key elements that are recommended for NCAs to consider when assessing the undertakings' calibration of internal models. It clarifies the most technical aspects of calibration in internal models, provides a number of examples resulting from identified good practices and includes recommendations regarding supervisory actions, which may be considered and adopted by NCAs as tools to enhance their supervision.

Supervisory assessment of conduct risks

[supervisory convergence plan reference: 1c]

EIOPA continued its work to address value for money risks in the unit-linked and hybrid products' market. Following the issuance of a Supervisory Statement in November 2021 and the publication of the methodology to assess value for money risks in the unit-linked and hybrid market in June 2022, EIOPA continued to monitor how NCAs implemented the methodology. It also continued working in enhancing its value for money toolkit, launching in December 2023 a public consultation on its proposed methodology for setting value-for-money benchmarks for unit-linked and hybrid insurance products. This is part of the toolkit EIOPA began developing in 2020 to provide supervisors with additional risk-based tools and enhance their ability to identify products in their markets that may not deliver fair value for money. EIOPA proposed a system to categorise unit-linked and hybrid insurance products with similar features into groups based on policyholders' needs and the indicators around which value for money benchmarks are to be developed.

EIOPA concluded the peer review on the supervision of Product Oversight and Governance (POG) requirements.² The peer review, the first in the area of supervision of conduct of business, was addressed to all EEA jurisdictions (EU-27, Iceland, Liechtenstein and Norway). POG requirements were expected to have a major impact in preventing customer detriment. The peer review aimed at assessing how NCAs supervise POG requirements and its application with regard to the target market assessment, product testing and product monitoring and the review phase for Insurance-Based Investment Products (IBIPs). The peer review found that most NCAs have adapted their

² [Peer Review on Product Oversight and Governance \(POG\) - European Union \(europa.eu\)](#)

internal processes to include the supervision of POG requirements introduced by the Insurance Distribution Directive³ (IDD) and by the relevant Commission Delegated Regulation.⁴ The recommended actions focused on broader conduct aspects linked to supervisory approaches and practices adopted by NCAs: i) Organisation and resources of POG supervision; ii) Risk-based approach; iii) Setting and communicating supervisory expectations; iv) Supervisory processes and; v) Supervisory activities.

Following the Warning⁵ to insurers and banks to address consumer protection issues related to the sale of credit protection insurance products EIOPA developed further convergence work to ensure that the Warning was effectively implemented. EIOPA and NCAs developed follow-up activities to address the identified risks to consumers arising from poor underwriting and sales practices as well as insufficient safeguards to avoid conflicts of interest. Taking into consideration that time is needed for both NCAs and industry to define actions to implement the requirements of the Warning, EIOPA collected information on the current status and the follow-up actions undertaken by each NCA, including concrete supervisory actions applicable to their national markets or concrete individual undertakings. As next steps, EIOPA intends to perform an in-depth analysis of how NCAs addressed the concrete findings and how the industry reacted and implemented the requirements of the Warning. This analysis will also address whether and how the Warning has achieved the expected outcomes or whether additional interventions are required.

In 2023, EIOPA continued developing its conduct supervisory toolkit, underlining the importance of evidence-led and proportionate supervision. The annual Consumer Trends Report⁶ and Costs and Past Performance⁷ Report embodied this approach. The Consumer Trends Report included detailed insights from a new Eurobarometer, which provided evidence of the impact of inflation on consumers but also explored consumers' experiences and views on digitalisation. It further looked into diversity, equity and inclusion with a focus on gender and on consumers who self-identify as belonging to a minority. The Costs and Past Performance Report continued to focus on providing a detailed analysis of real returns of EU retail investment products within EIOPA's remit, including an enhanced analysis of products with sustainability features and products sold on a cross-border basis.

EIOPA further enhanced market monitoring and conduct risk assessment to build practical and proportionate supervisory capacities across the EU, driving supervisory convergence in practical conduct of business supervision. In particular, it finalised a Supervisory Handbook Chapter on conduct risk assessment. This chapter aimed at providing guidance to NCAs on how to take a risk-based approach to conduct supervision and on how to implement conduct risk assessment frameworks.

Finally, as part of the continued efforts to enhance its conduct toolkit and to identify and address risks, in light of its mandate to coordinate mystery shopping activities, EIOPA worked towards defining the common criteria and parameters to undertake the first joint mystery shopping exercise across several EU Member States. The exercise will be conducted in eight Member States and will

³ Directive (EU) 2016/97 of the European Parliament and of the Council of 20 January 2016 on insurance distribution.

⁴ Commission Delegated Regulation (EU) 2017/2358 of 21 September 2017 supplementing Directive (EU) 2016/97 of the European Parliament and of the Council with regard to product oversight and governance requirements for insurance undertakings and insurance distributors.

⁵ [Warning to insurers and banks on Credit Protection Insurance \(CPI\) products - European Union \(europa.eu\)](#)

⁶ [Consumer Trends Report 2023 - European Union \(europa.eu\)](#)

⁷ [EIOPA's Costs and Past Performance Report December 2023 - European Union \(europa.eu\)](#)

follow a common methodology based on criteria developed by EIOPA and its Members. The results of the exercise will be available in 2024.

As part of its market monitoring activities, together with NCAs, EIOPA continued its assessment of emerging risks and trends, identified the key agenda for future supervisory work: exclusions, product and service complexity, diversity, equity and inclusion, protection gaps and, more broadly, financial health. It also begun more gradually addressing risks emerging from digitalisation, including those practices that can lead to increased conduct risks because of the poor use of technology. In this context, EIOPA issued a Supervisory Statement⁸ on differential pricing practices in non-life insurance lines of business and, as part of its consumer trends work, also monitored this.

Supervisory approach to environmental, social and governance (ESG) risks

[Supervisory convergence plan reference: 1d]

EIOPA's work regarding supervision of environmental, social and governance (ESG) risks was extensive and used very different supervisory convergence tools.

EIOPA planned to assess the need to review the chapter of its Supervisory Handbook on the supervision of climate change, approved in 2022, to reflect more experience and practices matured by NCAs and concluded to postpone the review to a future stage.

In 2023, EIOPA started the preliminary activities to monitor NCAs implementation of the EIOPA opinion on the use of climate change scenarios in the Own Risk and Solvency Assessment (ORSA)⁹, which is expected to take place in 2024 and will be finalised at the beginning of 2025.

As part of prudential Oversight activities, EIOPA performed an internal assessment on all EU insurance groups, covering both assets and liabilities and both transition and physical risk. The materiality assessment has been based on QRT data (quantitative reporting templates), therefore some approximation on the metrics needs applying. The main risk identified has been on reinsurers and physical risk, mainly due to the increase in NatCats (natural catastrophes) claims, which in some cases produced severe losses.

EIOPA selected insurance groups, where a college of supervisors is in place, to have a dedicated discussion on the assessment of climate change risk with a particular focus on the treatment in the ORSA process. The main goal of the activities has been the identification of best practices and/or industry standards. The outcome of the activities will feed into the Supervisory college activities report for 2023.

As part of conduct oversight, EIOPA collected data on ESG products and performed analyses on performance and costs of products with sustainability features reported in EIOPA's Cost and Past Performance Report¹⁰ published in December 2023. The larger sample of such products collected in 2023, resulting from an improved methodology for data collection and the disclosure of sustainability-related information on products under SFDR¹¹, has resulted in more robust and extensive observations.

⁸ [Supervisory statement on differential pricing practices in non-life insurance lines of business - European Union \(europa.eu\)](#)

⁹ [EIOPA issues Opinion on the supervision of the use of climate change risk scenarios in ORSA - European Union \(europa.eu\)](#)

¹⁰ [EIOPA's Costs and Past Performance Report December 2023 - European Union \(europa.eu\)](#)

¹¹ Sustainable Finance Disclosure Regulation

In May 2023, EIOPA delivered to the European Commission (EC) its progress report on greenwashing covering the definition of greenwashing, considerations on the supervision of greenwashing, as well as issues in the regulatory framework around greenwashing. Since then, EIOPA has been working on preparing the final report, which will cover the supervision of greenwashing as well as proposals on improvements to the regulatory framework around greenwashing. In December 2023, EIOPA launched for public consultation a draft Opinion on the supervision of sustainability claims and greenwashing, which aims to pave the way for a common European Union (EU) approach in the supervision of sustainability claims.

In 2022, EIOPA collected data through consumer research and behavioral experiments to understand demand-side underlying causes for the protection gap. It also explored possible policy measures to address the protection gap. Based on these two studies in 2023, EIOPA drafted a Staff Paper¹², which was published for public consultation. EIOPA also addressed the comments received through the public consultation and published a revised Staff Paper in Q1 2024.

Group Supervision

[Supervisory convergence plan reference: 1e]

EIOPA continued its work on further improving the Supervisory Handbook chapters on group supervision, in particular on the treatment of own funds (also for related undertakings falling under the category of other financial sectors).

Supervisory Technology (SupTech)

[supervisory convergence plan: 1f]

During 2023, EIOPA approved the second SupTech program which includes two new SupTech projects to be started in 2024: one on data quality to run and test validations and a second one on the use of natural language processing (NLP) applied to the Solvency and Financial Condition Report (SFCR).

Also during 2023, a pilot SupTech tool that analyses the information included in the (Packaged retail and insurance-based investment products) PRIIPs Key Information Document (KID) of (Insurance based investment products) IBIPs products sold in the EU market was implemented.

Supervision of captives

[supervisory convergence plan: 1g]

In 2023, EIOPA drafted an Opinion addressed to competent authorities on the supervision of captive insurance and reinsurance undertakings, that aims at facilitating a risk-based and proportionate supervision of captive insurance and reinsurance undertakings and to further harmonise, in the context of creating a level playing field within the EU, supervisory expectations in the topics touched upon. The draft Opinion sets out supervisory expectations specifically on intra-group transactions (especially cash pooling), the consistent application of the Prudent Person Principle (PPP) and

¹² [Consultation on Staff paper on measures to address demand-side aspects of the NatCat protection gap - European Union \(europa.eu\)](https://europa.eu)

governance-related aspects in connection with key functions and outsourcing requirements, taking into account the proportionality principle.

Following the public consultation of the draft Opinion, EIOPA plans to finalise and publish the Opinion in the first half of 2024.

Supervisory Tools in Cross-border contexts

[supervisory convergence plan: 1h]

EIOPA finalised the comprehensive analysis on targeted EIOPA tools and powers vis-à-vis the respective NCAs' enforcement powers as well as the EIOPA roles and responsibilities to mitigate the risks to consumers stemming from insurance undertakings operating in a host market under freedom of establishment and freedom to provide services (i.e. cross-border business). In particular, the analysis involved the challenges associated with the joint on-site inspections and the use of emergency powers under Article 155(4) of Solvency II.

With regard to the joint on-site inspections, follow-up work has been identified and areas for amendments to be included in the on-going review of the EIOPA Guidelines on the Supervisory Review Process.

Use of governance arrangements in third countries to perform functions or activities

EIOPA published a Supervisory Statement in February 2023 on the use of governance arrangements in third countries to perform functions or activities. The aim of the Statement is to ensure appropriate supervision and monitoring of the compliance of insurance undertakings and intermediaries with the requirements of the relevant EU legislation in relation to their governance arrangements in third countries.

1.1.2 RISK TO THE INTERNAL MARKET AND THE LEVEL PLAYING FIELD WHICH MAY LEAD TO SUPERVISORY ARBITRAGE

Internal model outcomes, modelling methodologies and supervisory practices [supervisory convergence plan reference: 2b]

Internal Model comparative studies contribute to EIOPA's objective of supervisory convergence. Conducted in collaboration with national supervisors, the common goal of these studies is to compare outputs from internal models, as well as to further develop supervisory tools and foster common supervisory practices.

During 2023, EIOPA finalised the following three studies:

1. Market and Credit Risk Comparative Study (MCRCS)

EIOPA, together with NCAs, performed a regular comparative study (YE2022 edition) on the market and credit risk within internal models, involving 20 European insurance groups. The objective of the study is to compare risk charges for a selection of financial instruments and benchmark portfolios to be used as a tool for the supervisory review of internal models.

The study performed in 2023 (considering 2022 year-end data) remained close to the structure of the previous exercise and included relevant aspects of risks associated with interest rates, exchange rates, credit spreads, equity and real estate.

In certain areas, the results showed sizeable variations between undertakings, with some cases requiring further review. In this context, supervisors have engaged (on some occasions partnering with EIOPA) with the undertakings in feedback discussions to better understand and evaluate the results at European level and assess whether follow-up actions are required.

2. Non-Life Underwriting Risk Comparative Study in Internal Models (NLCS)¹³

EIOPA, together with NCAs, concluded the second edition of the NLCS in Internal Models.

The study analysed internal models for the non-life underwriting of 75 European insurers belonging to 31 insurance groups. The aim of the study was to evaluate the differences between internal models to understand whether and to what extent these capture similar risks in a consistent manner. Additionally, it examined the non-life underwriting risk profiles to identify the reasons that influenced the risk capital over the first five years since the introduction of Solvency II.

The NLCS report identified notable differences in the capital intensities¹⁴ of internal models. Insurers with lower capital intensities tend to rely on uncertain estimates of future profits and users of internal models exhibit significant variation in the capital intensity compared to those using standard formula calculations.

¹³ [Comparative Study on non-life underwriting risk in internal models - European Union \(europa.eu\)](#)

¹⁴ The intensity is the indicator, used in the study, defined as the SCR over exposure.

EIOPA supports NCAs on the follow-up and monitors the development of the findings. Additionally, the outcome of the NLCS is used in other supervisory processes, sometimes in the assessment of model changes and in initial applications for solo and for group models.

3. Study on Diversification in Internal Models:¹⁵

EIOPA, together with NCAs, concluded the first edition of a study on diversification in internal models, based on year-end 2019 data stemming from 109 European insurance undertakings (comprising both solo and group data) belonging to 22 insurance groups. This study gives an overview of the current modelling approaches and equips NCAs with elements of a European sector-wide comparison as well as various diversification indicators that are intended to support and complement the work of national supervisors when monitoring the on-going compliance of internal models.

The study highlights that diversification in internal models is determined by at least four main factors: the delineation of the risks that are to be aggregated, the risk profile, the aggregation approach and the way dependencies between risks are determined to set up the aggregation approach. EIOPA observed multiple approaches, in particular regarding aggregation methods and the way dependencies between risks are determined.

The study uses a variety of metrics and analyses, each with its strengths and weaknesses, to obtain a holistic view on diversification within internal models. In particular, it highlights that different models of aggregation of risks lead to a sizeable dispersion in the capital requirements even for undertakings with similar business profiles.

The overall findings confirm the need for continuous supervisory scrutiny both at the local and European levels. A second edition of this study will be launched at the end of 2024.

Moreover, during 2023, EIOPA launched the following two additional studies:

4. Life Underwriting Risks Comparative Study

The Life Underwriting Risk comparative study intends to understand and compare life modelling techniques and to assess to what extent the life internal models capture events such as the current macro-economic environment or the covid-19 pandemic. Given the high heterogeneity of model scopes and model structures, the study aims to gain an understanding of life underwriting risk internal models used in the EEA, to provide NCAs with useful tools for supervision of the life models, and to share good practices and indicators among the NCAs. Also, considering the current macro-economic environment, the study will focus on providing the NCAs with a sector wide comparison of lapse and expense risks, in addition to biometric risks (mortality and longevity). A kick-off event was held with 90 participants from the NCAs and the industry.

5. Operational Risks

This first study on operational risks aims at achieving an overview of existing internal models for operational risk as well as identifying supervisory challenges and good practices.

Therefore, EIOPA, together with NCAs, developed and shared a questionnaire with relevant group supervisors. The survey is complemented by corresponding model documentation. The assessment

¹⁵ [Comparative Study on diversification in internal models - European Union \(europa.eu\)](https://eiuropa.eu/comparative-study-on-diversification-in-internal-models)

of the answers and documentation eventually fed into a report which was finalised at the end of March.

Authorisations, fitness and propriety

[supervisory convergence plan reference: 2c]

In the context of the implementation of the new Article 31a of the ESAs regulation, EIOPA continued working with the other ESAs to set up a system for the exchange of information relevant to the assessment of the fitness and propriety (F&P) of holders of qualifying holdings, directors and key function holders of financial institutions by NCAs. The project is based on a two-pronged approach: (1) joint Guidelines and other policy work and (2) IT solution facilitating the information exchange (consisting of a cross-sectoral common searchable database and contacts list).

In 2023, the scope of the system has been extended to include also legal persons, thus ensuring the complete coverage of data subjects. A further Public Consultations on the draft joint Guidelines on these additions was held, with no further feedback on the proposed amendments to the approach.

Work on the IT tool and the implementation continued in 2023, with a focus on the architecture and design documentation. During 2023, consultations with NCAs increased, both via bilateral and joint meetings, specifically on the IT. Also, meetings with the European Data Protection Supervisor took place.

Pension issues

[supervisory convergence plan reference: 2d]

EIOPA drafted a chapter of the IORPs' Supervisory Handbook "IORPs conditions of operation and conflict of interest management" seeking convergence on the assessment and supervision of IORPs' conditions of operation and on potential conflicts of interest, which may arise in particular in cases when IORPs are established by service providers. The chapter was built on preliminary work to better understand IORPs' business models and supervision of the latter across the EU. This work also informed policy proposals set in the Technical Advice on the review of the IORP II Directive published on EIOPA's website.¹⁶

EIOPA also published a follow-up report to the 2019 peer review on the application of the Prudent Person Rule for IORPs according to the IORP II requirements. IORPs are required to invest their capital in the best interest of members and beneficiaries and respect specific investment rules. The 2019 peer review issued 27 recommendations across seven areas to 28 NCAs. Of these, 8 recommendations were fully fulfilled, 10 were partially fulfilled but 9 were not fulfilled. EIOPA will continue to closely monitor the implementation of the recommended actions.

¹⁶ www.eiopa.europa.eu/publications/technical-advice-review-iorp-ii-directive_en

Third country reinsurance in the EU

[supervisory convergence plan reference: 2e]

In 2023, EIOPA publicly consulted its Supervisory statement on supervision of reinsurance concluded with third country insurance and reinsurance undertakings aiming to raise awareness of the risks stemming from regimes that have not been deemed equivalent to Solvency II by the European Commission and to propose a risk-based approach in limiting their effect. The Statement sets out supervisory expectations in several areas, including the assessment of the business context when using reinsurance from third countries and the importance of an early supervisory dialogue. Furthermore, it includes supervisory considerations on how to assess reinsurance agreements and undertakings' risk management systems in relation to the use of third-country reinsurers and foresees tools that will help to mitigate any additional risks that might arise.

Following its public consultation the Supervisory Statement is expected to be finalised in the first half of 2024.

In 2023, EIOPA also worked on the development of a co-operation framework between NCAs and EIOPA on the supervision of reinsurance with third country reinsurers. The co-operation framework provides recommendations on the triggers, frequency, and type of exchange of information with the third country competent authorities as well as co-operation between EEA National Competent Authorities and those Authorities and EIOPA before approaching and when assessing supervisory actions against third country competent authorities. The co-operation framework will be finalised in the first half of 2024.

Joint criteria on the independence of supervisory authorities

Together with the other European Supervisory Authorities– the European Banking Authority (EBA), and European Securities and Markets Authority (ESMA) EIOPA published their joint criteria on the independence of supervisory authorities, building further on and replacing the EIOPA criteria as published in 2021.

Supervisory independence is key to ensure that fair, effective and transparent decisions are taken by appropriately resourced supervisory authorities. These authorities can in turn provide effective and adequate protection for customers and consumers of financial services ensuring confidence in the financial system.

The independence criteria are organised around four key principles:

1. **Operational independence:** so supervisory authorities operate without any form of undue influence from the supervised sector and the government, have adequate legal powers and operational resources.
2. **Personal independence:** with transparent rules for the appointment, selection and removal of members of the supervisory authority's governing body, and high ethical standards for members of the supervisory authority's staff and governing body.
3. **Financial independence:** with sufficient financial resources for supervisory authorities to fulfil their mandates.
4. **Accountability and transparency:** so supervisory authorities conduct their tasks in a transparent and accountable manner.

1.1.3 SUPERVISION OF EMERGING RISKS

IT security and governance related risks, including cyber risk

[supervisory convergence plan reference: 3a]

DORA entered into force on 16 January 2023 and it will apply from 17 January 2025. In line with the ESAs' 2023 work programme, the three ESAs worked jointly on the development of the various policy mandates prescribed by DORA. This policy work includes the publication and dissemination to the European Commission of the first batch of policy mandates (on 17 January 2024, after a public consultation during the summer 2023) and the publication of the consultation papers of the second batch (08 December 2023). Moreover, the ESAs have published in September 2023 their technical advice on the criticality criteria for the designation of critical ICT third-party service providers (CTPPs) and on the oversight fees as a response to the European Commission's call for advice. The ESAs also delivered reports in relation to the upcoming implementation of a pan-European systemic cyber incident coordination framework (EU-SCICF).

In parallel to the policy development, the ESAs have also started preparing for the upcoming implementation of the Oversight Framework on critical ICT third-party service providers (CTPPs). This includes among others:

- Ongoing and enhanced engagement with relevant stakeholders, such as EU and third-country supervisory and oversight authorities as well as EU financial entities and ICT service providers;
- Performance of a data collection exercise on the landscape of ICT third-party providers in the EU. The results of the exercise were published by the ESAs on 27 September 2023.
- Establishment of a High-Level Group on DORA Oversight (HLGO) in December 2023 where involved competent authorities are participating and which aims to facilitate the design of the oversight framework, covering governance and other aspects of the upcoming framework;
- Ongoing development of the necessary IT tools which will support the oversight activities as well as the ICT-related incident framework. EIOPA also implemented the internal process to exchange information regarding cybersecurity and cyberattacks with the NCAs based on Article 29 of its regulation.

Digital Transformation

[supervisory convergence plan reference: 3b]

In view of the Artificial Intelligence (AI) Act negotiations no sectorial specific policy work was pursued at European level. In 2023, EIOPA undertook preparatory work to assess the gaps and overlaps between the requirements included in the AI Act and the existing ones in insurance sectorial legislation. Linked to this work EIOPA organised a dedicated work on the AI Act, in order to discuss its key provisions and its expected impact on the insurance sector before the summer of 2023. In autumn 2023, EIOPA also organised a workshop on generative AI in insurance, which provided useful insights into the state-of-play of this nascent technology in the insurance sector.

At international level EIOPA co-lead the AI workstream of the Fintech Forum of the IAIS, which developed a members-only thematic review on the regulation and supervision of the use of AI in

insurance. The thematic review highlighted that there are different approaches to the regulation and supervision of AI across the different jurisdictions. As a follow-up of this thematic review the IAIS will develop an AI application paper during 2024 to promote convergence in the application of the Insurance Core Principles in the context of the use of AI by insurance undertakings.

EIOPA's digital market monitoring survey also gathered data from the market on the uptake on the insurance sector of different technologies such as AI, Blockchain or Internet of Things. The survey also collected information on business models such as digital distribution and communication channels, cyber insurance products, open insurance applications and the relationship between insurers with BigTech and Insurtech start-ups. The results of the survey will be published in April 2024.

Moreover, in co-operation with the other ESAs, EBA and ESMA, EIOPA also organised dedicated calls with European consumers' organisations about the implications of new technologies and business models in financial services from a consumer protection perspective.

In 2023, the European Forum for Innovation Facilitators (EFIF) continued providing a platform for NCAs and the three ESAs to regularly share experiences from their engagement with firms through innovation facilitators, to exchange technological expertise, and to try and reach common views on the regulatory treatment of innovative products, services and business models. Established as a follow-up to the 2019 Joint ESA report on regulatory sandboxes and innovation hubs, in 2023 the EFIF developed a cross-sectoral mapping of financial services provided by Mixed Activity Groups (MAGs) through innovative distribution models, which will help to categorise the innovative distribution models by MAGs and assess their impact of innovative distribution models in the financial sector, and updated the EFIF financial innovations mapping.¹⁷ Moreover, the EFIF drafted a joint ESA report on innovation facilitators.¹⁸ The report reflects on the innovation facilitators established in the EU since the 2019 joint ESA report, the latest practices in the design and activities of innovation facilitators and emerging good practices, and new perspectives brought to the field such as the (Distributed Ledger Technology) DLT Pilot Regime, AI sandboxes or green sandboxes.

On 24 July 2023, EIOPA launched a public consultation on open insurance use case by publishing a Discussion Paper¹⁹, that examines the key features of an insurance dashboard. The paper was a follow-up to an initial Discussion Paper on Open Insurance, after which EIOPA concluded that further work on more concrete, specific and detailed open insurance use cases might facilitate a better understanding of implications for consumers, industry and supervisors.

The insurance dashboard use case selected aims to give consumers an overview of all their insurance policies in one place, while allowing insurance providers to present information about their own products at the same time, enabling consumers to better compare coverages and prices. The use case was developed to draw out technical and supervisory challenges by exploring how such a service could work in practice.

The Discussion Paper investigates the operational aspects of such a dashboard from a supervisory perspective, including data flows, stakeholder roles and responsibilities, standardisation and interoperability, as well as data protection and ethical considerations. Furthermore, it also outlines

¹⁷ [EFIF Taxonomy of Financial Innovation](#)

¹⁸ [2023 Joint ESAs Report on Innovation Facilitators](#)

¹⁹ [EIOPA Open Insurance use case - Insurance Dashboard.pdf \(europa.eu\)](#)

applicable legal frameworks, considers implementational challenges regarding data sharing and identifies benefits and risks.

In March 2023, EIOPA published a supervisory statement on differential pricing practices in insurance. The supervisory statement provided guidance about certain pricing practices, with and without the use of new technologies such as AI, which were not considered to be compliant with the requirement to treat consumers fairly, and provided guidance on the POG requirements that should be developed in order to mitigate conduct risks. Moreover, EIOPA also gathered data from the market on the uptake of differential pricing practices in its 2023 digital market monitoring survey, the result of which will be published in April 2024.

Cyber underwriting

[supervisory convergence plan reference: 3c]

EIOPA launched a survey²⁰ on access to cyber insurance by Small and Medium Enterprises (SMEs) to collect information on some critical aspects of the coverage, such as exclusions in general liability policies, terms and conditions of cyber coverage policies, types of incidents covered and so on. Such an analysis also explores the main barriers preventing SMEs from accessing cyber coverage, and what could incentivise them to buy coverage if available.

Digital business model analysis

[supervisory convergence plan reference: 3d]

The evolution of the technology and its uses in business processes have an impact across all steps of the value chain in the insurance sector including through the emergence of start-ups. Digitalisation also leads to the emergence and consolidation of new distribution channels, new ways of engaging with customers and new kinds of competitors and potential disruptors of traditional business models (e.g. Mixed Activity Groups (MAGs) performing financial and other services).

To reflect on the ongoing changes and support supervisors in the business model analysis in the context of the insurance digital market, EIOPA revised the business model analysis section of the EIOPA Supervisory Handbook.

The revised section provides quantitative and qualitative tools to support the assessment of the existing business models, including proportionate approaches and tools in light of digitalisation. Some use cases and examples inspired by real supervisory cases have been developed to support supervisors in their better understanding of the new technology business models/strategies, what risks they involve, and whether they will be sustainable in the long term.

²⁰ The survey has been launched in September 2023 and run until March 2024.

1.2 EIOPA'S OWN INDEPENDENT ASSESSMENT

EIOPA's own Oversight work aims to ensure a high, effective and consistent level of supervision.

For this purpose, EIOPA engages with the NCAs on their day-to-day supervision in the area of conduct and prudential supervision.

Technical assessment

On the basis of EIOPA's mandate provided in Regulation (EU) No 1094/2010, in particular Article 8(1)(b) thereof, EIOPA performed in 2023 an independent own technical assessment of the valuation of Technical Provisions (gross and net of reinsurance) for the motor third party liability portfolio of an insurance undertaking.

The EIOPA assessment aimed at contributing to the correct and consistent application of the Solvency II regulation with a view of ensuring proper protection of policyholders and beneficiaries.

Bilateral engagements with NCAs

To ensure a common European understanding of effective supervision, EIOPA regularly engages bilaterally with NCAs to assess more detailed national practices. EIOPA carried out 6 bilateral engagements with NCAs on prudential issues, including internal models. In the area of Internal Models (IM), EIOPA continued to carry out country field visits by visiting 2 NCAs to gather IM supervisory practices and provide EIOPA's expertise. EIOPA's bilateral engagements on prudential issues were dedicated to the following Member States and EEA countries: Belgium, Croatia, Cyprus, Germany, Luxembourg and Norway.

To ensure consistency and to build a comprehensive view on how NCAs perform conduct supervisory activities, EIOPA continued to carry out country visits to explore a set of pre-defined conduct-related topics, in addition to selected topics identified for each NCA. In particular, in 2023 it visited 4 Member States: Austria, Poland, Finland and Spain.

The independent assessment of supervisory practices across Europe provides EIOPA with an overall picture of applications of Solvency II and IORP II and other directives such as the IDD and may identify areas where actions are required, both at EU and national level, to further improve the supervisory framework and supervisory practices.

The countries to be visited are determined according to a multi-annual plan that is supported by the priorities established for the bilateral engagements with NCAs and other initiatives and also ensures that all NCAs are visited within an adequate timeframe. For the establishment of priorities EIOPA fine-tuned its internal Risk Assessment Framework (risk scoring), relying on some quantitative and qualitative risk indicators.

EIOPA issued a recommendation to the Registrar of Institutions of Occupational Retirement Provision (Registrar) responsible for supervising Institutions for Occupational Retirement Provision (IORPs) in Cyprus on actions necessary to restore compliance with the IORP II Directive. The recommendation refers to a breach of Union law affecting a number of IORPs operating

domestically in Cyprus. The Registrar failed to fulfil its obligation as foreseen in the IORP II Directive to register these IORPs, that have been operating for several years without registration.

Colleges of Supervisors

EIOPA is a member of Colleges of Supervisors and contributes through its active participation to the oversight of international cross-border insurance groups. Together with the group and solo supervisory authorities which are exercising the direct supervision, EIOPA is playing an important role in overcoming national fragmentation and in enhancing the convergence and effectiveness of European supervision.

The number of College of Supervisors vary from year to year. In 2023, there were 60 cross-border insurance groups, with a head office and subsidiaries in the European Union/European Economic Area (EU)/EEA) for which a College is established.²¹

In addition, EIOPA interacted with third country supervisory authorities on cross-border insurance groups with their headquarter outside Europe and conducting business in EU/EEA and participated in 8 third country College of Supervisors' meetings (in United Kingdom, Switzerland, and Bermuda).

In total EIOPA has been following 45 Colleges of Supervisors and participated in 66 College of Supervisors' meetings in 2023.

The College of Supervisors' engagements during 2023 focused mainly on group specific risks and on the impact of the current macro-economic environment on the groups, whose business models were mainly impacted by the persistent higher level of inflation and the rising interest rates environment.

In the context of its college activities on Aegon N.V., EIOPA issued an Opinion on a delegation agreement²² between Dirección General de Seguros y Fondos de Pensiones and De Nederlandsche Bank N.V. under Article 28 of the EIOPA Regulation, the first time such a delegation tool was activated.

Finally, College of Supervisors have been engaging on the climate change scenarios in Group ORSAs as part of the sustainability risk as well as on cross-sectoral issues (mainly risks stemming from the banking sector) and conduct of business topics.

Collaboration Platforms

Collaboration platforms continue to strengthen supervision of cross-border business provided by insurance undertakings through the Freedom to Provide Service (FoS) and Freedom of Establishment (FoE) and provide direct benefit for both home and host supervisors in information exchange and acting on commonly agreed measures where appropriate.

²¹ Annex to this document: "EIOPA list of identified insurance groups 2023 for which a College of supervisors is in place".

²² [EIOPA opinion on a delegation agreement between Dirección General de Seguros y Fondos de Pensiones and De Nederlandsche Bank N.V. under Article 28 of the EIOPA Regulation - European Union \(europa.eu\)](#)

By the end of 2023, five collaboration platforms based on the Solvency II Directive Art 152b(1) were operational with the involvement of 17 NCAs. Beyond these, EIOPA also joined two Collaborations platforms based on the Solvency II Directive Art 152b(2), previously the so-called Hub & Spoke platforms.

Several actions and measures were taken and were successfully implemented. In some cases, the supervisory cooperation and intervention led to the successful closing of collaboration platforms, while for some of the platforms the intensive co-operation is still continuing into 2024.

In this context EIOPA worked closely with Národná banka Slovenska (NBS), the Slovakian national supervisory authority, and the other national competent authorities through its cooperation platform to address the adequate protection of policyholders throughout the European Economic Area, regarding the operations of NOVIS, from both prudential and conduct of business perspective.

Equivalence monitoring

In 2023, EIOPA finalised the equivalence monitoring exercise in Switzerland, which aimed to assess if the supervisory implementation of the equivalent regime ensured the same outcome from a policyholder protection perspective with regards to the protection under Solvency II.

In addition, EIOPA also followed up on the equivalence monitoring exercise done in 2022 in Bermuda.

Union-wide Strategic Supervisory Priorities

In 2023, EIOPA monitored the status of implementation of the Union-wide Strategic Supervisory Priorities (USSP) defined for the period 2021-2023 in its third year of application (2023), which focused on the i) impact of the macro-economic environment on the insurance sector, including the combined effect of inflation and interest rate risk; ii) monitoring new trends in digitalisation and cyber; iii) value for money in unit-linked business. The USSP were considered by all NCAs' in their supervisory priorities and approaches in 2023. The outcome of the supervisory reviews indicates that the financial and solvency position as well as the liquidity of the European insurance market remained overall quite stable despite the unfavorable occurrences confronting the global economy in 2023.

EIOPA further performed an assessment, in co-operation with the NCAs, of the future expected developments and trends for the purpose of establishing the next three-year cycle (2024-2026), which was published on EIOPA's website in 2024.

Internal Model and Technical Assistance

EIOPA provides assistance to NCAs in the area of internal model applications upon request.

In 2023, EIOPA successfully finalised a technical assistance assignment to one NCA for the assessment of a group's partial internal model pre-application. In addition, EIOPA initiated technical assistance to two NCAs related to the assessment of a pre-application of a non-life partial internal model. Both undertakings belong to the same group and the pre-application phase is expected to end in Q1 2025.

Finally, through the DG REFORM fund technical support instrument (TSI), EIOPA also supported an NCA in developing its own conduct risk assessment framework, in analysing the existing offer and distribution practices attached to IBIPs with sustainability features in its market, and in developing and testing a methodology to carry out mystery shopping exercises. The project looked also at possible risks and trends in relation to digitalisation and at how the NCA could explore the use of SupTech to enhance its conduct supervision activities. In 2023, EIOPA also worked with DG REFORM and NCAs to develop a new project – to be carried out in 2024 and 2025 – on how SupTech can be used to identify possible greenwashing cases. Through the DG REFORM TSI, EIOPA also provided technical support to a NCA in developing a risk-based, forward-looking supervisory framework as part of its implementation of the IORP II Directive.

ANNEX

EIOPA list of identified insurance groups for which a College of supervisors is in place - including, per insurance group, an overview of the EU/EEA countries' National Competent Authorities participating as member or participant in the College of Supervisors during 2023.

Group Supervisor	Name of the group (or EEA sub-holding of 3rd country parent)²³	Location of head office, subsidiaries, or other related undertakings of the group (EU/EEA) - NCAs participating in the College of Supervisors²⁴
AT	Grazer Wechselseitige Group	AT BG CY HR HU RO SI
AT	Merkur Group	AT HR SI
AT	Uniqa Group	AT BG CZ HR HU LI PL RO
AT	Vienna Insurance Group	AT BG CZ DE EE HR HU LI LT LV PL RO SK
AT	Wüstenrot Group	AT HR SK
BE	Ageas SA/NV	BE PT
BE	KBC Insurance Group	BE BG CZ HU LU SK
BG	EUROINS INSURANCE GROUP ²⁵	BG RO GR
DE	ADAC	DE LU
DE	Allianz	DE AT BE BG CZ EL ES FR HR HU IE IT LI LU LT NL PL PT RO SK
DE	ARAG	DE IT NO ES NL
DE	DEVK-Sach	DE FR
DE	HanseMerkur	DE LI
DE	HDI	DE AT HU IE IT PL
DE	INTER	DE PL
DE	LV 1871	DE LI

²³ The following Colleges are in process of establishment finalisation: Barmenia (DE), The Sparkassen Versicherung (DE), OneAdvent (IE), Octium (LI), Longrun (PT)

²⁴ Including NCAs supervising EEA branches

²⁵ College not active anymore

DE	Münchener Rück/Ergo	DE AT BE CZ DK EE EL ES HU LT LU MT NL PL RO SK
DE	R+V	DE IT
DE	Signal Iduna	DE HU PL RO
DE	VHV	DE AT
DK	Tryghedsgruppe	DK SE
EL	Colonnade Finance	EL RO
EL	The Ethniki Insurance Group	EL CY RO
ES	LIBERTY INTERNATIONAL EUROPEAN HOLDINGS	ES IE LU PT
ES	MAPFRE, S. A.	ES DE IT MT PT
ES	Vida Caixa Group	ES PT
FR	AXA SA	FR DE BE ES IE IT LU
FR	BNP PARIBAS CARDIF	FR HU IT LU PL CZ SK SE
FR	CAISSE D'ASSURANCES MUTUELLES DU CREDIT AGRICOLE (CAMCA)	FR LU
FR	CGPA GROUPE	FR LU
FR	CNP Group	FR CY EL IE IT LU
FR	COVEA	FR IE LU
FR	CREDIT AGRICOLE ASSURANCES	FR EL ES IE IT LU PL PT
FR	GROUPAMA	FR BG EL HU IT RO HR
FR	Groupe des assurances du crédit mutuel	FR BE ES LU
FR	MACSF SGAM	FR LU
FR	MONCEAU (Mutuelle Centrale de Réassurance)	FR LU
FR	BPCE Group	FR LU
FR	SCOR SE	FR IE DE
FR	SGAM AG2R LA MONDIALE	FR LU
FR	SGAM BTP	FR ES PT
FR	SGAPS APICIL	FR LU
FR	SOGECAP	FR LU CZ RO
IT	Generali	IT AT BG HR CZ FR DE EL HU IE LI LU PL PT RO SI ES
IT	Gruppo Assicurativo Mediolanum	IT IE
IT	Gruppo Assicurativo Unipol	IT IE
IT	REALE MUTUA	IT ES
LU	AFI-ESCA	LU FR

LU	FWU Group AG	AT LU
NL	Achmea BV	NL SK EL
NL	Aegon NV ²⁶	NL ES PT
NL	NN Group	NL BE CZ EL HU PL RO SK ES
NO	Gjensidige Group	NO DK LT
NO	Storebrand ASA	NO SE
PL	Capital Group PZU	PL LV LT EE
SE	Nordea Liv Försäkringsgrupp	SE DK NO FI
SE	Nordnet Försäkringsgrupp	SE NO
SE	Sampo Plc	SE NO DK EE
SE	SEB Life and Pension Försäkringsgrupp	SE IE LV
SI	Triglav Group	SI HR

²⁶ AEGON Group, EEA College dissolved in 2023.

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