

Country-by-country analysis

Annex VII to the 2nd Report on the application
of the Insurance Distribution Directive (IDD)

Consumer Protection Department
EIOPA REGULAR USE
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07 December 2023

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Note:

Powers of national competent authorities (NCAs):

In February 2023, EIOPA launched an online survey addressed to NCAs to gather input as to whether they are sufficiently empowered to carry out their tasks. The following information is based on the responses from 30 NCAs¹ to this survey.

Changes in the EU insurance distribution market:

In February 2023, EIOPA launched a survey addressed to NCAs to gather information on the insurance intermediaries' market structure and patterns of cross-border activities. The following information is based on the responses from 30 NCAs² to this survey.

The figures should be interpreted with some caution as there are differences as to how intermediaries are registered in their home Member State, in the national categories of insurance intermediaries and in the approaches by NCAs to collect data.

¹ AT (BMAW and FMA), BE, BG, CY, CZ, DK, EE, ES, FI, FR, GR (UHC and BOG), HR, HU, IE, IT, LI, LT, LU, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK

² AT (BMAW and FMA), BE, BG, CY, CZ, DK, EE, ES, FI, FR, GR (UHC and BOG), HR, HU, IE, IT, LI, LT, LU, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK

AUSTRIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ³	8,979	2.00%
(Re)insurance GWP (in million) ⁴	20,815.873	1.5%
Number of (re)insurance undertakings ⁵	33	1.9%
Number of registered insurance intermediaries	17999	2.1%

National competent authority:

The Austrian Financial Market Authority (FMA) is the competent authority for the supervision of insurance distribution activities of insurance undertakings and credit institutions. With regard to banks as intermediaries, the full implementation of IDD into Austrian law was completed in June 2019.

The Federal Ministry for Digital and Economic Affairs (BMAW) is the competent authority for the supervision of insurance intermediaries. This is within the Austrian constitutional organisation a matter of Art. 102 B-VG (Federal Constitutional Act), so called “indirect federal administration”

³ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

⁴ “(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

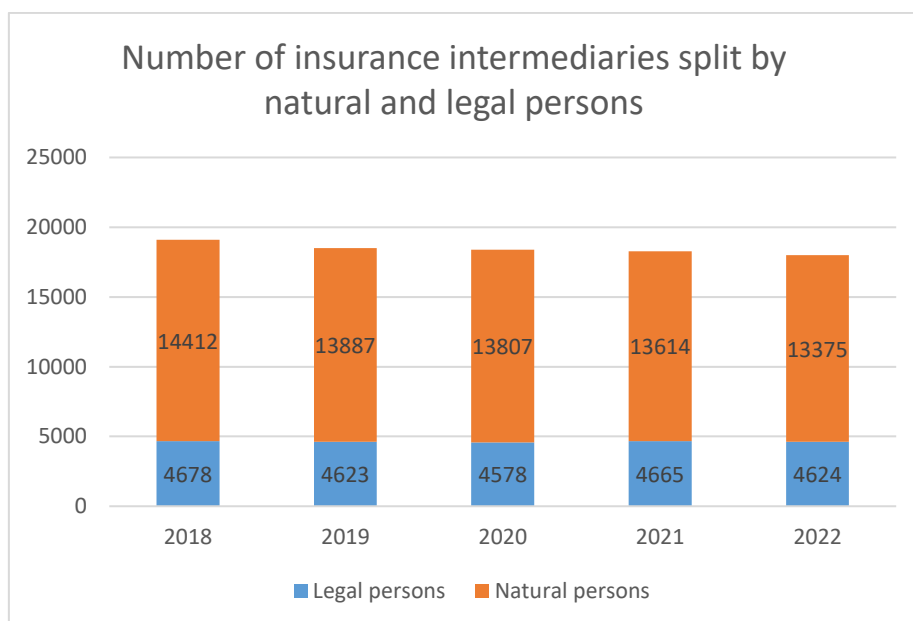
https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

with the Ministry as head, 9 regional governors and approximately more than 100 local district authorities of first instance.

Registered insurance intermediaries split by natural and legal persons:⁶



Comments provided by the NCA on the figures included in the chart above:

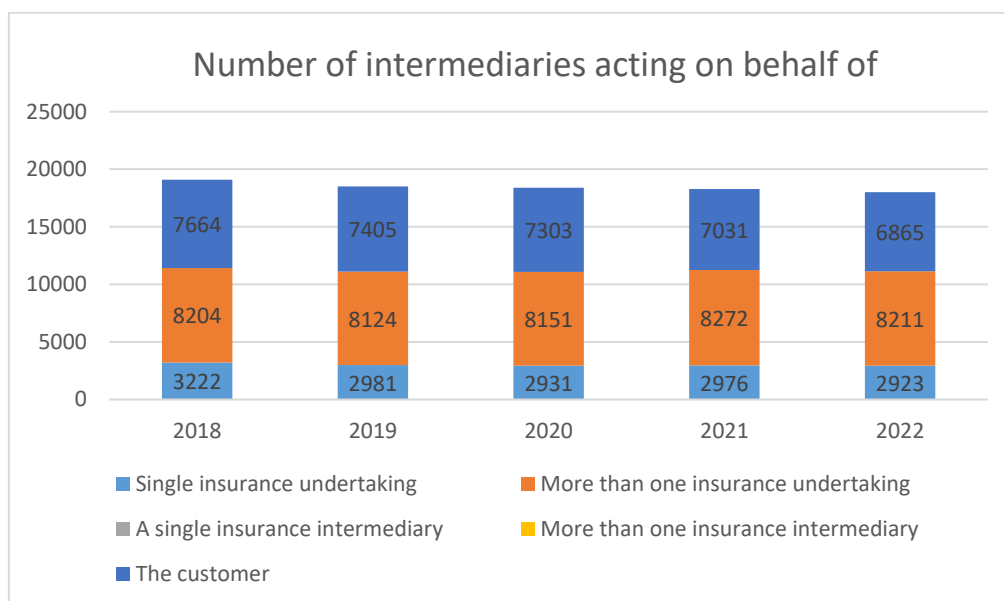
These are the exact numbers of registrations into our register (GISA).

Online registration system:

Access to our on line registration form you can find at <https://www.gisa.gv.at/online-gewerbebeanmeldung>. After having filled in the necessary form it is transferred to the local Trade Authority of the intended seat of the company. The trade authority checks within two months if all the requirements are fulfilled and afterwards the data is released to be entered into the official register (GISA). After release of the date and entering it into the register there is a current gathering of the data into the statistics of this register (the data reflected within this survey thus are on a daily basis.)

⁶ Number of insurance intermediaries registered with the 'competent authority' split by natural/legal persons. The reference dates are 31.12.2021 and 31.12.2022.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:⁷

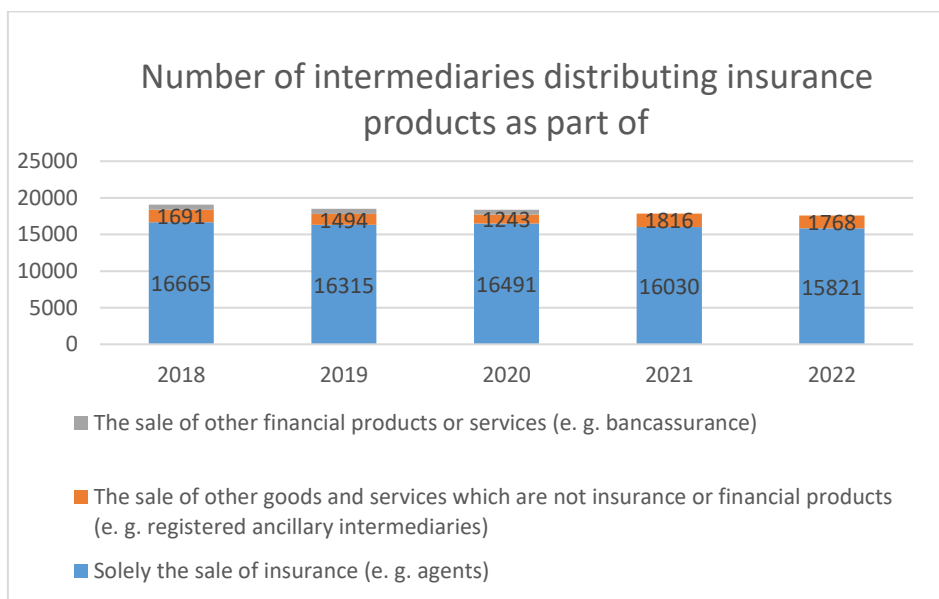


Comments provided by the NCA on the figures included in the chart above:

Exact data according to our register (GISA).

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

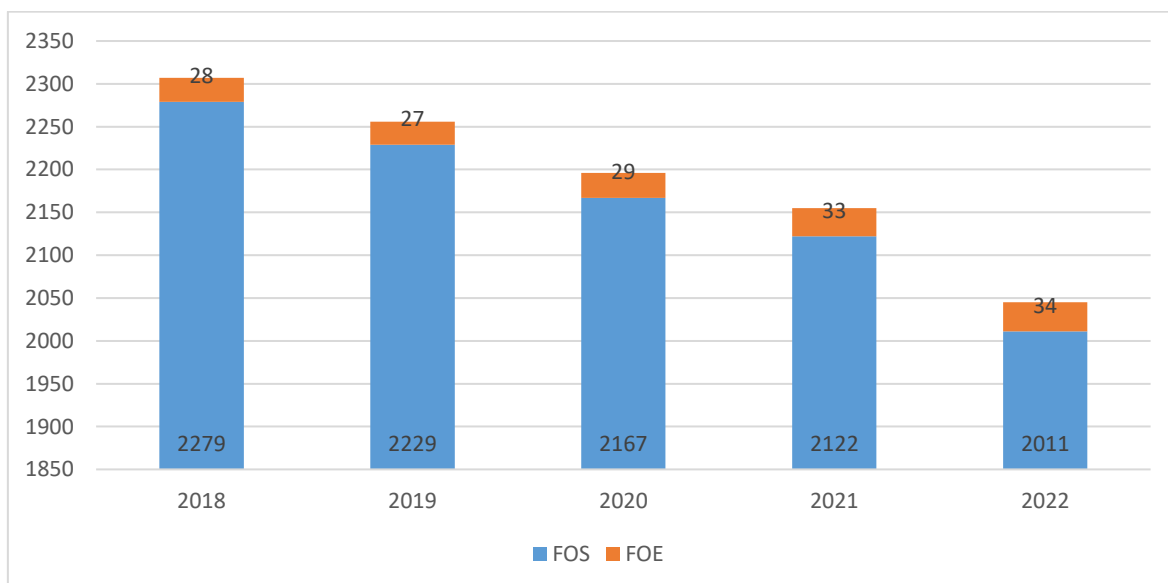
⁷ The reference dates are 31.12.2021 and 31.12.2022.



Comments provided by the NCA on the figures included in the chart above:

exact data according to our register (GISA)

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

exact data according to our register (GISA)

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁸

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	0	0	0
<i>Belgium</i>	891	0	891
<i>Bulgaria</i>	157	1	158
<i>Cyprus</i>	870	0	870
<i>Croatia</i>	138	3	141
<i>Czech Republic</i>	1019	2	1021
<i>Denmark</i>	878	0	878
<i>Estonia</i>	868	1	869
<i>Finland</i>	872	0	872
<i>France</i>	905	1	906
<i>Germany</i>	1783	17	1800
<i>Greece</i>	879	1	880
<i>Hungary</i>	1071	0	1071
<i>Iceland</i>	850	0	850
<i>Ireland</i>	875	0	875
<i>Italy</i>	1094	2	1096
<i>Latvia</i>	868	0	868
<i>Liechtenstein</i>	996	0	996
<i>Lithuania</i>	869	0	869
<i>Luxembourg</i>	905	0	905
<i>Malta</i>	877	0	877
<i>Netherlands</i>	887	0	887
<i>Norway</i>	854	0	854
<i>Poland</i>	925	3	928
<i>Portugal</i>	871	0	871
<i>Romania</i>	176	5	181
<i>Slovakia</i>	1021	3	1024
<i>Slovenia</i>	1041	4	1045
<i>Spain</i>	893	0	893
<i>Sweden</i>	873	0	873

⁸ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Total EEA</i>	<i>25206</i>	<i>43</i>	<i>25249</i>
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Comments provided by the NCA on the figures included in the table above:

exact data according to our register (GISA)

General qualitative description of the “patterns of cross-border activity”:

Austrian Intermediaries have to a high number notified activity abroad, more than the average passporting from other member states. Maybe but this is only because there are hardly any obstacles to inform the authorities and the notification then is going on automatically and everything is very easy for the intermediaries to manage. Thus there might indeed be many persons having made a notification and having a right to passport which is even registered but do not make use of this possibility.

Information on the powers of the NCA

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD (FMA):

The FMA has been sufficiently empowered to ensure the implementation of the IDD (see the list of statutory powers the FMA has received to ensure the implementation of the IDD in the previous report).

New statutory powers to implement the IDD received since 2022 (BMDW):

There was no change in the legal situation in this period in question 2022/23.

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD (BMDW):

This question cannot be answered in a fully distinct manner. This is but also due to a lack of specifications on necessary resources in the EU legislation thus one cannot say what to be enough resources or not. Generally we consider the provision of staff rather low.

As a the question of a legal base for mystery shopping is concerned we are welcoming very much to find such provision in the draft amendment to IDD in the retail investment strategy package from EC.

BELGIUM

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁹	11,618	2.6%
(Re)insurance GWP (in million) ¹⁰	44,172.414	3.2%
Number of (re)insurance undertakings ¹¹	57	3.3%
Number of registered insurance intermediaries	8911	1.1%

National competent authority:

Financial Services and Markets Authority (FSMA)

⁹ Based on Eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

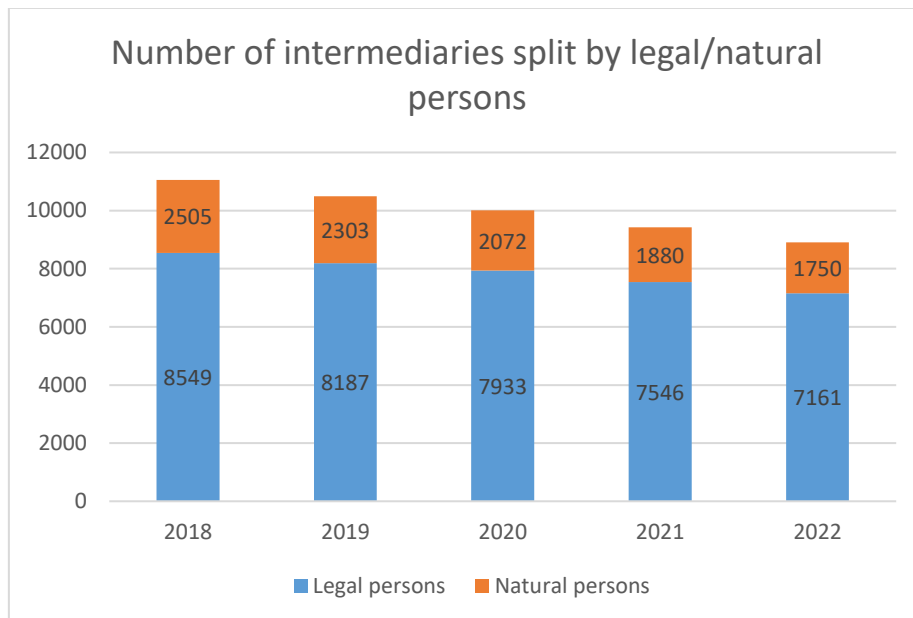
¹⁰ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹¹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



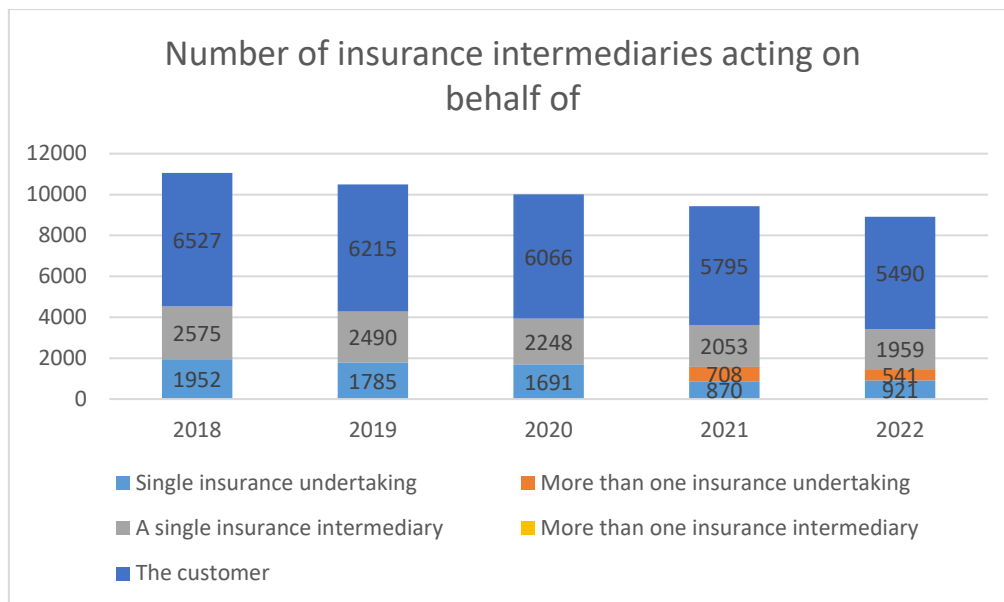
Comments provided by the NCA on the figures included in the chart above:

The above numbers do not include ancillary insurance intermediaries (2021: 395, of which 392 legal persons and 3 natural persons / 2022: 496, of which 493 legal persons and 3 natural persons).

Online registration system:

Since mid-2017 the FSMA operates a fully online system for the registration as an insurance intermediary. The same online tool is used for ulterior updates to the registration file. The Belgian legal framework is adapted to make the use of the online tool mandatory for all insurance intermediaries. The register of the insurance, reinsurance and ancillary insurance intermediaries is available on the FSMA's website and is updated on a weekly basis.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

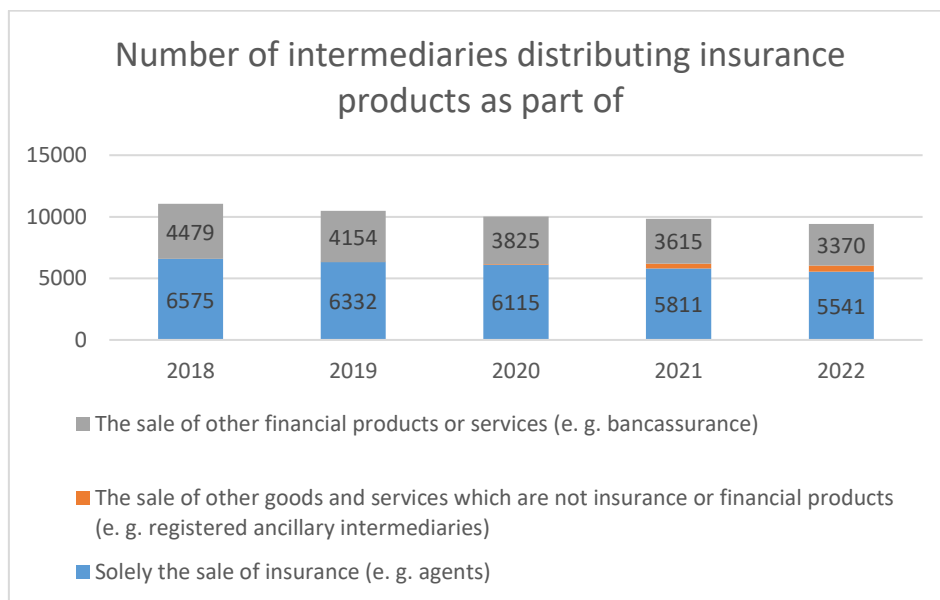
All data from the FSMA's online tool, taken on 31 Dec 202X.

Applied methodology for the classification:

- The single insurance undertaking category includes all agents and mandated underwriters who indicated that they work with 1 insurance company
- The more than one insurance undertaking category includes all agents and mandated underwriters who indicated that they work with more than 1 insurance company, or for whom no data is available
- The single insurance intermediary category includes the Belgian category of subagents.
- The more than one insurance intermediary category does not exist under Belgian law.
- the Customer category includes the Belgian category of brokers.

The above numbers do not include ancillary insurance intermediaries (2021: 395 / 2022: 496).

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the figures included in the chart above:

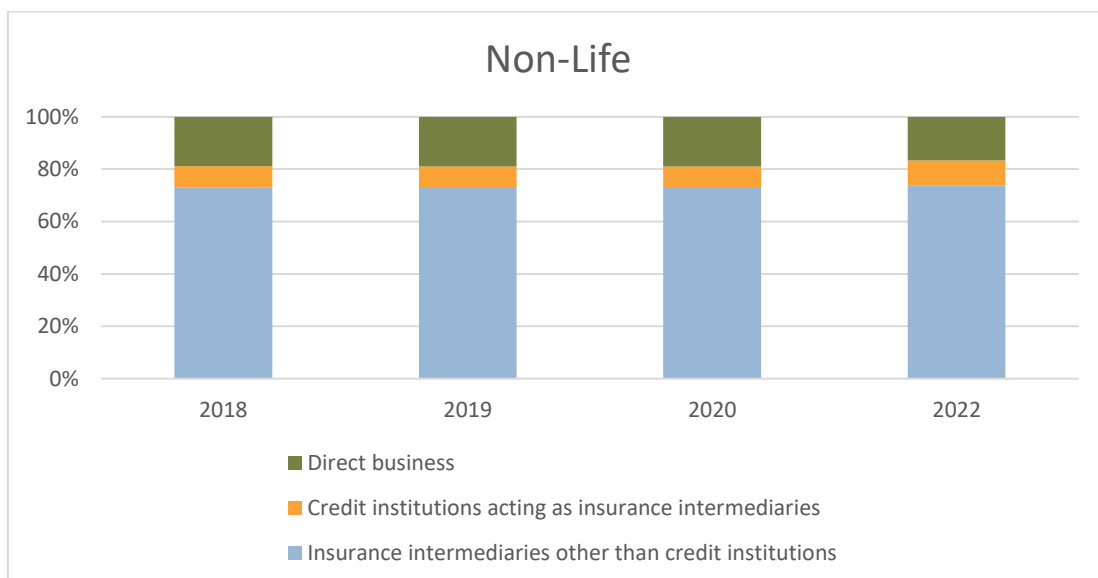
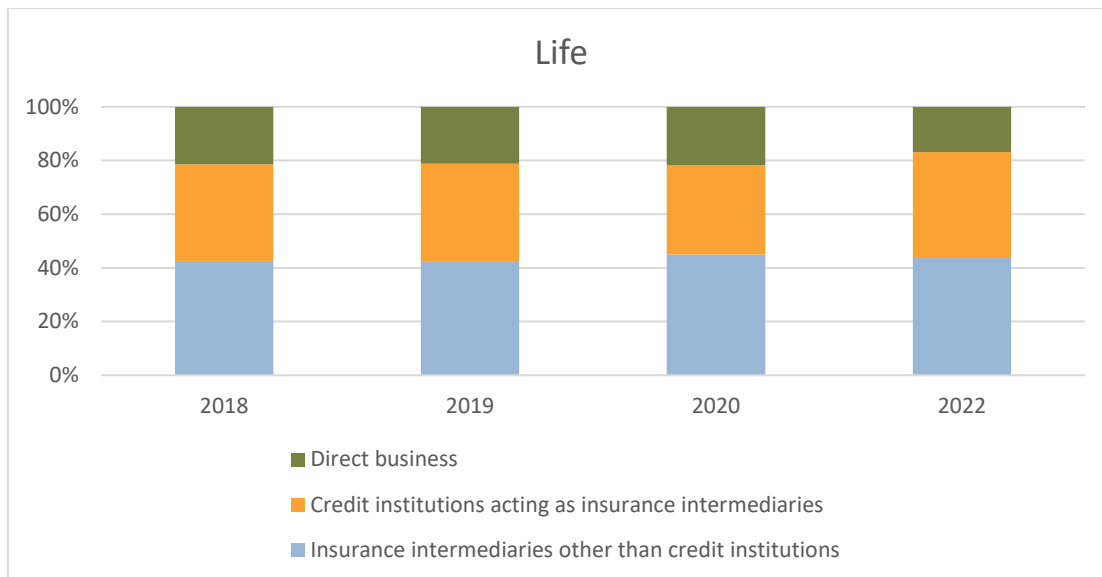
All data from the FSMA's online tool, taken on 31 Dec 202X.

Applied methodology for the classification:

- The category of the sale of other financial products or services (e.g., bancassurance) includes all Belgian insurance intermediaries with at least one other active license on 31 Dec 2022
- The category of insurance intermediaries distributing insurance products as part of the sales of other goods and services which are not insurance or financial products includes all Belgian ancillary insurance intermediaries
- Category of insurance intermediaries distributing insurance products as part of solely the sale of insurance includes all Belgian insurance intermediaries with no other active license on 31 Dec 2022

No information on exempted ancillary insurance intermediaries is available

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

For the years 2018-2020: data is taken from the annual reports on distribution channels by Belgian sector federation Assuralia.

For the year 2022: the FSMA asked the seven largest Belgian insurance companies to provide data on their GWP for in 2022.

As one insurance company was unable to deliver data for 2022, we used (for that insurance company) their 2021 data.

The data for these seven companies represents 63% of GWP in Life and 70% of GWP in Non-Life, when compared to the total GWP in Belgium in 2021 (total GWP as published by Assuralia, Belgium's sectoral federation of insurance companies).

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

0.3%

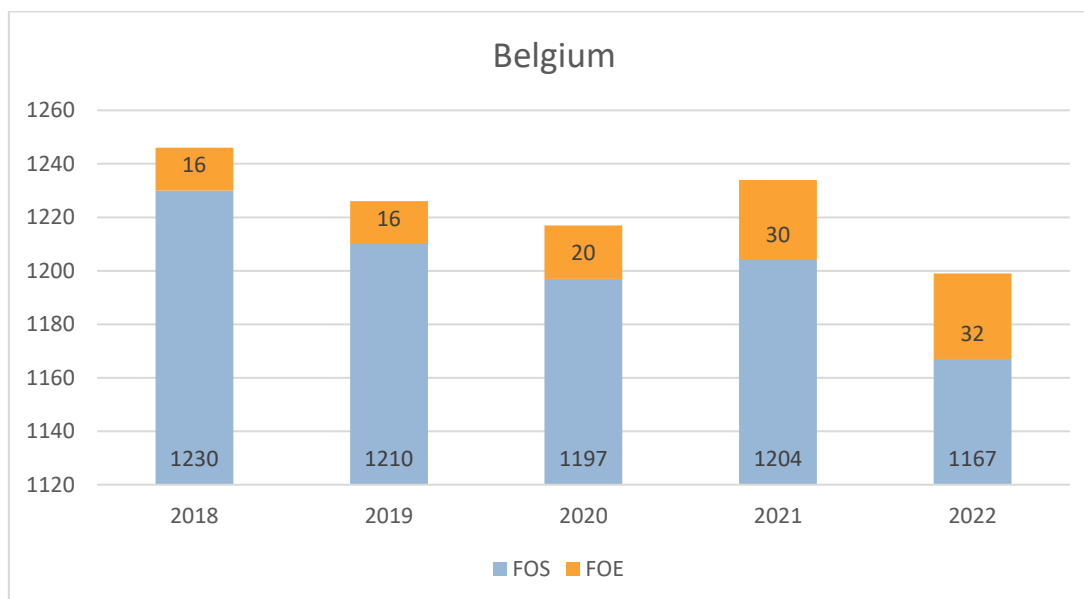
Comments provided by the NCA on the data above:

With the survey of the seven largest Belgian insurance companies as referred to in Q6, we also requested data on these companies' online intermediation/sales in 2022. Based on their responses, online intermediation/sales represents 0,07% of their total GWP 2022.

In addition, the latest available data published by Assuralia (Belgium's sectoral federation of insurance companies) on "pure e-commerce distribution" indicates 0,3% with the caveat that many other distribution channels could also take a digital form, so that this figure might be an underestimation. This is data for the year 2020. The 2021 report mentions explicitly that further data on e-commerce distribution is not available.

Due to the lack of a clear definition of "online intermediation/sales", comparability of numbers might be very difficult and will not provide a coherent view across all Member States.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

All data from the FSMA's online tool, taken on 31 Dec 2022.

The above numbers do not include ancillary insurance intermediaries holding an outgoing passport (2021: 4x from BE to LU / 2022: 4x from BE to LU and 1x from BE to FR).

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹²

Host Member State	1. FOS	2. FOE	3. TOTAL
Austria	137	1	138
Belgium	0	0	0
Bulgaria	128	0	128
Cyprus	125	0	125
Croatia	97	0	97
Czech Republic	136	1	137
Denmark	136	0	136
Estonia	122	0	122
Finland	130	0	130
France	791	4	792

¹² The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Germany</i>	<i>529</i>	<i>2</i>	<i>530</i>
<i>Greece</i>	<i>139</i>	<i>0</i>	<i>139</i>
<i>Hungary</i>	<i>131</i>	<i>0</i>	<i>131</i>
<i>Iceland</i>	<i>112</i>	<i>0</i>	<i>112</i>
<i>Ireland</i>	<i>136</i>	<i>2</i>	<i>137</i>
<i>Italy</i>	<i>194</i>	<i>2</i>	<i>194</i>
<i>Latvia</i>	<i>123</i>	<i>0</i>	<i>123</i>
<i>Liechtenstein</i>	<i>112</i>	<i>0</i>	<i>112</i>
<i>Lithuania</i>	<i>125</i>	<i>0</i>	<i>125</i>
<i>Luxembourg</i>	<i>1001</i>	<i>7</i>	<i>1005</i>
<i>Malta</i>	<i>130</i>	<i>0</i>	<i>130</i>
<i>Netherlands</i>	<i>662</i>	<i>4</i>	<i>664</i>
<i>Norway</i>	<i>121</i>	<i>0</i>	<i>121</i>
<i>Poland</i>	<i>152</i>	<i>0</i>	<i>152</i>
<i>Portugal</i>	<i>180</i>	<i>0</i>	<i>180</i>
<i>Romania</i>	<i>132</i>	<i>0</i>	<i>132</i>
<i>Slovakia</i>	<i>144</i>	<i>1</i>	<i>145</i>
<i>Slovenia</i>	<i>121</i>	<i>0</i>	<i>121</i>
<i>Spain</i>	<i>221</i>	<i>5</i>	<i>223</i>
<i>Sweden</i>	<i>136</i>	<i>0</i>	<i>136</i>
<i>Total EEA</i>	<i>6403</i>	<i>29</i>	<i>6416</i>

Comments provided by the NCA on the figures included in the table above:

All data from the FSMA's online tool, taken on 31 Dec 2022.

The above numbers do not include ancillary insurance intermediaries holding an outgoing passport (2021: 4x from BE to LU / 2022: 4x from BE to LU and 1x from BE to FR).

General qualitative description of the “patterns of cross-border activity”:

The major pattern of cross-border activity remains targeted at neighbouring countries on a FoS basis, as evidenced by the significant drop in passports after the top-4 (i.e. Belgium's neighbouring countries) to the next highest (Spain).

However, FoE activity remains extremely limited with 0,45 pct of the total number of passporting notifications.

There is no data available as to the effective use of the passporting rights. The numbers provided are the number of notifications made to other EEA NCAs.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

A Regulation by the FSMA prohibiting the distribution, in Belgium, of insurance contracts with variable premiums sold with multimedia devices entered into force on 13 November 2022.

BULGARIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹³	6,839	1,5%
(Re)insurance GWP (in million) ¹⁴	2,730.334	0.2%
Number of (re)insurance undertakings ¹⁵	30	1.7%
Number of registered insurance intermediaries	6839	0.8%

National competent authority:

Financial Supervision Commission (FSC)

¹³ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

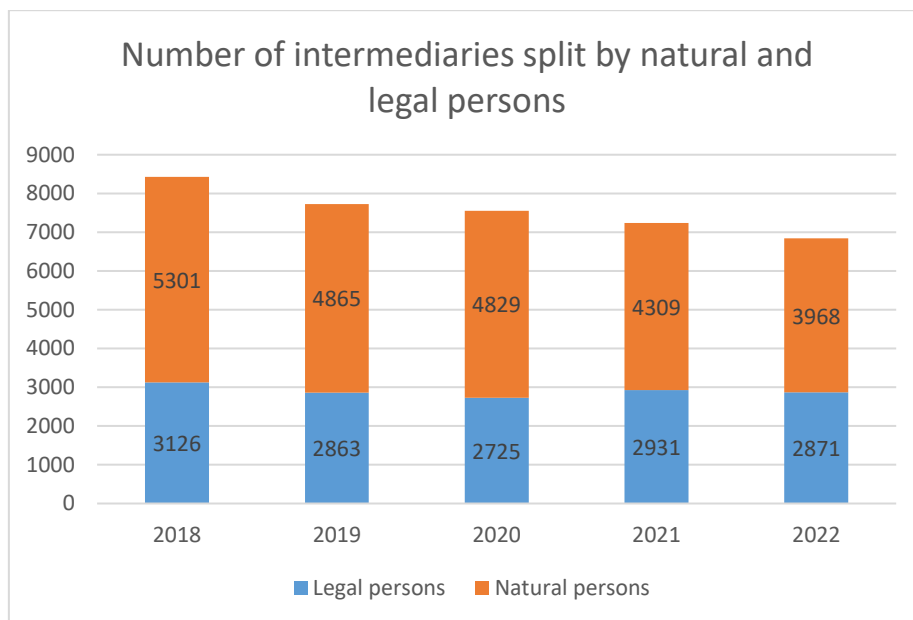
¹⁴ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



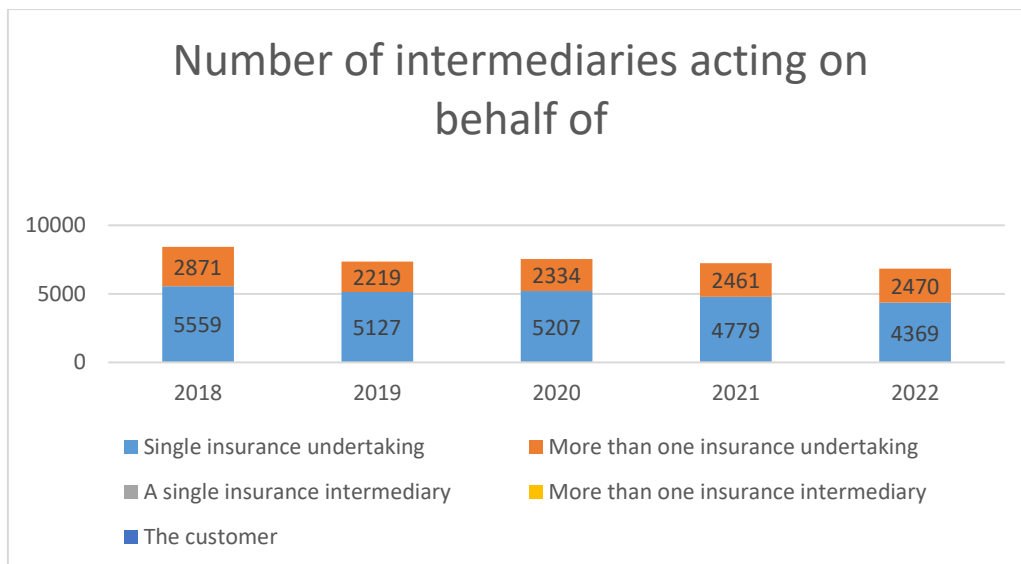
Comments provided by the NCA on the figures included in the chart above:

The information provided is from annual statistic for insurance intermediaries at the end of each above period.

Online registration system:

The Ordinance 67 has entered into force and regulates the procedure for registration of insurance intermediaries electronically, according to which intermediaries are registered electronically. Daily adjustments are performed.

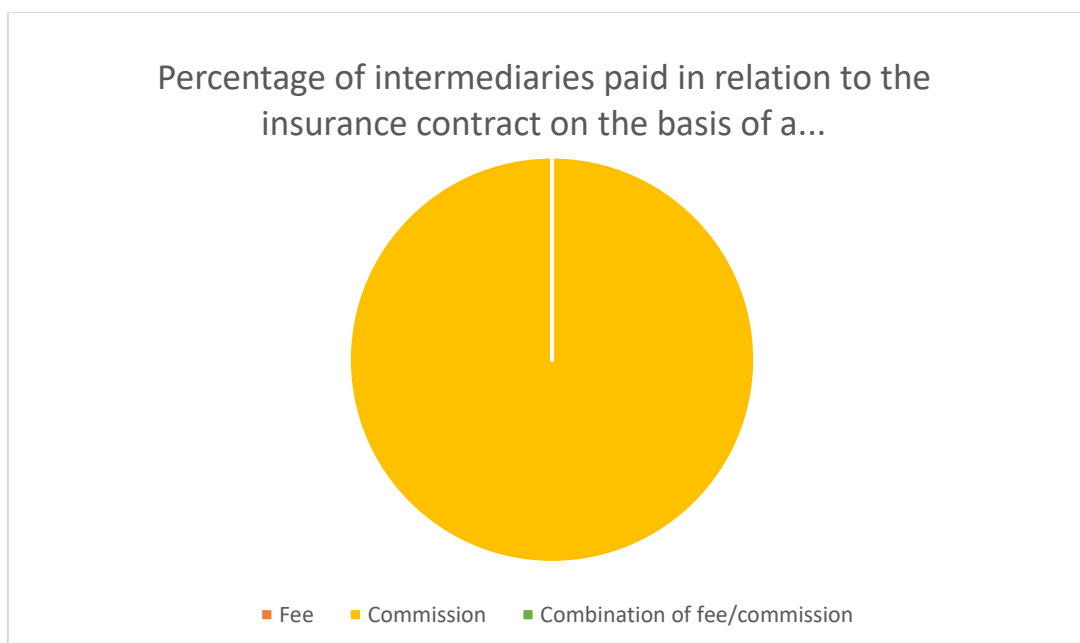
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

The information above is only for number of insurance agents. FSC is in process of developing new information system, which will provide all the information for all insurance intermediaries and will be ready till the end of 2023.

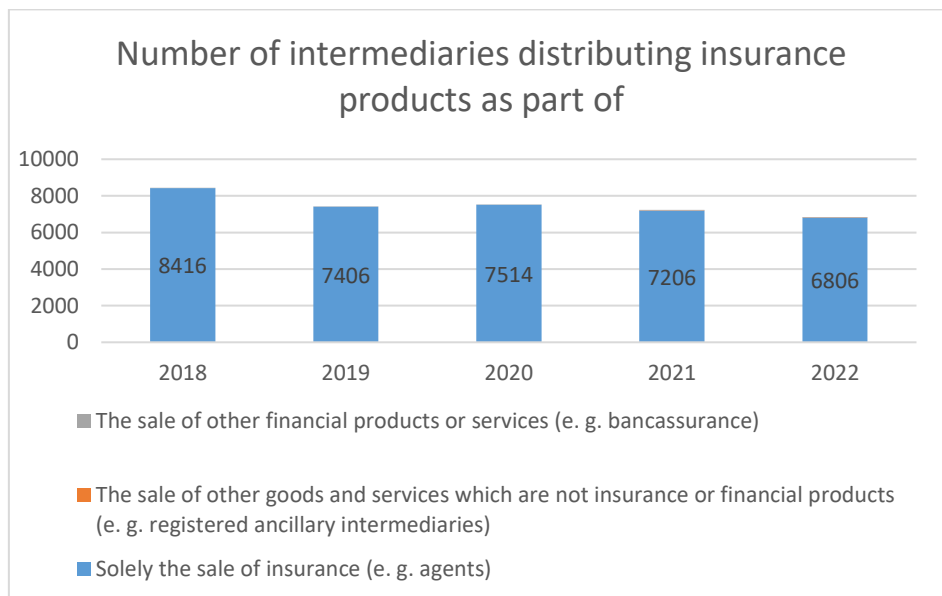
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

The data include all insurance intermediaries - both brokers and agents and all of them receive remuneration.

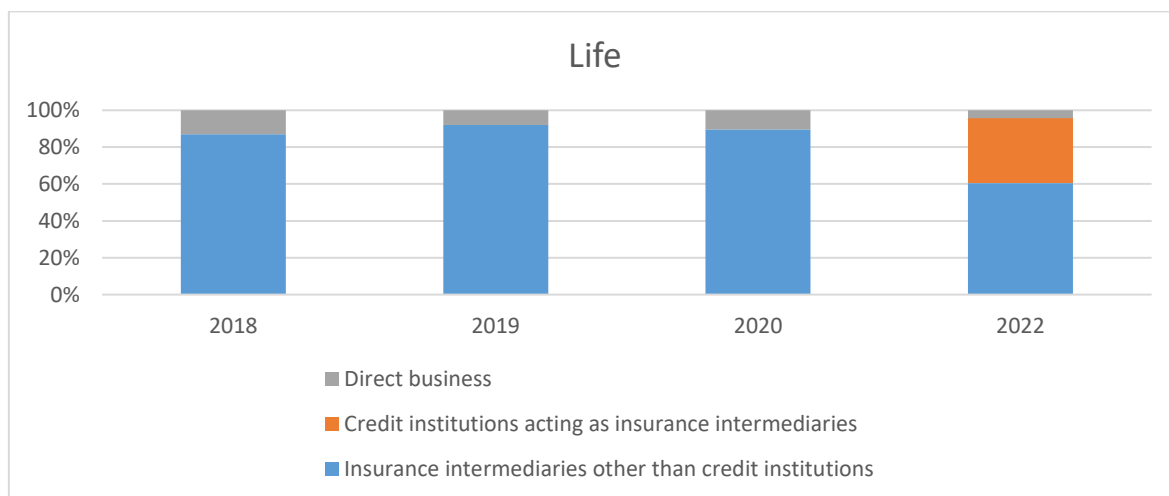
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

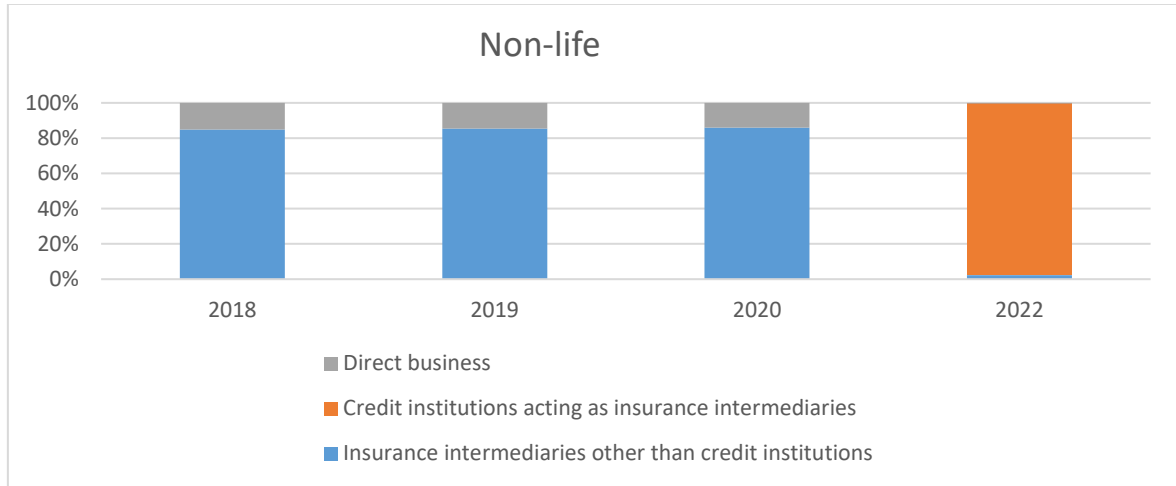


Comments provided by the NCA on the figures included in the chart above:

FSC is in process of developing new information system, which will provide all the information for all insurance intermediaries distributing insurance products as part of the above points. It is expected to be finalised until the end of 2023.

GWP split by distribution channels:





Comments provided by the NCA on the figures included in the charts above:

The information provided is from annual statistic for insurance intermediaries at the end of each above period

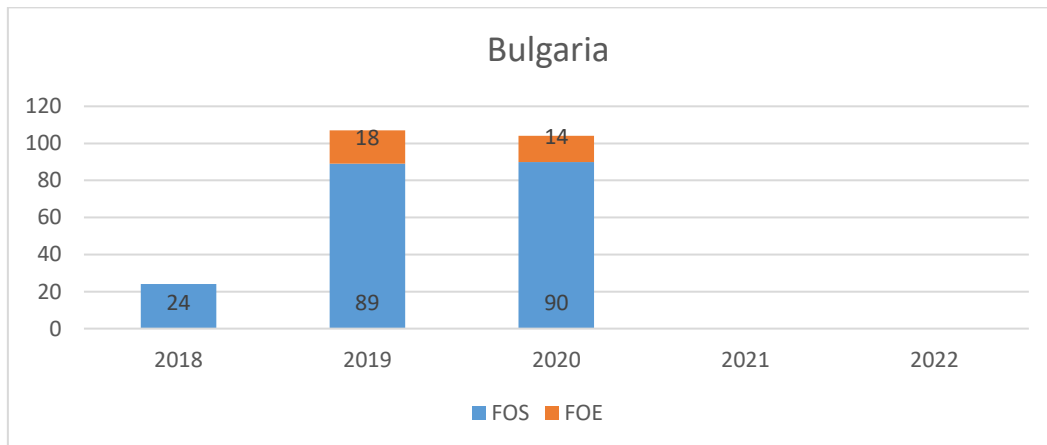
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

The data that we have is only regarding life insurance and the information that we have from insurers is that the percentage is very low, approximately 0.01%.

Comments provided by the NCA on the data above:

Regarding life insurance we gathered information from the insurers.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

The data that FSC collects is only the total number of the insurance intermediaries in our jurisdiction with passport to operate in another member states.

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹⁶

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	34	0	34
<i>Belgium</i>	35	0	35
<i>Bulgaria</i>	0	0	0
<i>Cyprus</i>	30	0	30
<i>Croatia</i>	23	0	23
<i>Czech Republic</i>	32	0	32
<i>Denmark</i>	28	0	28
<i>Estonia</i>	27	0	27
<i>Finland</i>	27	0	27
<i>France</i>	35	0	35
<i>Germany</i>	37	0	37
<i>Greece</i>	39	0	39
<i>Hungary</i>	32	0	32
<i>Iceland</i>	11	0	11
<i>Ireland</i>	30	0	30
<i>Italy</i>	41	0	41
<i>Latvia</i>	26	0	26
<i>Liechtenstein</i>	11	0	11
<i>Lithuania</i>	28	0	28
<i>Luxembourg</i>	29	0	29
<i>Malta</i>	29	0	29
<i>Netherlands</i>	30	0	30
<i>Norway</i>	12	0	12
<i>Poland</i>	32	0	32
<i>Portugal</i>	30	0	30

¹⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Romania</i>	43	4	47
<i>Slovakia</i>	47	0	47
<i>Slovenia</i>	10	0	10
<i>Spain</i>	34	0	34
<i>Sweden</i>	29	0	29
<i>Total EEA</i>	851	4	855

Comments provided by the NCA on the figures included in the table above:

The provided information is based on the data which is gathered from our official website of FSC regarding notifications.

General qualitative description of the “patterns of cross-border activity”:

We observe that most of the Bulgarian insurance intermediaries prefer to carry out insurance distribution activities under the freedom to provide services rather than under right of establishment in other Member States. In addition, all of the insurance intermediaries that carry out their activities in the territory of other Member States for the time being are legal entities and they are insurance brokers.

Additional information not covered above :

Out of the total realized premium income and the recorded income from commissions for 2020, 95% are from non-life insurance and 5% from life insurance. The written premiums and commissions in 2020, under non-life insurance are 76% from motor insurances and 19% under the other classes of non-life. As for the written premiums and commissions on life insurance, they are realized mainly from Life and annuity insurance, and health insurance.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

Since 2022, no new amendments have been introduced to the legislation regarding the implementation of IDD.

CROATIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹⁷	3,862	0.8%
(Re)insurance GWP (in million) ¹⁸	1,687.451	0.1%
Number of (re)insurance undertakings ¹⁹	15	0.9%
Number of registered insurance intermediaries	11131	1.3%

National competent authority:

Croatian Financial Services Supervisory Agency (HANFA)

¹⁷ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

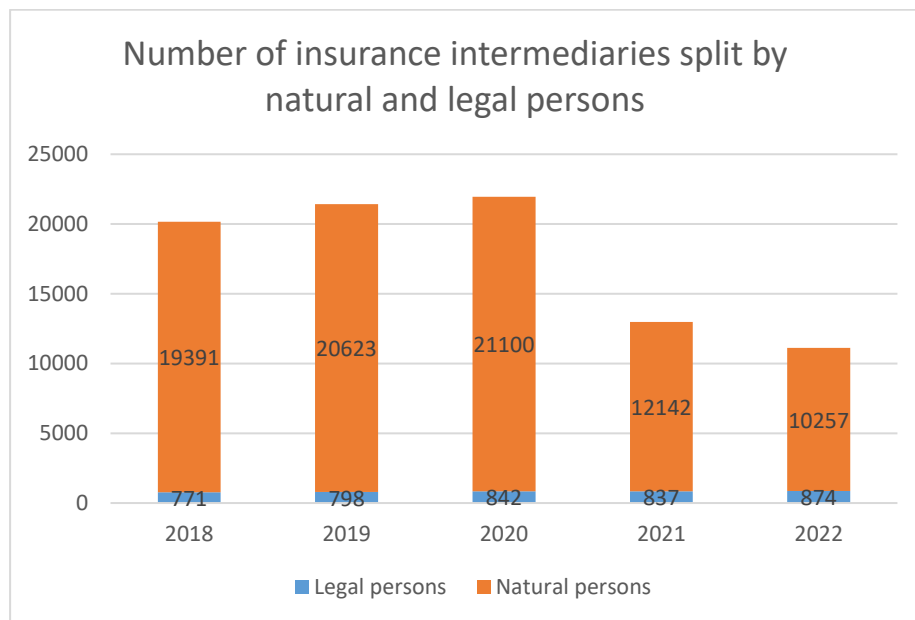
¹⁸ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹⁹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



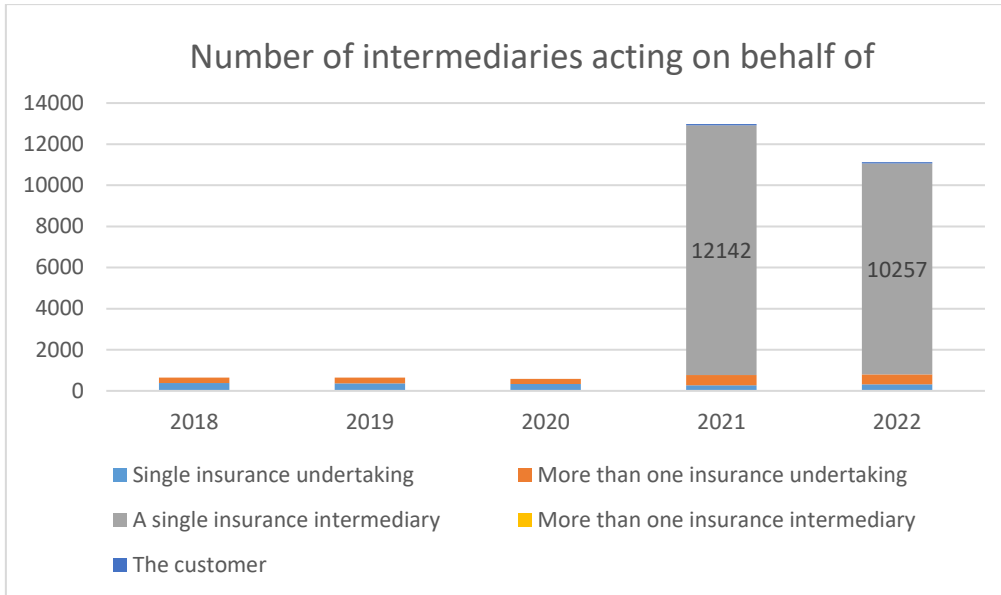
Comments provided by the NCA on the figures included in the chart above:

There is a decrease in the number of natural persons in the register of Insurance agents, insurance and/or reinsurance brokers and ancillary insurance intermediaries- 1.885 persons fewer in 2022. than in 2021. since they didn't fulfill their obligation according to the Insurance Act (15 hours of professional training or development per year). The data delivered for 2021 and 2022 is the total number of insurance intermediaries in the respective year. The data for 2018-2020 refers to the number of insurance intermediaries that have been registered in that year. The data for 2021-2022 refers to the total number of registered insurance intermediaries.

Online registration system:

Information about number of registered insurance, reinsurance and ancillary insurance intermediaries is updated as needed (sometimes daily when there is a change in the register).

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:

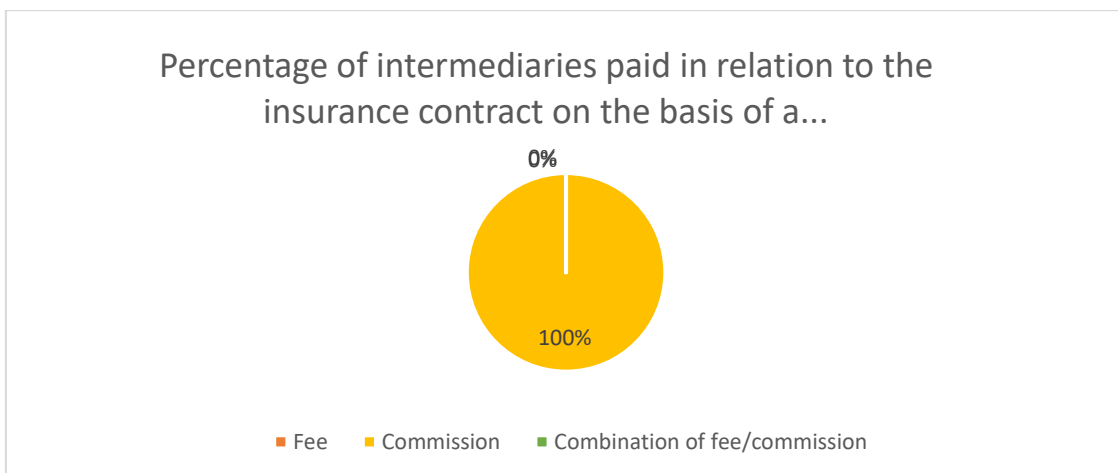


Comments provided by the NCA on the figures included in the chart above:

The above numbers are not entirely accurate from 2018 to 2020. Namely, the mentioned records are for intermediaries who submitted their reports electronically, while for those who submit in paper form, there are no records from which the stated data could be extracted.

Please note that in the period from 2021 to 2022 there was in progress a procedure of compliance with IDD requirements which resulted in deletion of over 1800 natural persons from the register of insurance agents and brokers due to failure of compliance with IDD fit (mandatory education - 15 h per year) requirements.

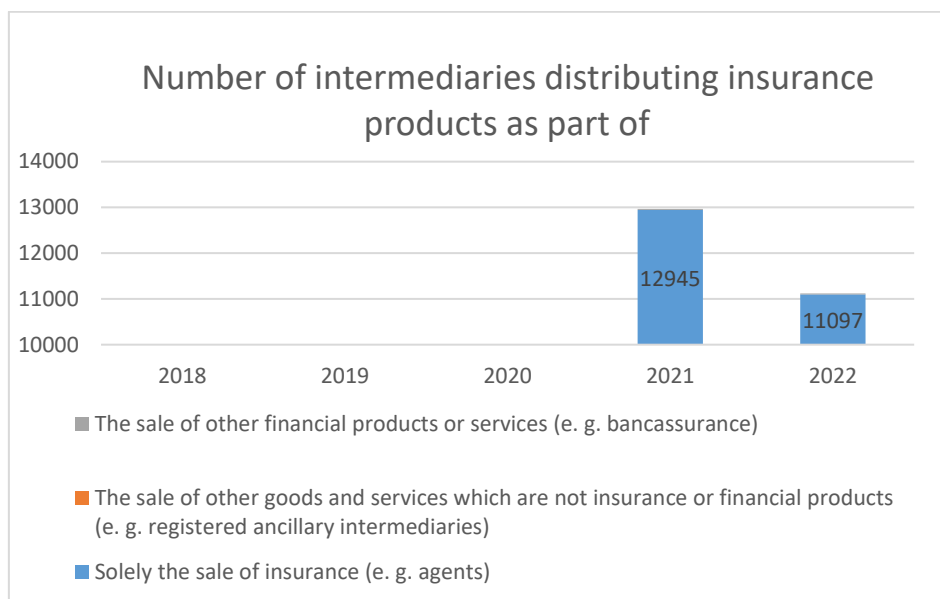
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

Please note that according to the Croatian Insurance Act, insurance agents can only receive commission from the insurance undertaking and insurance brokers can receive commission either from the insurance undertaking or fee from the client. HANFA regularly (semi-annually and annually) receives reports on collected commissions.

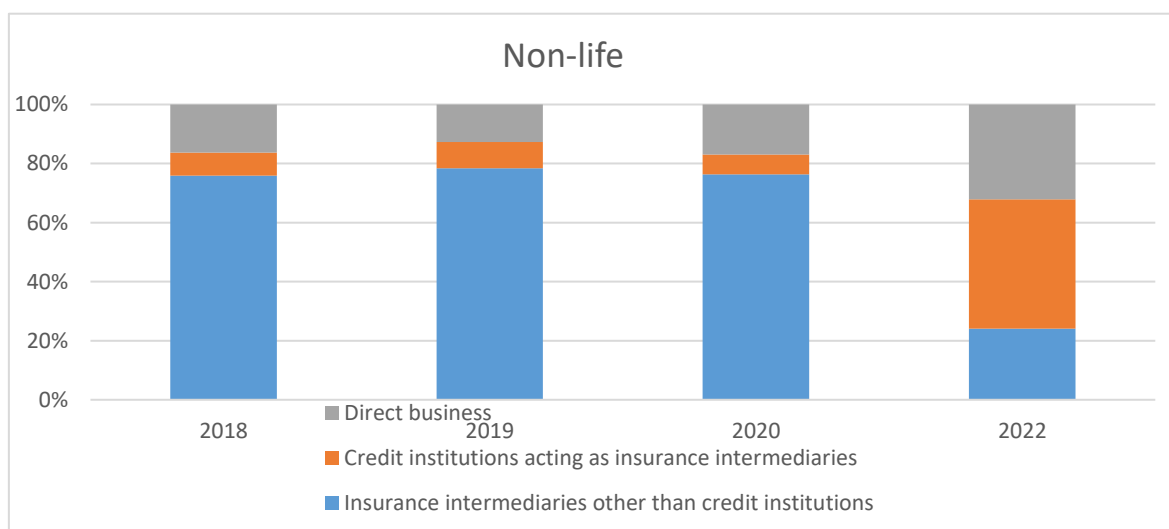
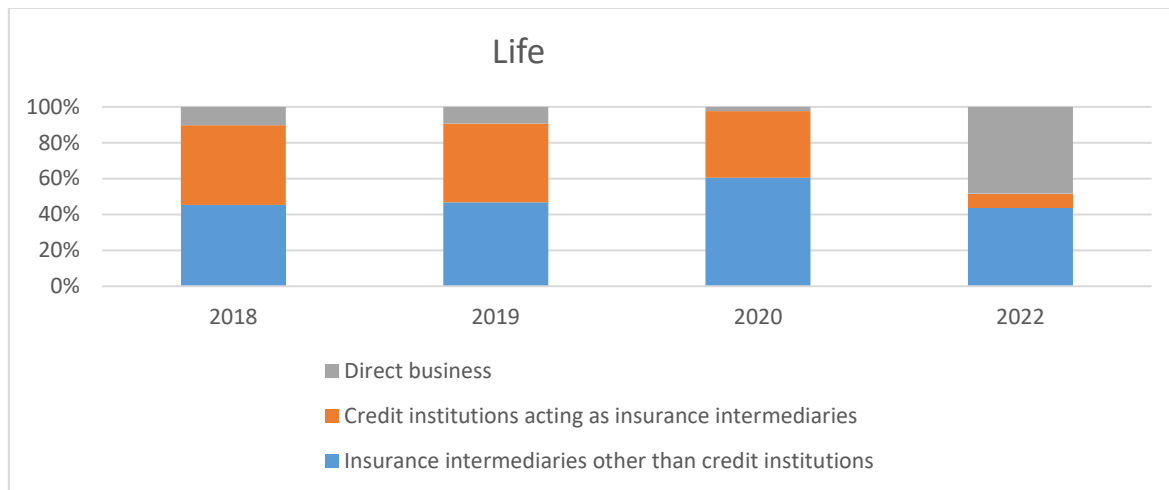
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the figures included in the chart above:

In the reference period, except the abovementioned comment P.32 with regards solely the sale of insurance HANFA did not observe any special deviations or special trends in the Croatian insurance distribution market.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

The source of information are the annual statistical statements which HANFA receives from insurance undertakings (data on GWP per sales channel). The data provided represents 100% of the Croatian market. In the previous period (2020 and 2021) direct business represented approx. 50% of sales and in 2022 has decreased to 44,7%

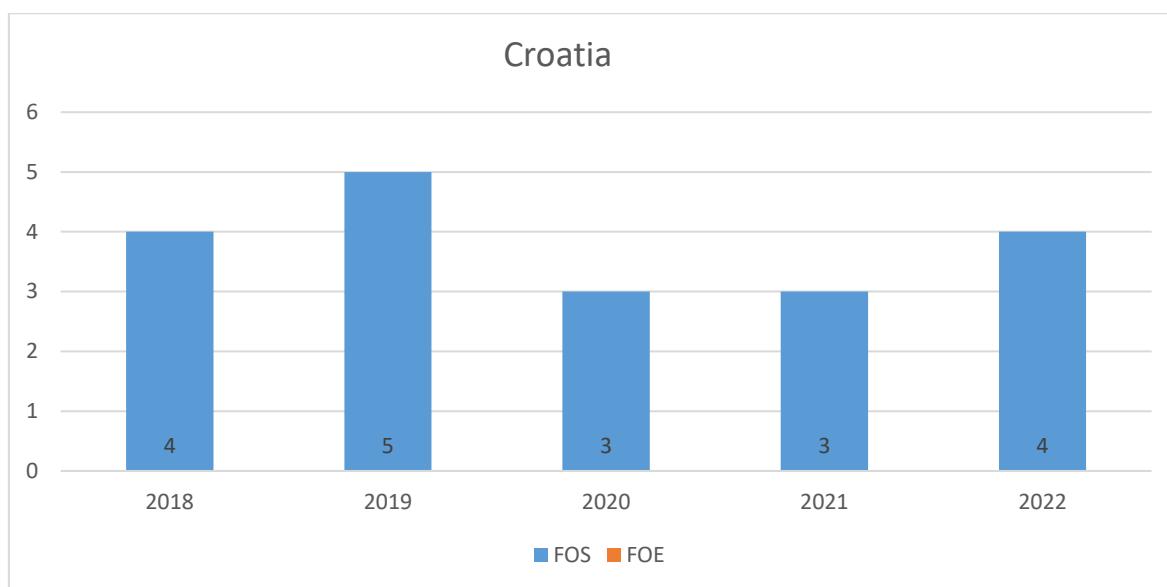
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

0.0056

Comments provided by the NCA on the data above:

Digitalization of intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in our market is still in early stages due to the tradition of concluding insurance business face to face but there is an indication among younger people to conclude insurance contract via mobile apps for travel and MTPL insurance products.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

There are no specific background information on the data indicated above as there is a slight one item increase.

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:²⁰

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	6	0	6
<i>Belgium</i>	5	0	5
<i>Bulgaria</i>	1	0	1
<i>Cyprus</i>	1	0	1
<i>Croatia</i>	0	0	0
<i>Czech Republic</i>	6	0	6

²⁰ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Denmark</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Estonia</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Finland</i>	<i>2</i>	<i>0</i>	<i>2</i>
<i>France</i>	<i>6</i>	<i>0</i>	<i>6</i>
<i>Germany</i>	<i>5</i>	<i>0</i>	<i>5</i>
<i>Greece</i>	<i>3</i>	<i>0</i>	<i>3</i>
<i>Hungary</i>	<i>4</i>	<i>0</i>	<i>4</i>
<i>Iceland</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Ireland</i>	<i>2</i>	<i>0</i>	<i>2</i>
<i>Italy</i>	<i>5</i>	<i>0</i>	<i>5</i>
<i>Latvia</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Liechtenstein</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Lithuania</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Luxembourg</i>	<i>2</i>	<i>0</i>	<i>2</i>
<i>Malta</i>	<i>4</i>	<i>0</i>	<i>4</i>
<i>Netherlands</i>	<i>3</i>	<i>0</i>	<i>3</i>
<i>Norway</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Poland</i>	<i>7</i>	<i>0</i>	<i>7</i>
<i>Portugal</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Romania</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Slovakia</i>	<i>4</i>	<i>0</i>	<i>4</i>
<i>Slovenia</i>	<i>24</i>	<i>0</i>	<i>24</i>
<i>Spain</i>	<i>2</i>	<i>0</i>	<i>2</i>
<i>Sweden</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Total EEA</i>	<i>99</i>	<i>0</i>	<i>99</i>

Comments provided by the NCA on the figures included in the table above:

There are no specific background information on the data indicated above as there no change in the number of insurance intermediaries with a passport to carry out insurance mediation activities.

General qualitative description of the “patterns of cross-border activity”:

Patterns of cross-border activity are that there are no FOE passport to carry out insurance distribution activities and that FOS passport is predominant in neighbouring countries.

Additional information not covered above :

Please note that new Ordinance has been adopted which prescribes (from 2023 onwards) the obligation of insurance intermediaries to provide HANFA with data and information regarding GWP for each insurance class i.e. risk

Information on powers of the NCA

New statutory powers to implement the IDD received since 2022

Although mystery shopping was implemented into Croatian Insurance Act in 2018, in 2023, mystery shopping is upgraded and regulated with more detailed provisions by the new Ordinance (it is expected to enter into force by 30/06/2023). HANFA has recognized importance and benefits of mystery shopping and has included it into regular supervisory activities. In particular, since 2020, HANFA has conducted 7 mystery shopping inspections, including 3 insurance companies, 2 credit institutions, 1 insurance agency and 1 postal services provider. Mystery shopping inspections were conducted regarding compliance of insurance distribution with provisions of the Insurance Act and other positive regulations, especially with regard to provision of pre-contractual information to the clients and compliance with rules of professional conduct of distributors.

Except for the mentioned, there were no new statutory powers given to HANFA since 2022 to ensure the implementation of the IDD.

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

We did not face any significant difficulties (in terms of sufficient power or similar) in conducting of business supervision. HANFA also established an internal distribution monitoring team which consisting of 3 people who are fully dedicated to the supervision of insurance intermediaries. Depending on the subject of supervision, as well as other supervisory activities and defined inspection plan, other employees can also be included into supervisory activities related to insurance distributors.

CYPRUS

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ²¹	904.705	0.2%
(Re)insurance GWP (in million) ²²	1,217.479	0.09%
Number of (re)insurance undertakings ²³	29	1.7%
Number of registered insurance intermediaries	2322	0.3%

National competent authority:

Insurance Companies Control Service

²¹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

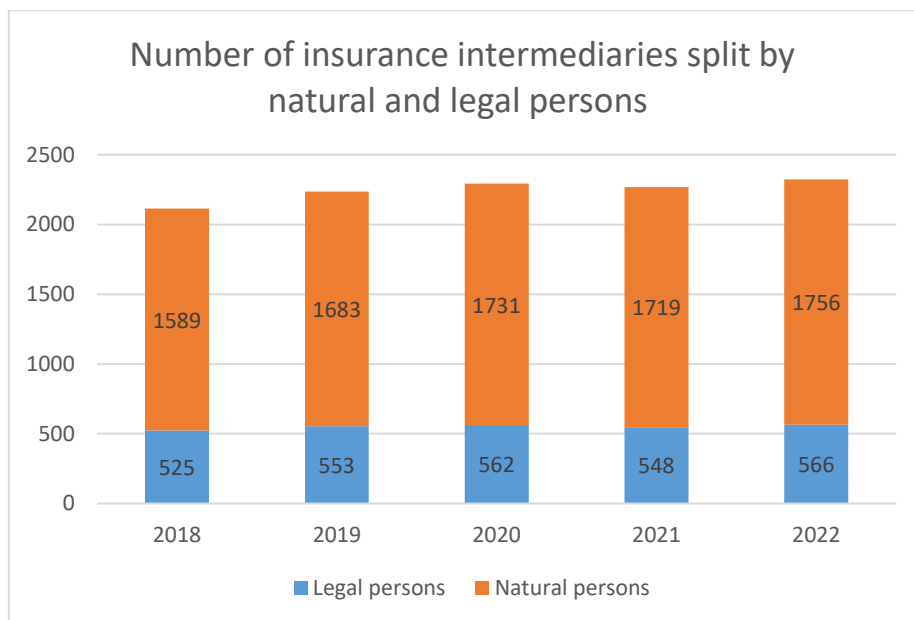
²² (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

²³ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

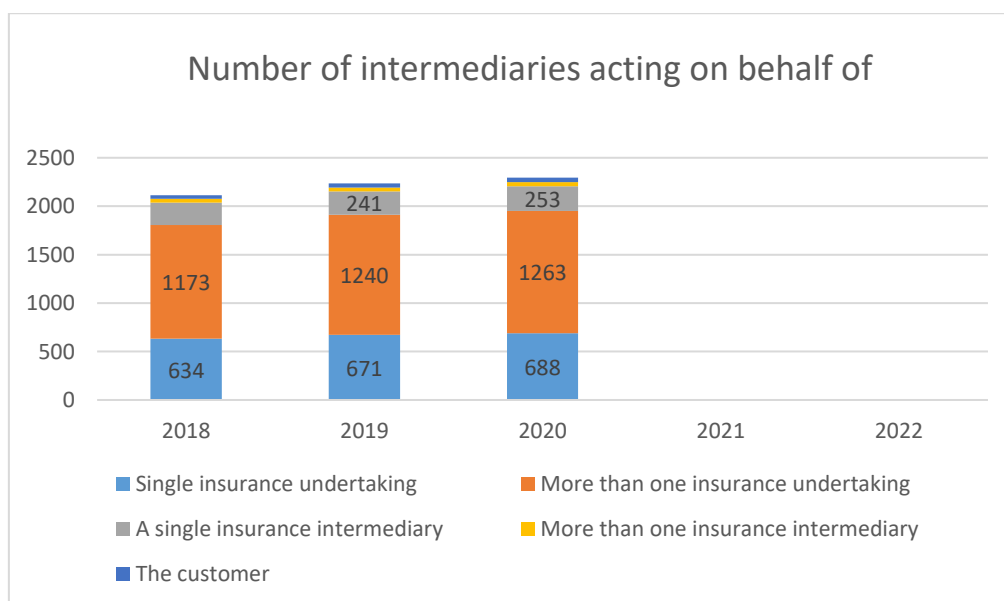
Registered insurance intermediaries split by natural and legal persons:



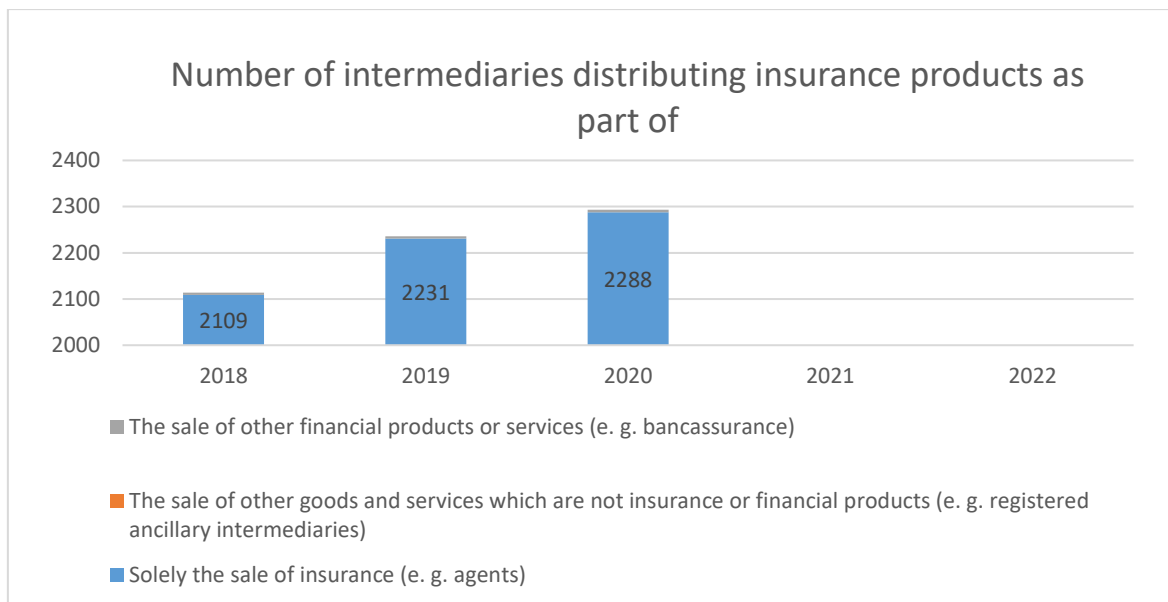
Online registration system:

Please note that currently our on-line intermediaries registration system is undergoing major upgrade. Our objective is that the system will automatically update on a daily basis the number of insurance intermediaries.

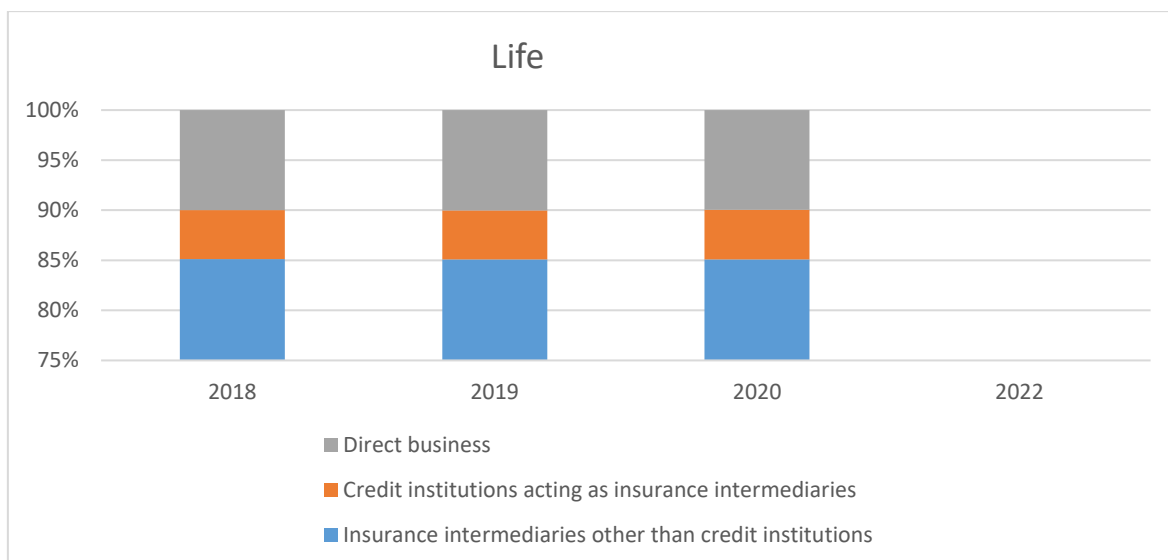
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:

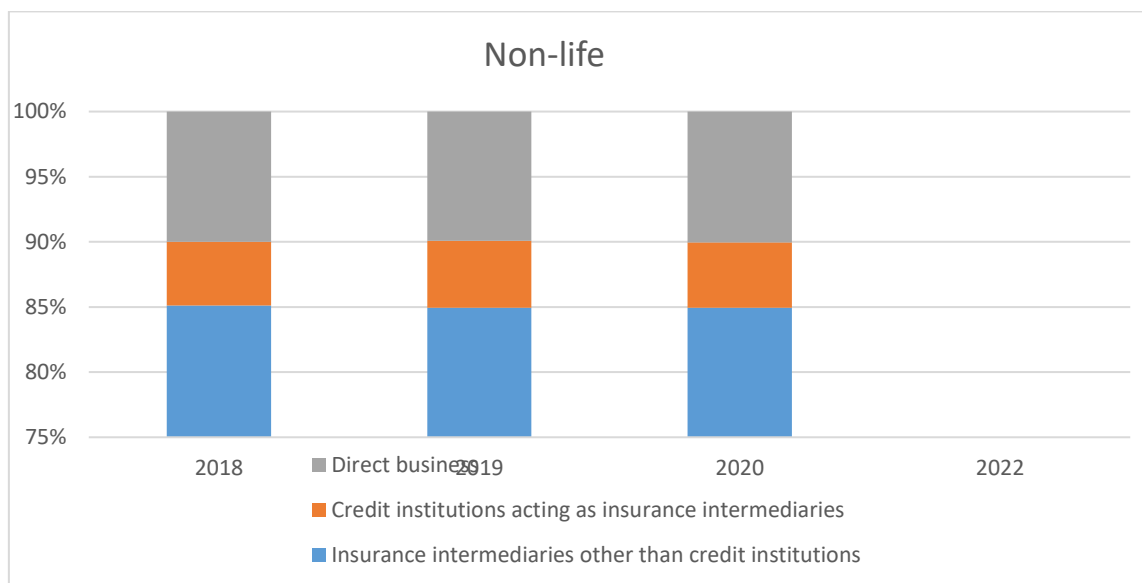


Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

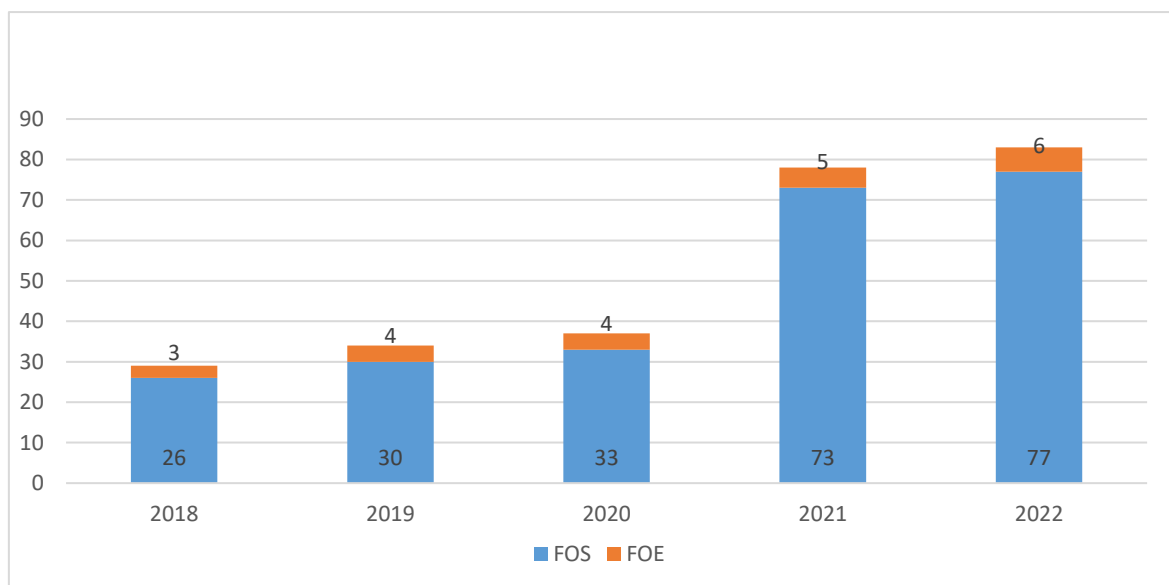


GWP split by distribution channels:





Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:²⁴

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	20	0	20

²⁴ The row “Total EEA” and the column “3. TOTAL” count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Belgium</i>	33	0	33
<i>Bulgaria</i>	18	0	18
<i>Cyprus</i>	0	0	0
<i>Croatia</i>	15	0	15
<i>Czech Republic</i>	19	0	19
<i>Denmark</i>	21	1	22
<i>Estonia</i>	16	0	16
<i>Finland</i>	18	0	18
<i>France</i>	34	1	35
<i>Germany</i>	31	0	31
<i>Greece</i>	60	3	63
<i>Hungary</i>	19	0	19
<i>Iceland</i>	10	0	10
<i>Ireland</i>	24	0	24
<i>Italy</i>	30	0	30
<i>Latvia</i>	15	0	15
<i>Liechtenstein</i>	10	0	10
<i>Lithuania</i>	16	0	16
<i>Luxembourg</i>	26	0	26
<i>Malta</i>	33	0	33
<i>Netherlands</i>	25	0	25
<i>Norway</i>	17	0	17
<i>Poland</i>	19	0	19
<i>Portugal</i>	21	3	24
<i>Romania</i>	20	0	20
<i>Slovakia</i>	19	0	19
<i>Slovenia</i>	17	0	17
<i>Spain</i>	31	2	33
<i>Sweden</i>	27	1	28
<i>Total EEA</i>	664	11	675

Comments provided by the NCA on the figures included in the table above:

There is an upward trend on the number of FOS compared to previous years.

General qualitative description of the “patterns of cross-border activity”:

The cross border activity from our Member State has an increasing trend.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

Issuance of Orders to be able to impose monetary fines in case of non-compliance with CPD hours required according to the local legislation.

CZECHIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ²⁵	10,517	2.3%
(Re)insurance GWP (in million) ²⁶	8,386.338	0.6%
Number of (re)insurance undertakings ²⁷	22	1.3%
Number of registered insurance intermediaries	32448	3.7%

National competent authority:

Czech National Bank

²⁵ Based on eurostat data for 1 January 2022:

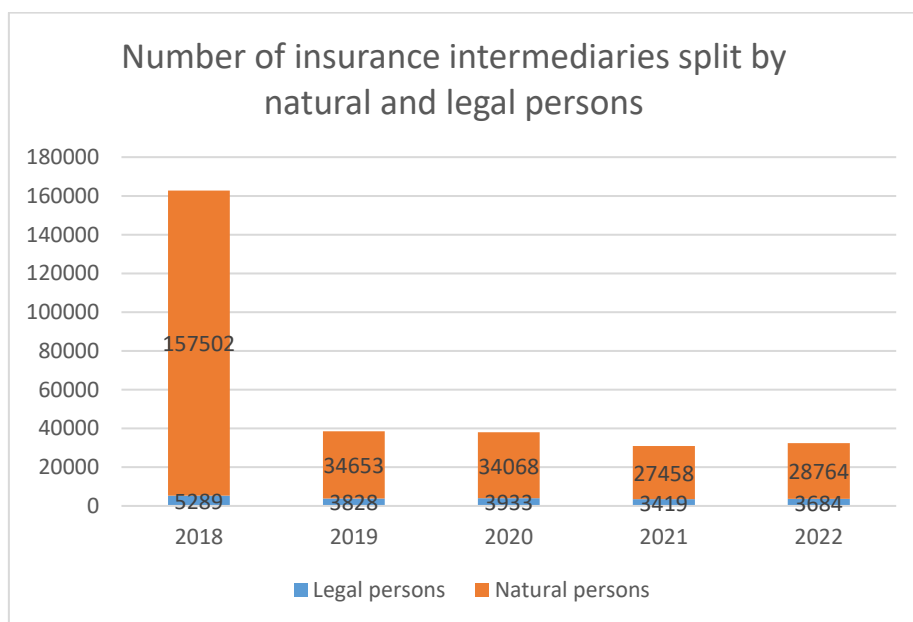
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

²⁶ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

²⁷ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:**Comments provided by the NCA on the figures included in the chart above:**

The number of registered insurance intermediaries sharply decreased in 2019 as a result of changes in our registration system (yearly re-registration fees and simplified removal procedures), enabling us to delete inactive intermediaries efficiently.

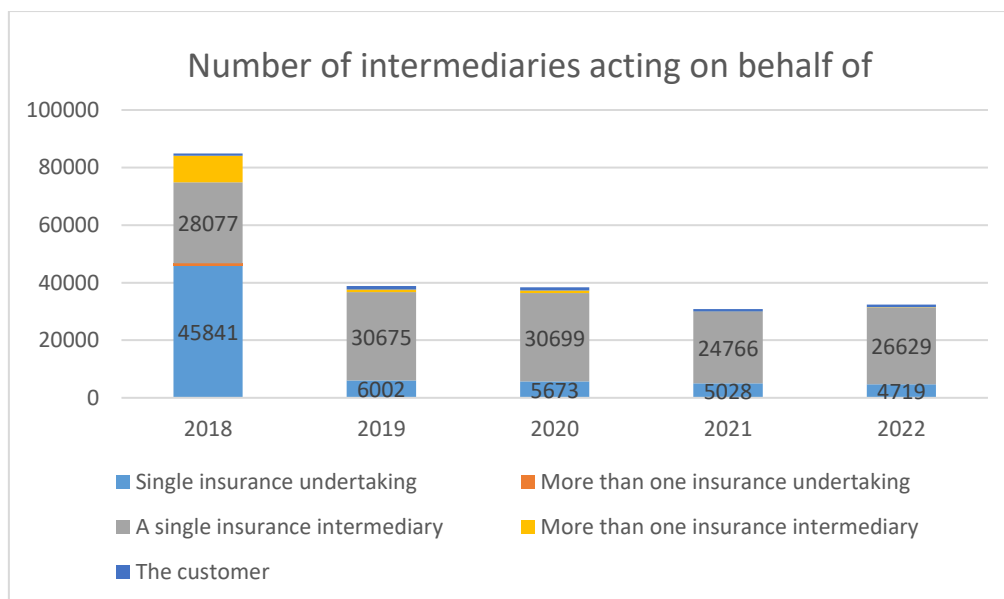
Please note that none of our data on insurance intermediaries takes account of policy-holders that act as sellers/service providers and provide an insurance cover to their customers under group insurance contracts. Under Czech law, this activity does not require registration.

Online registration system:

Independent intermediaries can opt to be registered using an online registration tool called "REGIS". Via REGIS, they can access an online registration form, fill out all the requested information and submit all required documents so that their application can be reviewed by the competent department and (dis)approved. Contrastingly, tied agents and ancillary insurance intermediaries must be registered using the REGIS online registration tool. Unlike independent intermediaries, tied agents and ancillary insurance intermediaries do not submit the registration form themselves - instead, the principal (insurance undertaking/independent intermediary/intermediary from another MS) submits it on their behalf. The registration is done automatically without any formal review of the application; it is the responsibility of the principal

to ensure that its tied agents and ancillary insurance intermediaries meet all the legal requirements for registration. The information on the number of registered insurance, reinsurance and ancillary insurance intermediaries is updated once a day.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:

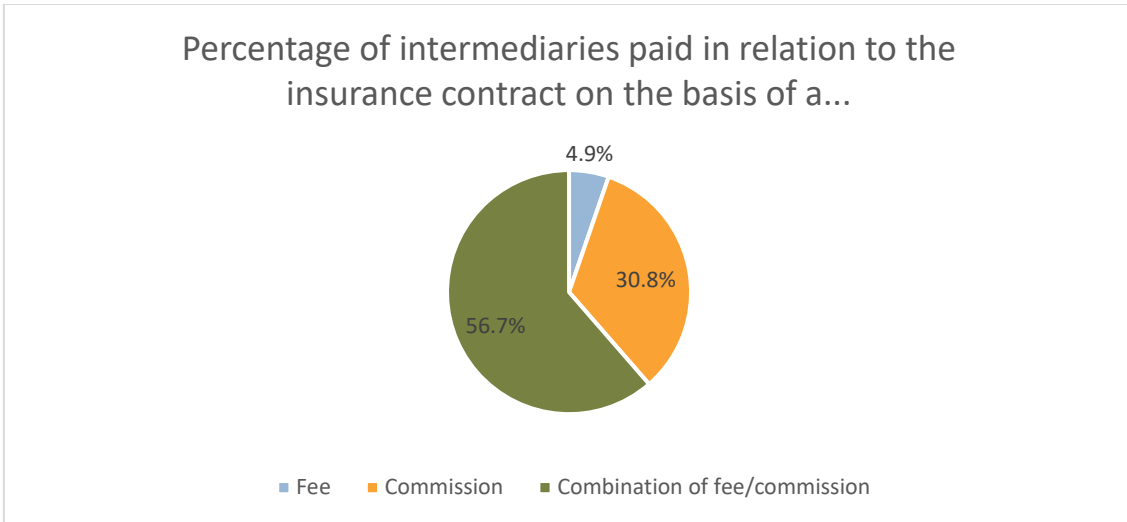


Comments provided by the NCA on the figures included in the chart above:

The total numbers of registered intermediaries provided in this question do not equal the totals provided on page 50 because the applicable domestic legislation currently permits (or used to permit at some point during the applicable time period) insurance intermediaries to combine certain roles and to act on behalf of multiple entities under certain conditions.

For instance, it is not uncommon for registered ancillary insurance intermediaries to simultaneously represent insurance undertakings and insurance intermediaries. Similarly, "independent intermediaries" are allowed to offer services to customers both as brokers (in which case they are paid by the customer and are barred from accepting payments from the insurance undertaking) and as agents (in which case they receive a commission from the insurance undertaking). Certain insurance intermediaries are thus included more than once (e.g with regards to the category insurance intermediaries acting on behalf of more than one insurance undertaking, insurance intermediaries acting on behalf of the customer), thereby increasing The total number of registered intermediaries in this chart.

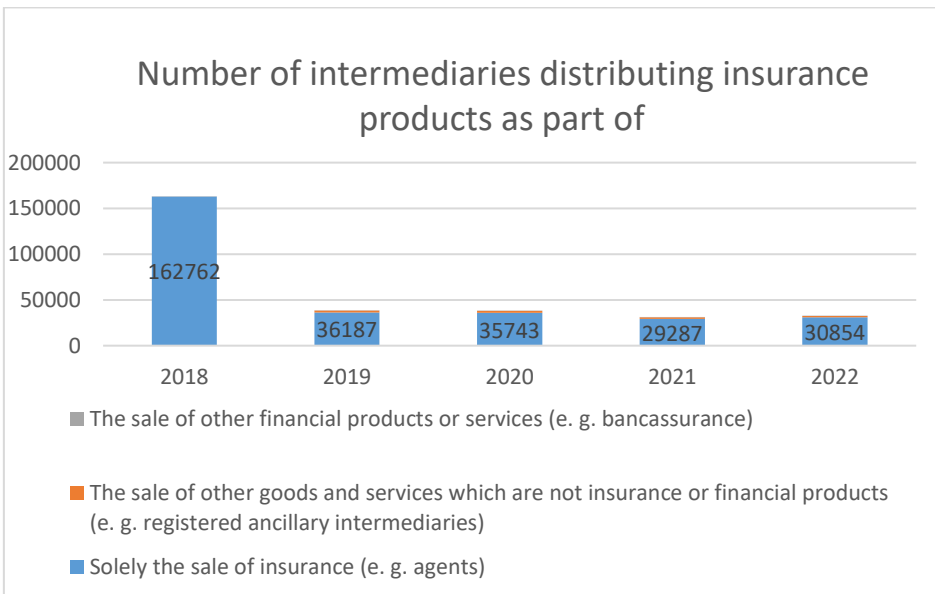
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



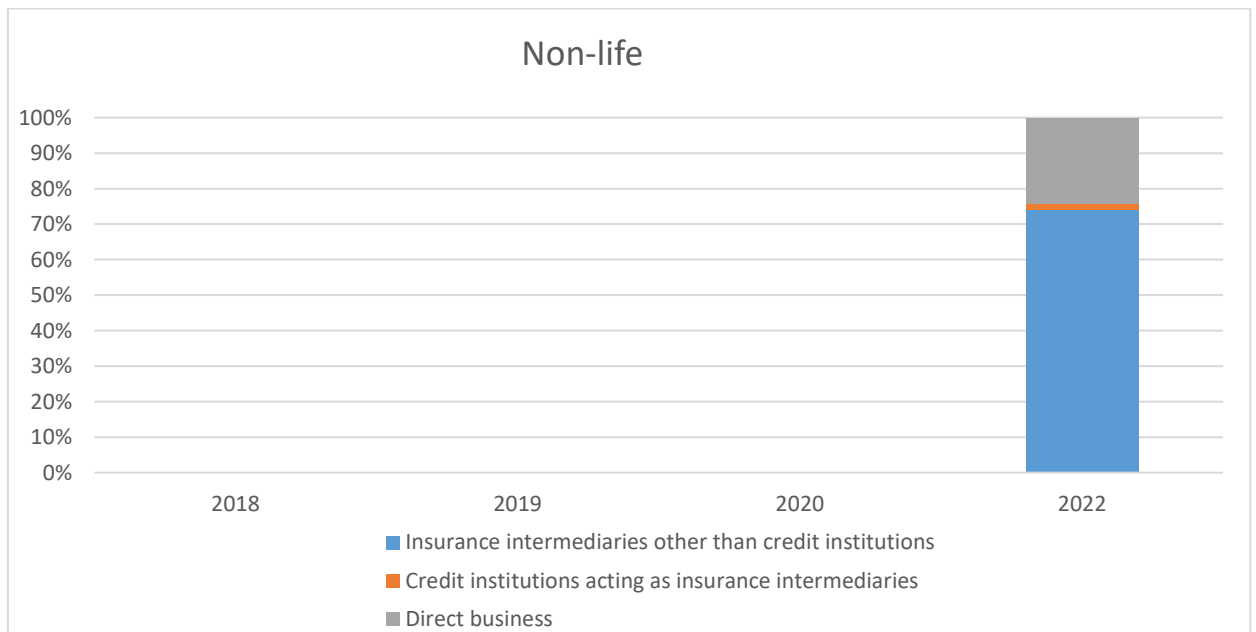
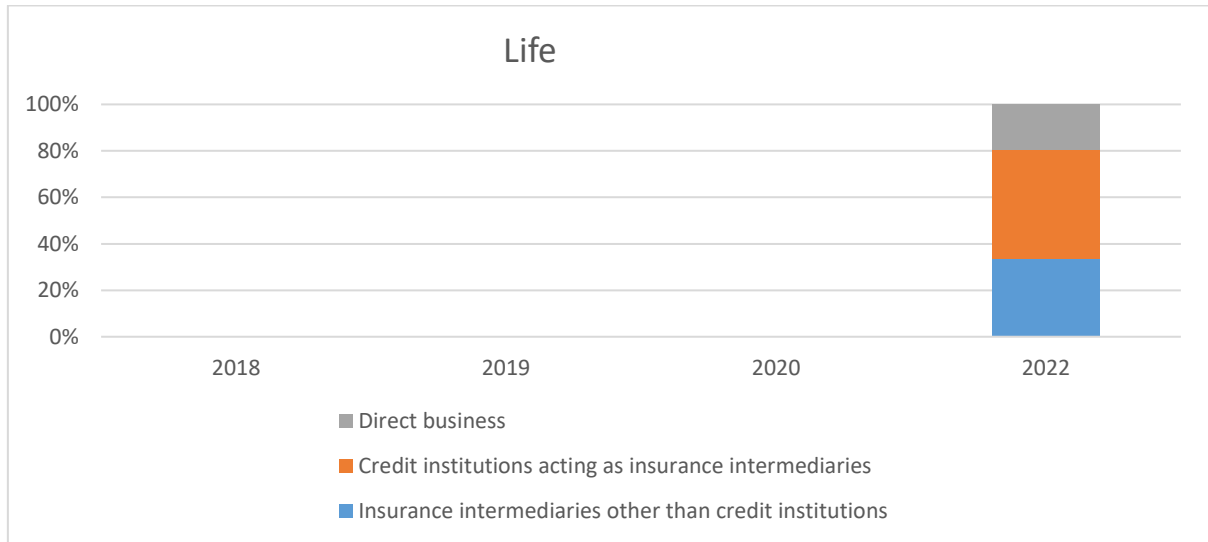
Comments provided by the NCA on the figures above :

The sum of above percentages is not 100 % due to 63 insurance intermediaries (whose share of the entire market is 7,66 %) that did not yet submit their annual statement. The numbers reflect only independent intermediaries. The inclusion of tied agents, which are mostly natural persons and are overwhelmingly paid on the basis of commission, would skew the numbers (intermediaries distributing on the basis of commission would amount to 98,25 %)

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above

Amounts above are denominated in EUR (converted from CZK based on the ECB CZK/EUR average exchange rate for 2022). Based on national reporting including insurance undertakings licensed in CZ by CNB (w/o FOE and FOS) and Intermediaries reporting. Split for life/non-life based on intermediaries reporting. GWP is reported only on new contracts (w/o renewals).

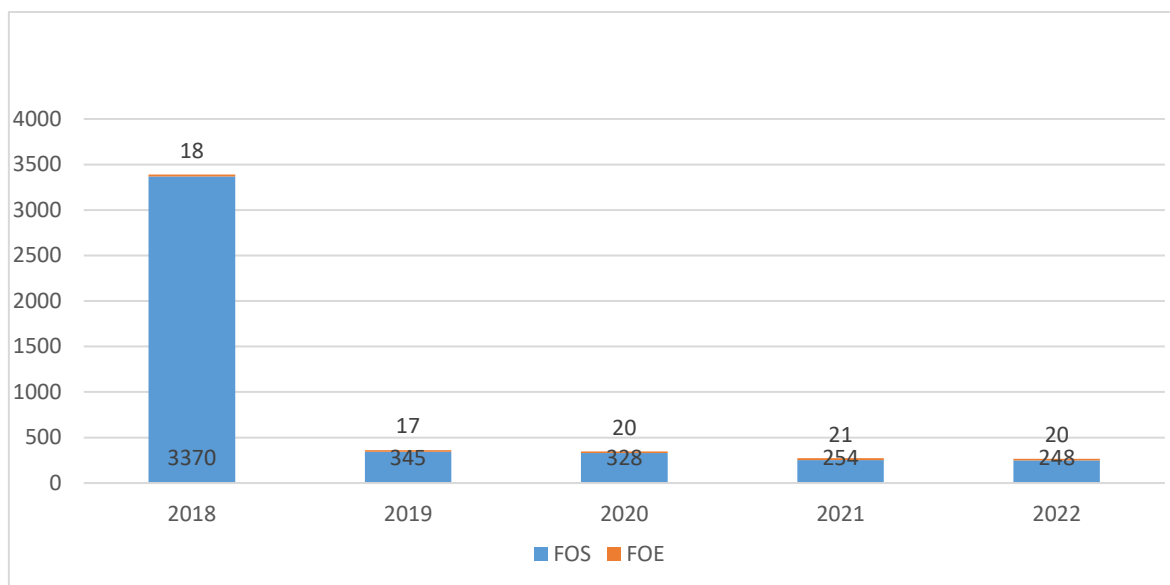
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

25 545 673 - sales through insurance undertakings' websites

Comments provided by the NCA on the data above:

Amount above is denominated in EUR (converted from CZK based on the ECB CZK/EUR average exchange rate for 2022). Based on national reporting including insurance undertakings licensed in CZ by CNB (w/o FOE and FOS). GWP is reported only on new contracts (w/o renewals).

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:²⁸

	1. FOS	2. FOE	3. TOTAL

²⁸ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Austria</i>	115	0	115
<i>Belgium</i>	72	0	72
<i>Bulgaria</i>	34	1	34
<i>Cyprus</i>	66	1	66
<i>Croatia</i>	20	0	20
<i>Czech Republic</i>	0	0	0
<i>Denmark</i>	68	0	68
<i>Estonia</i>	65	0	65
<i>Finland</i>	66	0	66
<i>France</i>	77	0	77
<i>Germany</i>	112	0	112
<i>Greece</i>	67	0	67
<i>Hungary</i>	101	1	102
<i>Iceland</i>	55	0	55
<i>Ireland</i>	72	0	72
<i>Italy</i>	73	1	73
<i>Latvia</i>	66	0	66
<i>Liechtenstein</i>	57	0	57
<i>Lithuania</i>	69	0	69
<i>Luxembourg</i>	68	0	68
<i>Malta</i>	64	0	64
<i>Netherlands</i>	71	0	71
<i>Norway</i>	62	0	62
<i>Poland</i>	125	1	125
<i>Portugal</i>	67	0	67
<i>Romania</i>	33	2	34
<i>Slovakia</i>	239	16	247
<i>Slovenia</i>	70	0	70
<i>Spain</i>	70	1	70
<i>Sweden</i>	69	0	69
<i>Total EEA</i>	2193	24	2203

Comments provided by the NCA on the figures included in the table above:

In total, 10 insurance intermediaries have a FOS passport to carry out insurance mediation in all EEA states listed in table above.

General qualitative description of the “patterns of cross-border activity”:

Most cross-border activities occur in Slovakia: 94% of Czech insurance intermediaries with a FOS passport are passported into Slovakia. This close connection to Slovakia is largely due to historical bonds and virtually non-existent language barrier.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

The Czech National Bank has received no additional statutory powers related to implementation of the IDD since 2022.

DENMARK

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ²⁹	5,873	1,3%
(Re)insurance GWP (in million) ³⁰	40,744.612	3.0%
Number of (re)insurance undertakings ³¹	72	4.2%
Number of registered insurance intermediaries	2571	0.3%

National competent authority:

Danish Financial Supervisory Authority

²⁹ Based on eurostat data for 1 January 2022:

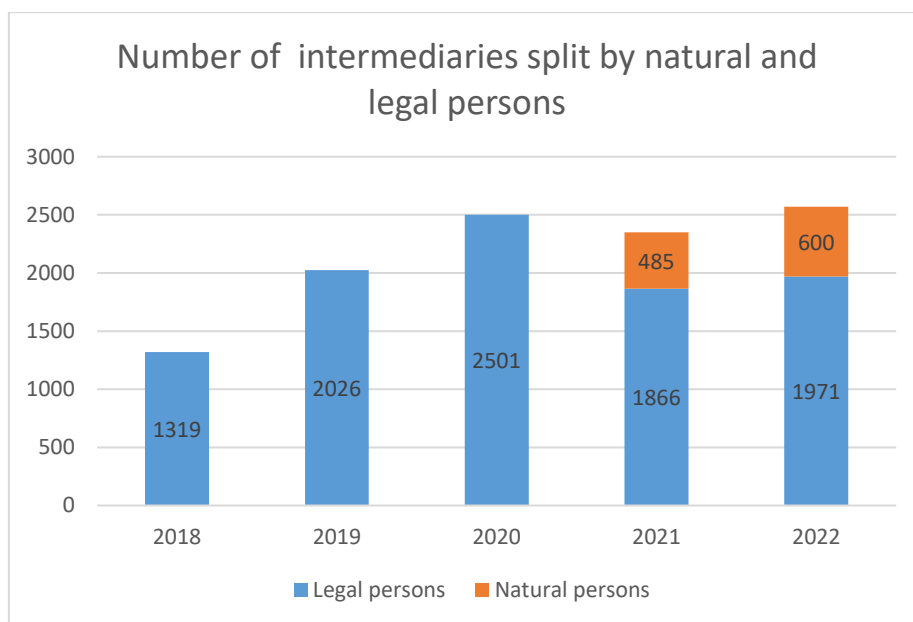
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

³⁰ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

³¹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:**Comments provided by the NCA on the figures included in the chart above:**

With the implementation of the IDD in October 2018, it was no longer possible to be registered as a natural person in Denmark. In Denmark we have previously submitted numbers for natural persons, understanding a natural person, as a person with personal license to perform insurance distribution in a legal person with the required permit. After October 2018 we only approve the entities (companies) in which the natural persons perform insurance distribution.

The data includes both regular intermediaries and ancillary intermediaries.

Natural persons 2021: The split between intermediaries and ancillary intermediaries is 183 / 302

Legal persons 2021 : The split between intermediaries and ancillary intermediaries is 405 / 1461

Natural persons 2022: The split between intermediaries and ancillary intermediaries is 283 / 317

Legal persons 2022: The split between intermediaries and ancillary intermediaries is 427 / 1544

Online registration system:

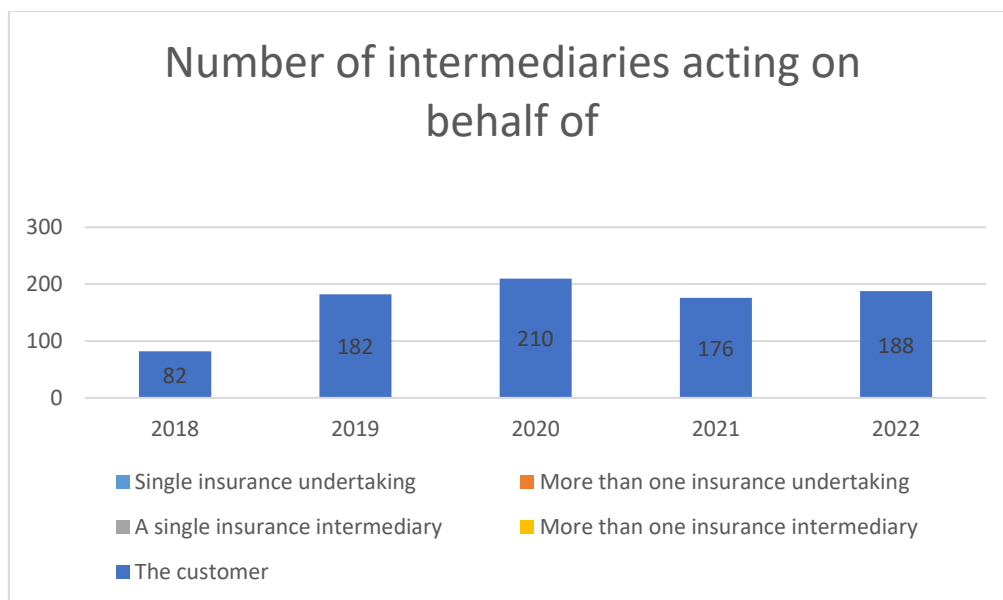
In Denmark all applicants must apply through www.virk.dk - either as an intermediary or ancillary intermediary.

https://virk.dk/myndigheder/stat/FT/selvbetjening/Ansoegningsskema_for_registrering_som_forsikringsformidler_eller_genforsikringsformidler/

https://virk.dk/myndigheder/stat/FT/selvbetjening/Ansoegningsskema_for_registrering_som_accessorisk_forsikringsformidler/

As soon as the application has been processed and the intermediary has been registered, the official register on DFSA's website is updated.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

In Denmark we do not register the number or the name(s) of the insurance companies, for whom an intermediary distributes insurances. Once the registration is completed the insurance intermediary may choose how many insurance companies it wishes to cooperate with and it may change from one insurance company to another without informing the DFSA.

The intermediary may also act independently of the insurance companies, acting solely on behalf of the customer, in which case Denmark has introduced additional requirements to protect the customer.

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:

7% of the insurance intermediaries are paid in relation to the insurance contract on the basis of a fee.

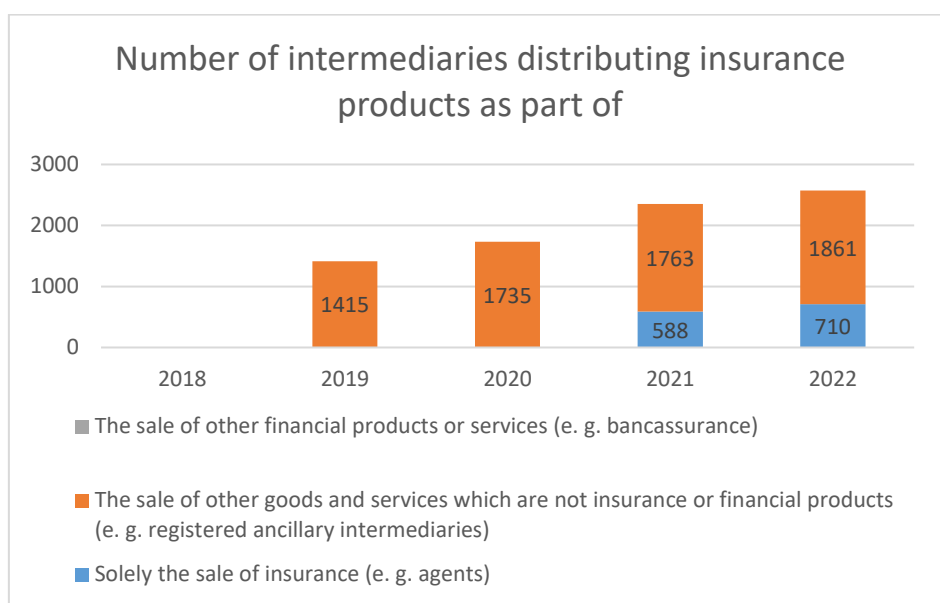
Comments provided by the NCA on the figures above :

In Denmark it is possible to register as an "independent intermediary". These independent intermediaries may only receive fees directly from the customer (as they may only represent the customer). Denmark has registered 188 of these independent intermediaries which comes to 7% of the total amount of intermediaries.

Upon implementation of the Directive, Denmark made the conscious choice not to over-implement. Consequently, the intermediaries are not obliged to report this kind of information to the DFSA.

The DFSA has identified the largest insurers representing at least 60% of the national market and intends to ask the insurers to provide the data in question. However, please note that these insurers are not legally obligated to answer

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the figures included in the chart above:

In Denmark, we do not register information regarding the sale of other financial products or services (e.g : bancassurance).

Comments provided by the NCA on the figures included in the charts above:

Upon implementation of the Directive, Denmark made the conscious choice not to over-implement. Consequently, the intermediaries are not obliged to report this kind of information to the DFSA. Consequently, the intermediaries are not obliged to report this kind of information to the DFSA.

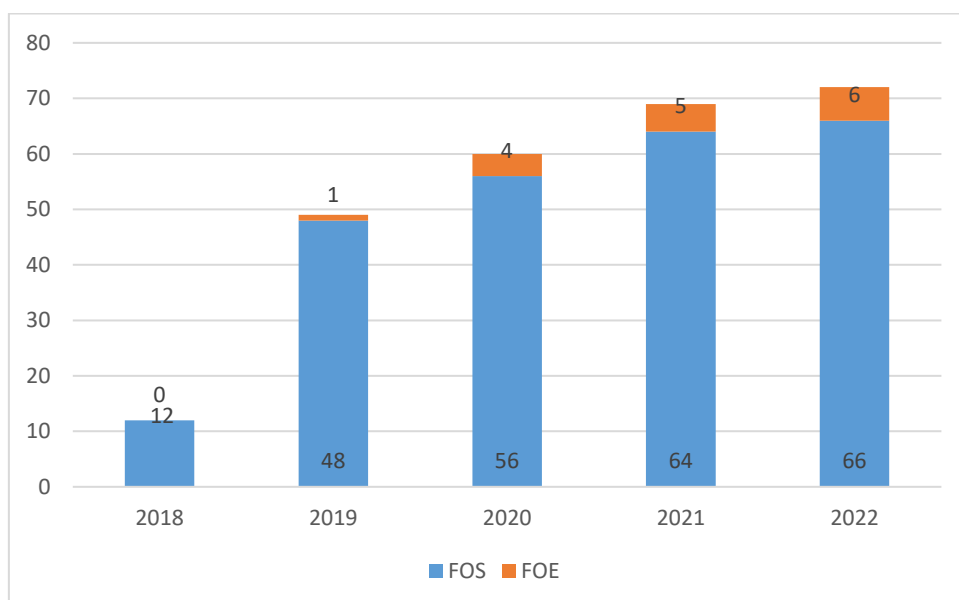
The DFSA has identified the largest insurers representing at least 60% of the national market and intends to ask the insurers to provide the data in question. However, please note that these insurers are not legally obligated to answer.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

Upon implementation of the Directive, Denmark made the conscious choice not to over-implement. Consequently, the intermediaries are not obliged to report this kind of information to the DFSA.

The DFSA has identified the largest insurers representing at least 60% of the national market and intends to ask the insurers to provide the data in question. However, please note that these insurers are not legally obligated to answer.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:³²

Host Member State	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	14	0	14
<i>Belgium</i>	17	0	17
<i>Bulgaria</i>	13	0	13
<i>Cyprus</i>	13	0	13
<i>Croatia</i>	9	0	9
<i>Czech Republic</i>	11	0	11

³² The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Denmark</i>	0	0	0
<i>Estonia</i>	16	0	16
<i>Finland</i>	24	1	24
<i>France</i>	21	0	21
<i>Germany</i>	27	1	27
<i>Greece</i>	15	0	15
<i>Hungary</i>	12	0	12
<i>Iceland</i>	13	0	13
<i>Ireland</i>	15	0	15
<i>Italy</i>	19	0	19
<i>Latvia</i>	14	0	14
<i>Liechtenstein</i>	6	0	6
<i>Lithuania</i>	14	0	14
<i>Luxembourg</i>	15	0	15
<i>Malta</i>	10	0	10
<i>Netherlands</i>	20	3	20
<i>Norway</i>	31	2	33
<i>Poland</i>	19	0	19
<i>Portugal</i>	12	0	12
<i>Romania</i>	13	0	13
<i>Slovakia</i>	13	0	13
<i>Slovenia</i>	11	0	11
<i>Spain</i>	18	2	18
<i>Sweden</i>	33	2	34
<i>Total EEA</i>	468	11	471

General qualitative description of the “patterns of cross-border activity”:

Relatively limited interest in cross-border activities compared to the total number of registered intermediaries.

ESTONIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ³³	1,332	0.3%
(Re)insurance GWP (in million) ³⁴	956,810	0.07%
Number of (re)insurance undertakings ³⁵	9	0.5%
Number of registered insurance intermediaries	394	0.05%

National competent authority:

Finantsinspektsioon

³³ Based on eurostat data for 1 January 2022:

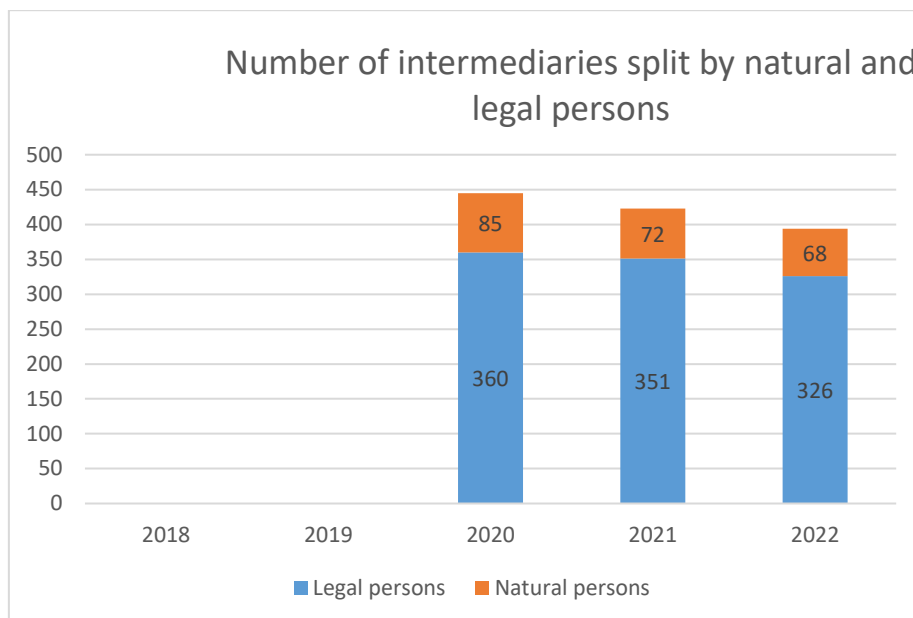
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

³⁴ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

³⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

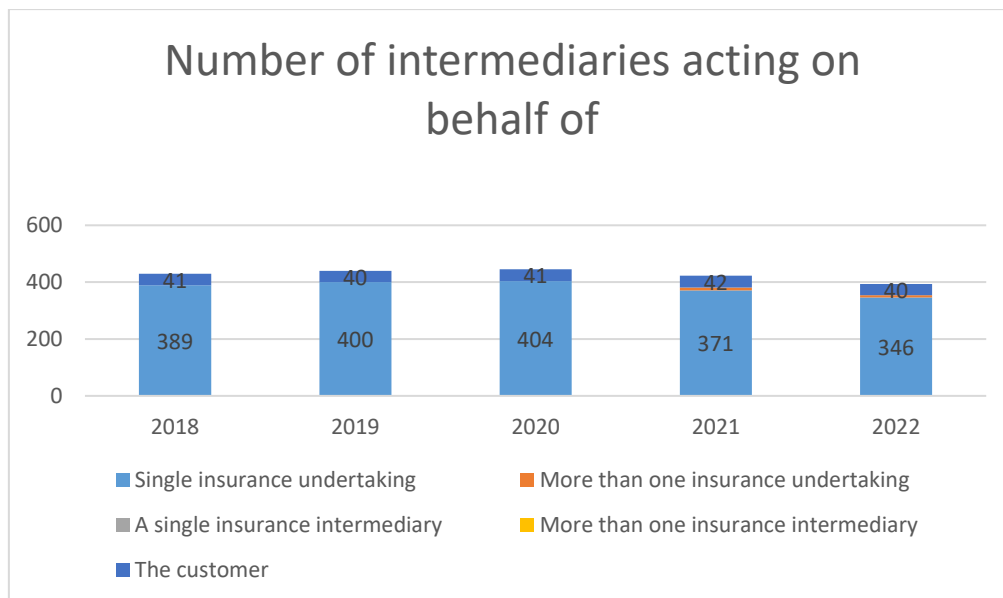
Registered insurance intermediaries split by natural and legal persons:**Comments provided by the NCA on the figures included in the chart above:**

In Estonia, the insurer is also obliged to register the insurance distributors specified (excluded) in Article 1 (3 and 4) of the IDD. On the relevant list on Finantsinspektsioon's website, there was 212 such insurance agents in 2022. These agents are mostly travel bureaus, selling travel insurance. For the sake of uniformity of the IDD data provided in this questionnaire, these agents are not included in the number of insurance agents who must be registrated according to the IDD.

Online registration system:

Insurance agents are entered into the list of insurance intermediaries by Estonian insurance undertakings and branches of the foreign insurance undertakings. Estonian insurance undertakings and branches of the foreign insurance undertakings are authorized (access with digital identification) to enter and remove their insurance agents directly on the Finantsinspektsioon's website on-line. Estonian insurance brokers and FOS and FOE intermediaries are entered into the list of insurance intermediaries on Finantsinspektsioon's website by Finantsinspektsioon. The register is updated on an ongoing basis without delay. Estonian insurance broker can submit an application for inclusion into the list of intermediaries and upload relevant document files on the Finantsinspektsioon's website.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



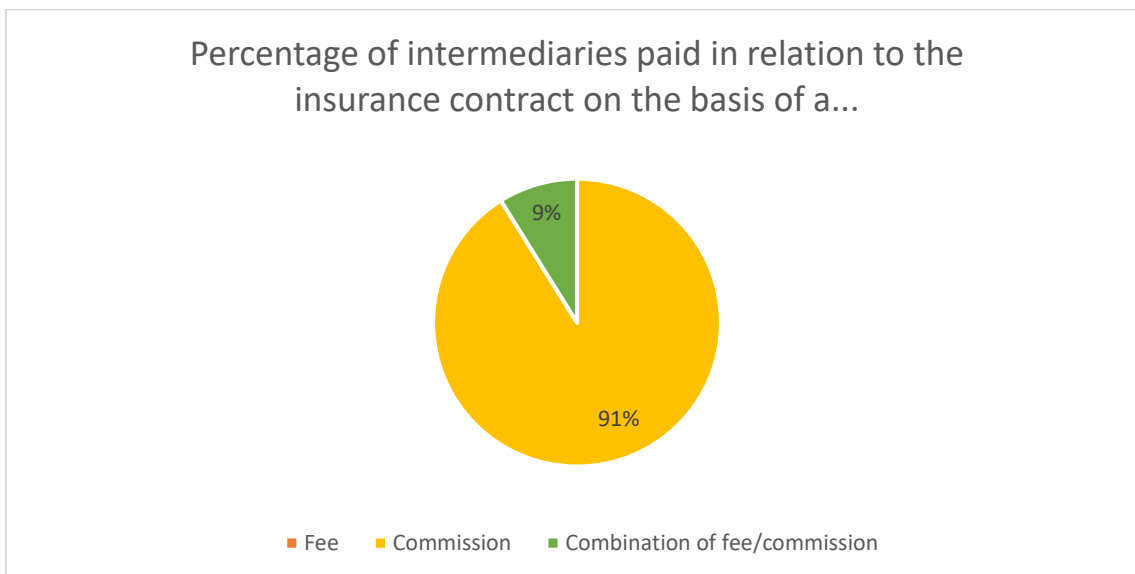
Comments provided by the NCA on the figures included in the chart above:

(i) An insurance undertaking may enter in the list of intermediaries only an insurance agent who has not already been entered in the list of intermediaries as the insurance agent of another insurance undertaking in the distribution of insurance contracts of the same class or subclass of insurance activities and who meets the requirements provided for insurance agents by Estonian Insurance Activities Act.

These insurance agents who represent only one undertaking are shown in the category of a single insurance undertaking. Agents representing more than one undertaking, but in different classes of insurance, are shown in the category of more than one insurance undertaking.

The category of intermediaries acting on behalf of the customer lists all Estonian insurance brokers acting in the interests of the customer.

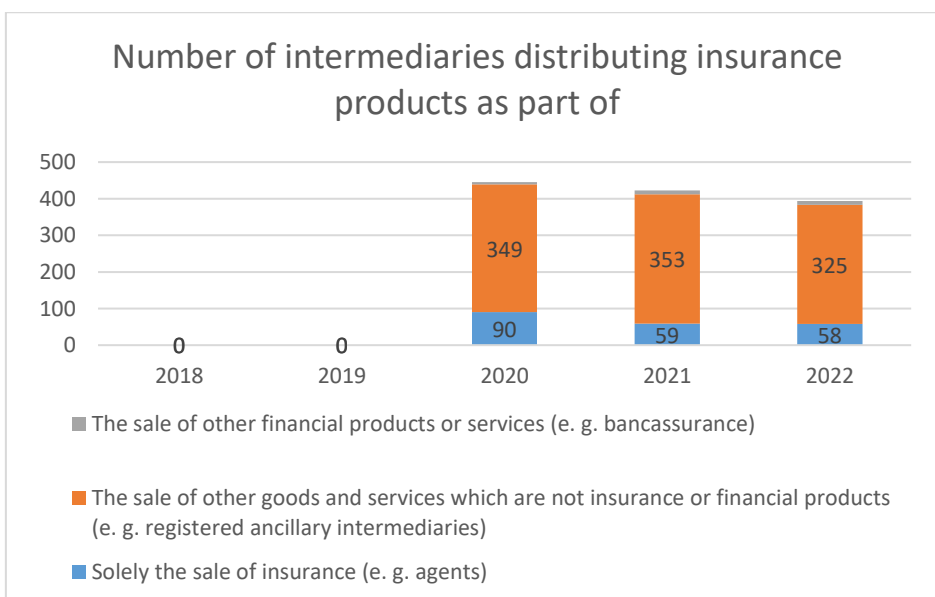
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

The Commission category includes all insurance agents and 5 insurance brokers. The combination of fee/ commission category includes 35 insurance brokers. In Estonia, an insurance broker may be remunerated by the client or remunerated by the insurer at the client's expense. Remuneration of a broker by an insurer at the expense of a client is common.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

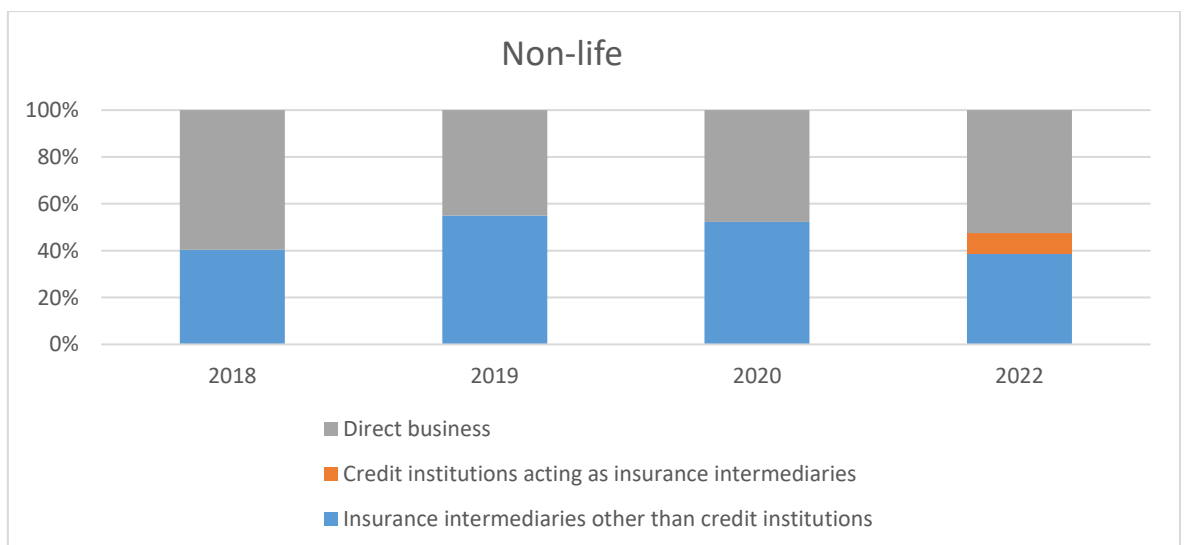
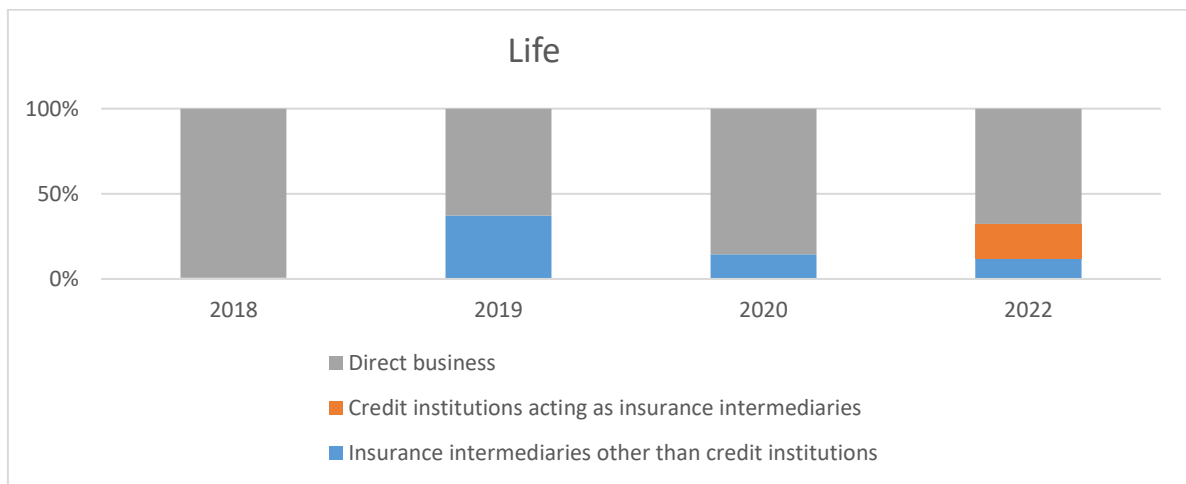


Comments provided by the NCA on the figures included in the chart above:

The category of the sale of other goods and services which are not insurance or financial products indicates the number of insurance agents, who's main activity is not insurance distribution, but who have to be registrated as insurance distributors (insurance agents) according to the IDD.

In Estonia, the insurer is also obliged to register the insurance distributors specified (excluded) in Article 1 (3 and 4) of the IDD. On the relevant list on Finantsinspektsioon's website, there was 212 such insurance agents in 2022. These agents are mostly travel bureaus, selling travel insurance. For the sake of uniformity of the IDD data provided in this questionnaire, these agents are not included in the number of insurance agents who must be registrated according to the IDD.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

Cross-market questionnaire about sales on the Estonian market.

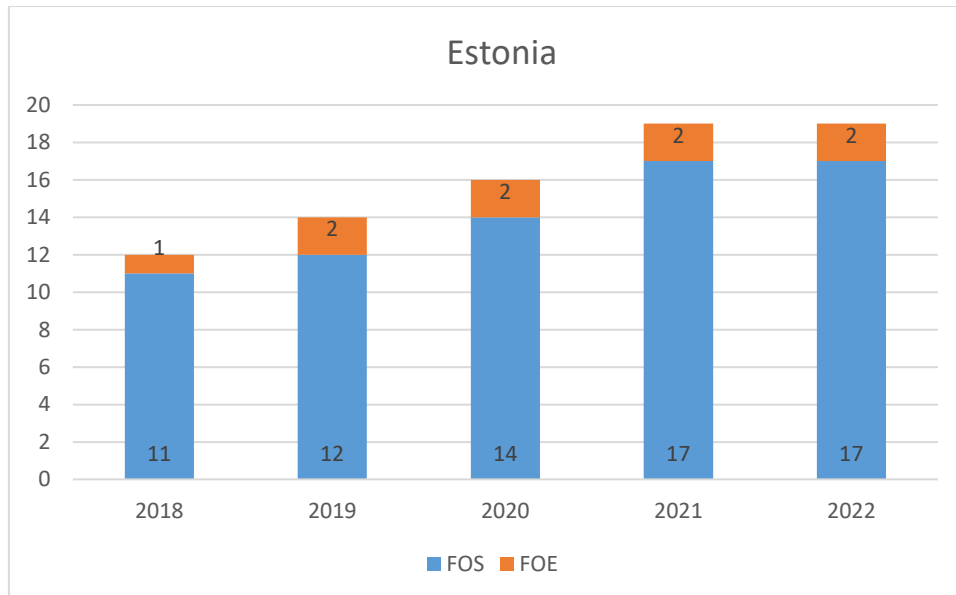
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

Approximately 90% of insurance brokers distribute insurance in e-channels. Insurance agents generally use insurers' sales programs/platforms, and here the distributions differ between non-life and life insurance. There are also big differences between distributors of life insurers, some do not use e-channels almost at all, some use e-channels approximately 80%. Average use of e-channels in non-life insurance is higher, approximately 85-90%.

Comments provided by the NCA on the data above:

Source of information is cross-market questionnaire about sales on the Estonian market (Insurance brokers and insurance undertakings).

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:³⁶

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	9	0	9
<i>Belgium</i>	9	0	9
<i>Bulgaria</i>	9	0	9
<i>Cyprus</i>	8	0	8
<i>Croatia</i>	9	0	9
<i>Czech Republic</i>	9	0	9
<i>Denmark</i>	9	0	9
<i>Estonia</i>	0	0	0
<i>Finland</i>	13	0	13
<i>France</i>	12	0	12
<i>Germany</i>	10	0	10
<i>Greece</i>	8	0	8
<i>Hungary</i>	10	0	10
<i>Iceland</i>	6	0	6
<i>Ireland</i>	9	0	9
<i>Italy</i>	8	0	8
<i>Latvia</i>	13	2	15
<i>Liechtenstein</i>	5	0	5
<i>Lithuania</i>	12	0	12
<i>Luxembourg</i>	8	0	8
<i>Malta</i>	8	0	8
<i>Netherlands</i>	10	0	10
<i>Norway</i>	6	0	6
<i>Poland</i>	10	0	10
<i>Portugal</i>	10	0	10
<i>Romania</i>	9	0	9
<i>Slovakia</i>	8	0	8
<i>Slovenia</i>	8	0	8
<i>Spain</i>	10	0	10

³⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

COUNTRY-BY-COUNTRY ANALYSIS – Annex VII to the 2nd Report on the application of the IDD

EIOPA CONFIDENTIAL USE

EIOPA-BoS-23-480

<i>Sweden</i>	<i>12</i>	<i>0</i>	<i>12</i>
<i>Total EEA</i>	<i>267</i>	<i>2</i>	<i>269</i>

FINLAND

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ³⁷	5,548	1.2%
(Re)insurance GWP (in million) ³⁸	8,449.683	0.62%
Number of (re)insurance undertakings ³⁹	43	2.5%
Number of registered insurance intermediaries	3812	0.4%

National competent authority:

Financial Supervisory Authority

³⁷ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

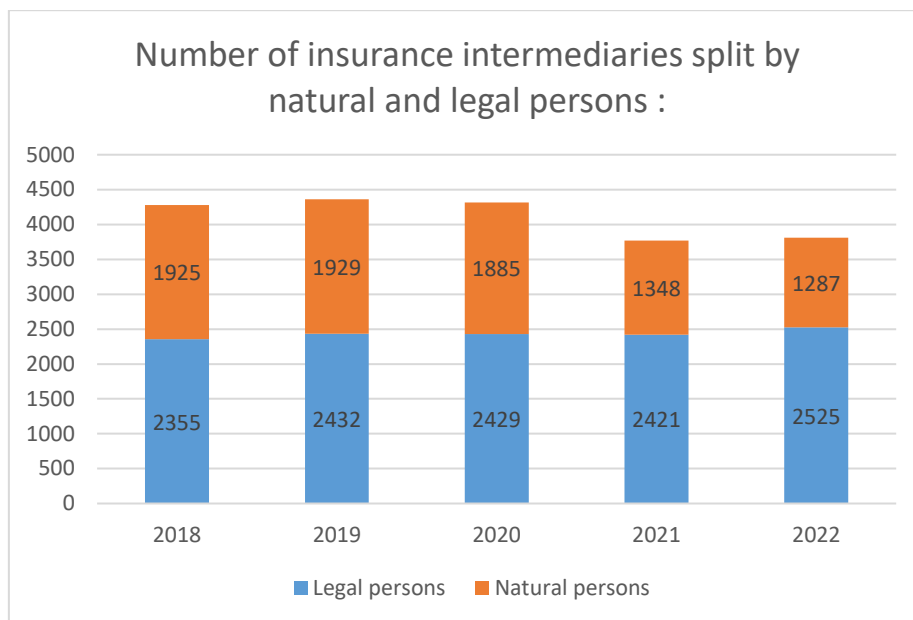
³⁸ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

³⁹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

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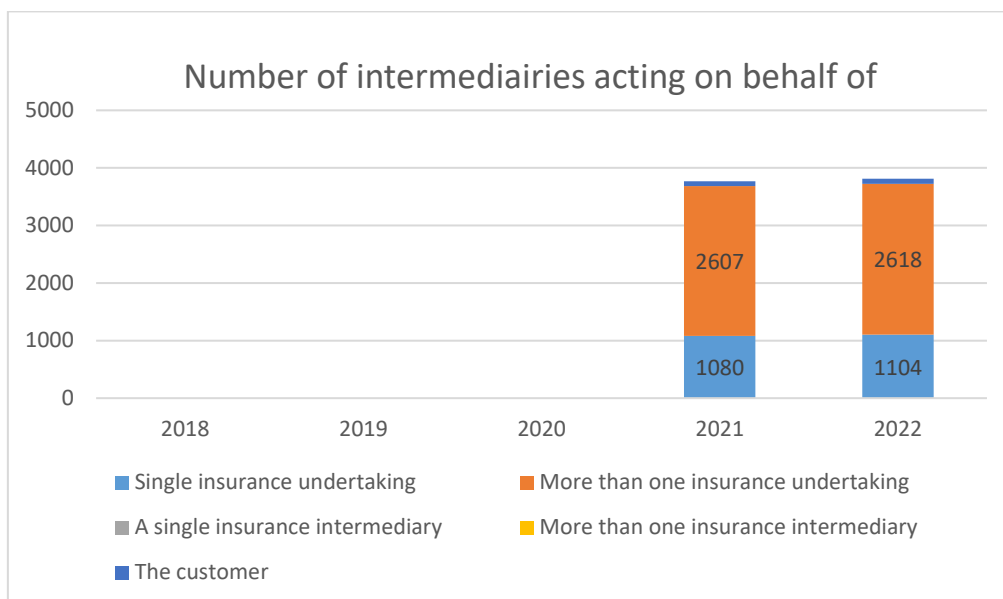
Registered insurance intermediaries split by natural and legal persons:



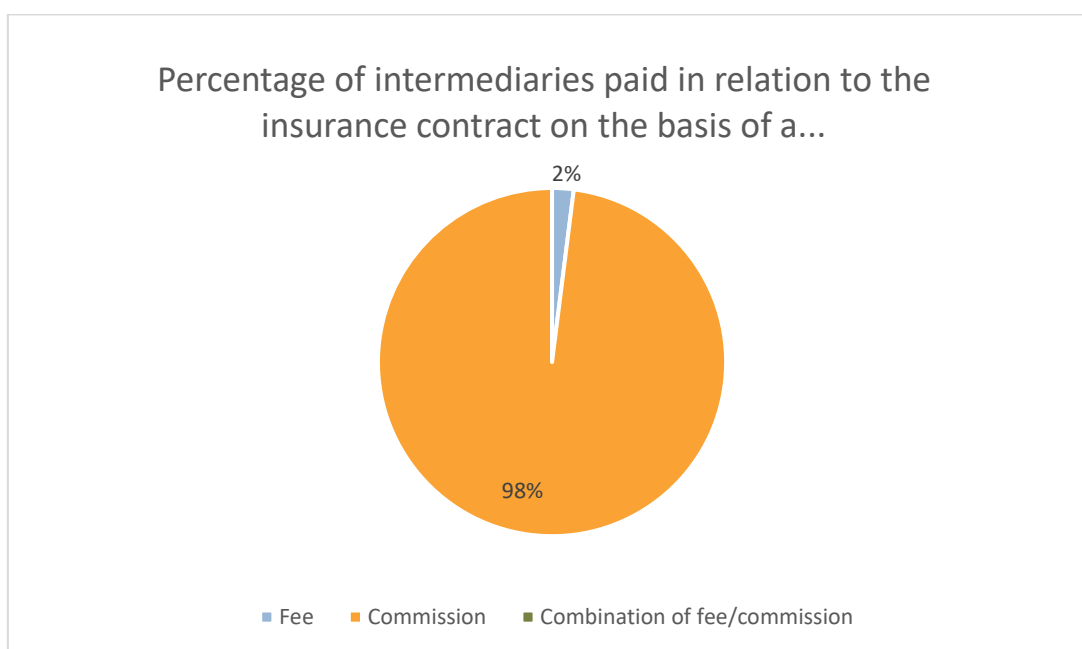
Online registration system:

The applications and registration are made on the online system. The registration fee is paid in advance before the applications arrive through the system to the handling process. The information is updated on the daily bases based on the applications that the intermediaries make via the online system.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



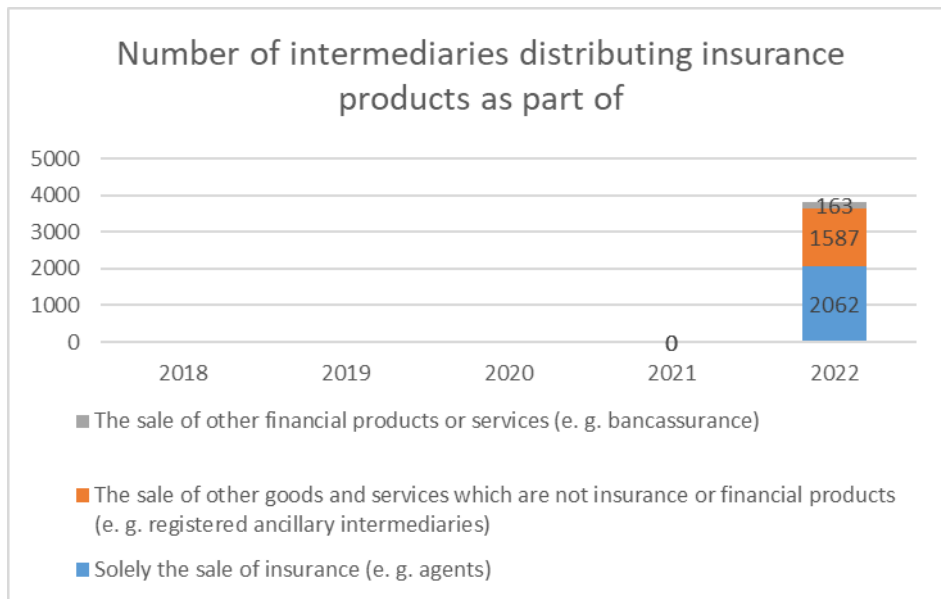
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



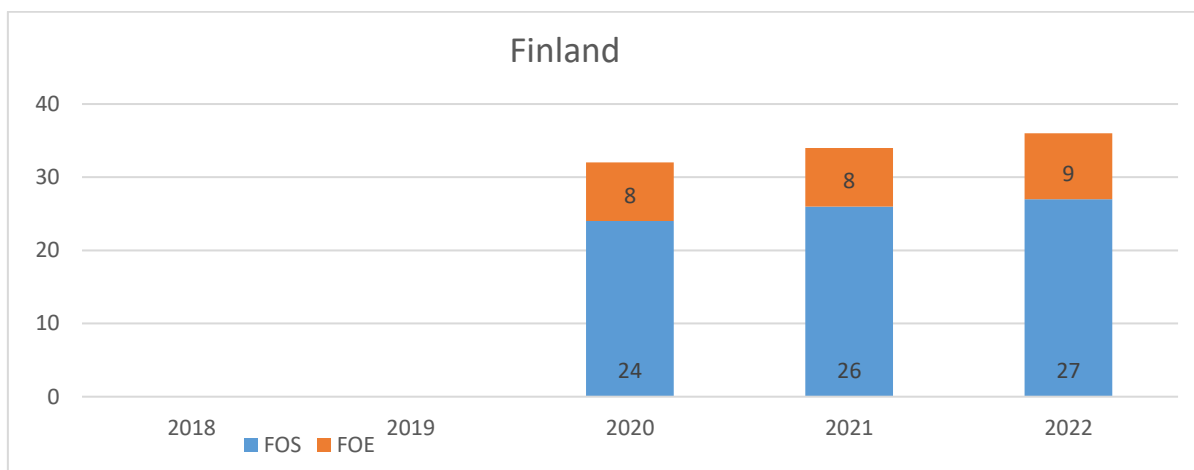
Comments provided by the NCA on the figures above :

The brokers get the remuneration paid directly by the customer.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁴⁰

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	5	0	5
<i>Belgium</i>	9	0	9
<i>Bulgaria</i>	3	0	3
<i>Cyprus</i>	3	0	3
<i>Croatia</i>	3	0	3
<i>Czech Republic</i>	4	0	4
<i>Denmark</i>	14	1	15
<i>Estonia</i>	16	2	18
<i>Finland</i>	0	0	0
<i>France</i>	7	0	7
<i>Germany</i>	6	0	6
<i>Greece</i>	3	0	3
<i>Hungary</i>	4	0	4
<i>Iceland</i>	0	1	1
<i>Ireland</i>	6	0	6
<i>Italy</i>	8	1	9
<i>Latvia</i>	15	1	16
<i>Liechtenstein</i>	3	0	3
<i>Lithuania</i>	15	2	17
<i>Luxembourg</i>	6	1	7
<i>Malta</i>	3	0	3
<i>Netherlands</i>	4	0	4
<i>Norway</i>	15	2	17
<i>Poland</i>	4	0	4
<i>Portugal</i>	6	0	6
<i>Romania</i>	3	0	3
<i>Slovakia</i>	4	0	4
<i>Slovenia</i>	3	0	3
<i>Spain</i>	7	0	7

⁴⁰ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Sweden</i>	<i>19</i>	<i>6</i>	<i>25</i>
<i>Total EEA</i>	<i>198</i>	<i>17</i>	<i>215</i>

Information on powers of the NCA

Extent to which NCA has not been sufficiently empowered to ensure implementation of the IDD:

The FIN-FSA has the powers but limited personnel for supervision.

FRANCE

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁴¹	67,872	15%
(Re)insurance GWP (in million) ⁴²	330,940.978	24.3%
Number of (re)insurance undertakings ⁴³	151	8.7%
Number of registered insurance intermediaries	62284	7.2%

National competent authority:

French Prudential Supervision and Resolution Authority (ACPR) and the French Banking, Insurance and Financial register (ORIAS)

⁴¹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

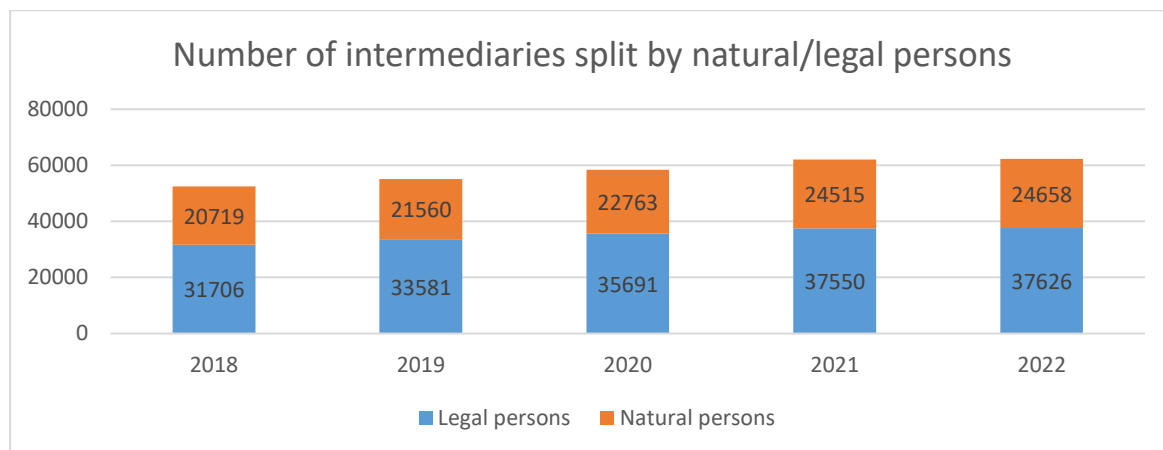
⁴² "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

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⁴³ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

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Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

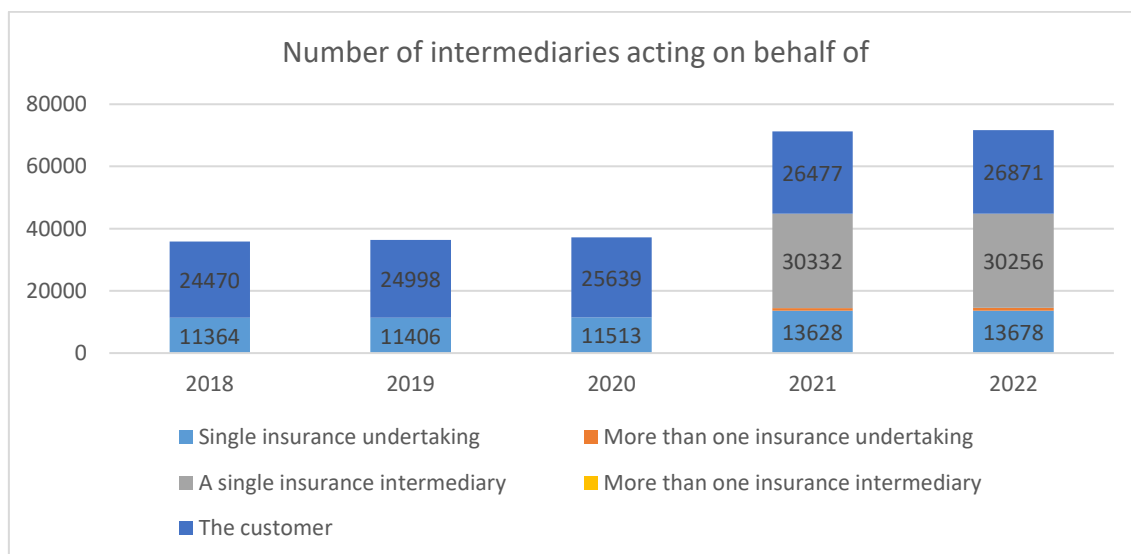
Source : the ORIAS (French national register of financial intermediaries) 2021 annual report (published september 2022), and 2022 annual report.

Online registration system:

The ORIAS, the French national register of bank, insurance and financial intermediaries, has set up an online registration system with a form the intermediaries have to fill out.

Financial intermediaries once they are registered usually do not have to renew their registration every year, although 2023 is an exception: in the context of the new obligation for intermediaries to be members of a professional association, all banking and insurance intermediaries had to renew their registration on the ORIAS website by March 31st 2023.

Registered insurance intermediaries split by categories based on the activities of intermediaries:



Comments provided by the NCA on the figures included in the chart above:

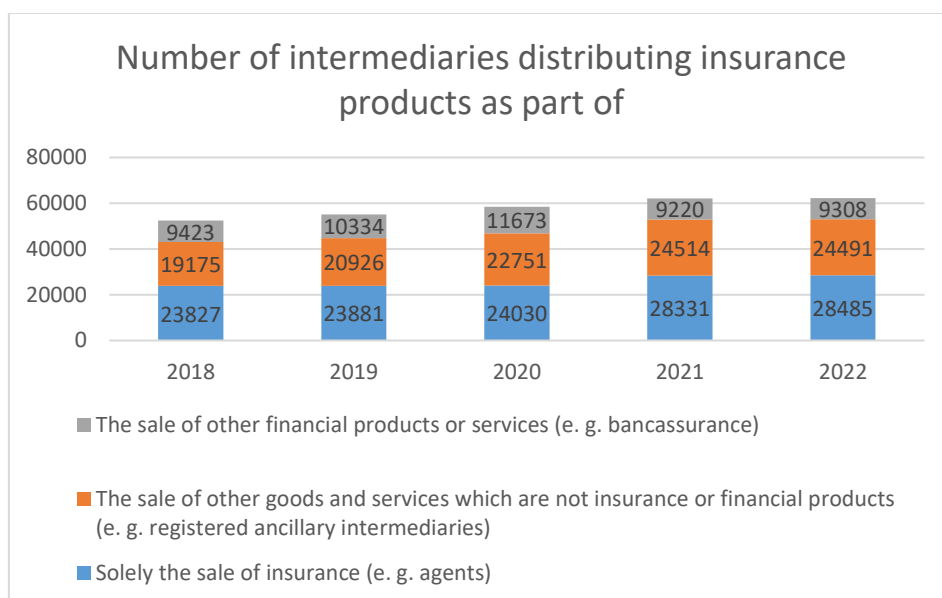
Source : the ORIAS (French national register of financial intermediaries) 2021 annual report, and 2022 annual report. The total sum of registered intermediaries is superior to the number of intermediaries because the categories are not mutually exclusive.

The rise in the number of intermediaries between 2020 and 2021 in the table above results from a methodological change, not from a structural change in the market.

We matched:

- the notion of "number of insurance intermediaries acting on behalf of a single insurance undertaking" with the categories "agents généraux d'assurance" (11 681 in 2021) and "mandataires d'assurance liés" (1 947 in 2021).
- the notion of "number of insurance intermediaries acting on behalf of more than one insurance undertaking" with the category "mandataires d'assurance non-liés"
- the notion of "number of insurance intermediaries acting on behalf of a single insurance intermediary" with the category "mandataires d'intermédiaires d'assurances".
- the notion of "number of insurance intermediaries acting on behalf of the customer with the category "courtiers d'assurance ou de réassurance".

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

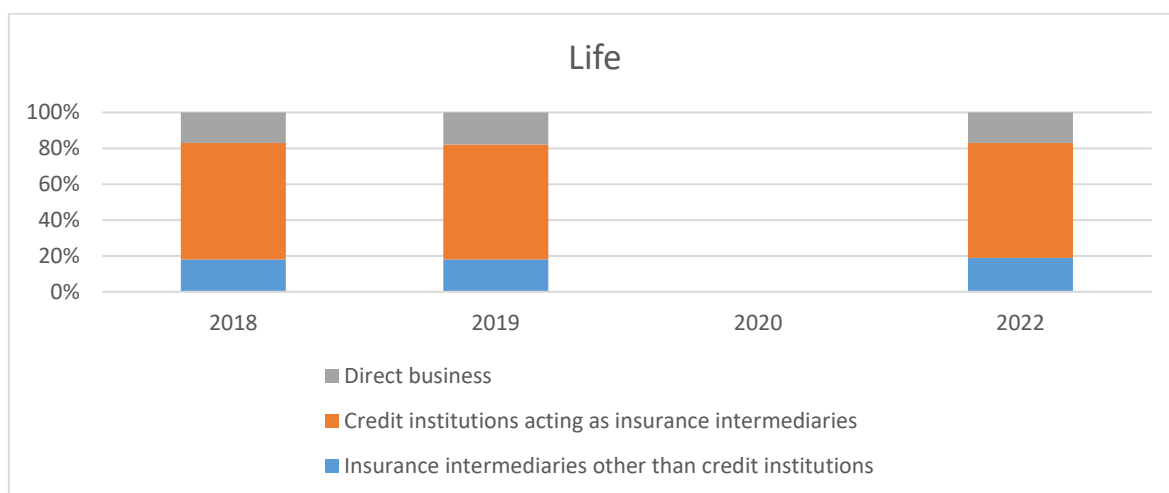


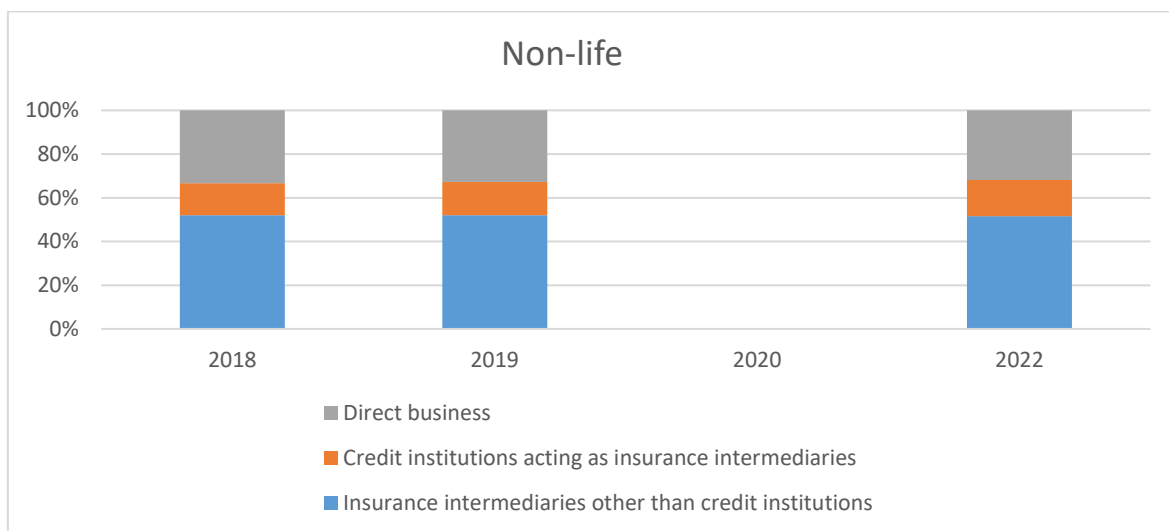
Comments provided by the NCA on the figures included in the chart above:

Source : the ORIAS (French national register of financial intermediaries) 2021 annual report p.38-39, and 2022 annual report.

The number of intermediaries distributing solely insurance products has been inferred from their NAF code (a national classification indicating a company's activity) as indicated by the ORIAS annual report. The number of intermediaries distributing insurance products as part of the sale of other financial products or services indicated is the remainder of intermediaries practicing "financial and insurance activities". The number of insurance intermediaries distributing insurance products as part of the sale of other goods and services which are not insurance or financial products is the sum of registered intermediaries with a NAF code different from "Financial and insurance activities". The most common NAF codes among those intermediaries are "commerce ; repairs of cars and motorbikes" (10 496), "real estate activities" (4 456) and "specialized, scientific and technical activities" (4 025).

GWP split by distribution channels:



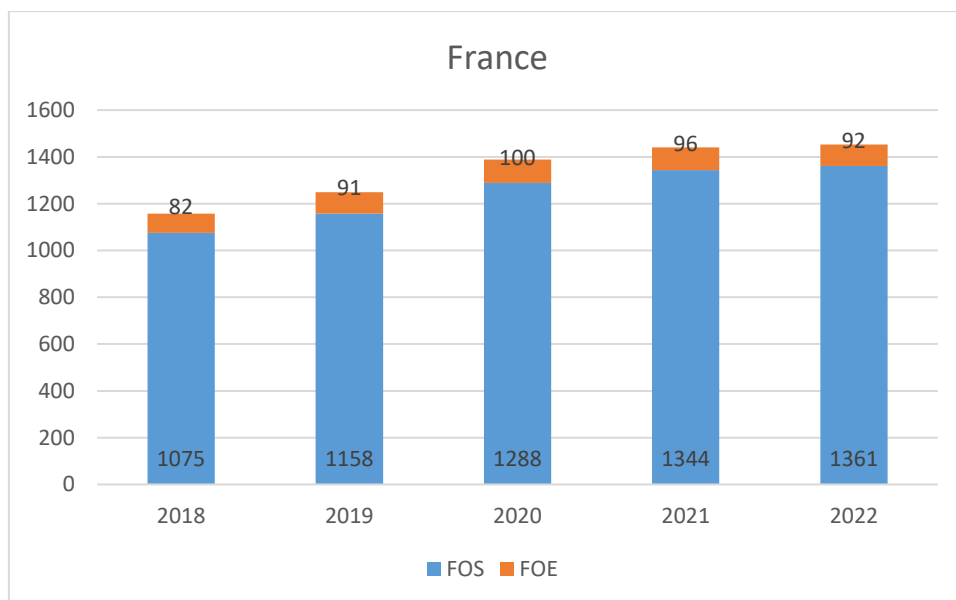


Due to methodological change in terms of data calculation in 2020, no data is available for this year.

Comments provided by the NCA on the figures included in the charts above:

Neither ACPR nor ORIAS collect the split of premiums per category of intermediaries. The data presented here comes from the annual survey published by the French Federation of Insurance, France Assureurs (https://www.franceassureurs.fr/wp-content/uploads/20230830_donnees-cles-2022.pdf). **Health insurance (nSLT) and products known as "prévoyance" on the French market (CPI, income protection insurance, dependency, etc.), representing 27,9 Bn €, are not included in the table. The unit of the table is the billion of euros.** The number indicated as "direct business" corresponds to "direct business and other modes of distribution" in the original survey.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

Source: the ORIAS annual report

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁴⁴

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	458	2	458
<i>Belgium</i>	956	22	970
<i>Bulgaria</i>	411	1	411
<i>Cyprus</i>	420	2	421
<i>Croatia</i>	305	0	305
<i>Czech Republic</i>	431	2	433
<i>Denmark</i>	455	1	455
<i>Estonia</i>	407	0	407
<i>Finland</i>	435	1	436
<i>France</i>	0	0	0
<i>Germany</i>	675	15	684
<i>Greece</i>	449	4	452

⁴⁴ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Hungary</i>	437	2	437
<i>Iceland</i>	389	0	389
<i>Ireland</i>	494	2	496
<i>Italy</i>	712	27	735
<i>Latvia</i>	406	0	405
<i>Liechtenstein</i>	390	0	389
<i>Lithuania</i>	408	0	407
<i>Luxembourg</i>	906	10	912
<i>Malta</i>	439	1	439
<i>Netherlands</i>	560	5	563
<i>Norway</i>	409	2	410
<i>Poland</i>	472	5	476
<i>Portugal</i>	642	20	661
<i>Romania</i>	434	2	435
<i>Slovakia</i>	415	2	416
<i>Slovenia</i>	407	1	407
<i>Spain</i>	753	29	777
<i>Sweden</i>	454	3	457
<i>Total EEA</i>	14529	161	14 643

Comments provided by the NCA on the figures included in the table above:

Source : We filled out the table with data from the 2022 ORIAS annual report.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

We have not received any new statutory powers in that time period regarding the implementation of IDD.

GERMANY

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁴⁵	83,237	18.4%
(Re)insurance GWP (in million) ⁴⁶	335,298.764	24.7%
Number of (re)insurance undertakings ⁴⁷	256	14.8%
Number of registered insurance intermediaries	190708	22%

National competent authority:

Federal Financial Supervisory Authority (BaFin) (insurance undertakings)

German Chamber of Commerce and Industry (DIHK) is the joint body responsible for the technical operation of the 'Broker Registry' on behalf of the Chambers of Industry and Commerce (§ 11a

⁴⁵ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

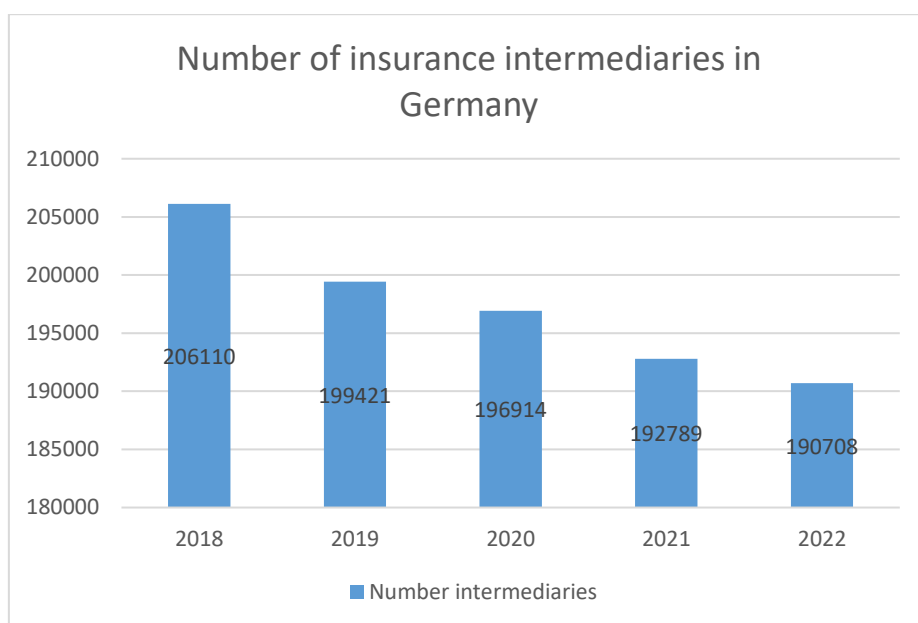
⁴⁶ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁴⁷ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Para 1 Sentence 2 of the German Trade Regulation Act, GewO). Regulatory authority lies with the individual IHKs and not the DIHK. Additionally, the local Trade Supervisory Authorities have certain powers in relation to insurance intermediaries, in particular regulatory competences.



Comments provided by the NCA on the figures included in the chart above:

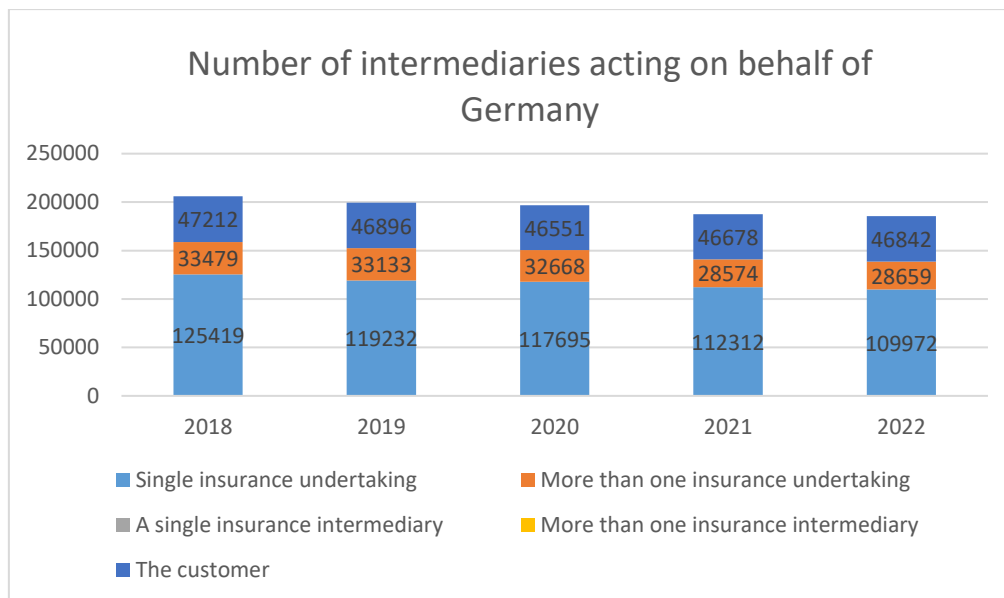
We do not have statistical information about the legal personality of insurance intermediaries because the numbers we do collect don't differentiate by legal personality.

Online registration system:

In general, Germany provides the opportunity to register online. On the online-register of the Chambers of Commerce and Industry (www.vermittlerregister.info) insurance intermediaries can register online. Insurance intermediaries have to assure that they are registered in the online registration system provided by the German Chamber of Commerce and Industry.

The online registration system is updated on a daily basis.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



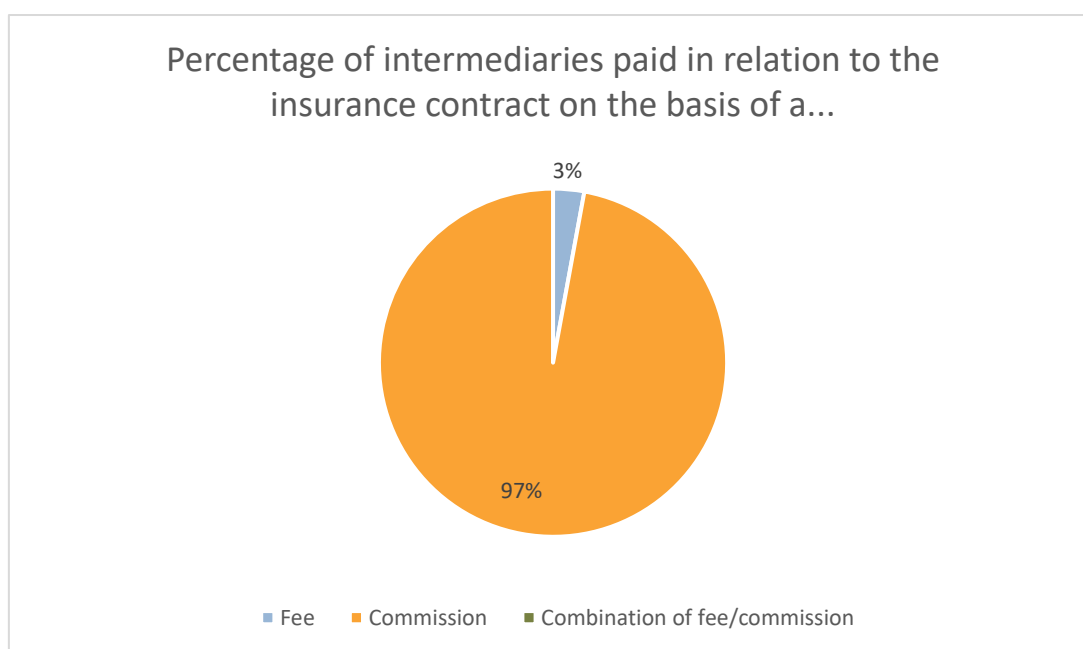
Comments provided by the NCA on the figures included in the chart above:

The feedback is based on the following system:

We have assigned tied insurance agents to the Category of number of insurance intermediaries acting on behalf of a single insurance undertaking. We have assigned insurance agents with a licence to the category of insurance intermediaries acting on behalf of the customer. As a rule, these are multiple agents who work for different insurance companies. In individual cases, however, these representatives only work for one company despite having a licence. However, this is not evident from the register. We have assigned insurance brokers and insurance consultants to the category of insurance intermediaries acting on behalf of customer. No allocation was made for product-accessory insurance intermediaries, since it is not apparent for whom they work.

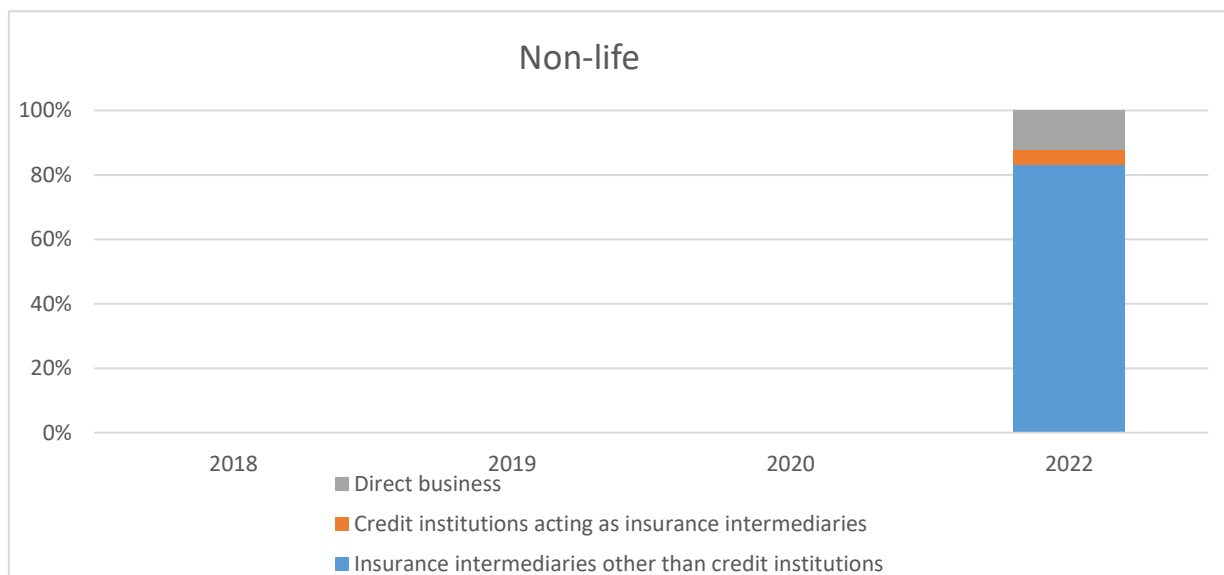
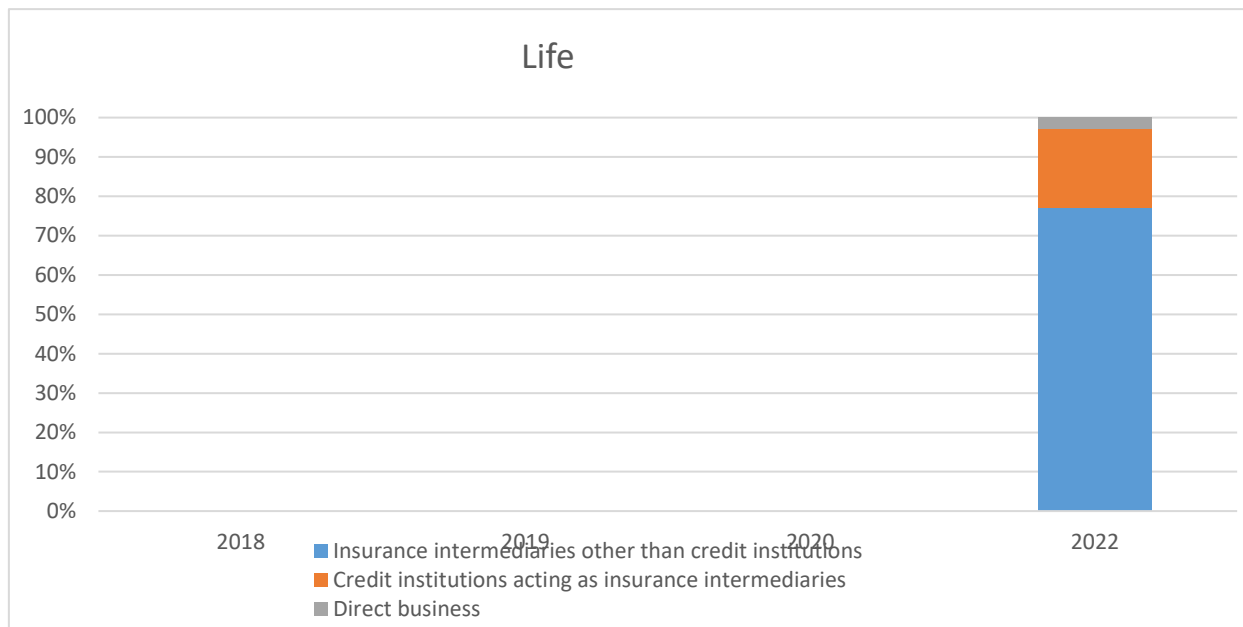
Therefore, the total number of intermediaries differs from the number given above P.91.

Germany does not collect any specific data about the way insurance products are distributed. From the data collected in Germany it is not possible to draw conclusions about the questions required.

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:Comments provided by the NCA on the figures above

According to the IDD, the data requested by EIOPA are not kept in stock by market participants or NCAs. This data is not available to BaFin or the Chambers of Industry and Commerce for any other reason. Therefore, BaFin carried out a survey of the supervised insurance undertakings in accordance with EIOPA's requirements (market share 60% in relation to new business in 2022). The insurance undertakings were asked to inform BaFin on the percentage of products they had sold without calculated acquisition costs in 2022 (in relation to gross premiums written). In this case, it can be assumed that the respective sales partner was paid directly by the customer. However, the undertaking were not requested to collect the data in question from their distribution partners themselves. However, the market coverage of only 60% already leads to considerable distortions in the result. For example, in Germany only a few life insurers actively sell net policies. Depending on whether these undertakings are part of the market survey, however, there are considerable differences in the result. Due to national peculiarities, the figures on non-life do not include health insurance.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

According to the IDD, the data requested by EIOPA are not to be kept by market participants or NCAs. However, BaFin has information on the percentage of the distribution channels due to a corresponding supply by the Gesamtverband der Deutschen Versicherungswirtschaft (GDV)). The GDV publishes annual distribution channel statistics for the German market. The scope of gross premiums written refers to both domestic and cross-border business in the EU/EEA area. Due to

the lack of individual feedback on new business for 2022, the new business reported here is only an approximated value. Due to national peculiarities, the figures on non-life do not include health insurance.

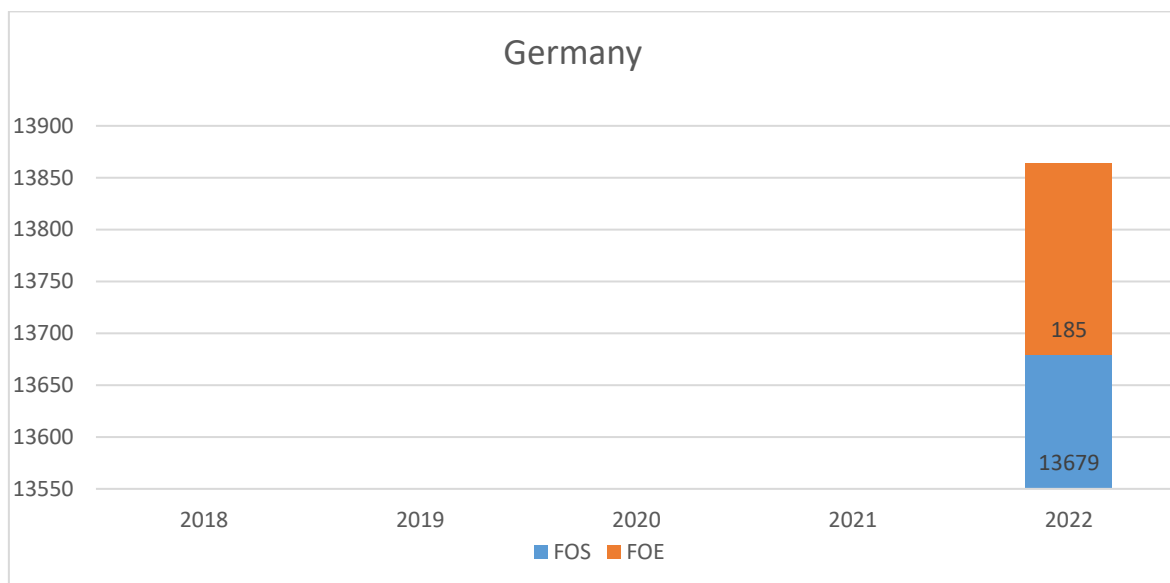
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

Life: 0,44 % Non-Life: 1,48 % Total: 0,742 %

Comments provided by the NCA on the data above:

According to the IDD, the data requested by EIOPA are not to be held by the market participants or the NCAs. For the year 2022, this data is not available to BaFin or the Chambers of Industry and Commerce for any other reason. Therefore, BaFin conducted a survey of the supervised insurance undertakings in accordance with EIOPA's requirements (market share 60% in relation to new business in 2022). The insurance undertakings were asked to state what proportion of new business in 2022 was accounted for by online sales (in relation to gross premiums written). However, the undertakings were not asked to take their sales partners into account or to involve them. However, the market coverage of only 60% already leads to considerable distortions in the result. For example, in Germany, online sales in the life sector are carried out in particular by term life insurance undertakings. Depending on whether these undertakings are part of the market survey, however, there are considerable differences in the result. Furthermore, since no binding definition of the term online sales was given by EIOPA, the responses of the insurance undertakings are not easily comparable. Due to national peculiarities, the figures on non-life do not include health insurance. However, BaFin has comprehensive findings on the online sales of insurance undertakings in the period 2019 to 2021 from a market survey conducted in 2021. This survey covered 308 insurance undertakings under BaFin supervision. Among other things, the scope of online sales was queried. In addition, the distribution channel (website, app, comparison portal) as well as the most important insurance products distributed online were queried. However, the findings obtained in this context clearly contradict the data now available. For the year 2021, for example, based on an estimate by the companies surveyed, a volume of online sales in the life sector of approximately 10% and in the non-life sector of approximately 27% was reported. In this survey, however, the insurance companies - in contrast to the current survey - also had to involve their distribution partners. In addition, the survey was limited to the domestic insurance business.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

We can only call up the data on a daily basis. The cut-off date for the reported data is 21.06.2023.

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State⁴⁸:

<i>Austria</i>	1674	38	1712
<i>Belgium</i>	575	5	580
<i>Bulgaria</i>	372	2	374
<i>Cyprus</i>	333	2	335
<i>Croatia</i>	253	1	254
<i>Czech Republic</i>	517	5	522
<i>Denmark</i>	423	3	426
<i>Estonia</i>	333	0	333
<i>Finland</i>	374	0	374
<i>France</i>	706	19	725
<i>Germany</i>	0	0	0
<i>Greece</i>	403	8	411
<i>Hungary</i>	442	2	444
<i>Iceland</i>	226	1	227
<i>Ireland</i>	377	1	378

⁴⁸ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Italy</i>	<i>643</i>	<i>17</i>	<i>660</i>
<i>Latvia</i>	<i>349</i>	<i>2</i>	<i>351</i>
<i>Liechtenstein</i>	<i>262</i>	<i>0</i>	<i>262</i>
<i>Lithuania</i>	<i>335</i>	<i>0</i>	<i>335</i>
<i>Luxembourg</i>	<i>607</i>	<i>7</i>	<i>614</i>
<i>Malta</i>	<i>330</i>	<i>0</i>	<i>330</i>
<i>Netherlands</i>	<i>629</i>	<i>11</i>	<i>640</i>
<i>Norway</i>	<i>287</i>	<i>3</i>	<i>290</i>
<i>Poland</i>	<i>574</i>	<i>14</i>	<i>588</i>
<i>Portugal</i>	<i>399</i>	<i>4</i>	<i>403</i>
<i>Romania</i>	<i>417</i>	<i>3</i>	<i>420</i>
<i>Slovakia</i>	<i>399</i>	<i>2</i>	<i>401</i>
<i>Slovenia</i>	<i>374</i>	<i>1</i>	<i>375</i>
<i>Spain</i>	<i>643</i>	<i>30</i>	<i>673</i>
<i>Sweden</i>	<i>423</i>	<i>4</i>	<i>427</i>
<i>Total EEA</i>	<i>13679</i>	<i>185</i>	<i>13864</i>

Comments provided by the NCA on the figures included in the table above:

We can only call up the data on a daily basis. The cut-off date for the reported data is 21.06.2023.

General qualitative description of the “patterns of cross-border activity”:

We have not yet identified any patterns of cross-border activity from Germany. This question was simply not subject to any examinations.

Information on the powers of the NCA

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

BaFin could act more efficiently in conduct of business supervision if it was authorised to impose administrative fines to insurance companies with low standards in their product approval process.

GREECE

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁴⁹	10,460	2.3%
(Re)insurance GWP (in million) ⁵⁰	4,687.315	0.4%
Number of (re)insurance undertakings ⁵¹	34	2.0%
Number of registered insurance intermediaries	17164	2%

National competent authority:

Bank of Greece (BOG) (insurance undertakings)

Union of Hellenic Chambers of Commerce (insurance intermediaries)

Registered insurance intermediaries split by natural and legal persons:

⁴⁹ Based on eurostat data for 1 January 2022:

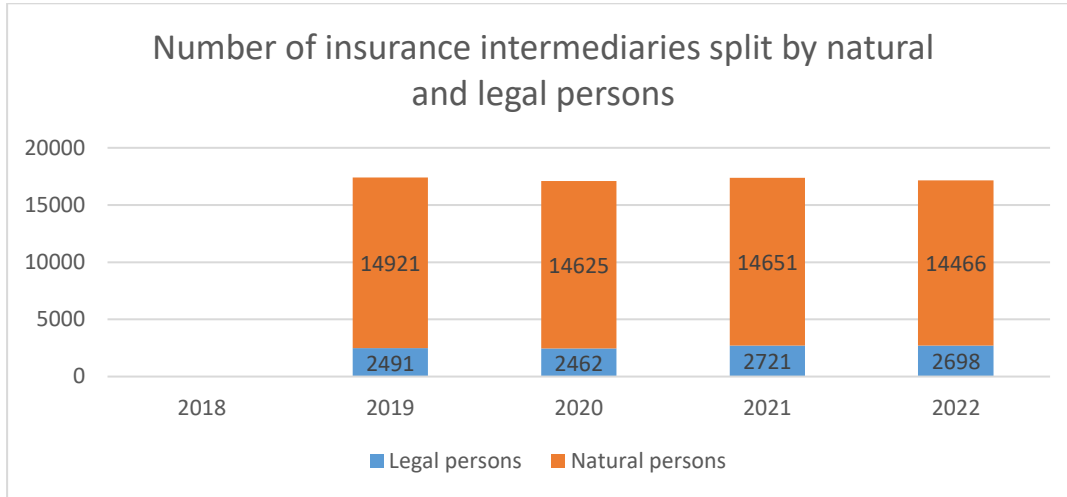
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

⁵⁰ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁵¹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx



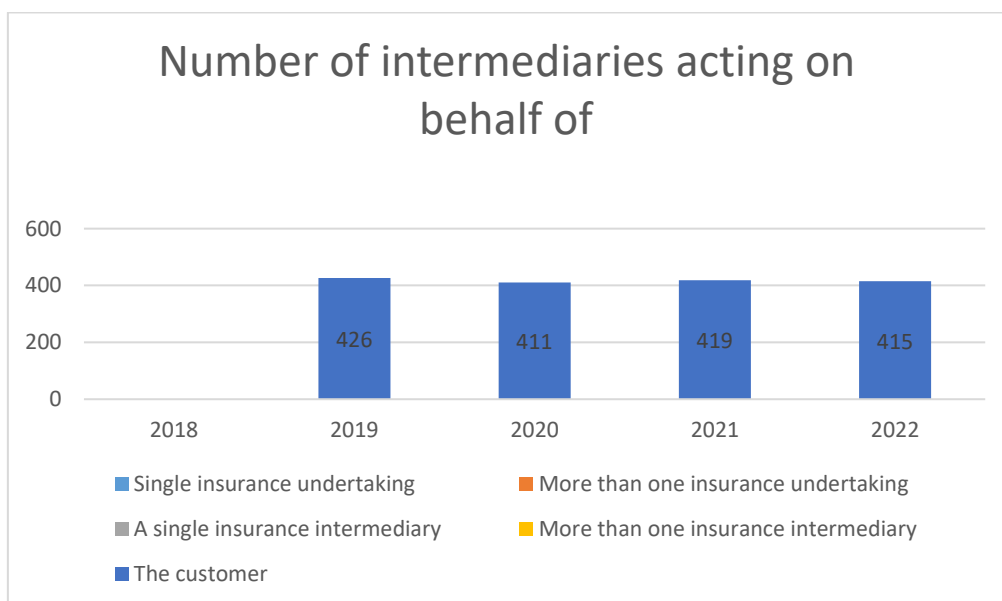
Comments provided by the NCA on the figures included in the chart above:

Natural Persons are Personal Companies.

Online registration system:

Approximately 70% of Greece's startups are supported via an online registration system. This procedure lasts 5 days under normal conditions (including the verification of supporting documents). The Single Information Point for Active Insurance Intermediaries is updated in real time when a registration is completed.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



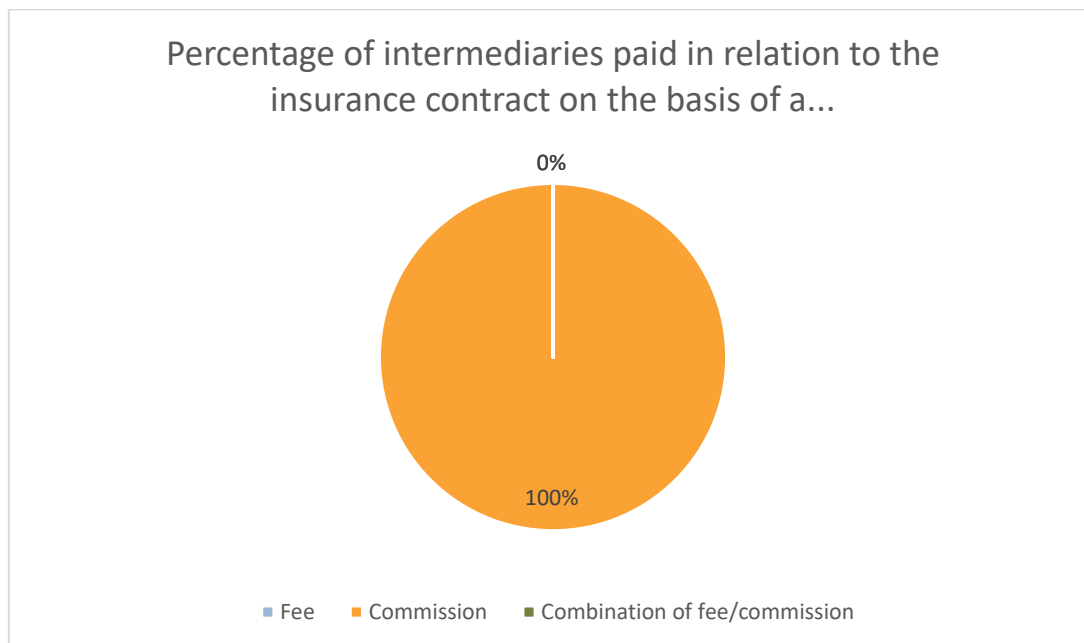
Comments provided by the NCA on the figures included in the chart above:

We do not have the information to separate Number of insurance intermediaries acting on behalf of a single insurance undertaking and number of insurance intermediaries acting on more than one insurance undertaking.

Although the sum of the number of insurance intermediaries acting on behalf of a single insurance undertaking and the number of insurance intermediaries acting on more than one insurance undertaking for 2021 is 16953 and for 2022 is 16749

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:

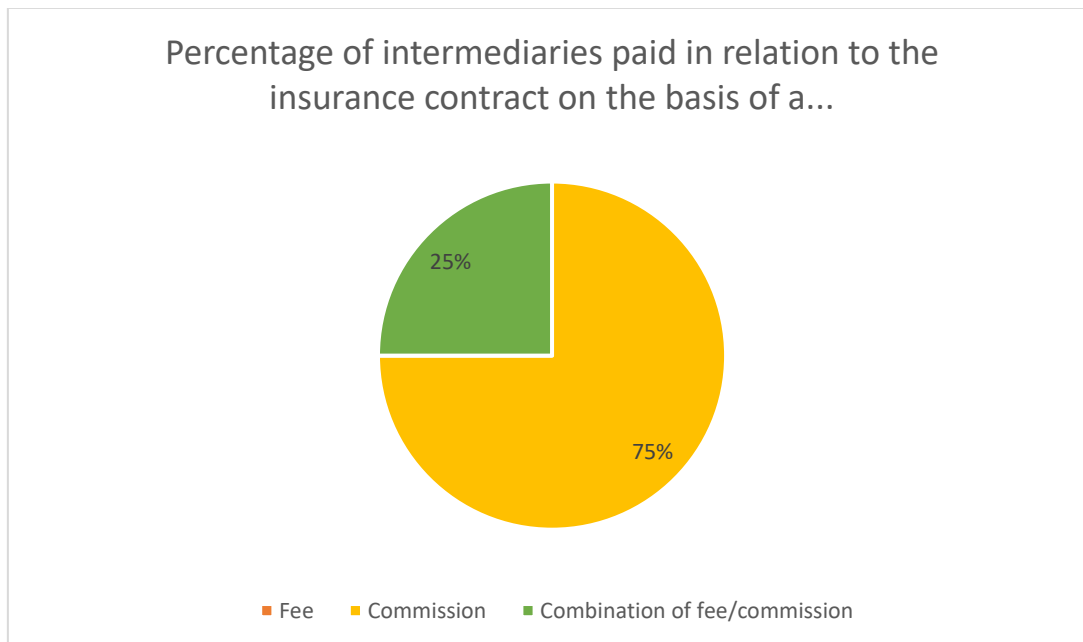
According to UHC :



Comments provided by the NCA on the figures above :

All insurance agents and coordinators of insurance agents (as they will be reported by the Union of Hellenic Chambers of Commerce) are paid on the basis of a commission from insurance undertakings. The insurance broker can receive either a commission from the insurance undertakings or/and a fee from the customer in accordance with a written contract between them, but the fee payment is not a common practice in our market.

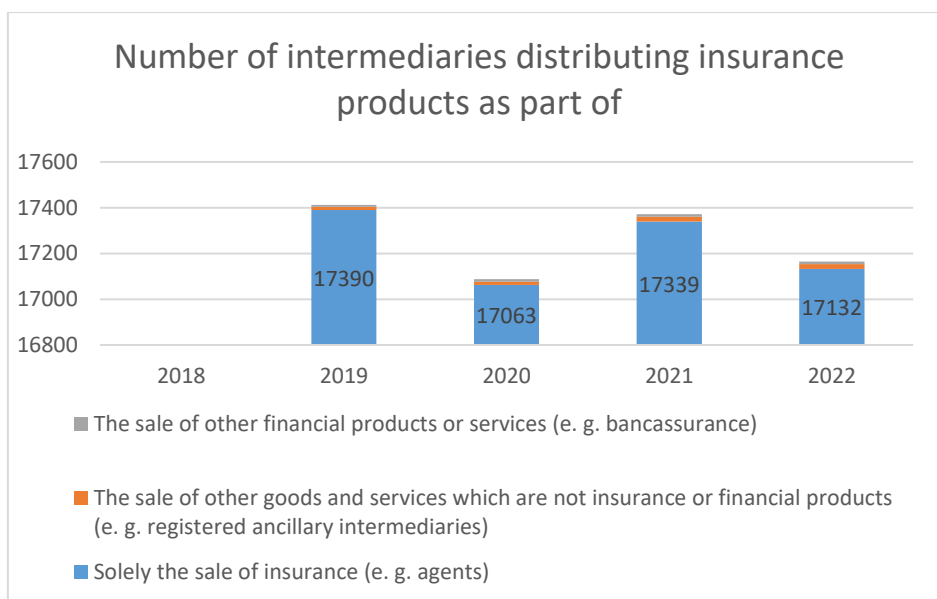
According to BOG:



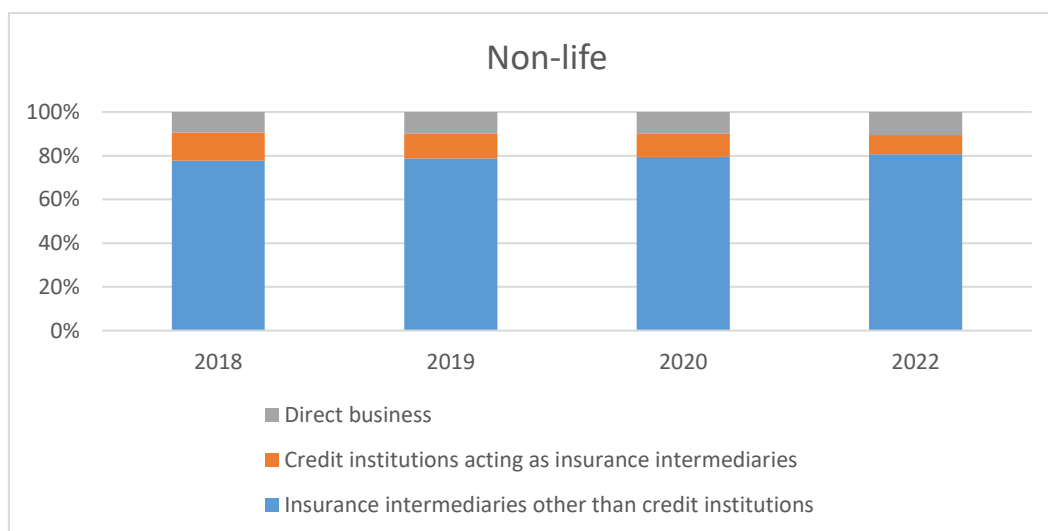
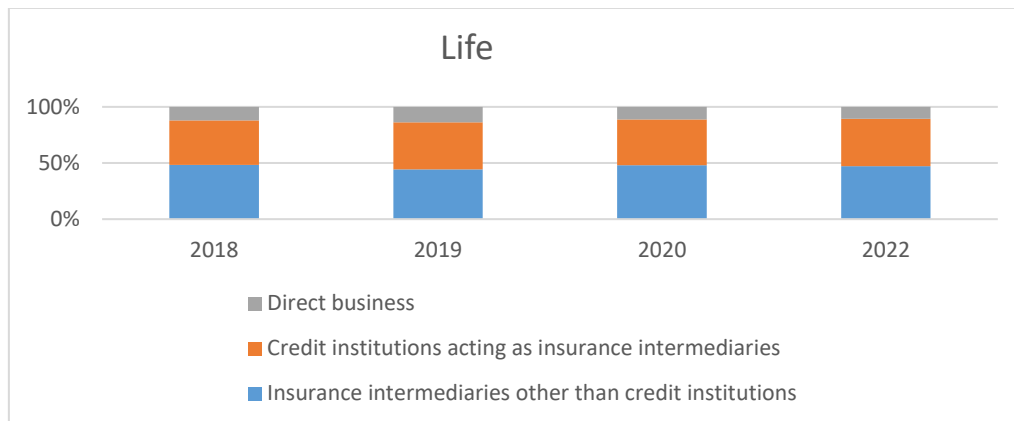
Comments provided by the NCA on the figures above :

According to the greek legislation only insurance intermediaries acting on behalf of the customer are paid directly by the customer. From our experience only 25% is taking advantage of this opportunity. All the other type of intermediaries are referring to Commission.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



GWP split by distribution channels:



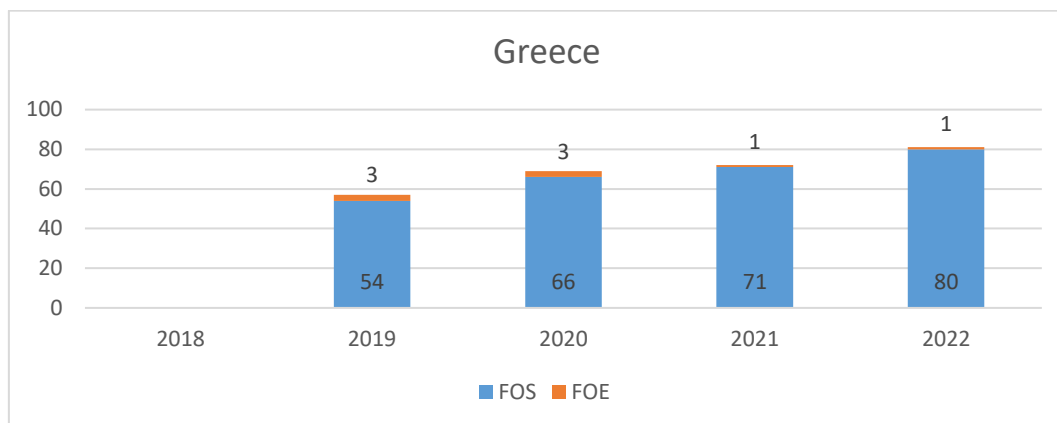
Comments provided by the NCA on the figures included in the charts above:

Source of information : Greek Insurance Undertakings

Comments provided by the NCA on the data above:

Sales are generated mainly from traditional, in person distribution and 11 out of 36 greek insurance undertakings distribute also directly selected products online (via websites) but they did not provide specific figures. There are also insurance intermediaries that distribute online, but this amount of gross written premiums is not reported separately, as it is included in the amount written via intermediaries.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁵²

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	15	0	15
<i>Belgium</i>	24	1	25
<i>Bulgaria</i>	43	0	43
<i>Cyprus</i>	53	0	53
<i>Croatia</i>	11	0	11
<i>Czech Republic</i>	22	0	22
<i>Denmark</i>	10	0	10
<i>Estonia</i>	23	0	23
<i>Finland</i>	18	0	18
<i>France</i>	21	0	21
<i>Germany</i>	20	0	20
<i>Greece</i>	0	0	0
<i>Hungary</i>	20	0	20
<i>Iceland</i>	5	0	5
<i>Ireland</i>	22	0	22
<i>Italy</i>	31	0	31

⁵² The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Latvia</i>	<i>18</i>	<i>0</i>	<i>18</i>
<i>Liechtenstein</i>	<i>5</i>	<i>0</i>	<i>5</i>
<i>Lithuania</i>	<i>12</i>	<i>0</i>	<i>12</i>
<i>Luxembourg</i>	<i>11</i>	<i>0</i>	<i>11</i>
<i>Malta</i>	<i>23</i>	<i>0</i>	<i>23</i>
<i>Netherlands</i>	<i>21</i>	<i>0</i>	<i>21</i>
<i>Norway</i>	<i>7</i>	<i>0</i>	<i>7</i>
<i>Poland</i>	<i>26</i>	<i>0</i>	<i>26</i>
<i>Portugal</i>	<i>24</i>	<i>0</i>	<i>24</i>
<i>Romania</i>	<i>32</i>	<i>0</i>	<i>32</i>
<i>Slovakia</i>	<i>7</i>	<i>0</i>	<i>7</i>
<i>Slovenia</i>	<i>20</i>	<i>0</i>	<i>20</i>
<i>Spain</i>	<i>27</i>	<i>0</i>	<i>27</i>
<i>Sweden</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Total EEA</i>	<i>571</i>	<i>1</i>	<i>572</i>

Additional information not covered above :

An insurance undertaking mentioned that after the implementation of the IDD there are no material changes, at a market level, concerning distribution channels and/or remuneration structure. However, a tendency for market concentration can be seen, mainly due to the stricter regulatory framework and the imperative need for IT developments, which lead to increased operational costs, marginally affordable by small brokerage entities.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022 :

There are not any new statutory powers received for the implementation of IDD since 2022. However, BoG plans to incorporate mystery shopping to its statutory powers.

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

Bank of Greece is currently sufficiently empowered to do proper conduct of business supervision. However, the only area (among the above-mentioned tasks 1-5) that is not empowered to supervise is the “Registration of intermediaries” because, according to the national legislation, it is another’s authority responsibility/task.

HUNGARY

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁵³	9,689	2.1%
(Re)insurance GWP (in million) ⁵⁴	3,562.353	0.3%
Number of (re)insurance undertakings ⁵⁵	22	1.3%
Number of registered insurance intermediaries	45376	5.2%

National competent authority:

Magyar Nemzeti Bank

⁵³ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

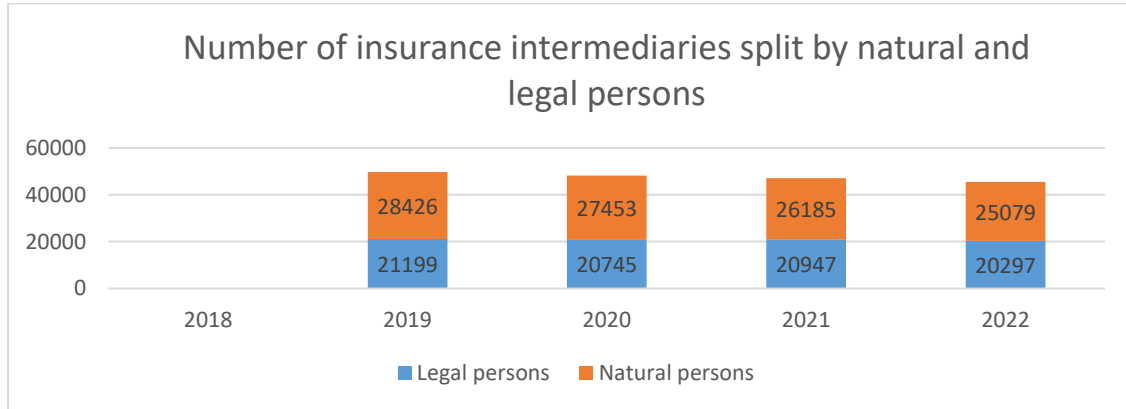
⁵⁴ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁵⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



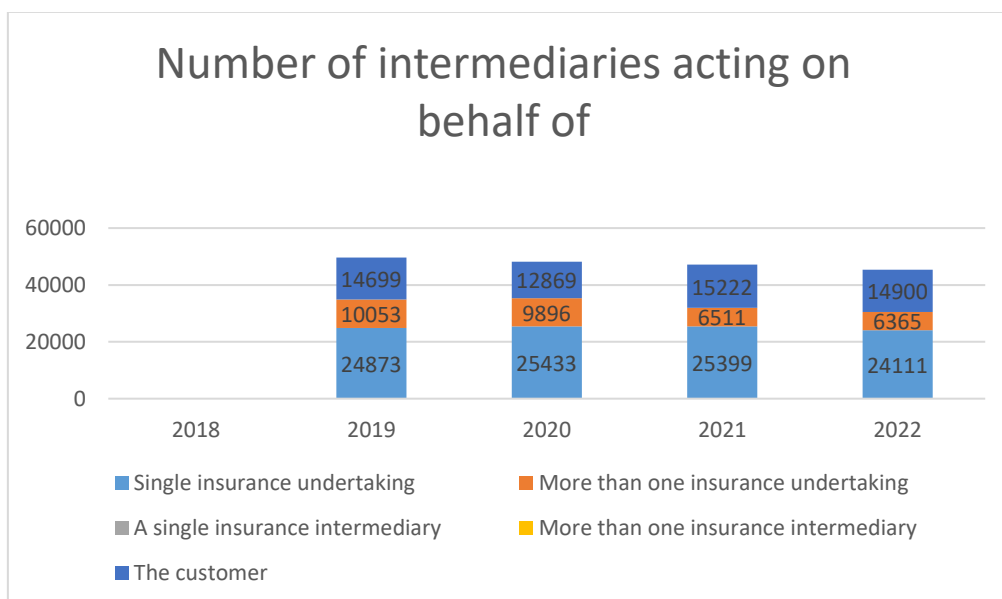
Comments provided by the NCA on the figures included in the chart above:

The natural persons are mostly employed with agency contracts, that is the reason of the high number of legal persons.

Online registration system:

In Hungary, the National Bank of Hungary has an online registration system called ERA (Electronic System For Receiving Authenticated Data). The system allows the intermediaries to registrate and communicate with the National Bank of Hungary. The information on the number of registered insurance and reinsurance intermediaries have to be updated immediately, but at least 2 working days after the change has happened.

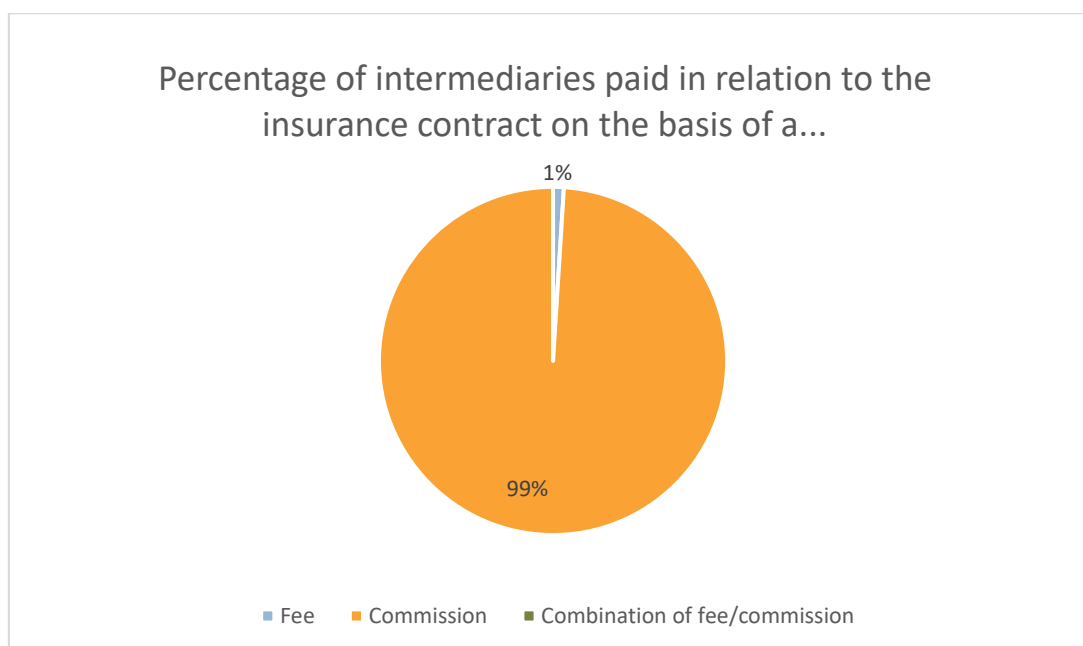
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

The category of insurance intermediaries acting on behalf of more than one insurance intermediary is banned in Hungary.

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figure above :

99% - on the basis of a commission of any kind, that is the remuneration included in the insurance premium

1% - on the basis of a fee, that is the remuneration paid directly by the customer

The relevant part of the Hungarian insurance law (Act LXXXVIII of 2014 - on the Business of Insurance):

2. Definitions

49. 'commission' shall mean any form of remuneration, comprising a specific percentage of the insurance premium, provided to the insurance intermediary in exchange for his services for brokering an insurance contract, or in connection with the performance of the insurance contract he has brokered or maintained, also if the contract is retained for a designated period of time, directly by the insurance company underwriting the risk;

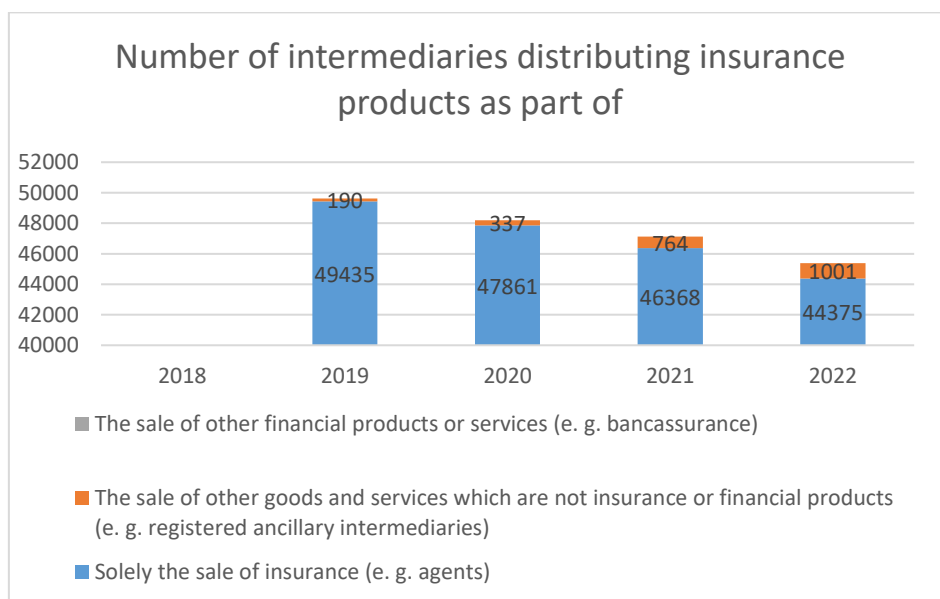
Section 375/B

(1) Tied insurance intermediaries shall be entitled to commission in accordance with this Act.

(2) Independent insurance intermediaries shall be remunerated directly by the employer for intermediary services on the basis of the relevant agreement, in particular when the assignment covers consultancy exclusively, or the mediation of insurance contracts whose premium does not cover remuneration payable by the insurance company directly, or covers only a part of such remuneration.

(3) If the independent insurance intermediary has an agreement with the principal - in accordance with the information he has provided - not to be remunerated directly as provided for in Subsection (2), or being remunerated in part only, he may receive indirect remuneration - comprising a specific percentage of the insurance premium - from the insurance company that underwrites the insurance risk covered by the contract he has mediated

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

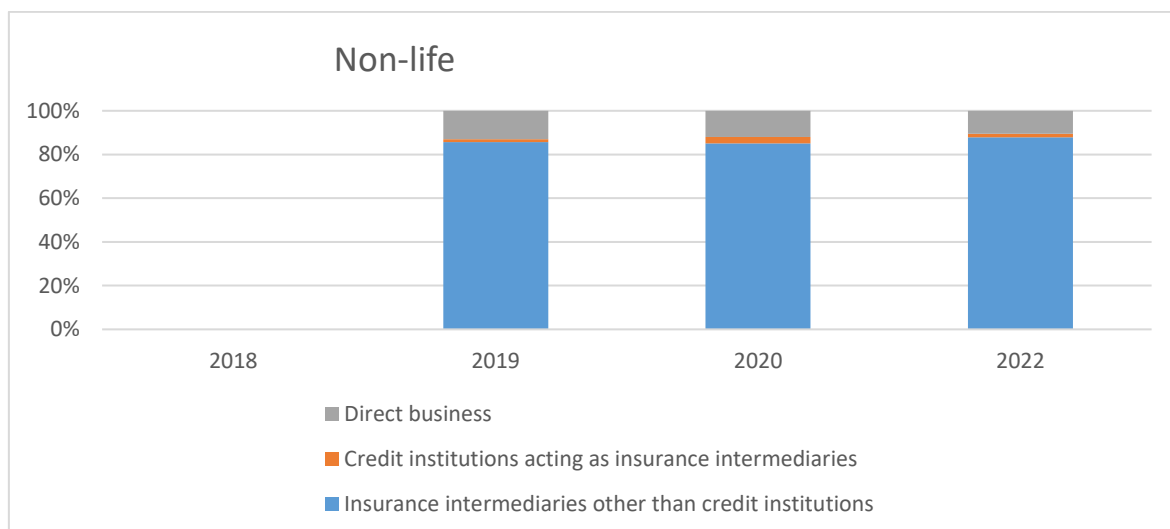
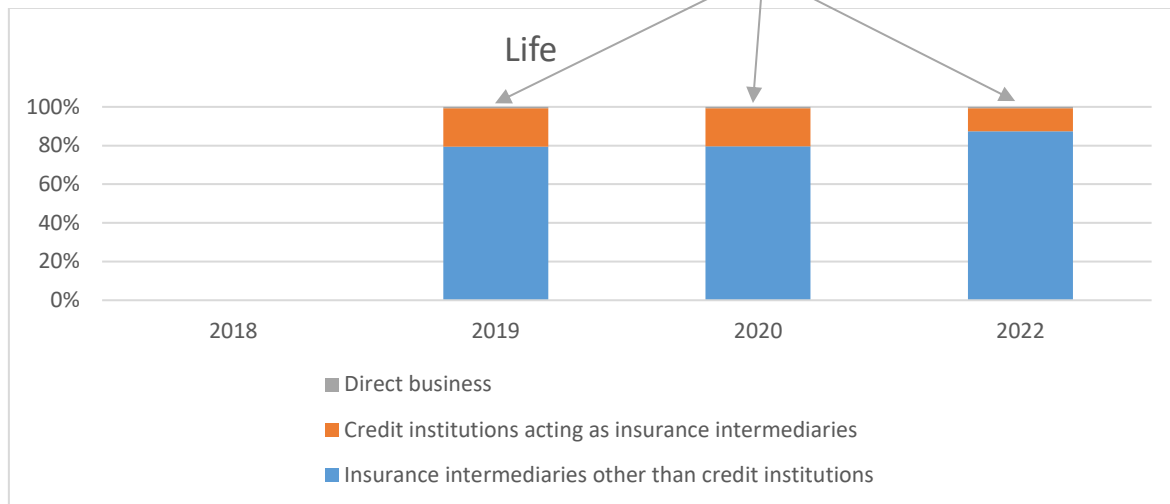


Comments provided by the NCA on the figures included in the chart above:

We do not have data in this type on the classification concerning the sale of other financial products or services (e.g., bancassurance)). The sale is always made through a licensed intermediary.

„Direct business“ represents 0.6% (2019) and 0.7% (2020, 2022) of the overall GWP (not clearly visible in the chart)

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

In the chart above we could provide data on premiums of new contracts by distribution channel

The source of data is 42Y24 template of Supplementary National Reporting 2022.

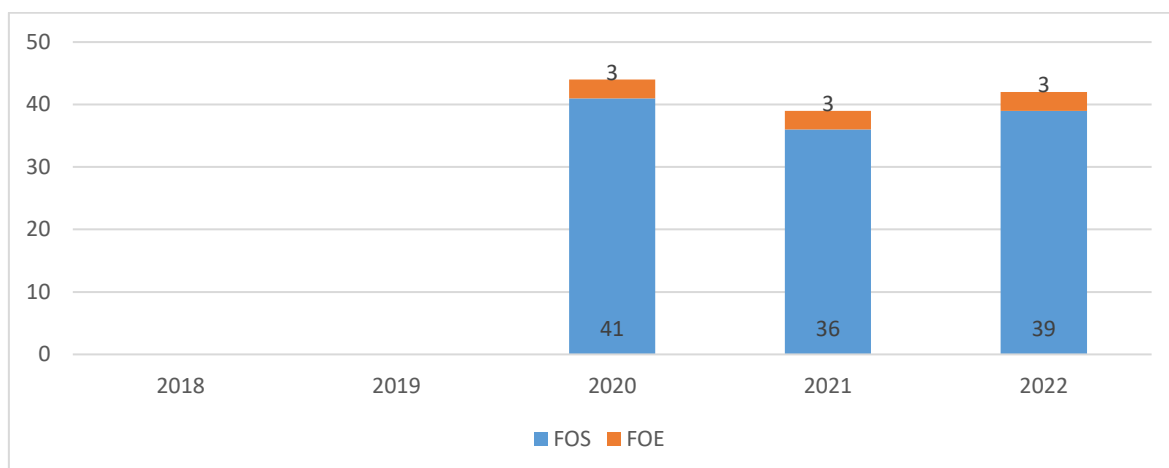
The National Bank of Hungary have revised the figures for the previous years due to a review of the classification methodology.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

Comments provided by the NCA on the data above:

The data is calculated from national data reporting.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

There is two domestic insurance intermediaries with passport to operate in another MS under FOE have also passport to operate in another MS under FOS.

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁵⁶

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	20	0	20
<i>Belgium</i>	11	0	11
<i>Bulgaria</i>	11	0	11
<i>Cyprus</i>	9	0	9
<i>Croatia</i>	8	0	8
<i>Czech Republic</i>	16	1	17
<i>Denmark</i>	10	0	10
<i>Estonia</i>	10	0	10
<i>Finland</i>	10	0	10

⁵⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>France</i>	<i>10</i>	<i>0</i>	<i>10</i>
<i>Germany</i>	<i>17</i>	<i>0</i>	<i>17</i>
<i>Greece</i>	<i>10</i>	<i>0</i>	<i>10</i>
<i>Hungary</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Iceland</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Ireland</i>	<i>11</i>	<i>0</i>	<i>11</i>
<i>Italy</i>	<i>10</i>	<i>0</i>	<i>10</i>
<i>Latvia</i>	<i>10</i>	<i>0</i>	<i>10</i>
<i>Liechtenstein</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Lithuania</i>	<i>10</i>	<i>0</i>	<i>10</i>
<i>Luxembourg</i>	<i>8</i>	<i>0</i>	<i>8</i>
<i>Malta</i>	<i>8</i>	<i>0</i>	<i>8</i>
<i>Netherlands</i>	<i>11</i>	<i>0</i>	<i>11</i>
<i>Norway</i>	<i>2</i>	<i>0</i>	<i>2</i>
<i>Poland</i>	<i>19</i>	<i>1</i>	<i>20</i>
<i>Portugal</i>	<i>9</i>	<i>0</i>	<i>9</i>
<i>Romania</i>	<i>25</i>	<i>1</i>	<i>26</i>
<i>Slovakia</i>	<i>25</i>	<i>0</i>	<i>25</i>
<i>Slovenia</i>	<i>15</i>	<i>0</i>	<i>15</i>
<i>Spain</i>	<i>11</i>	<i>0</i>	<i>11</i>
<i>Sweden</i>	<i>10</i>	<i>0</i>	<i>10</i>
<i>Total EEA</i>	<i>328</i>	<i>3</i>	<i>331</i>

General qualitative description of the “patterns of cross-border activity”:

MNB do not have any further information related to the “patterns of cross-border activity.”

Information on powers of the NCA

New statutory powers to implement the IDD received since 2022

Not directly related to IDD, but helping its application (enhancing investor and customer protection) the MNB may order the rendering of electronic information inaccessible temporarily as provisional protective measure from 15 January 2022, based on 49/D(4), 91/A and 93/A of the Act on MNB

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

MNB has sufficiently empowered to do proper conduct of business supervision.

ICELAND

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁵⁷	376.248	0.08%
(Re)insurance GWP (in million) ⁵⁸	572,893	0.04%
Number of (re)insurance undertakings ⁵⁹	8	0.5%
Number of registered insurance intermediaries	54	0.01%

National competent authority:

Central Bank of Iceland

⁵⁷ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

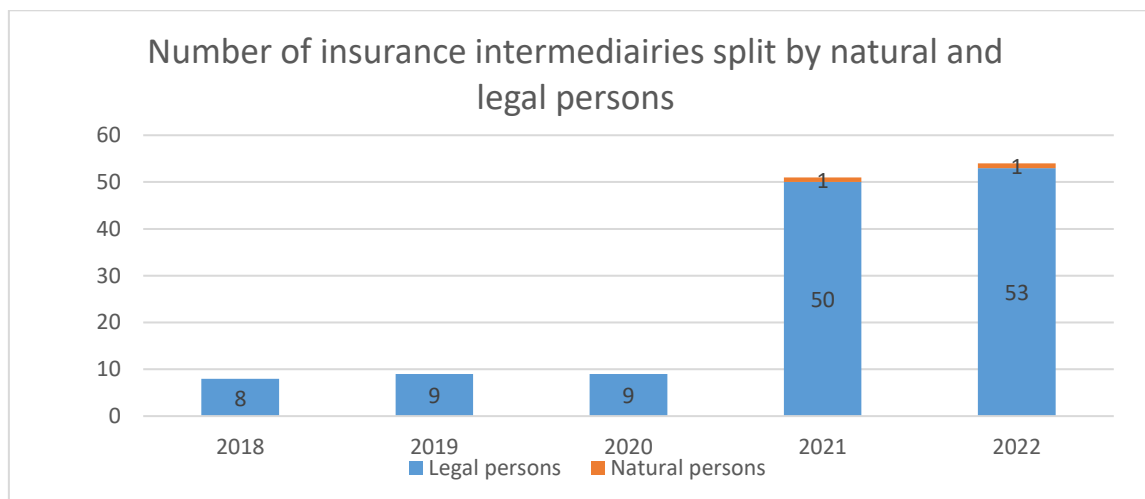
⁵⁸ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁵⁹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



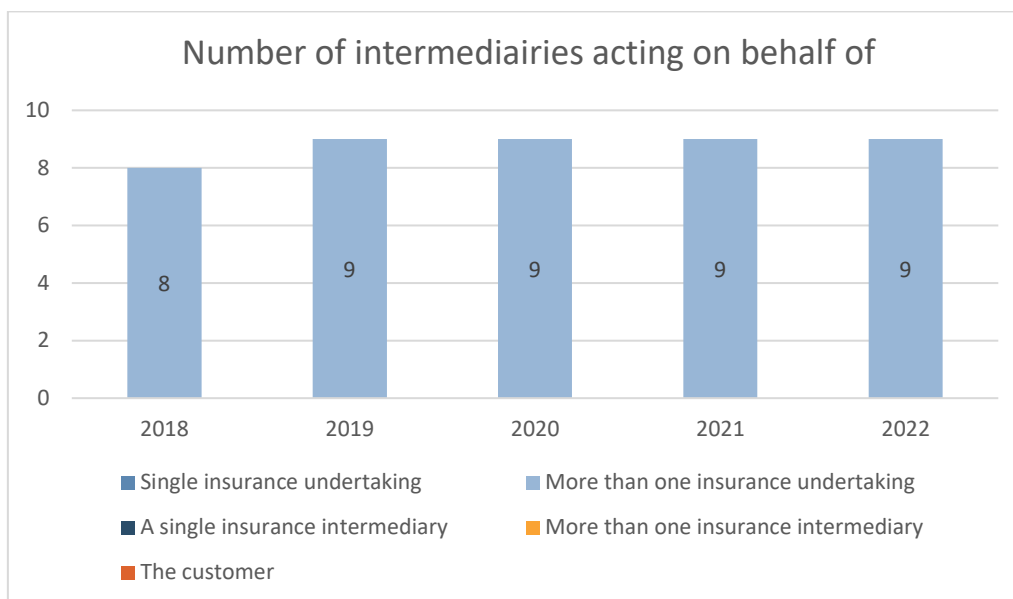
Comments provided by the NCA on the figures included in the chart above:

Full list is available at the following website link : <https://www.fme.is/eftirlit/eftirlitsskyld-starfsemi/dreifingaradilar-vatrygginga/> 2021 and 2022 include ancillary insurance intermediaries

Online registration system:

The Financial Supervisory Authority merged into the Central Bank of Iceland in January 2020 our webpage have been undergoing some changes. Unfortunately, the online registration system is not up and running yet. Since the IDD was implemented into Icelandic law only one insurance intermediary received a licence and that was in March 2020.

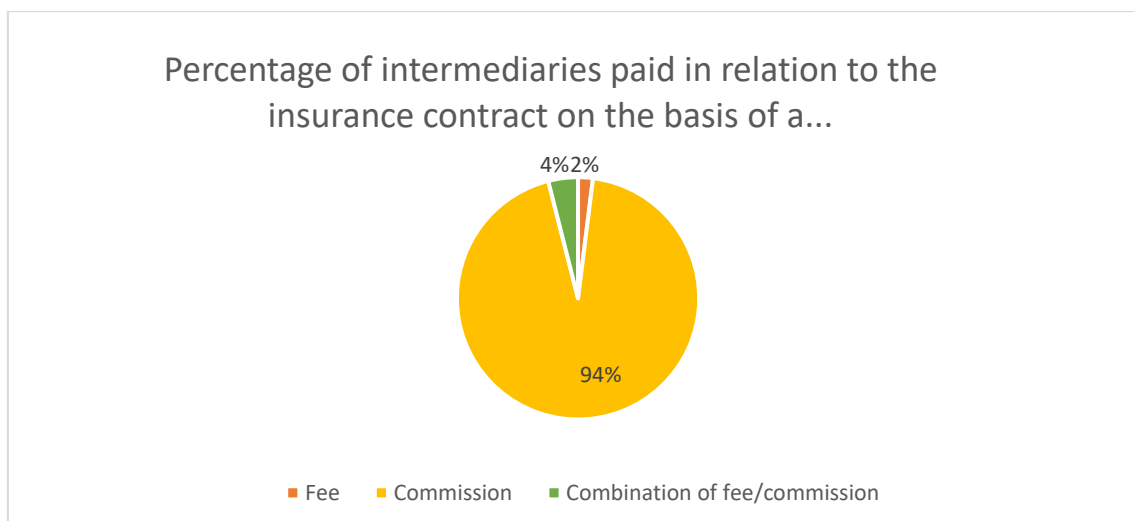
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

Full list is available here: <https://www.fme.is/eftirlit/eftirlitsskyld-starfsemi/dreifingaradilar-vatrygginga/>

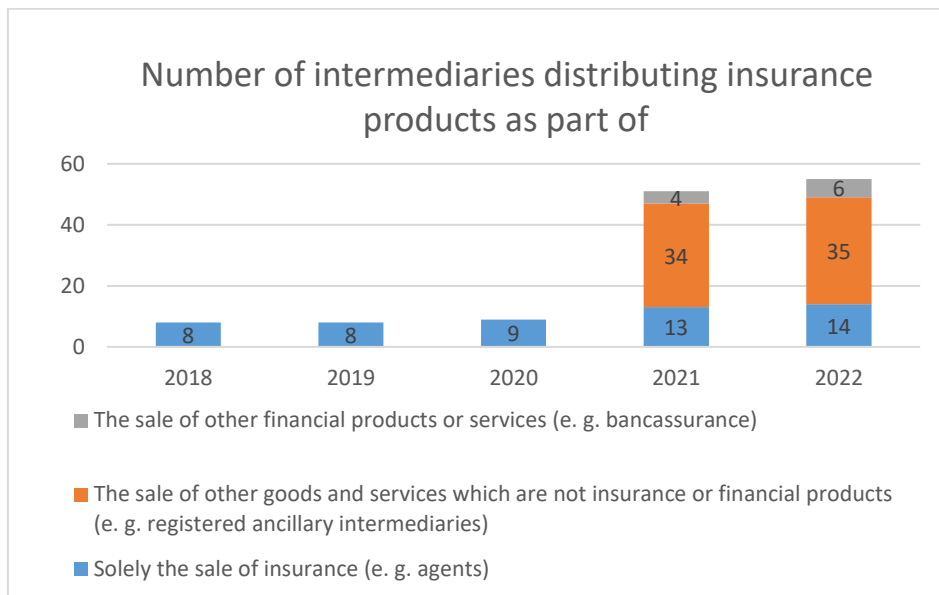
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

This split is based on number of intermediaries (total 55), not by premium volume. Out of nine licenced insurance intermediaries there is only one that receives their remuneration paid directly by the customer and two that operate on a combination of fee and commission. We assume that insurance brokers / agents and auxiliary insurance intermediaries (total 46) received their remuneration as a part of the insurance premium (commission).

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

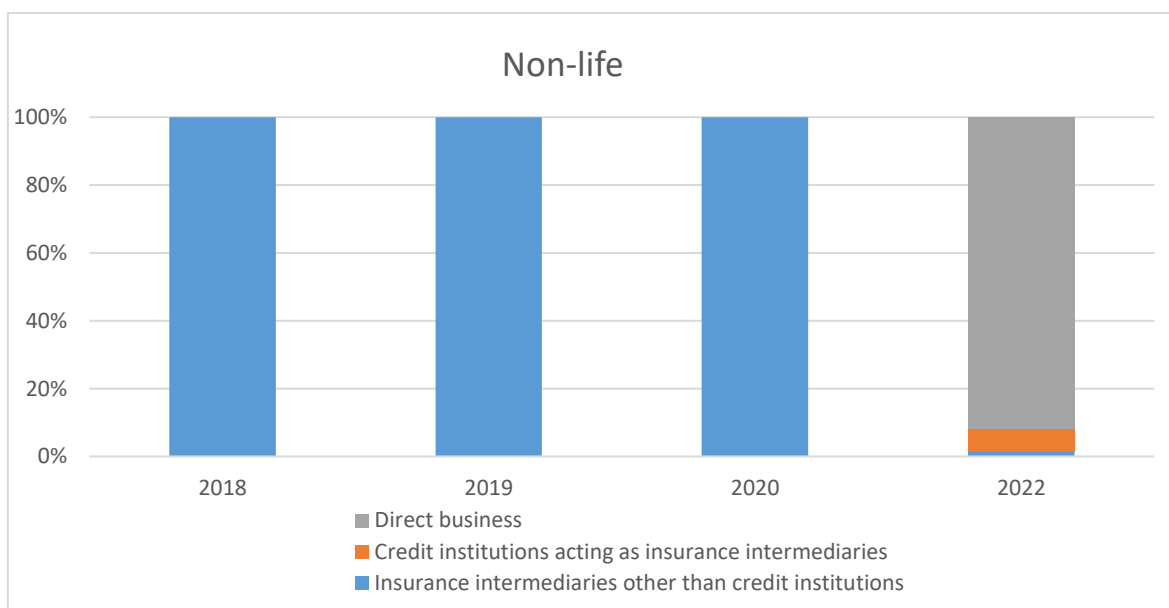
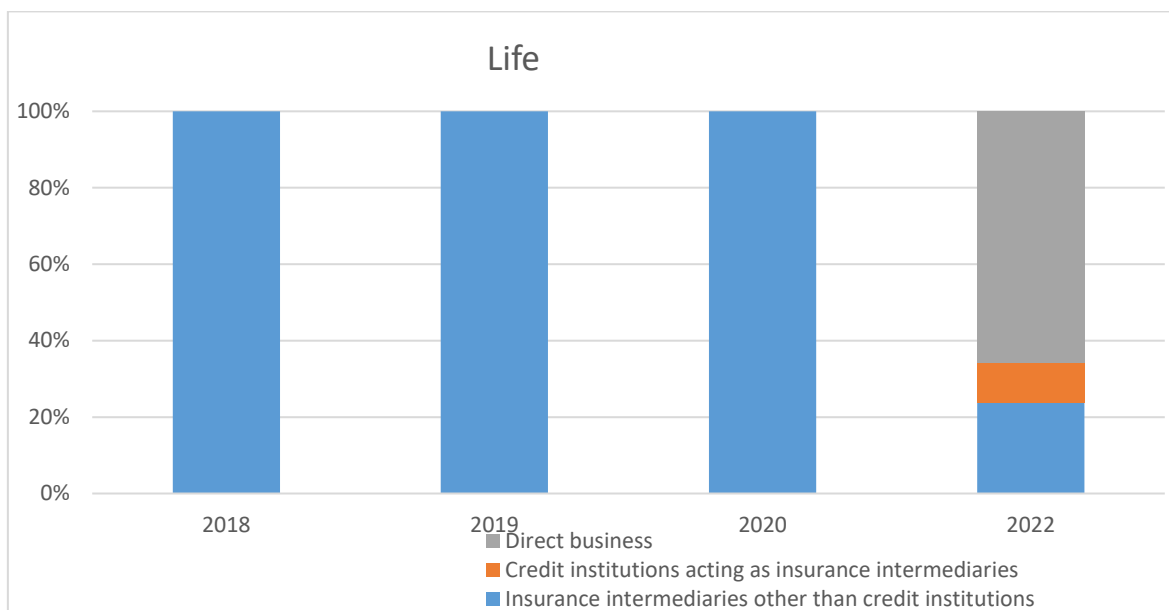


Comments provided by the NCA on the figures included in the chart above:

Full list is available here: <https://www.fme.is/eftirlit/eftirlitsskyld-starfsemi/dreifingaradilar-vatrygginga/>

2021 and 2022 includes ancillary insurance intermediaries

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

Information is sourced via local reporting for all licenced intermediaries, a specific data request to relevant undertakings regarding point 2 and Solvency II reporting for total written premiums.

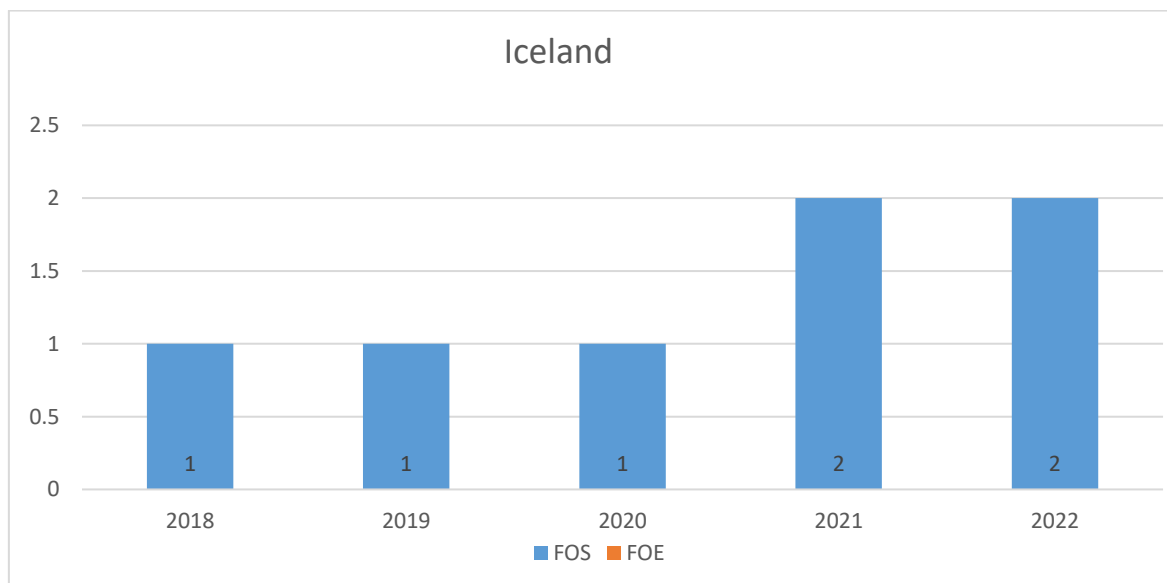
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

Online distribution varies between insurance undertakings as the quality/level of their online distribution channels are vastly different. Some undertakings offer fully automated sales via web/mobile app while others offer what is basically a form for information on insurance needs which is then completed by a natural person. The undertaking that has the most advanced online distribution (~20% market share) has seen their online sales (fully automated) gone from 0% in 2018 to about 25%. The second largest undertaking (~30%) reports that about 25% of their sales are what they would classify as online/digital. Another undertaking (~16% market share) that has also developed fully automated online / app based sales currently sells about 0,5% through the app and 4,5% through the web.

Comments provided by the NCA on the data above:

Specific data request was sent to Icelandic undertakings, which represent >95% of the domestic written premiums.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁶⁰

⁶⁰ The row “Total EEA” and the column “3. TOTAL” count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	0	0	0
<i>Belgium</i>	0	0	0
<i>Bulgaria</i>	0	0	0
<i>Cyprus</i>	0	0	0
<i>Croatia</i>	0	0	0
<i>Czech Republic</i>	0	0	0
<i>Denmark</i>	2	0	2
<i>Estonia</i>	0	0	0
<i>Finland</i>	1	0	1
<i>France</i>	0	0	0
<i>Germany</i>	1	0	1
<i>Greece</i>	0	0	0
<i>Hungary</i>	0	0	0
<i>Iceland</i>	0	0	0
<i>Ireland</i>	1	0	1
<i>Italy</i>	0	0	0
<i>Latvia</i>	0	0	0
<i>Liechtenstein</i>	0	0	0
<i>Lithuania</i>	0	0	0
<i>Luxembourg</i>	0	0	0
<i>Malta</i>	0	0	0
<i>Netherlands</i>	0	0	0
<i>Norway</i>	2	0	2
<i>Poland</i>	0	0	0
<i>Portugal</i>	0	0	0
<i>Romania</i>	0	0	0
<i>Slovakia</i>	0	0	0
<i>Slovenia</i>	0	0	0
<i>Spain</i>	0	0	0
<i>Sweden</i>	1	0	1
<i>Total EEA</i>	8	0	8

General qualitative description of the “patterns of cross-border activity”:

Limited to none cross-border activities of domestic intermediaries, no pattern has been emerging and we have not seen any increased interest of domestic entities looking to start operations via FoS or FoE.

Information on the resources of the NCA

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

It would be helpful to the FSA's supervisory procedure to be able to use mystery shopping. The FSA does not have the power (legally) to use mystery shopping in its supervision.

IRELAND

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁶¹	5,060	1.18%
(Re)insurance GWP (in million) ⁶²	102,420.675	7.5%
Number of (re)insurance undertakings ⁶³	163	9.4%
Number of registered insurance intermediaries	2583	0.3%

National competent authority:

Central Bank of Ireland

⁶¹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

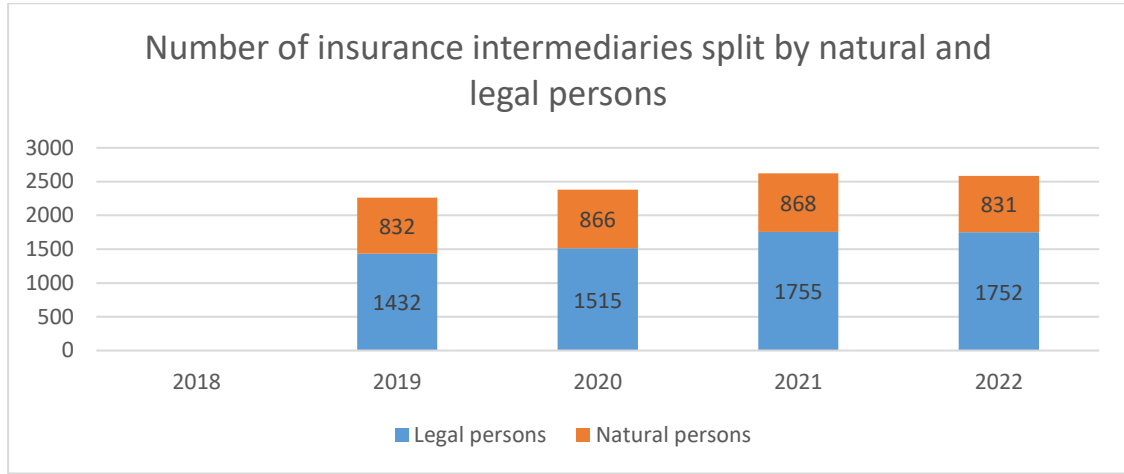
⁶² "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁶³ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



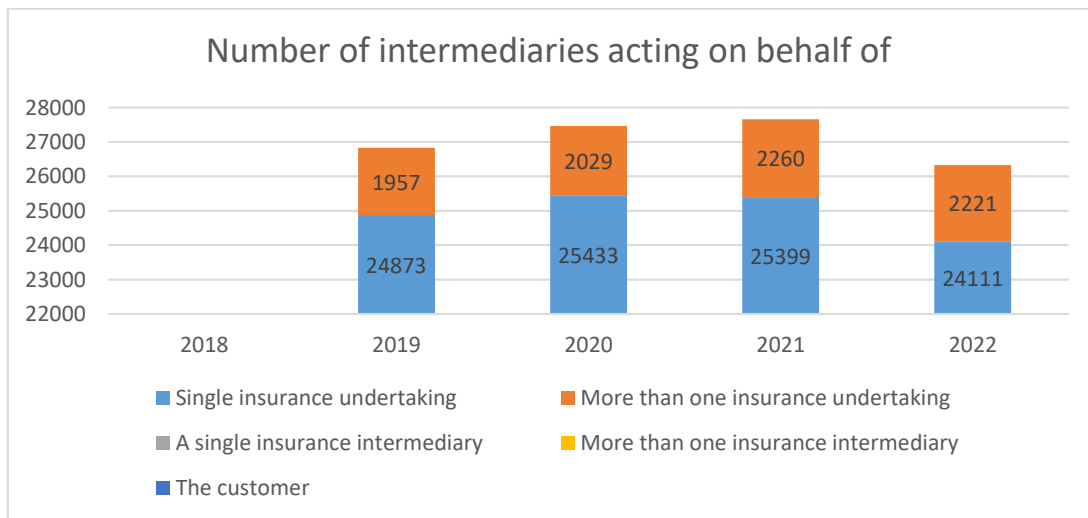
Comments provided by the NCA on the figures included in the chart above:

Data has been provided as at 31 December of each year. Note the number of intermediaries includes Insurance, Reinsurance and Ancillary Insurance Intermediaries and tied agents.

Online registration system:

The registration form for insurance intermediaries is available on the Central Bank's website. It is completed by firms and submitted, with any relevant attachments, via a secure file transfer system. Individual Questionnaires for proposed Pre-Approval Controlled Function role holders are completed electronically and submitted via the Central Bank's online reporting system. Information on the number of registered insurance intermediaries is updated continuously on our internal records. These updated details are reflected in the public register every 2 weeks.

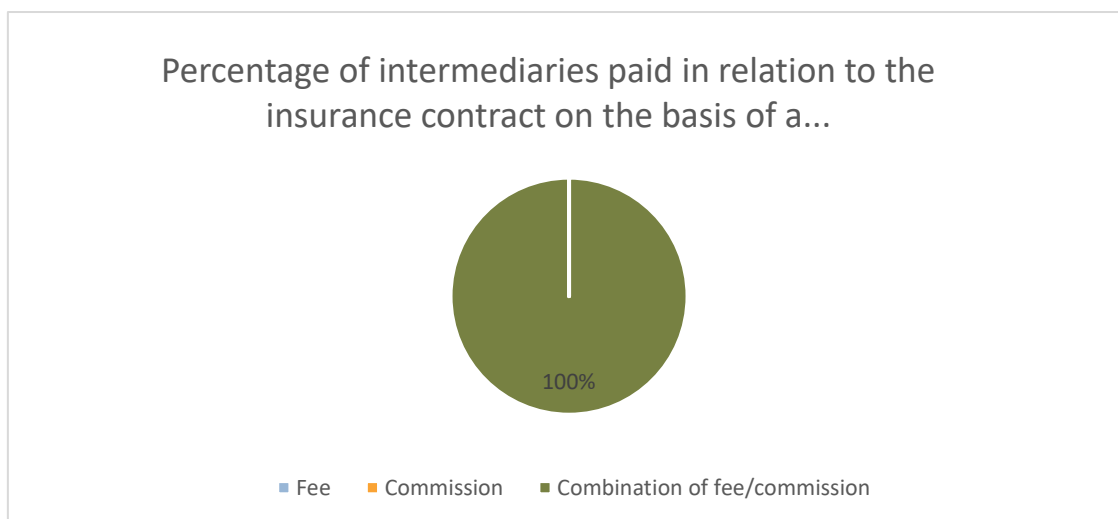
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

Data has been provided as at 31 December of each year.

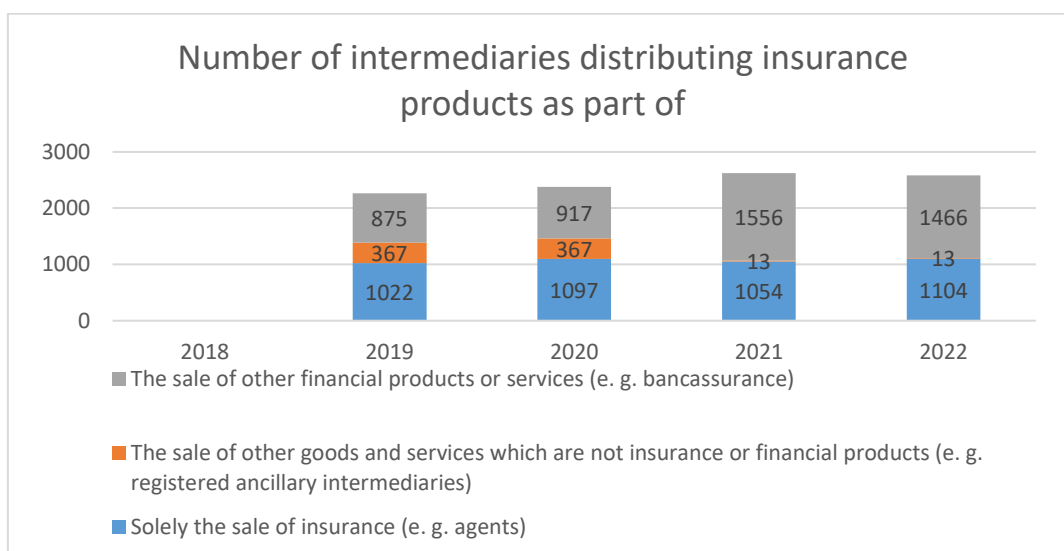
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

Data has been provided as at 31 December of each year.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the figures included in the chart above:

Data has been provided as at 31 December of each year.

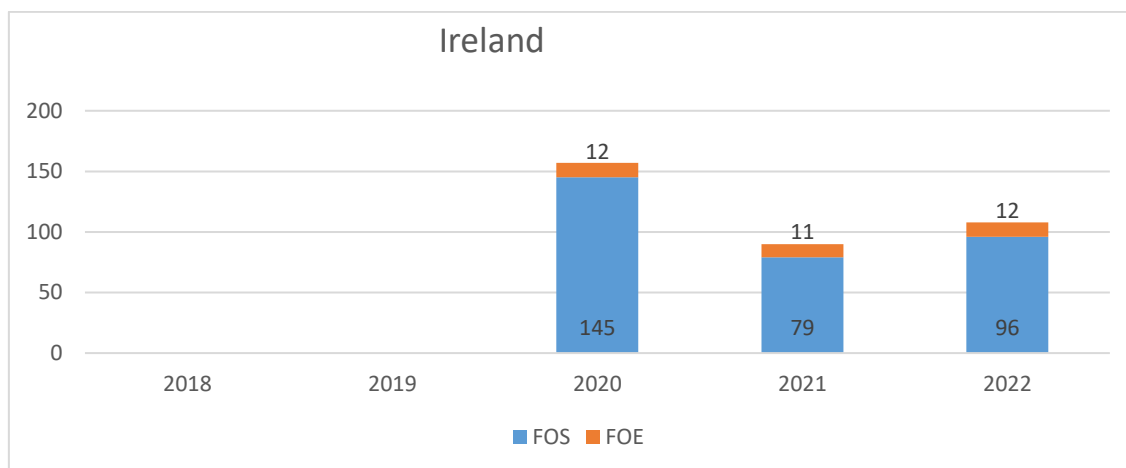
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

The Central Bank is prudentially responsible for undertakings which operate across Europe (via freedom to provide services and freedom of establishment) and globally (for the reinsurance market), leading to a very diverse range of distribution models for the undertakings we supervise. The Central Bank has not sought to collect data on the insurance distribution channels for all insurance companies operating in all countries.

On a domestic basis, we collect some data on insurance distribution for the non-life sector. This is collected via a national specific template that is only provided by the main domestic non-life insurers and so does not constitute a view of the entire market.

In general we observe a gradual increase in the proportion sold through intermediaries (including brokers) over the last 5 years for the sample of insurers considered.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁶⁴

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	46	0	46
<i>Belgium</i>	57	0	57
<i>Bulgaria</i>	40	0	40
<i>Cyprus</i>	47	1	48

⁶⁴ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Croatia</i>	41	0	41
<i>Czech Republic</i>	42	0	42
<i>Denmark</i>	56	0	56
<i>Estonia</i>	42	0	42
<i>Finland</i>	45	1	45
<i>France</i>	66	5	70
<i>Germany</i>	64	2	65
<i>Greece</i>	49	1	49
<i>Hungary</i>	42	0	42
<i>Iceland</i>	29	0	29
<i>Ireland</i>	<i>n/a</i>	<i>n/a</i>	
<i>Italy</i>	52	0	52
<i>Latvia</i>	42	0	42
<i>Liechtenstein</i>	31	0	31
<i>Lithuania</i>	42	0	42
<i>Luxembourg</i>	47	1	47
<i>Malta</i>	51	0	51
<i>Netherlands</i>	56	1	56
<i>Norway</i>	38	0	38
<i>Poland</i>	50	1	50
<i>Portugal</i>	50	1	50
<i>Romania</i>	41	0	41
<i>Slovakia</i>	39	0	39
<i>Slovenia</i>	41	0	41
<i>Spain</i>	62	1	62
<i>Sweden</i>	48	0	48
<i>Total EEA</i>	1356	15	1371

Comments provided by the NCA on the figures included in the table above:

The vast majority of Irish insurance intermediaries passport on an FOS basis and most are small to medium in size. Limitations: As the information is manually extracted, it is provided on a best efforts basis.

General qualitative description of the “patterns of cross-border activity”:

Cross border notification numbers have remained relatively stable over the last couple of years.

ITALY

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁶⁵	59,030	13%
(Re)insurance GWP (in million) ⁶⁶	135,019.570	9.9%
Number of (re)insurance undertakings ⁶⁷	87	5.0%
Number of registered insurance intermediaries	235404	27.2%

National competent authority:

Institute for the Supervision of Insurance (IVASS)

⁶⁵ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

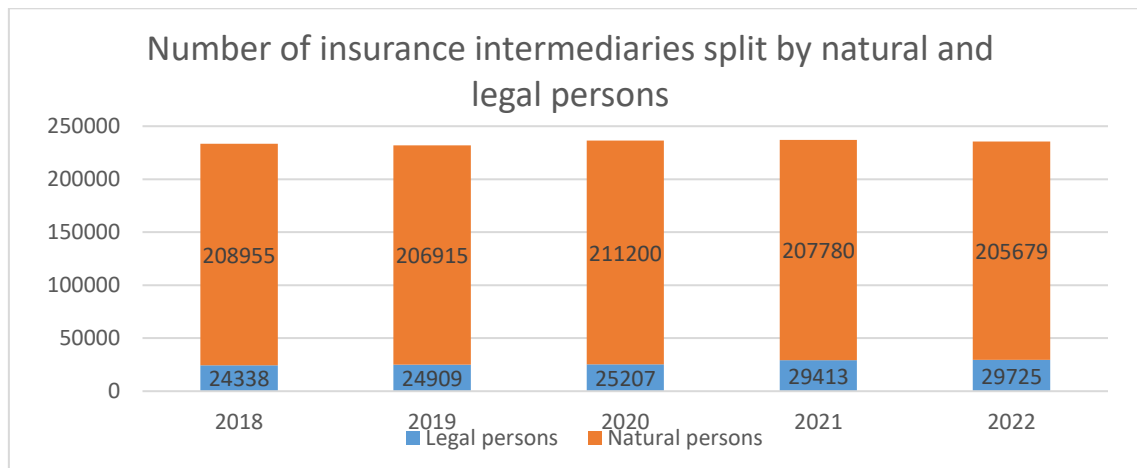
⁶⁶ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁶⁷ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

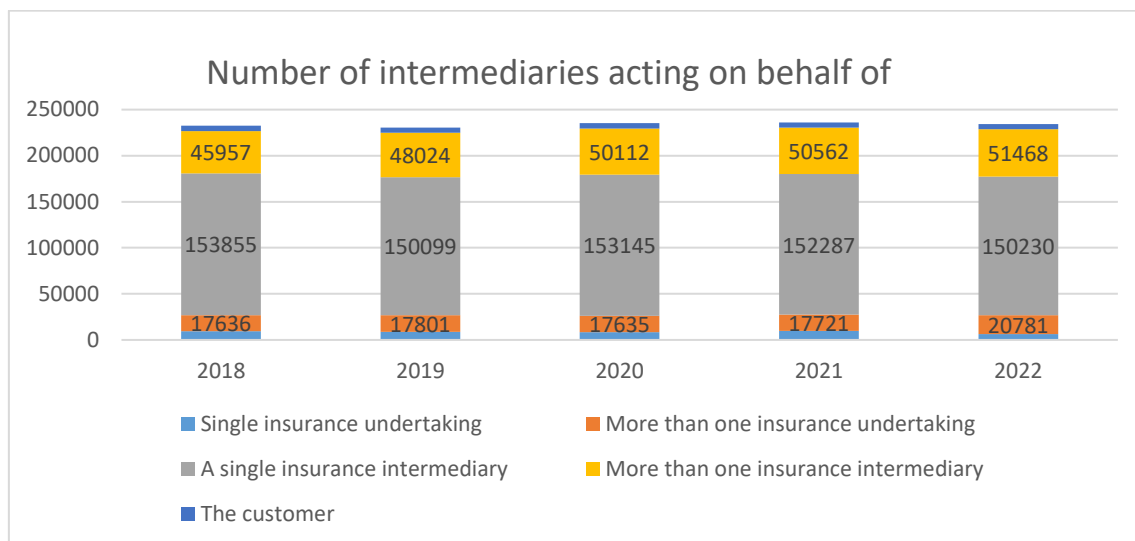
Please, note that the category of natural persons includes those individuals who act as representatives of one or more legal persons.

The data also includes the collaborators of the intermediaries enrolled in the section A (agents), B (broker), and D (banks and financial entities) of the Register of Insurance, reinsurance and ancillary Insurance intermediaries (RUI).

Online registration system:

On 25 July 2023 IVASS amended the national Regulation on insurance distribution by setting up a new registration system according to which insurance and reinsurance intermediaries will be able to update their own position through a direct access to the web portal of the Register by using digital identification instruments.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:

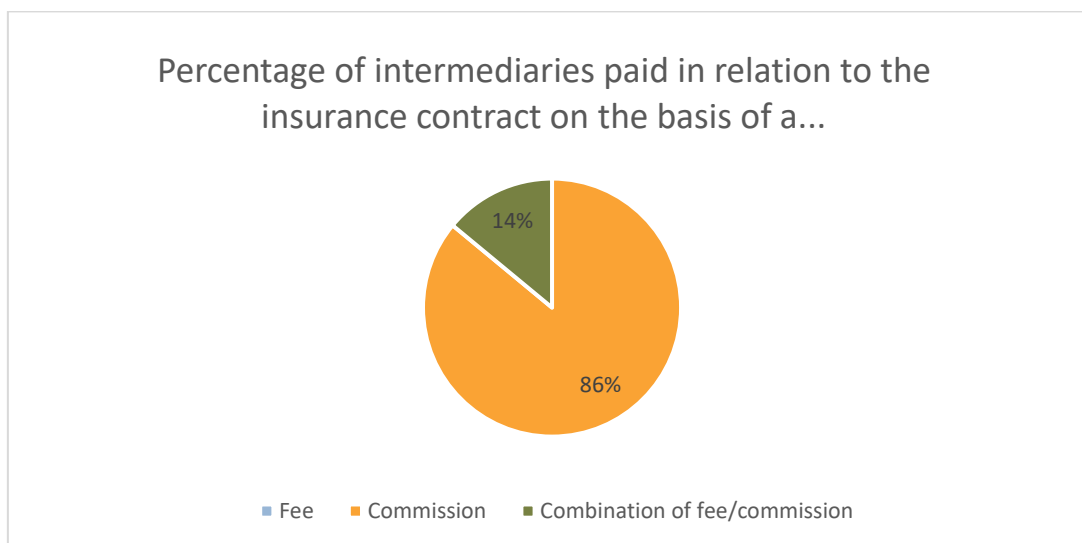


Comments provided by the NCA on the figures included in the chart above:

Please note that the total number of registered intermediaries differs from the total number above (“Registered insurance intermediaries split by natural and legal persons”) because of:

- some individuals act as representatives of one or more legal persons, so only the company was counted;
- some agents temporarily not active i.e. who should fall under the category “a single insurance undertaking” or the category “more than one insurance undertaking” but are in the process of changing insurance undertaking.

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

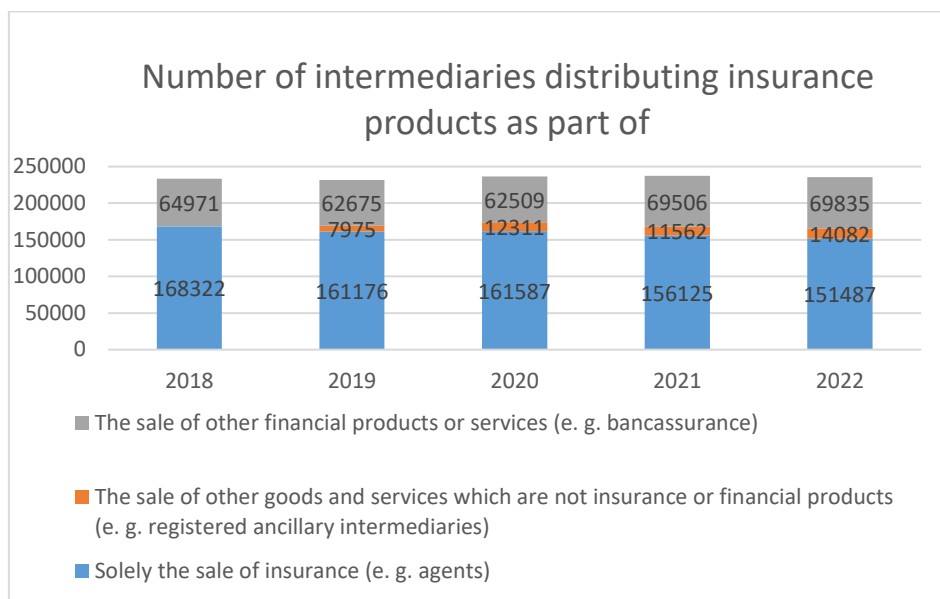
IVASS is aware of the following information on remuneration models related to each category of registered intermediaries, acquired from the national associations of industry:

- Agents: Commissions, rappels, bonus commissions
- Brokers: 3 remuneration models in Italy: i) mixed remuneration: mediation activity commissions from insurers and fees paid by consumers for managing the contract/the contractual relationship with the undertaking (e.g. claims management); ii) commissions paid by insurance undertakings; iii) commissions paid solely by large professional clients on the basis of a specific negotiation between the client and the broker.
- Direct canvassers of insurance undertakings: Commissions
- Bancassurance: commissions, bonus commissions
- Others: Commissions

The chart above has been completed by assuming as an approximation that the remuneration scheme described above applies to all intermediaries of a category.

Please note that this table does not include those intermediaries who are not active

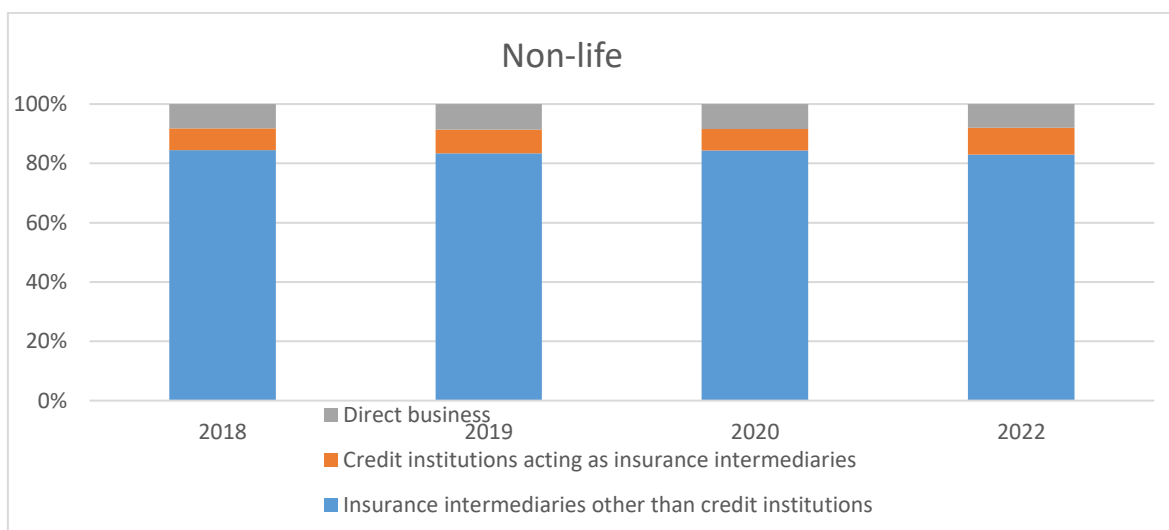
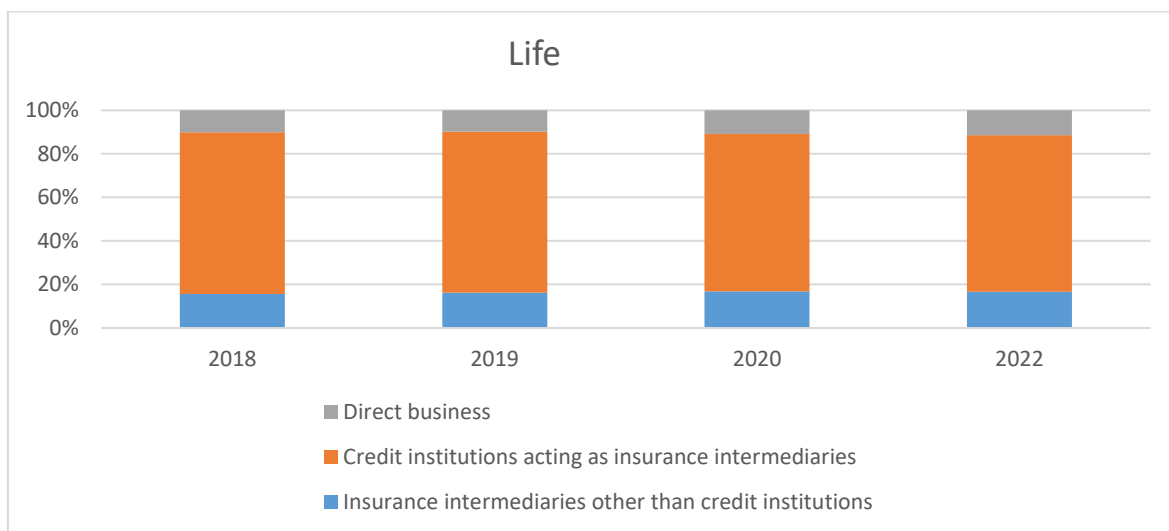
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the figures included in the chart above:

Data under the category “the sale of other goods and services which are not insurance or financial products” includes both ancillary intermediaries and ancillary collaborators; however, the number essentially refer to ancillary collaborators of other intermediaries (ancillary intermediaries were only 8 at the end of 2022). Ancillary collaborators work in particular on behalf of banking or financial entities enrolled in section D (67%), agents enrolled in section A (17%) or brokers in section B (11%) of the RUI or operating in Italy under the European passport regime (5%). Most of ancillary collaborators are car dealerships.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

The source is the quarterly data submissions from undertakings and are published quarterly by IVASS in its Statistical Bulletin. It contains a summary of the data collected by the Authority on the insurance market.

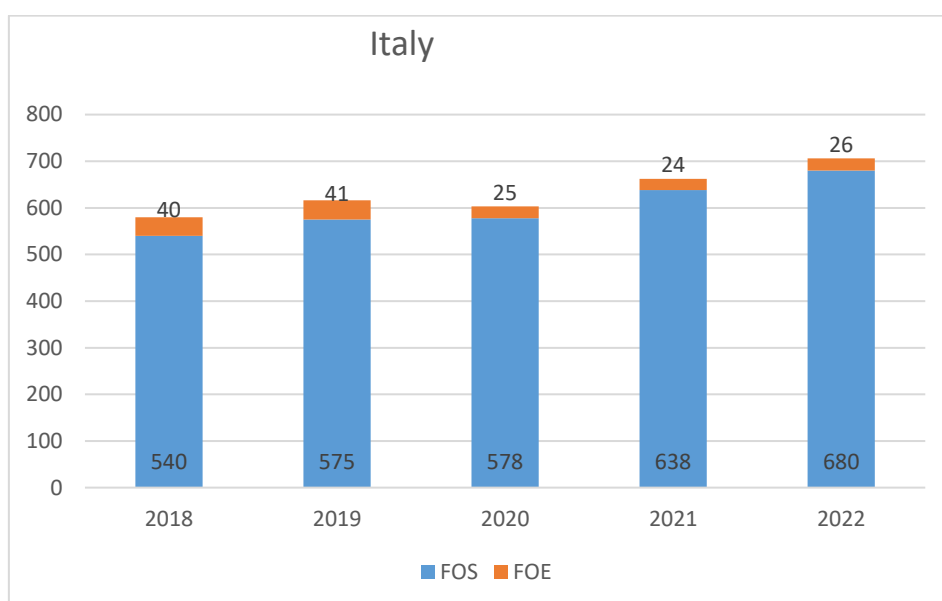
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

In 2022 the proportion of online intermediation/sales on the total volume of GPW is 1.6%.

Comments provided by the NCA on the data above:

The data provided relate to GWP collected in Italy by Italian undertaking and branches of non-UE undertakings. In particular, the data under the category “insurance intermediaries other than credit institutions” include both agents and brokers; the data under the category “credit institutions acting as insurance intermediaries” include also premiums collected by financial advisors; the data under the category “direct business” include also the premiums collected by the tied agencies.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁶⁸

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	435	2	436
<i>Belgium</i>	412	1	412
<i>Bulgaria</i>	331	0	331
<i>Cyprus</i>	329	0	329
<i>Croatia</i>	235	0	235
<i>Czech Republic</i>	374	0	374
<i>Denmark</i>	347	0	347
<i>Estonia</i>	313	0	313

⁶⁸ The row “Total EEA” and the column “3. TOTAL” count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Finland</i>	<i>301</i>	<i>0</i>	<i>301</i>
<i>France</i>	<i>535</i>	<i>4</i>	<i>538</i>
<i>Germany</i>	<i>499</i>	<i>1</i>	<i>499</i>
<i>Greece</i>	<i>380</i>	<i>1</i>	<i>380</i>
<i>Hungary</i>	<i>386</i>	<i>0</i>	<i>386</i>
<i>Iceland</i>	<i>280</i>	<i>0</i>	<i>280</i>
<i>Ireland</i>	<i>379</i>	<i>0</i>	<i>379</i>
<i>Italy</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Latvia</i>	<i>308</i>	<i>0</i>	<i>308</i>
<i>Liechtenstein</i>	<i>327</i>	<i>0</i>	<i>327</i>
<i>Lithuania</i>	<i>310</i>	<i>0</i>	<i>310</i>
<i>Luxembourg</i>	<i>387</i>	<i>1</i>	<i>387</i>
<i>Malta</i>	<i>389</i>	<i>1</i>	<i>389</i>
<i>Netherlands</i>	<i>394</i>	<i>1</i>	<i>394</i>
<i>Norway</i>	<i>307</i>	<i>0</i>	<i>307</i>
<i>Poland</i>	<i>417</i>	<i>2</i>	<i>418</i>
<i>Portugal</i>	<i>387</i>	<i>1</i>	<i>387</i>
<i>Romania</i>	<i>399</i>	<i>8</i>	<i>406</i>
<i>Slovakia</i>	<i>357</i>	<i>1</i>	<i>358</i>
<i>Slovenia</i>	<i>375</i>	<i>0</i>	<i>375</i>
<i>Spain</i>	<i>522</i>	<i>9</i>	<i>530</i>
<i>Sweden</i>	<i>329</i>	<i>0</i>	<i>329</i>
<i>Total EEA</i>	<i>607</i>	<i>15</i>	<i>622</i>

Comments provided by the NCA on the figures included in the table above:

As shown in the table, the domestic insurance intermediaries enrolled in the RUI mainly notified their intention to operate on an outgoing basis under the FoS regime (freedom to provide services).

LATVIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁶⁹	1,876	0.4%
(Re)insurance GWP (in million) ⁷⁰	623,982	0.05%
Number of (re)insurance undertakings ⁷¹	6	0.3%
Number of registered insurance intermediaries	1397	0.2%

National competent authority:

Latvijas Banka

⁶⁹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

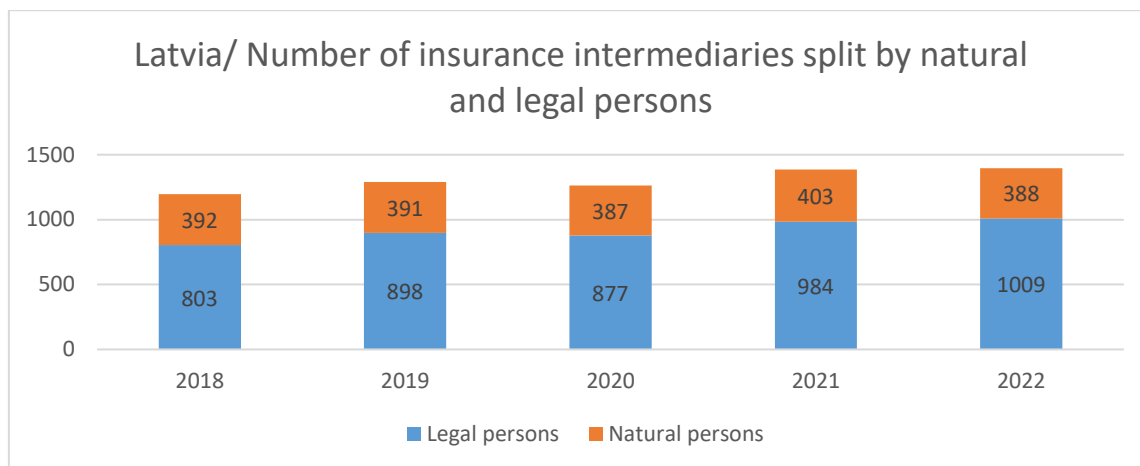
⁷⁰ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁷¹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



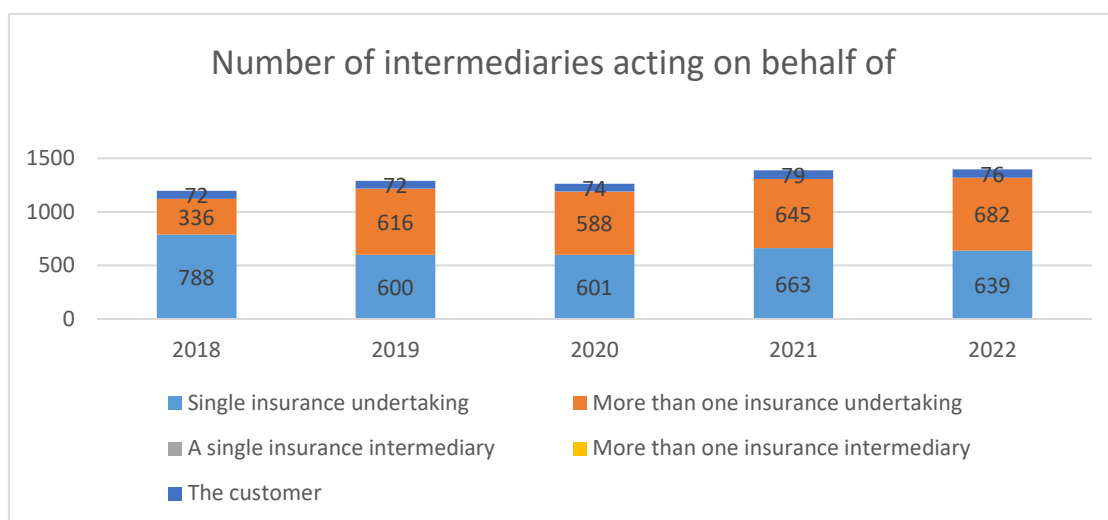
Comments provided by the NCA on the figures included in the chart above:

Information covers total number of all insurance intermediaries in Latvia (brokers, insurance agents and ancillary insurance intermediaries).

Online registration system:

In Latvia the registration system is fully integrated in the Latvijas Banka's webpage where the application form could be filled online, all the necessary documents added to the form and directly submitted to the Latvijas Banka for the registration. The registration is fully distant and no physical meetings or resubmissions of any documents are required. The information on the number of registered insurance intermediaries is updated continuously.

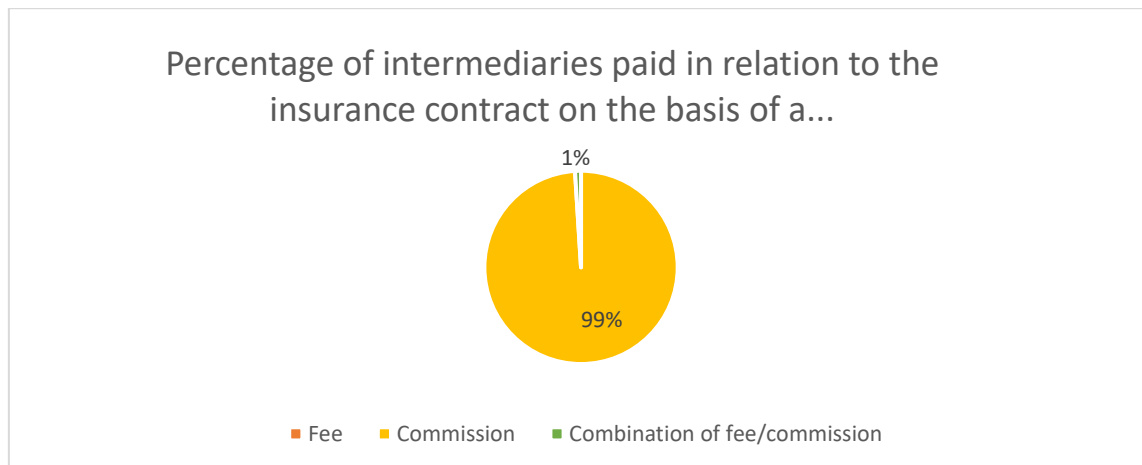
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

Information covers total number of all insurance intermediaries in Latvia (brokers, insurance agents and ancillary insurance intermediaries).

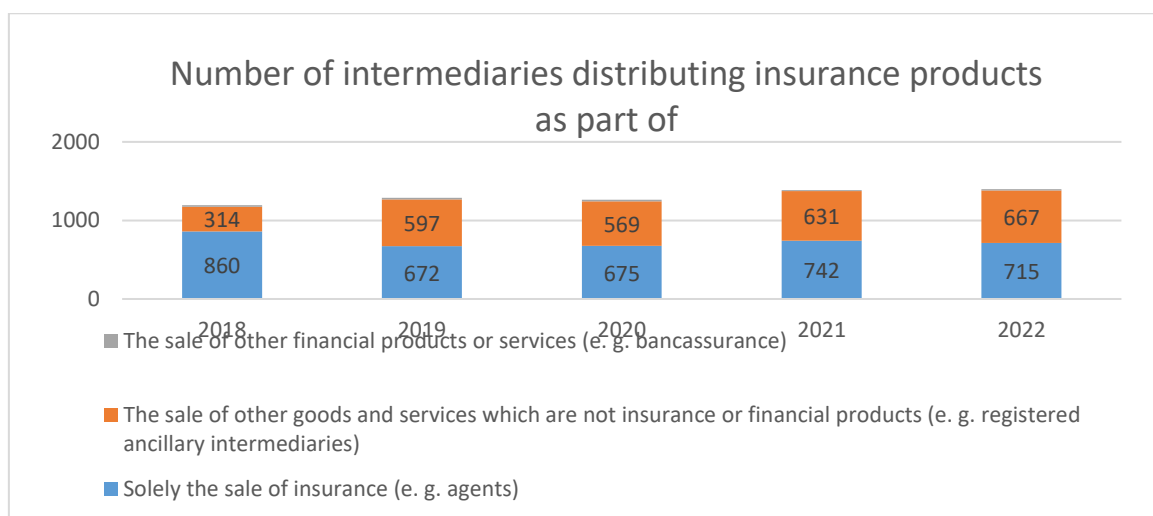
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

The remuneration based on commissions are the dominant type of remuneration in the market. Also in those very few cases where market participants indicated other type of remuneration, they commented that these particular types of remuneration is also connected to commissions.

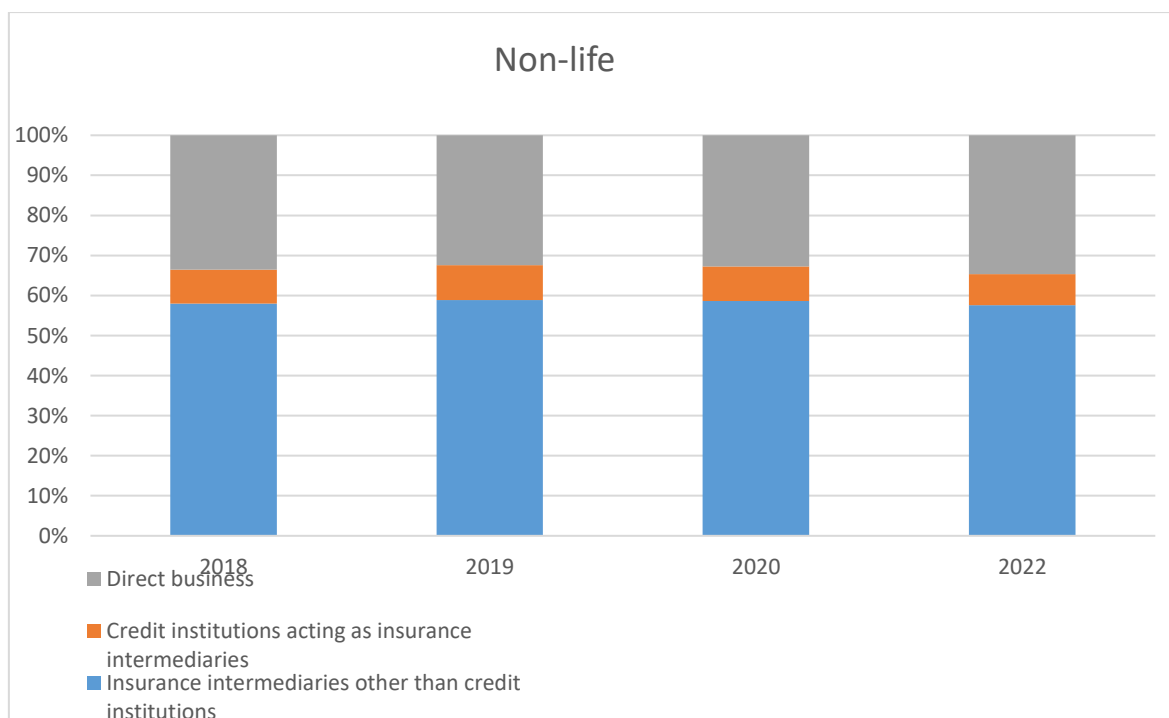
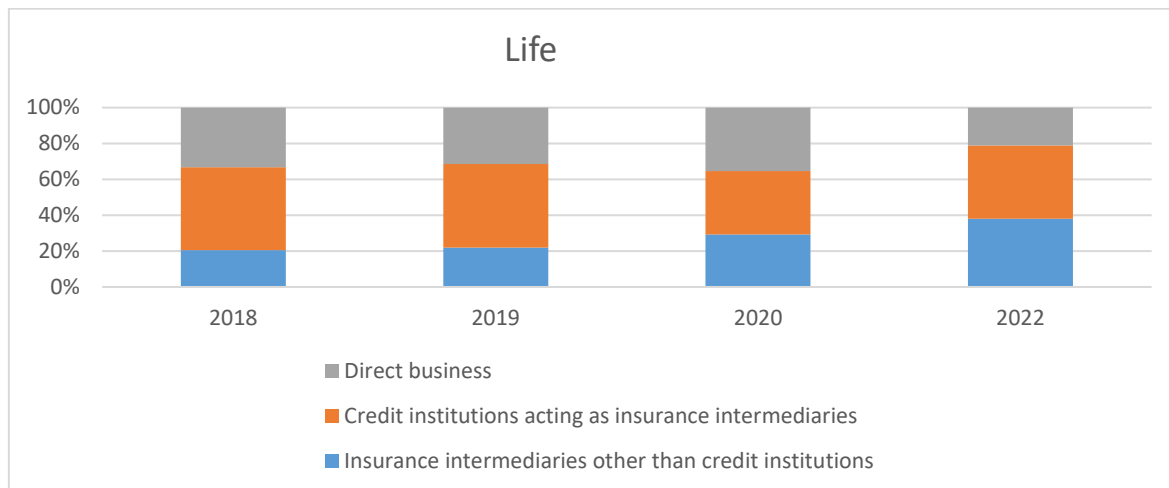
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the figures included in the chart above:

Information covers total number of all insurance intermediaries in Latvia (brokers, insurance agents and ancillary insurance intermediaries).

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

Information is gathered directly from insurers and fully cover insurance market in Latvia (total GWP in Latvia).

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

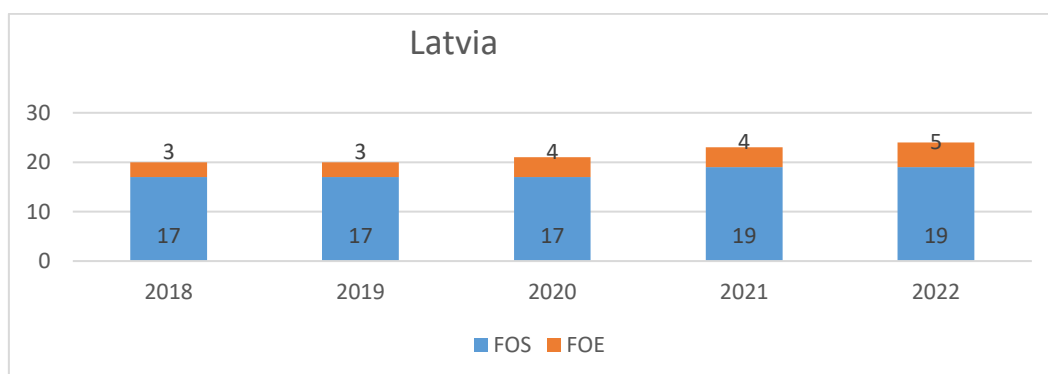
Total insurance business: online sales compose 4.3% from direct sales and 7.1% from intermediation. The total online sales in insurance compose 11.4%.

From that:

Non-life insurance: online sales compose 3.1% from direct sales and 9.0% from intermediation. The total online sales in non-life insurance compose 12.1%.

Life insurance: online sales compose 8.8% from direct sales and 0% from intermediation. The total online sales in life insurance compose 8.8%.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

Information covers the data about insurance brokers that carries out insurance distribution activities under FoS and FoE.

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁷²

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	9	0	9

⁷² The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Belgium</i>	8	0	8
<i>Bulgaria</i>	7	0	7
<i>Cyprus</i>	9	1	10
<i>Croatia</i>	3	0	3
<i>Czech Republic</i>	9	0	9
<i>Denmark</i>	7	0	7
<i>Estonia</i>	14	2	16
<i>Finland</i>	9	0	9
<i>France</i>	9	0	9
<i>Germany</i>	10	0	10
<i>Greece</i>	7	0	7
<i>Hungary</i>	7	0	7
<i>Iceland</i>	2	0	2
<i>Ireland</i>	7	0	7
<i>Italy</i>	7	0	7
<i>Latvia</i>	0	0	0
<i>Liechtenstein</i>	2	0	2
<i>Lithuania</i>	17	3	20
<i>Luxembourg</i>	9	0	9
<i>Malta</i>	7	0	7
<i>Netherlands</i>	7	0	7
<i>Norway</i>	2	0	2
<i>Poland</i>	10	0	10
<i>Portugal</i>	7	0	7
<i>Romania</i>	7	0	7
<i>Slovakia</i>	10	0	10
<i>Slovenia</i>	7	0	7
<i>Spain</i>	7	1	8
<i>Sweden</i>	9	0	9
<i>Total EEA</i>	225	7	232

Comments provided by the NCA on the figures included in the table above:

Information covers the data about insurance brokers that carries out insurance distribution activities under FoS and FoE.

General qualitative description of the “patterns of cross-border activity”:

About 25% of the insurance brokers have applied notification to be able to carry out insurance distribution activities abroad (via FoS or FoE), but not all of them are providing insurance services abroad in fact. Mainly insurance brokers work abroad in two other Baltic countries (Estonia and Lithuania) what is usual and characteristic for the insurance market in region.

LIECHTENSTEIN

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁷³	39.308	0.0001%
(Re)insurance GWP (in million) ⁷⁴	5,505.399	0.4%
Number of (re)insurance undertakings ⁷⁵	23	1.3%
Number of registered insurance intermediaries	51	0.01%

National competent authority:

Financial Market Authority Liechtenstein

⁷³ Based on eurostat data for 1 January 2022:

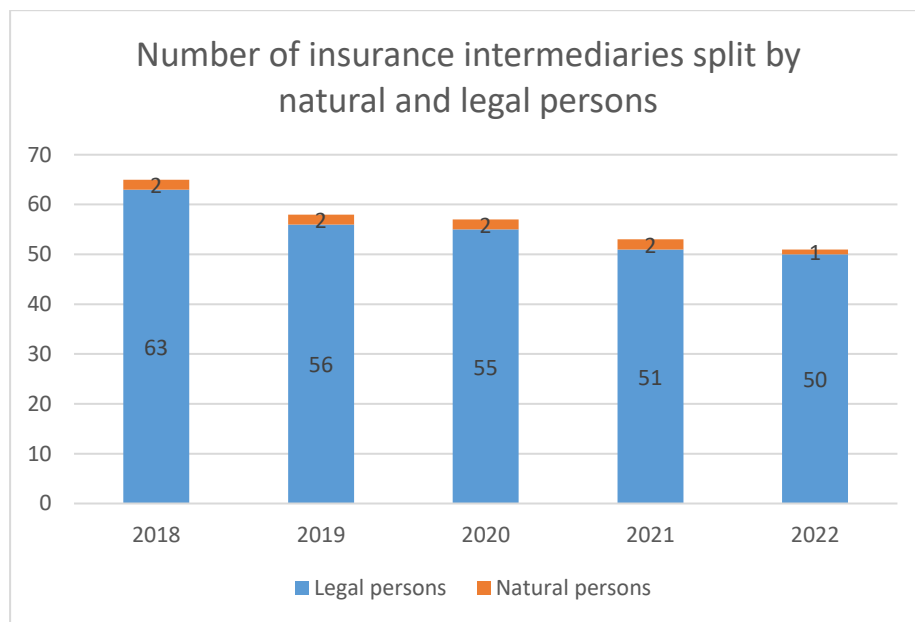
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

⁷⁴ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁷⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

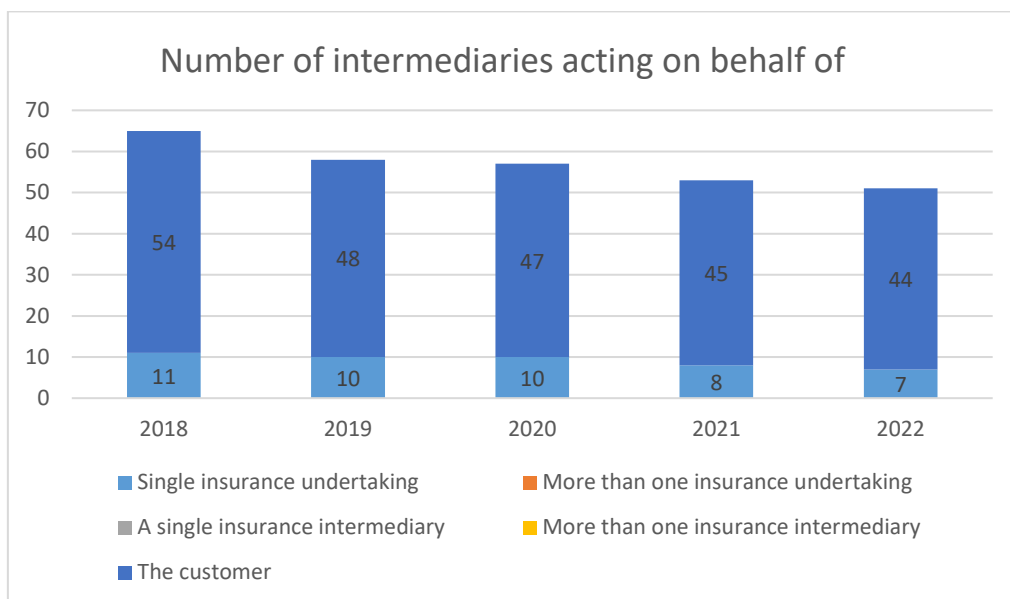
https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:**Online registration system:**

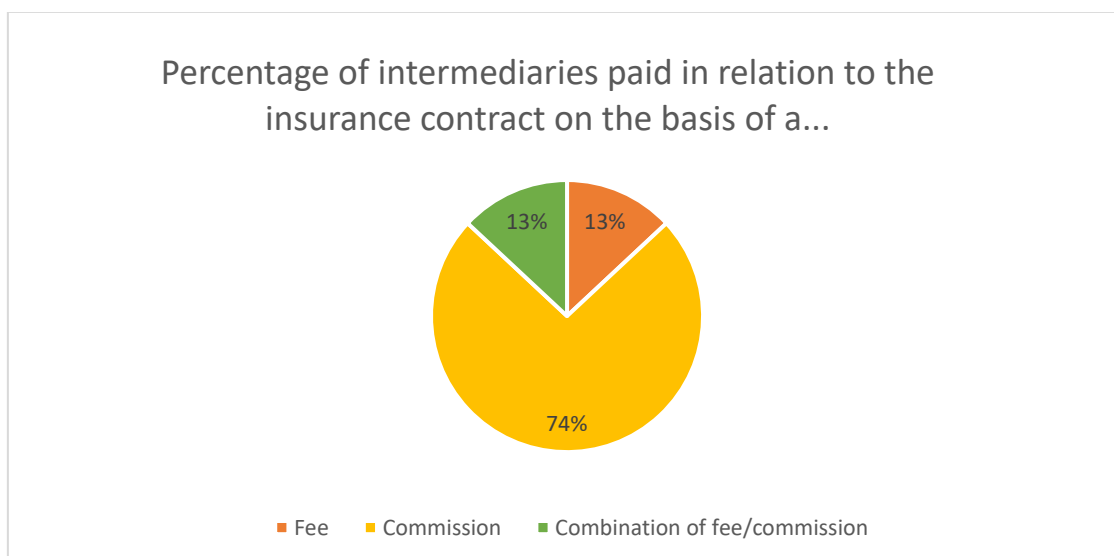
In implementation of Article 3(2), subparagraph 2 of the IDD, the FMA Liechtenstein has implemented an online registration tool for intermediaries. This is an electronic form which must be filled in and submitted electronically by the applicant. In the form, the applicant must provide all information regarding the licensing requirements according to the IDD and fill in fields in which the applicant must describe, e.g. the internal organisation, the head office, his distribution activities, products, target market, etc.. The form must also contain information on the bodies and persons responsible for insurance distribution. In addition, the applicant must attach all relevant documents and annexes to the form.

Upon request, the FMA must be provided with further information and documents required for the assessment of the application. Due to the low number of new licence applications, the information on registered insurance, insurance intermediaries and ancillary insurance intermediaries is always up to date.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



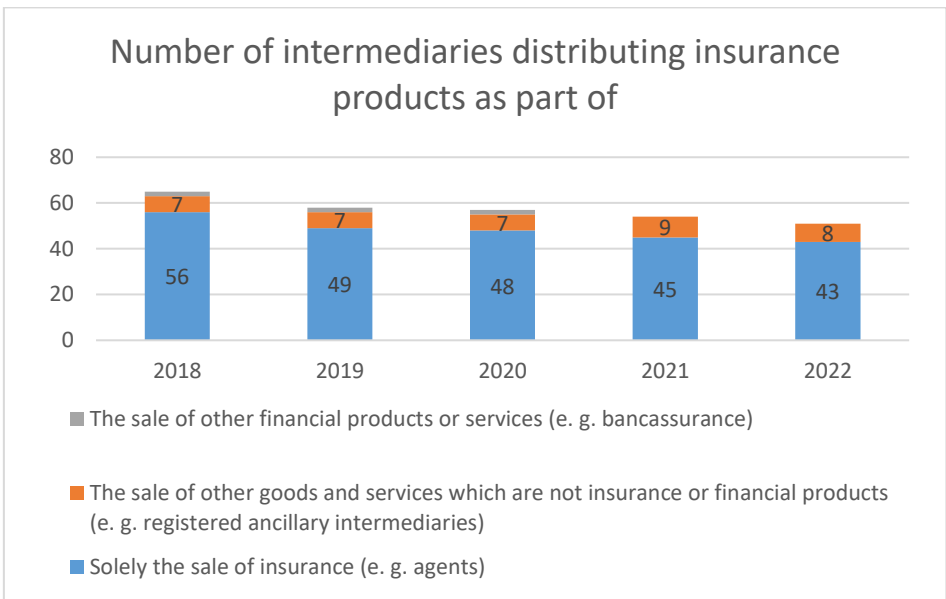
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



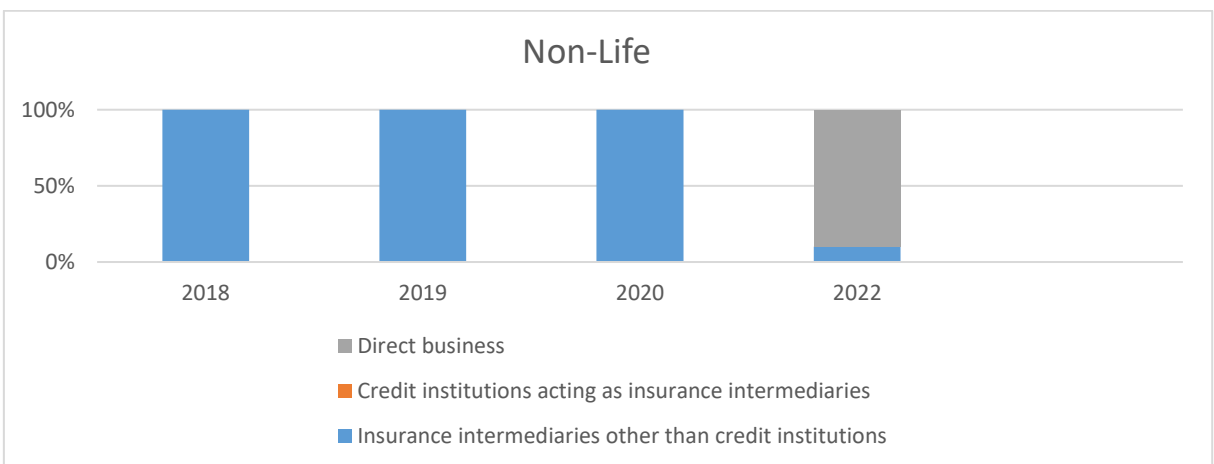
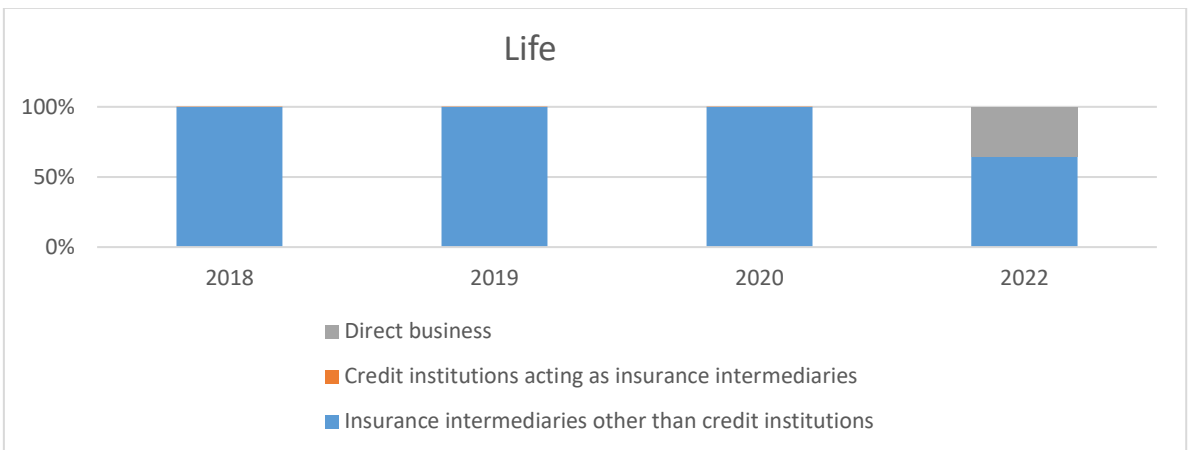
Comments provided by the NCA on the figures above :

We note that for certain intermediaries no up-to-date information is available.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



GWP split by distribution channels:

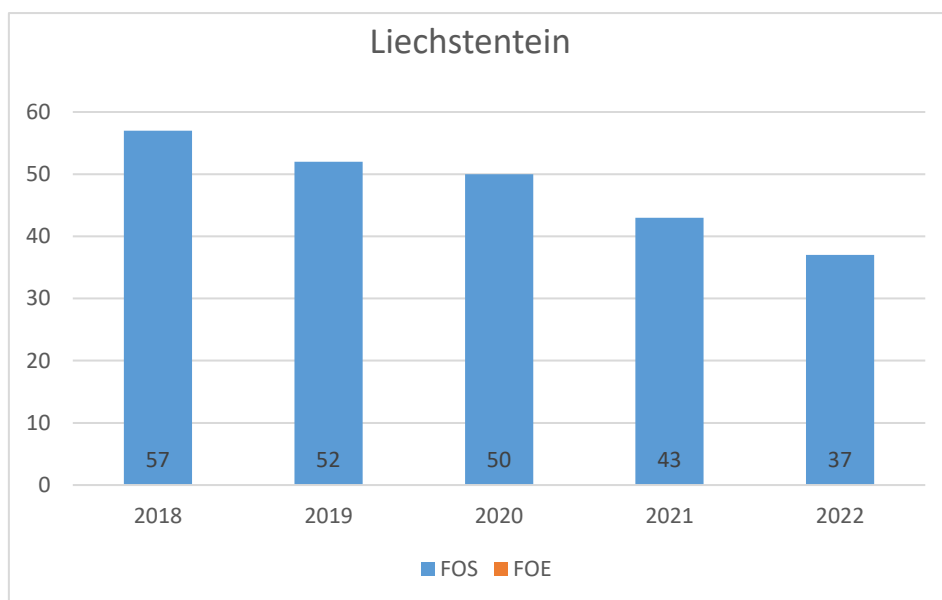


Comments provided by the NCA on the figures included in the charts above:

This data is requested from both insurance intermediaries and insurance companies as part of the reporting process.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

We requested this data from the insurance undertakings covering 60% of the Liechtenstein market. According to their data, a total of 3.4% of gross premium volume is written through online sales.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁷⁶

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	34	0	34
<i>Belgium</i>	18	0	18
<i>Bulgaria</i>	13	0	13
<i>Cyprus</i>	14	0	14
<i>Croatia</i>	12	0	12

⁷⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Czech Republic</i>	21	0	21
<i>Denmark</i>	20	0	20
<i>Estonia</i>	10	0	10
<i>Finland</i>	12	0	12
<i>France</i>	26	0	26
<i>Germany</i>	37	0	37
<i>Greece</i>	17	0	17
<i>Hungary</i>	20	0	20
<i>Iceland</i>	11	0	11
<i>Ireland</i>	20	0	20
<i>Italy</i>	29	0	29
<i>Latvia</i>	10	0	10
<i>Liechtenstein</i>	0	0	0
<i>Lithuania</i>	13	0	13
<i>Luxembourg</i>	19	0	19
<i>Malta</i>	16	0	16
<i>Netherlands</i>	18	0	18
<i>Norway</i>	18	0	18
<i>Poland</i>	18	0	18
<i>Portugal</i>	19	0	19
<i>Romania</i>	12	0	12
<i>Slovakia</i>	18	0	18
<i>Slovenia</i>	15	0	15
<i>Spain</i>	26	0	26
<i>Sweden</i>	17	0	17
<i>Total EEA</i>	533	0	533

General qualitative description of the “patterns of cross-border activity”:

most of the Liechtenstein insurance intermediaries are active in cross-border business.

LITHUANIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁷⁷	2,806	0.6%
(Re)insurance GWP (in million) ⁷⁸	873.670	0.06%
Number of (re)insurance undertakings ⁷⁹	9	0.5%
Number of registered insurance intermediaries	3727	0.4%

National competent authority:

Bank of Lithuania

⁷⁷ Based on eurostat data for 1 January 2022:

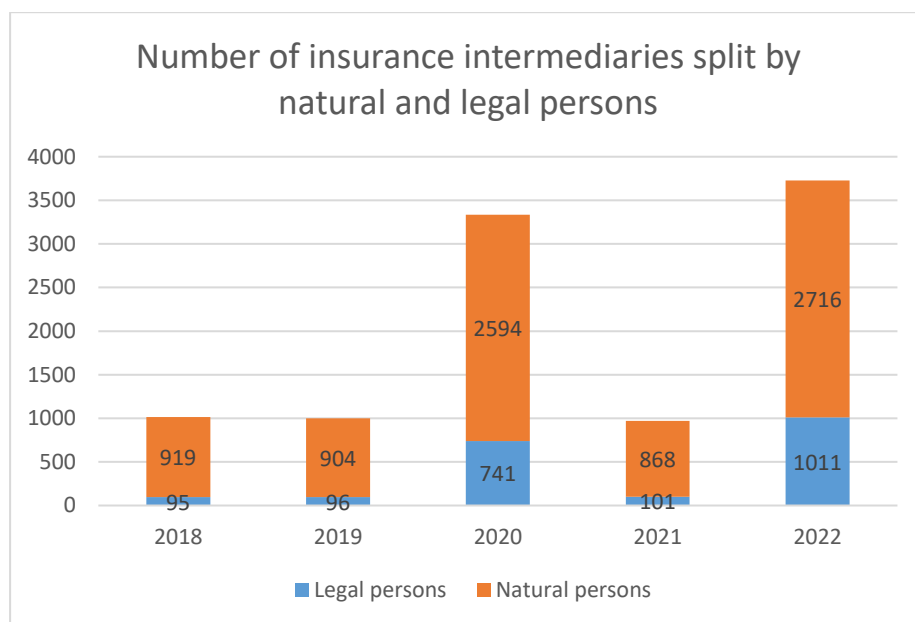
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

⁷⁸ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁷⁹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

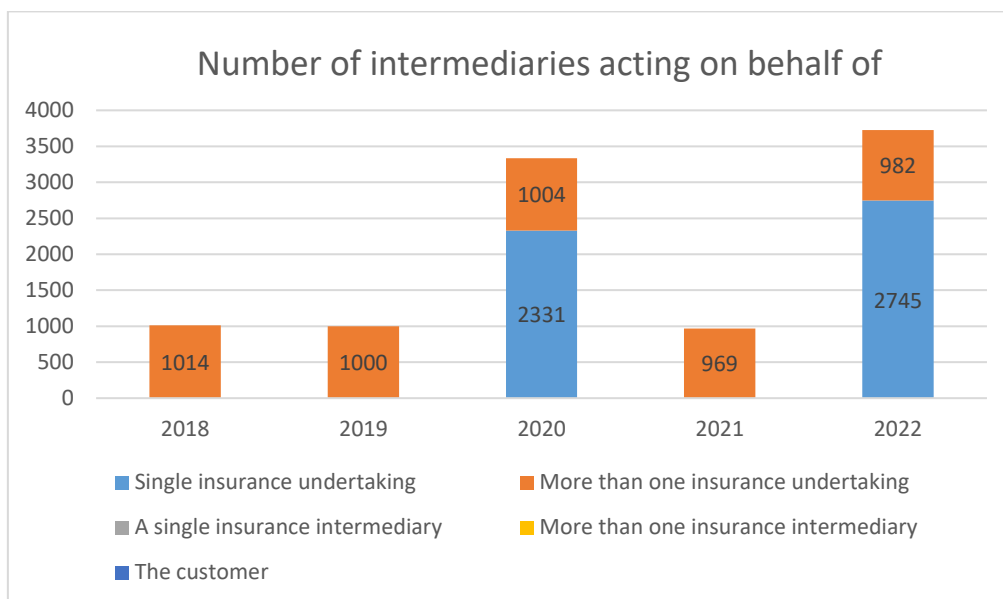
Registered insurance intermediaries split by natural and legal persons:**Comments provided by the NCA on the figures included in the chart above:**

It should be noted that the Bank of Lithuania is responsible for registration of insurance brokerage companies, the Chamber of Insurance Brokers - for registration of insurance brokers (natural persons). Insurance agent companies (legal persons) and insurance agents (natural persons) are registered by insurers, the up-to-date list of insurance intermediaries acting on a single insurance undertaking is published on website of that insurer, so it is not possible to get data on the number of insurance intermediaries in 2021 (ie. 2021 data on the number of natural and legal persons include only insurance brokers (868) and insurance brokerage companies (101)). The number of natural persons in 2022 (2716) is a sum of the number of insurance brokers (880) and insurance agents (1836). The number of legal persons in 2022 (1011) is a sum of the number of insurance brokerage companies (102) and the number of insurance agent companies (909).

Online registration system:

Link to the online registration system: <https://www.lb.lt/en/authorisation-application>. All information on registered insurance brokerage companies published on the website of the Bank of Lithuania is up-to-date.

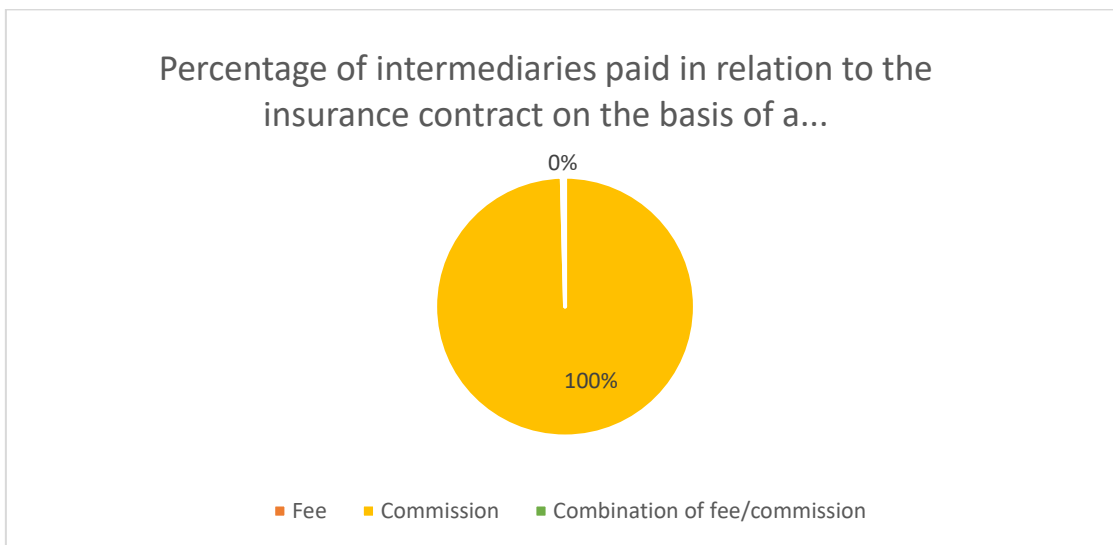
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

2021 data provided for the number of insurance intermediaries acting on more than one insurance undertaking is the sum of of the number of insurance brokers and insurance brokerage companies (as 2021 data on insurance agents and insurance agent companies were not available). Regarding 2022 data, , the number of intermediaries acting on behalf of the single insurance undertaking is the sum of the number of insurance agent companies and insurance agents (909+1836); the number of intermediaries acting on behalf of more than one insurance undertaking is the sum of the number of insurance brokerage companies and insurance brokers(102+880).

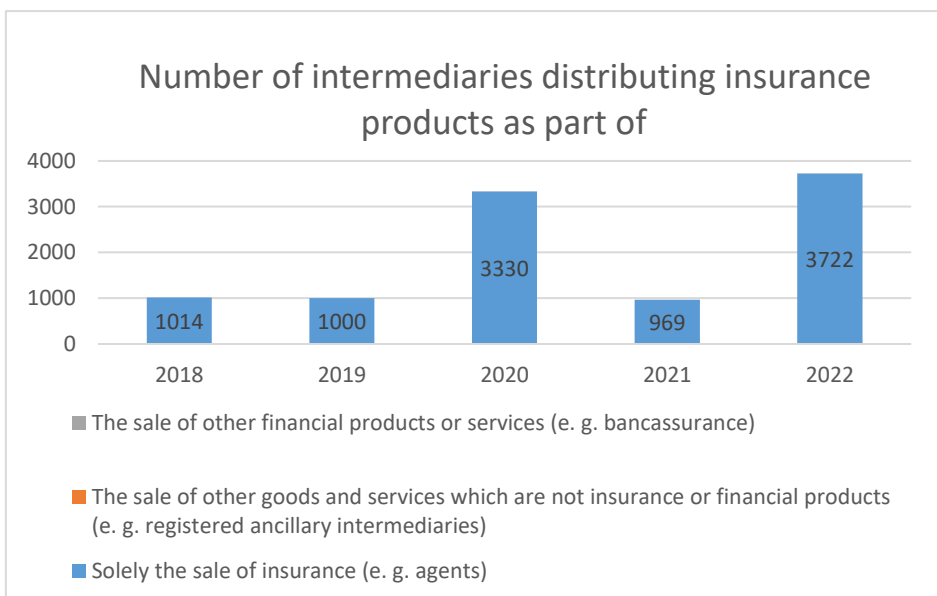
Way of remuneration of insurance iintermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

Almost all insurance intermediaries are remunerated on the basis of a commission of any kind. Just 14 insurance brokerage companies (out of 102) are remunerated on the basis of a combination of fee and commission (the share of remuneration paid directly by the client, typically by legal persons, is 7 percent of insurance brokerage companies' income). Percentage of insurance intermediaries in the combination of fee/commission category (0.40) is calculated as the ratio of 14 to 3727 (total number of registered intermediaries).

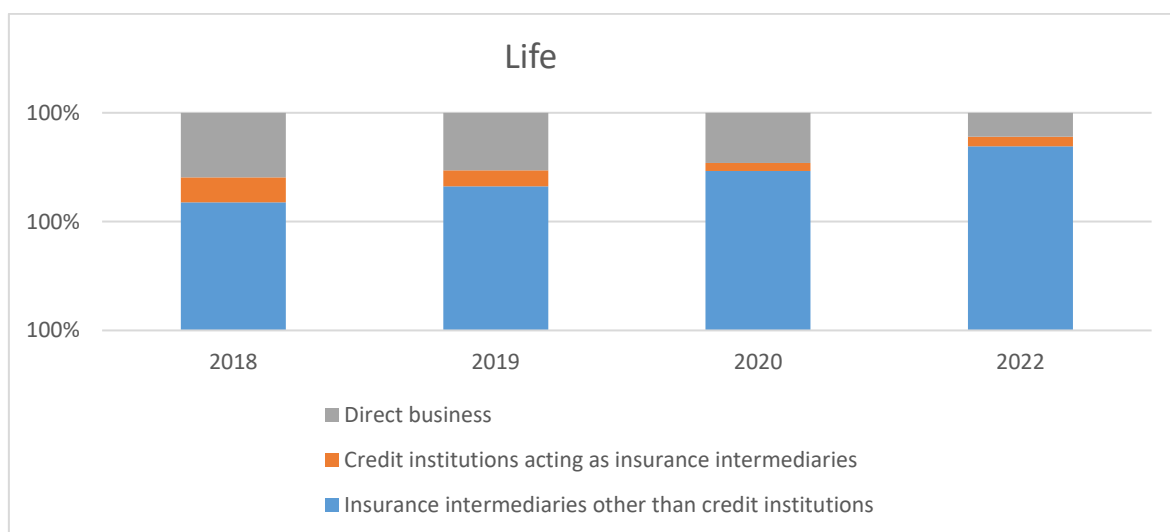
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

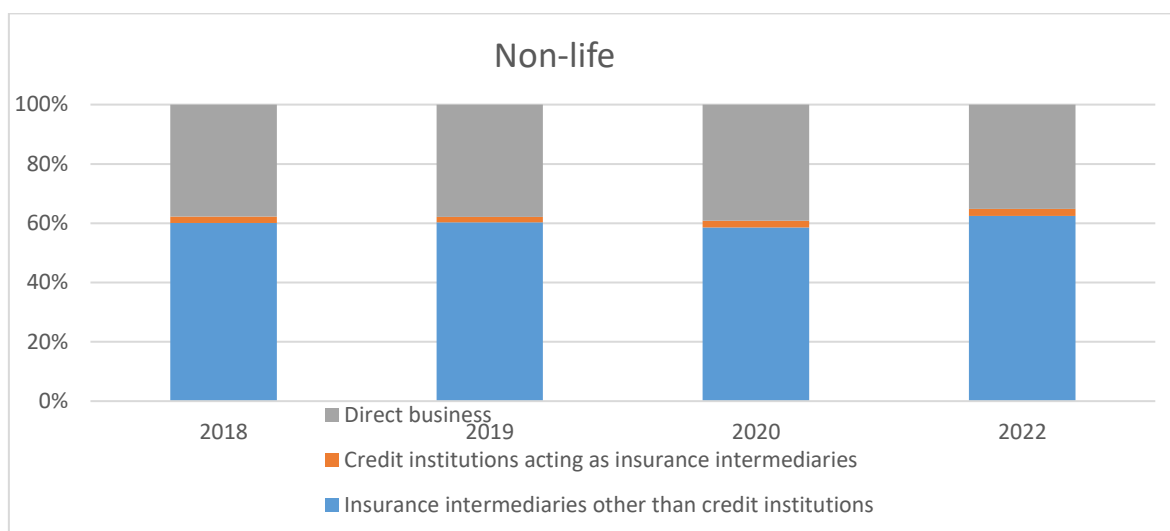


Comments provided by the NCA on the figures included in the chart above:

2021 data provided in the category of solely the sale of insurance is the sum of of the number of insurance brokers and insurance brokerage companies. As regards 2022, there are 5 banks, acting as insurance agent companies and providing bancassurance, indicated in the category of the sale of other financial products or services; the rest of the insurance intermediaries are indicated in category of solely the sale of insurance. It should be noted that in Lithuania insurance agents and ancillary intermediaries are registered by insurers and published in one list, so it is not possible to determine the exact number of ancillary intermediaries.

GWP split by distribution channels:





Comments provided by the NCA on the figures included in the charts above:

Statistical data is collected by the Bank of Lithuania. Data on gross premiums written via different distribution channels were provided by insurance undertakings (not by insurance intermediaries).

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

The Bank of Lithuania collects data on online sales. We do not collect information on type of online sale (i.e. information is not splitted more granulary (sales directly via websites, mobile apps and etc.). Data on gross premiums written via different distribution channels (including e-channel) were provided by insurance undertakings (not by insurance intermediaries). Therefore, the Bank of Lithuania has only data reported by insurers on their online sales.

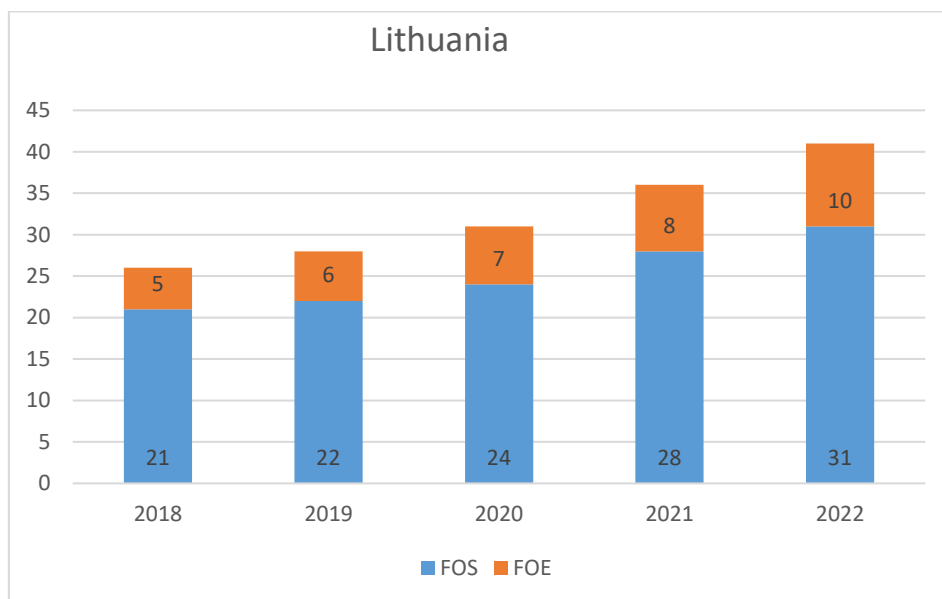
Online sales data is splitted by line of business. Gross premiums written of online sales for 2022 year were:

Non-life: 44 222 002 Eur

Life: 4 160 377 Eur

Total: 48 382 379 Eur

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁸⁰

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	13	0	13
<i>Belgium</i>	14	0	14
<i>Bulgaria</i>	13	0	13
<i>Cyprus</i>	12	0	12
<i>Croatia</i>	9	0	9
<i>Czech Republic</i>	10	0	10
<i>Denmark</i>	14	0	14
<i>Estonia</i>	25	3	26
<i>Finland</i>	14	0	14
<i>France</i>	14	0	14
<i>Germany</i>	13	0	13
<i>Greece</i>	12	0	12
<i>Hungary</i>	13	0	13
<i>Iceland</i>	7	0	7
<i>Ireland</i>	13	0	13
<i>Italy</i>	12	0	12
<i>Latvia</i>	28	4	30

⁸⁰ v

<i>Liechtenstein</i>	<i>8</i>	<i>0</i>	<i>8</i>
<i>Lithuania</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Luxembourg</i>	<i>12</i>	<i>0</i>	<i>12</i>
<i>Malta</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Netherlands</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Norway</i>	<i>8</i>	<i>0</i>	<i>8</i>
<i>Poland</i>	<i>26</i>	<i>3</i>	<i>28</i>
<i>Portugal</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Romania</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Slovakia</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Slovenia</i>	<i>12</i>	<i>0</i>	<i>12</i>
<i>Spain</i>	<i>13</i>	<i>0</i>	<i>13</i>
<i>Sweden</i>	<i>14</i>	<i>0</i>	<i>14</i>
<i>Total EEA</i>	<i>394</i>	<i>10</i>	<i>399</i>

Information on the powers of the NCA

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

Provisions of IDD have been fully transposed in the national legislation, therefore, the Bank of Lithuania has all statutory powers to ensure the implementation of the IDD.

LUXEMBOURG

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁸¹	645.397	0.1%
(Re)insurance GWP (in million) ⁸²	53,064.155	4%
Number of (re)insurance undertakings ⁸³	71	4.1%
Number of registered insurance intermediaries	4138	0.5%

National competent authority:

Commissariat aux Assurances (CAA)

⁸¹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

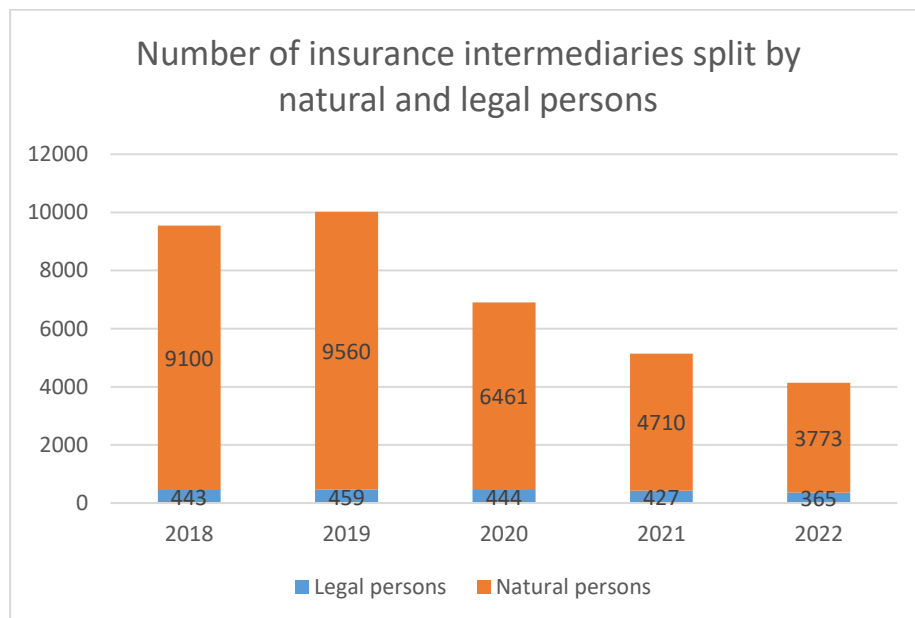
⁸² "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁸³ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

The decrease in the number of insurance intermediaries over the past years is related to the CAA's enquiry to identify the agents who are still active and those who did not complete the annual trainings requirements.

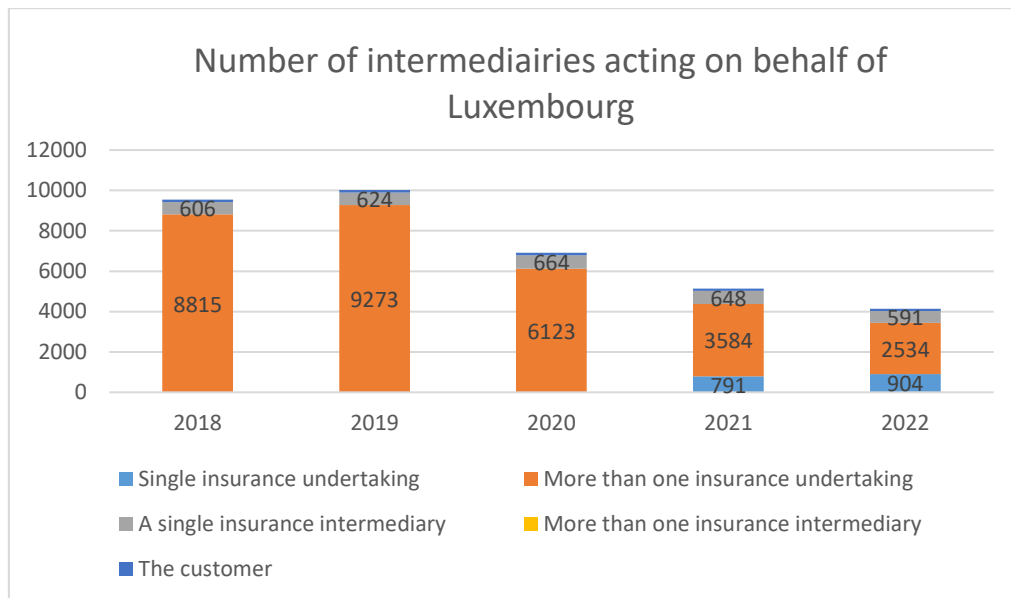
Please note that the numbers in the above table include all registered intermediaries. Some of them have been counted twice, as they are registered as both brokerage firms' director and brokers. When double counting is not taken into account, the total number of registered intermediaries is 4489 for 2021 and 3547 for 2022.

Online registration system:

The forms for the various applications for approval or registration are available on the CAA website.

These can be completed electronically and provided to the CAA by email.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

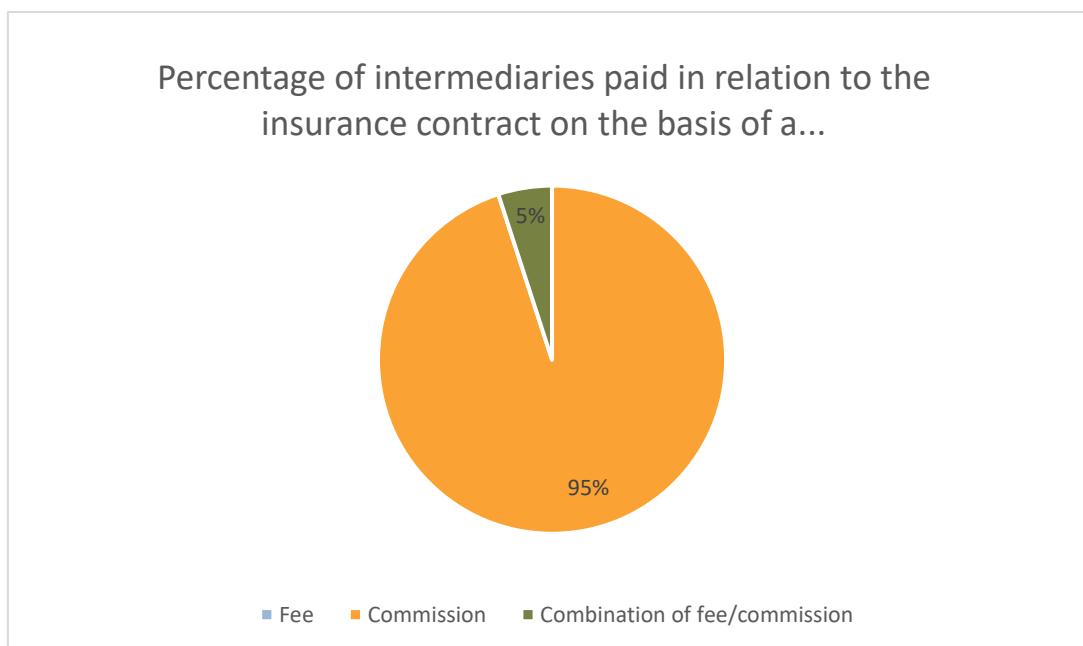
Compared to last years' surveys, we have been able to distinguish between agents acting on behalf of a single insurance undertaking and those acting on behalf on more than one insurance undertaking.

In accordance with Luxembourg law, no agent may receive approval for several insurance undertakings in the same class of insurance.

An agent may receive approval for more than one insurance undertaking in different classes of insurance (f.i. for IU1 in life insurance and for IU2 in non-life insurance).

An agent can also received approval in the same class for several undertakings, if these undertakings jointly so request.

Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



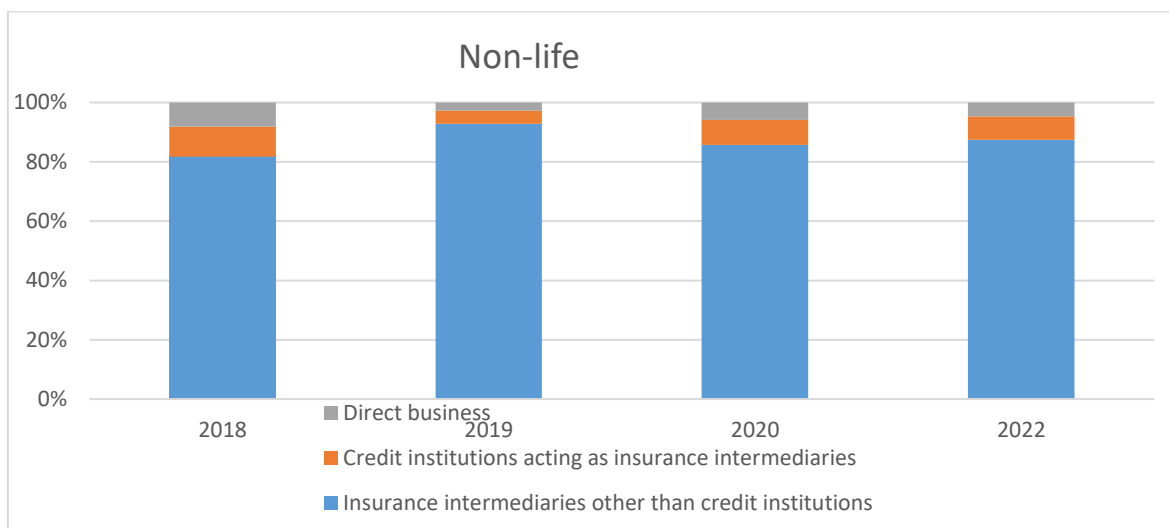
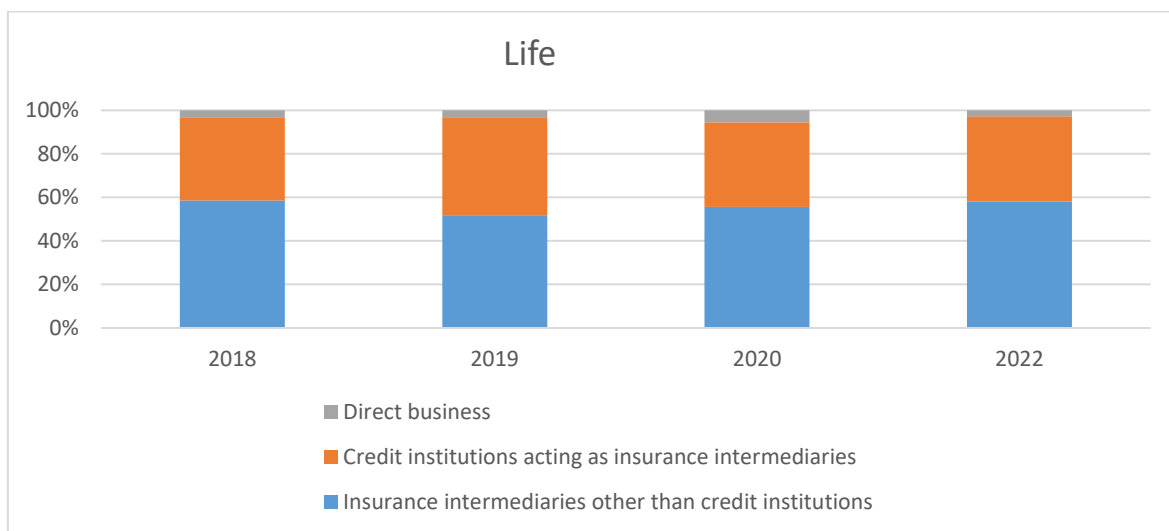
Comments provided by the NCA on the figures above :

The data in the above table only includes information related to brokerage firms and brokers, for which CAA receives an annual Reporting. These data are estimated percentage, as the verification of annual reporting for 2022 is still ongoing.

As a whole, no insurance brokerage firms is paid solely based on a fee (remuneration paid directly by the customer).

Please be informed that an annual reporting for agencies is currently being developed, and clearer information should be available next year.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

These data are obtained from annual Reporting of Luxembourg insurance undertakings and therefore also include data on non-Luxembourg intermediaries.

Data are subject to modifications as verifications on insurers' 2022 Reporting are still ongoing.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

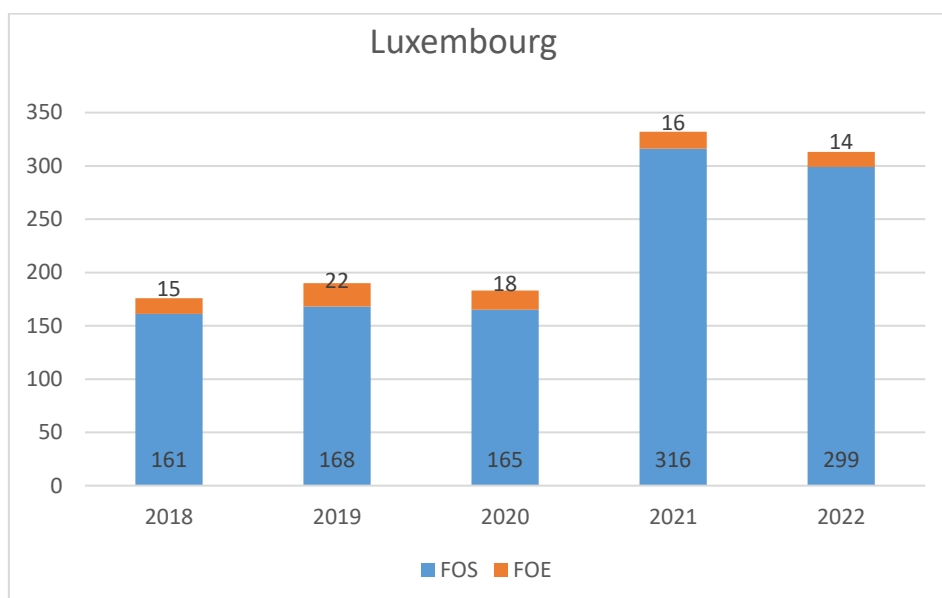
Based on the information obtained from insurance undertakings, there hasn't been any direct online sales for life insurance business. Regarding non-life insurance business, the new production for 2022 of direct online sales represent 0,33% of the total non-life new production. (21.634.583€).

Comments provided by the NCA on the data above:

CAA does not have information coming directly from intermediaries related to online sales.

The only data CAA can provide is information obtained from the annual Reporting of Luxembourg insurance undertakings. The provided information thus only includes direct sales. The data for 2022 are still subject to modifications as verifications on insurers' 2022 Reporting are still ongoing.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

The increase in FOS numbers compared to previous years surveys is linked to the fact that the data provided for 2022 now includes agents and brokerage firms operating in FOS in the EEA (which was not the case in previous reports)

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁸⁴

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	64	0	64
<i>Belgium</i>	277	2	277

⁸⁴ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Bulgaria</i>	47	0	47
<i>Cyprus</i>	57	0	57
<i>Croatia</i>	36	0	36
<i>Czech Republic</i>	56	0	56
<i>Denmark</i>	57	1	57
<i>Estonia</i>	50	0	50
<i>Finland</i>	62	0	62
<i>France</i>	175	8	175
<i>Germany</i>	143	3	143
<i>Greece</i>	63	0	63
<i>Hungary</i>	55	0	55
<i>Iceland</i>	31	0	31
<i>Ireland</i>	60	1	60
<i>Italy</i>	89	5	90
<i>Latvia</i>	51	0	51
<i>Liechtenstein</i>	31	0	31
<i>Lithuania</i>	55	0	55
<i>Luxembourg</i>	0	0	0
<i>Malta</i>	61	0	61
<i>Netherlands</i>	89	2	89
<i>Norway</i>	44	0	44
<i>Poland</i>	61	0	61
<i>Portugal</i>	92	0	92
<i>Romania</i>	51	0	51
<i>Slovakia</i>	56	0	56
<i>Slovenia</i>	53	0	53
<i>Spain</i>	100	3	101
<i>Sweden</i>	73	1	73
<i>Total EEA</i>	999	14	300

Comments provided by the NCA on the figures included in the table above:

The data provided for 2022 now includes agents operating in FOS in the EEA (which was not the case in previous reports).

MALTA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁸⁵	520.971	0.1%
(Re)insurance GWP (in million) ⁸⁶	8,957.346	0.7%
Number of (re)insurance undertakings ⁸⁷	32	1.9%
Number of registered insurance intermediaries	445	0.1%

National competent authority:

Malta Financial Services Authority

⁸⁵ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

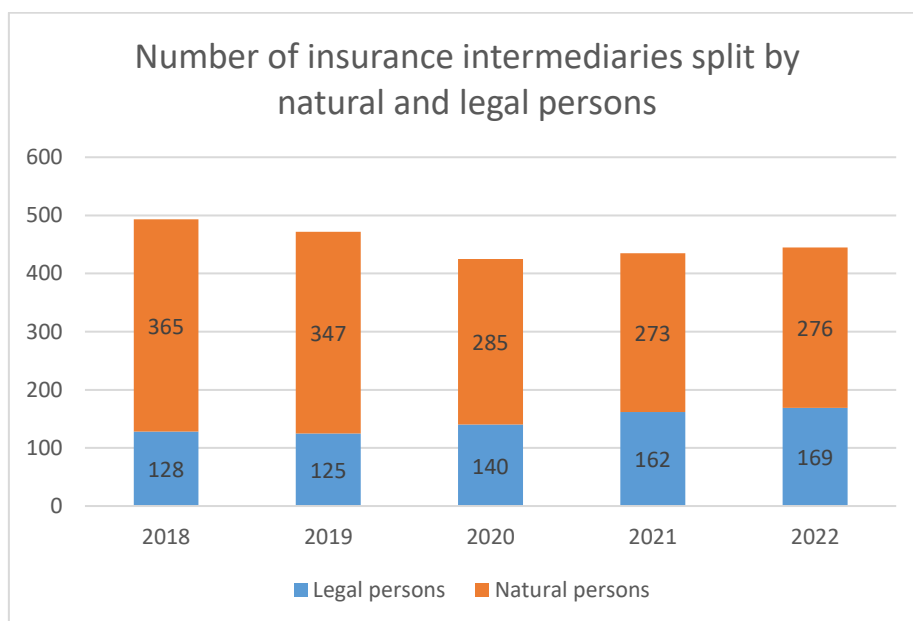
⁸⁶ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁸⁷ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

The figures shown above are as at 31 December of each year.

Online registration system:

In line with the requirements emanating from the IDD, the MFSA has launched an online application facility wherein persons (natural and legal) wishing to apply for an insurance intermediary licence can submit their application online to the MFSA. The applications which are available are the following:

- Application for enrolment in the Agents, Managers or Brokers List;
- Application for the registration of individuals in the Agents, Managers or Brokers Register;
- Application for the enrolment of Tied Insurance Intermediaries in the Tied Insurance Intermediaries List; and
- Application for the enrolment of Ancillary Insurance Intermediaries in the Ancillary Insurance Intermediaries List.

In order for persons to submit an online application, they first need to apply for a username through the MFSA Portal and once they are granted with the log in details, they can fill in the respective application. Depending on the type of application submitted the applicant will be asked

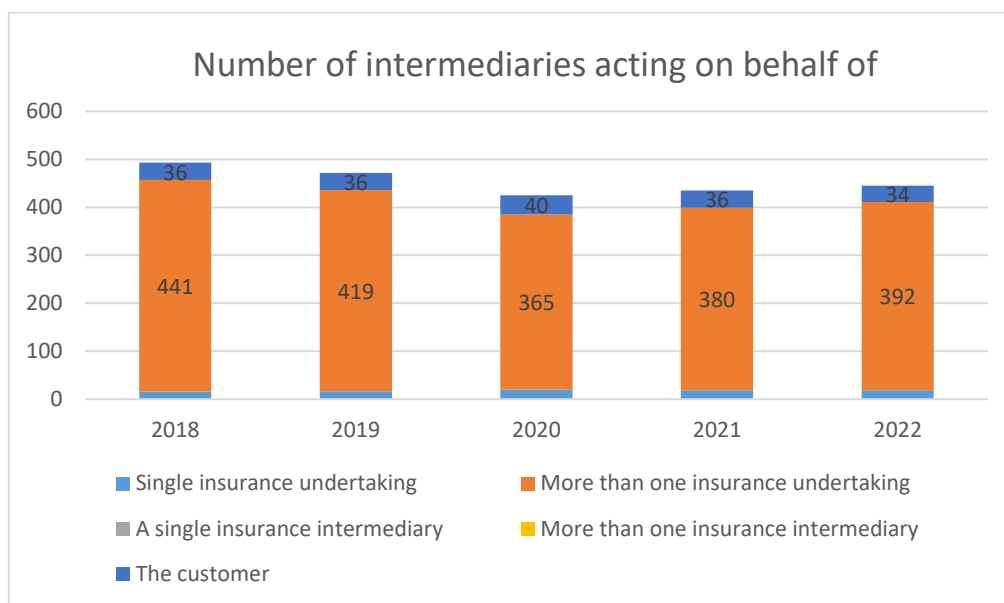
to include certain documentation. For example, in the case of an insurance broker / agent / manager they will be requested to submit a scheme of operations and financial projections.

Once the application is completed and all the required documentation is attached the applicant submits the application through the MFSA portal.

The applicant is informed every time the status of the application changes for example from the “submitted status” to “assigned status” to “in process status” to the final stage which is the “approved status”.

The IT system introduced also provides the facility that at any point in time we can issue statistics on the number of applications received, applications being processed and applications approved, refused or withdrawn.

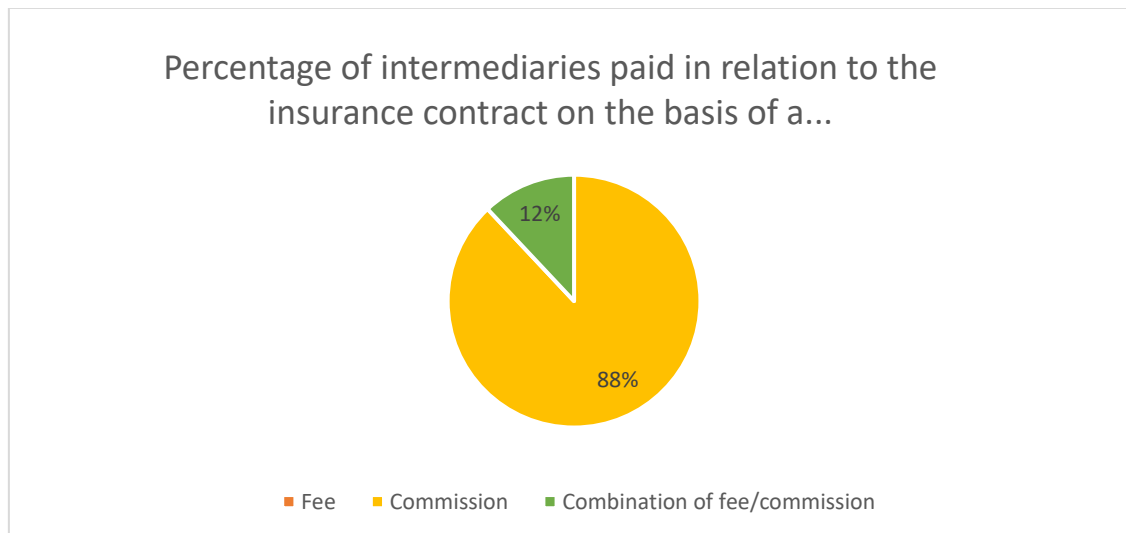
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

One of the relevant categories in the Maltese national register is 'tied insurance intermediaries' which can work with only one insurance undertaking on particular classes of business. Example - XYZ is a tied insurance intermediary who transacts life business with Company A and general business (non-life) with Company B.

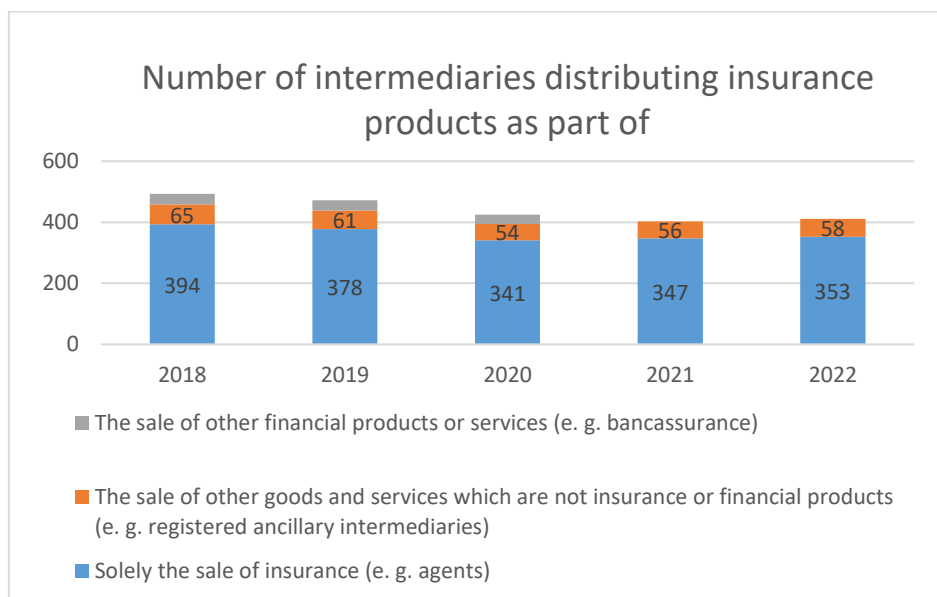
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



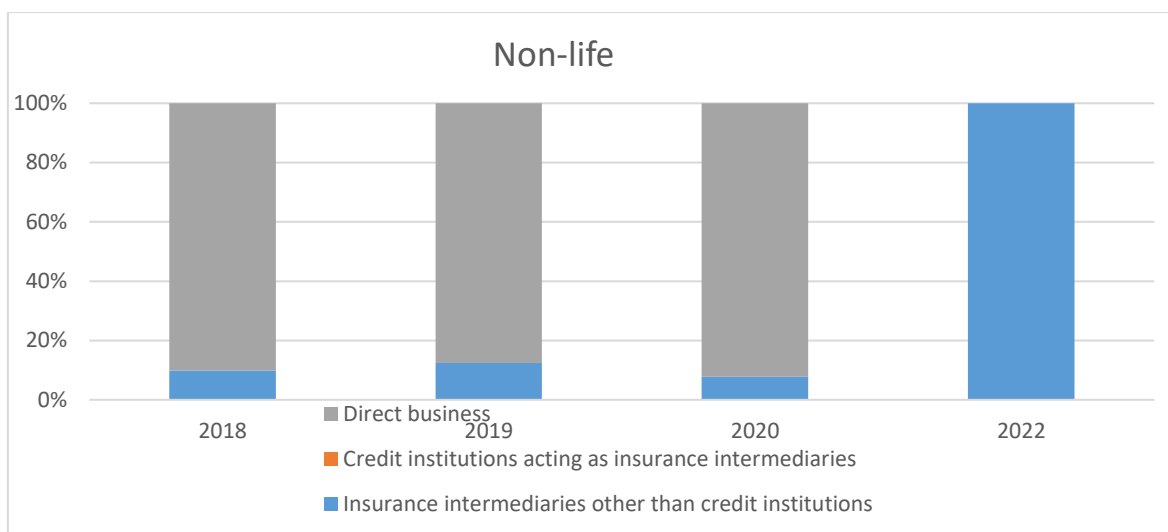
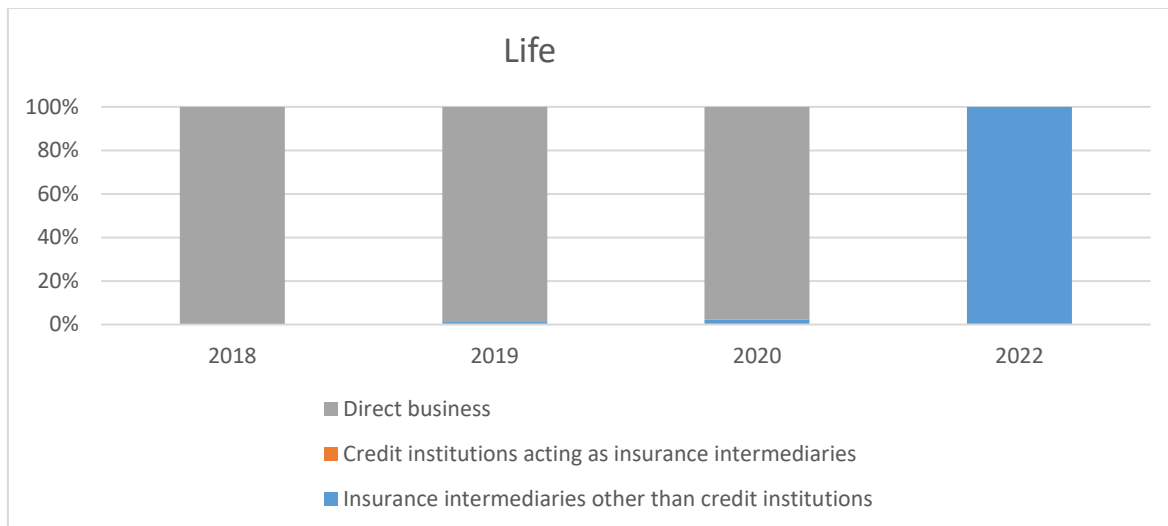
Comments provided by the NCA on the figures above :

Tied Insurance Intermediaries are solely remunerated on the basis of a commission which is included in the insurance premium and paid by the Insurance Undertaking. Insurance Brokers & Insurance Agents are usually remunerated on the basis of a commission which is included in the premium as well as additional fees, established by the intermediary and which are paid by the customer such as policy fees, admin fees, brokerage fees).

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

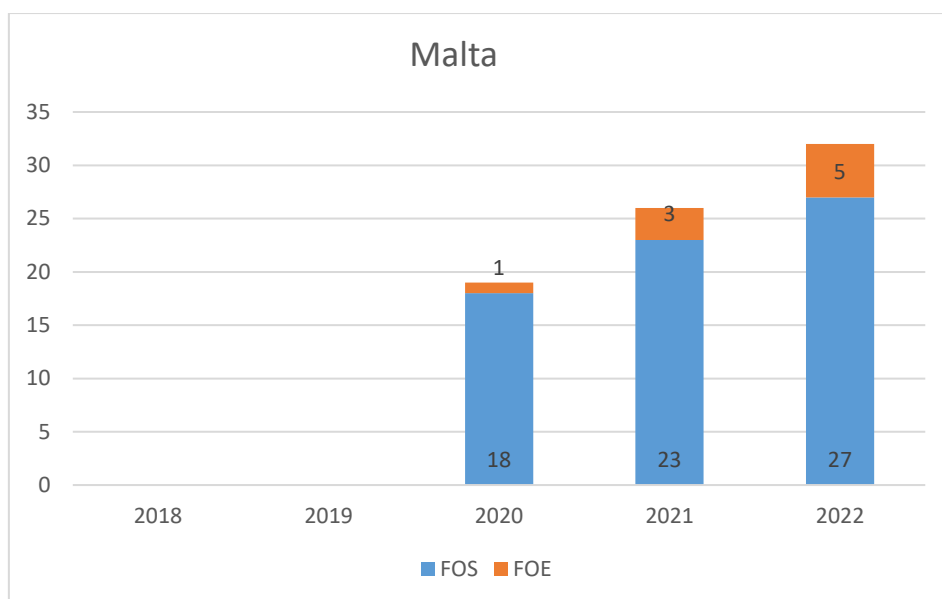
Under insurance intermediaries other than credit institutions - GWP includes brokers + agents.

In the Maltese regulatory framework, credit institutions acting as insurance are categorised as tied insurance intermediaries. We do not collect quantitative data of tied insurance intermediaries in our regulatory returns as these would have been captured under direct business. Currently, we do not have the direct business generated

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

We do not currently collect information of online intermediation/sales of our market. However, it is planned to create a new conduct data form in order to capture this type of information in future submissions.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁸⁸

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	17	0	17
<i>Belgium</i>	19	0	19
<i>Bulgaria</i>	17	0	17
<i>Cyprus</i>	18	2	20
<i>Croatia</i>	16	0	16
<i>Czech Republic</i>	16	0	16
<i>Denmark</i>	21	0	21
<i>Estonia</i>	17	0	17
<i>Finland</i>	18	0	18
<i>France</i>	21	1	22
<i>Germany</i>	20	0	20

⁸⁸ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Greece</i>	<i>18</i>	<i>0</i>	<i>18</i>
<i>Hungary</i>	<i>16</i>	<i>0</i>	<i>16</i>
<i>Iceland</i>	<i>17</i>	<i>0</i>	<i>17</i>
<i>Ireland</i>	<i>21</i>	<i>2</i>	<i>23</i>
<i>Italy</i>	<i>21</i>	<i>0</i>	<i>21</i>
<i>Latvia</i>	<i>16</i>	<i>0</i>	<i>16</i>
<i>Liechtenstein</i>	<i>16</i>	<i>0</i>	<i>16</i>
<i>Lithuania</i>	<i>16</i>	<i>0</i>	<i>16</i>
<i>Luxembourg</i>	<i>20</i>	<i>0</i>	<i>20</i>
<i>Malta</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Netherlands</i>	<i>22</i>	<i>0</i>	<i>22</i>
<i>Norway</i>	<i>19</i>	<i>0</i>	<i>19</i>
<i>Poland</i>	<i>19</i>	<i>0</i>	<i>19</i>
<i>Portugal</i>	<i>19</i>	<i>1</i>	<i>20</i>
<i>Romania</i>	<i>17</i>	<i>0</i>	<i>17</i>
<i>Slovakia</i>	<i>18</i>	<i>0</i>	<i>18</i>
<i>Slovenia</i>	<i>17</i>	<i>0</i>	<i>17</i>
<i>Spain</i>	<i>21</i>	<i>2</i>	<i>23</i>
<i>Sweden</i>	<i>22</i>	<i>1</i>	<i>23</i>
<i>Total EEA</i>	<i>535</i>	<i>9</i>	<i>544</i>

General qualitative description of the “patterns of cross-border activity”:

The majority of the domestic insurance intermediaries which passport in other Member States are insurance brokers. There are no predominant classes of business mediated by insurance brokers.

THE NETHERLANDS

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁸⁹	17,591	3.9%
(Re)insurance GWP (in million) ⁹⁰	81,543.289	6.0%
Number of (re)insurance undertakings ⁹¹	96	5.6%
Number of registered insurance intermediaries	6451	0.7%

National competent authority:

Dutch Authority for the Financial Markets

⁸⁹ Based on eurostat data for 1 January 2022:

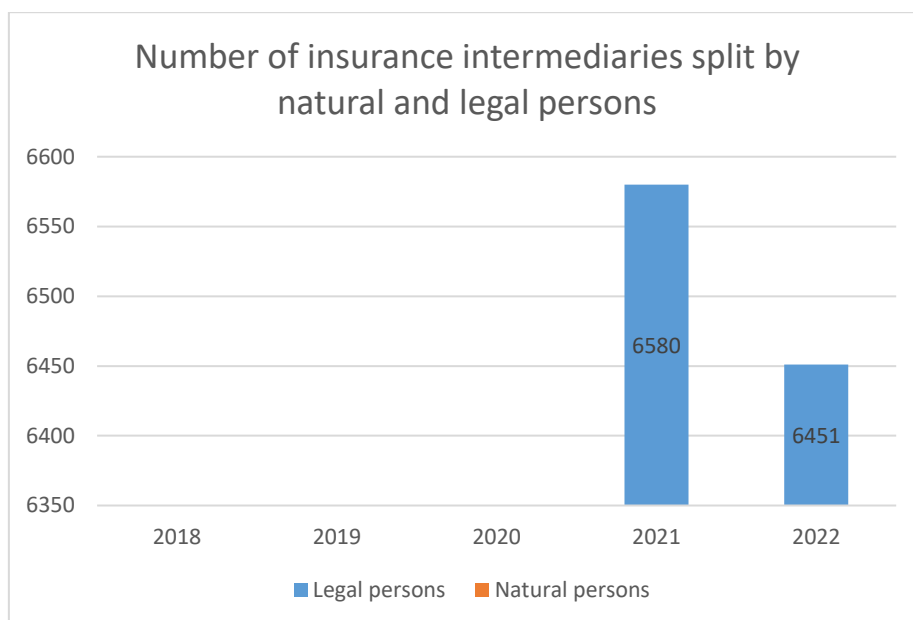
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

⁹⁰ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁹¹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:**Comments provided by the NCA on the figures included in the chart above:**

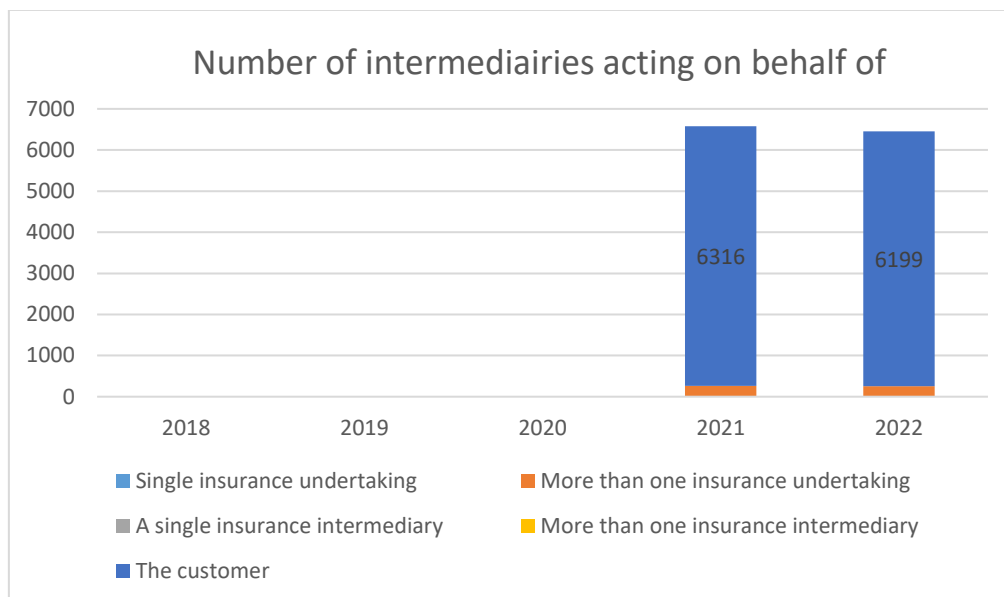
In the Netherlands we only grant licenses to companies that are registered at the chamber of commerce. However, these companies can be companies with no legal personality, like partnerships. In 2021 there were 3.400 licenseholders with a legal personality and 3.180 without one. In 2022 there were 3.404 license holders with a legal personality and 3.047 licenseholders without.

Next to the licenseholders, the AFM has 4.371 tied insurance intermediaries on 31-12-2021 in her register and 4.452 tied insurance intermediaries on 31-12-2022. And the AFM has 1.862 connected companies on 31-12-2021 in her register and 1.754 on 31-12-2022. Connected companies have a registration at the AFM under the responsibility of a license holder. The license holder must ensure that the connected company complies with relevant regulation.

Online registration system:

Insurance intermediaries can apply for a license via an online license application form. Through this form, they have to provide all the necessary information to receive the license. Our online register, which holds information about all the registered companies, is updated on a day-to-day basis. Therefore, any changes are visible the next day. We do not show the number of how many companies are registered.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



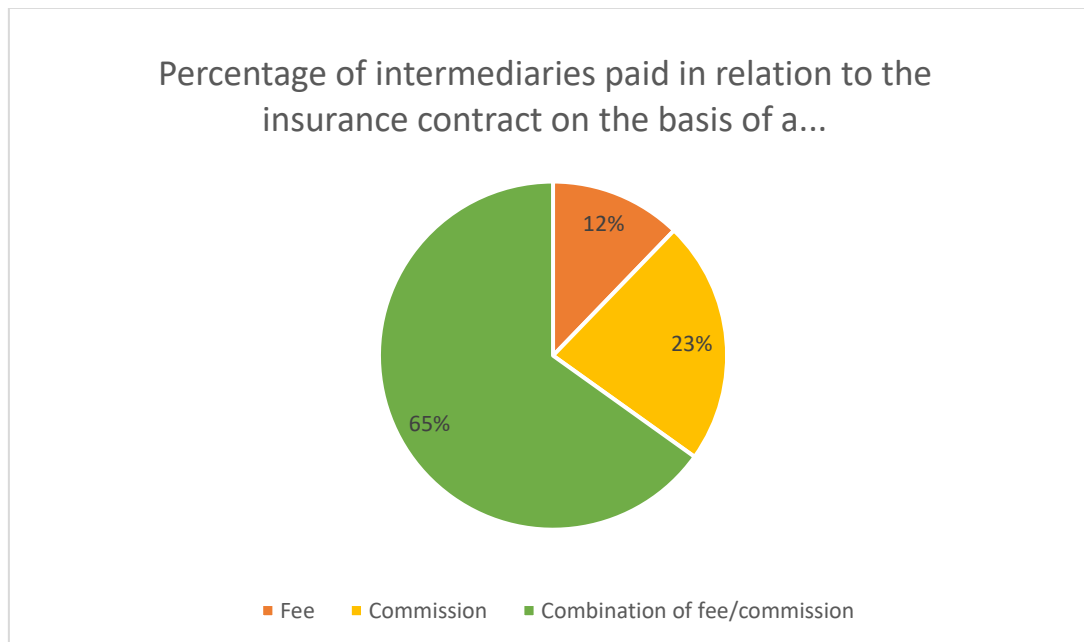
Comments provided by the NCA on the figures included in the chart above:

In the Netherlands we do not register if a licenseholder is acting on behalf of a single insurance undertaking, a single insurance intermediary, more than one insurance intermediary or the customer.

In the Netherlands we have a figure that is called a 'gevolmachtigd agent', an underwriting agent, who acts mostly for more than one insurance undertaking. From the license holders there are 252 companies with a registration as an underwriting agent (please note that these underwriting agents can also have a license as a insurance intermediary acting on behalf of the customer, so the number under 5 could be higher). Because we can not specify the other categories and we have the ban on commission in the Netherlands insurance intermediaries mostly must act on behalf of the customer.

Please note that, as stated by the information related to registered insurance intermediaries next to the license holder we also have registered connected companies and tied insurance intermediaries.

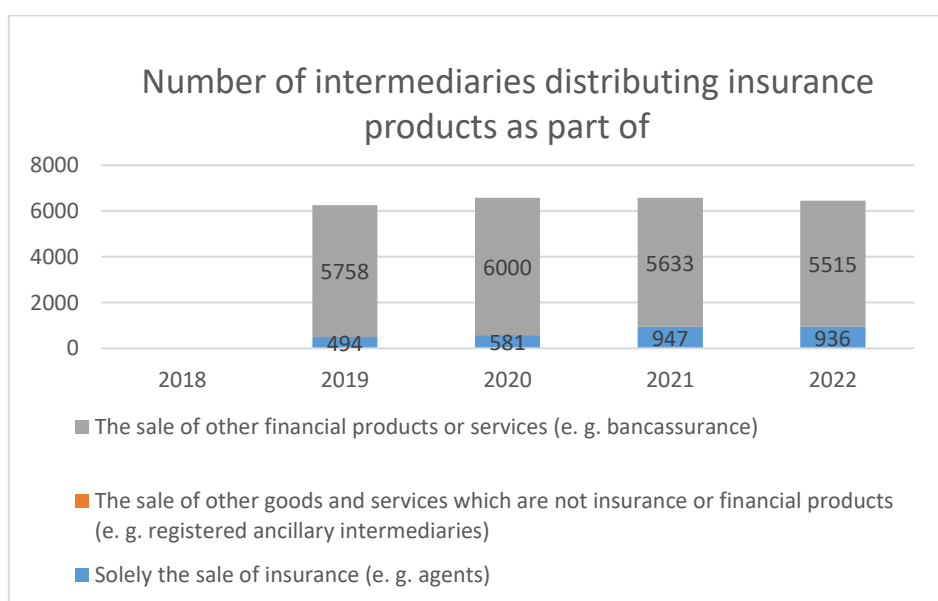
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

We are currently collecting 2022 data, so we used percentage-estimated from previous year. The percentage and distribution is constant in the previous three years.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the table above :

The number under the category of the sale of others goods and services is input from a yearly data request from the AFM.

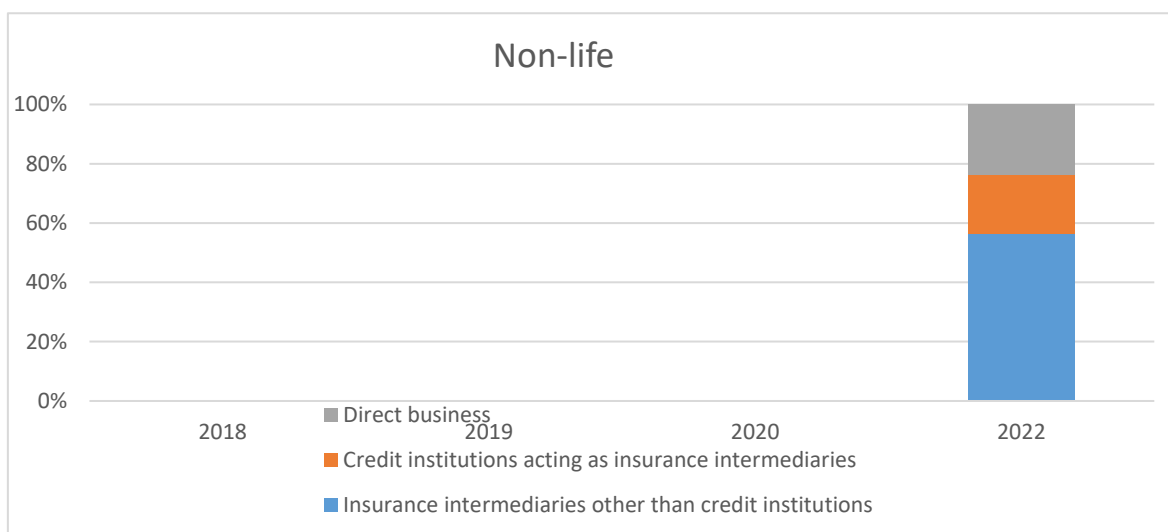
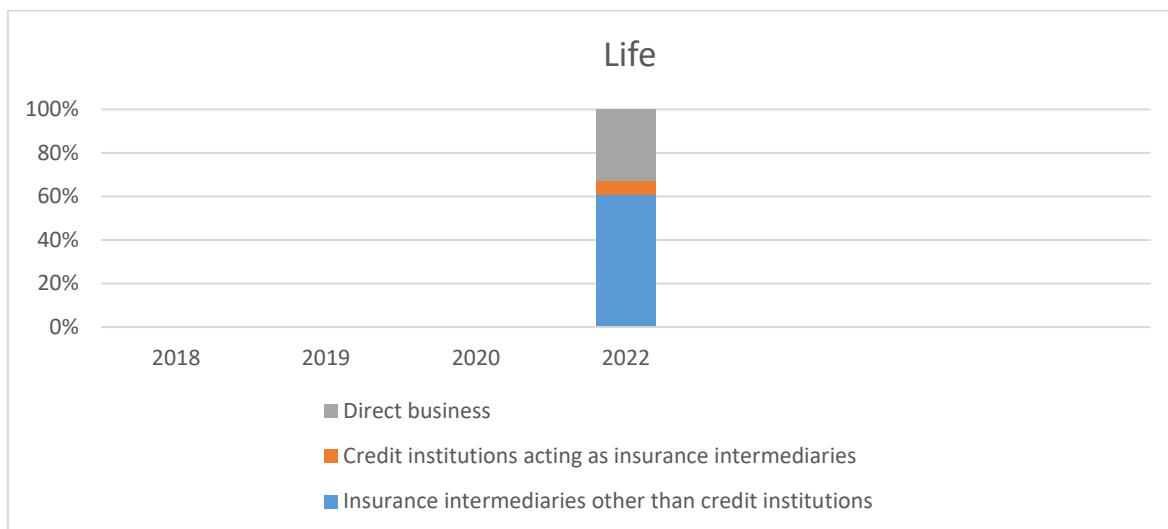
The number we have received from that request is 852.

However, the numbers under the category of the sale of other financial products or services and the category of solely the sale of insurance is data from or register. If you therefore cumulate the number under these both abovementioned categories, it will give you the total amount of insurance intermediaries.

We don't know how the number of intermediaries under the category of the sale of others goods and services is cumulated by the insurance intermediaries under the category of the sale of other financial products or service and the category of solely the sale of insurance.

For that reason, we have not included the number 852 under the category of the sale of other goods and services.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

The information is derived from the five largest insurance companies in the Netherlands, accommodating for over 60% of the total market.

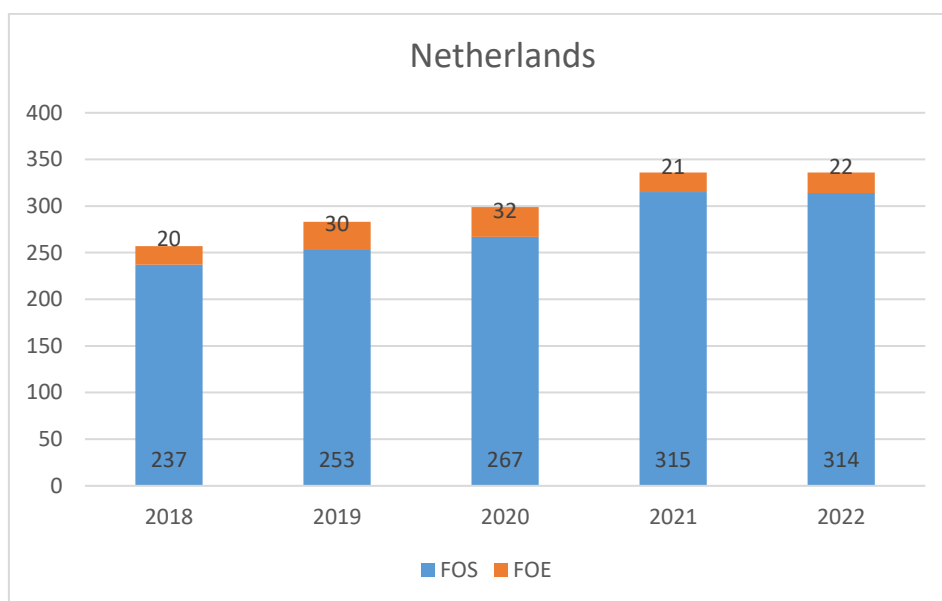
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

The total number of online intermediation/sales is € 4.994.400.406,38

Comments provided by the NCA on the data above:

The information is derived from the five largest insurance companies in the Netherlands, accommodating for over 60% of the total market.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁹²

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	112	0	112
<i>Belgium</i>	284	10	294
<i>Bulgaria</i>	70	0	70
<i>Cyprus</i>	76	1	77
<i>Croatia</i>	50	0	50
<i>Czech Republic</i>	85	0	85
<i>Denmark</i>	106	0	106
<i>Estonia</i>	73	0	73
<i>Finland</i>	86	0	86
<i>France</i>	153	4	157

⁹² The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Germany</i>	<i>223</i>	<i>8</i>	<i>231</i>
<i>Greece</i>	<i>79</i>	<i>1</i>	<i>80</i>
<i>Hungary</i>	<i>79</i>	<i>0</i>	<i>79</i>
<i>Iceland</i>	<i>63</i>	<i>0</i>	<i>63</i>
<i>Ireland</i>	<i>104</i>	<i>1</i>	<i>105</i>
<i>Italy</i>	<i>127</i>	<i>3</i>	<i>130</i>
<i>Latvia</i>	<i>73</i>	<i>0</i>	<i>73</i>
<i>Liechtenstein</i>	<i>61</i>	<i>0</i>	<i>61</i>
<i>Lithuania</i>	<i>72</i>	<i>1</i>	<i>73</i>
<i>Luxembourg</i>	<i>123</i>	<i>0</i>	<i>123</i>
<i>Malta</i>	<i>81</i>	<i>0</i>	<i>81</i>
<i>Netherlands</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Norway</i>	<i>86</i>	<i>1</i>	<i>87</i>
<i>Poland</i>	<i>100</i>	<i>0</i>	<i>100</i>
<i>Portugal</i>	<i>103</i>	<i>2</i>	<i>105</i>
<i>Romania</i>	<i>81</i>	<i>0</i>	<i>81</i>
<i>Slovakia</i>	<i>77</i>	<i>0</i>	<i>77</i>
<i>Slovenia</i>	<i>72</i>	<i>0</i>	<i>72</i>
<i>Spain</i>	<i>144</i>	<i>3</i>	<i>147</i>
<i>Sweden</i>	<i>98</i>	<i>0</i>	<i>98</i>
<i>Total EEA</i>	<i>2941</i>	<i>35</i>	<i>2976</i>

Comments provided by the NCA on the figures included in the table above:

There are 31 insurance intermediaries with a passport to all the EEA-countries. Most of the insurance intermediaries with a European passport, only have a passport for 1 MS (91 insurance intermediaries).

General qualitative description of the “patterns of cross-border activity”:

In general the AFM observes an increase in cross border activity. This originates from two sources 1. dutch insurers moving to another country and 2. new insurers starting in another country. Foreign insurers are mostly active in the Netherlands via underwriting agents (volmacht). The role of the intermediaries is thus important in the increase in cross border activity. The increase in foreign insurers via underwriting agents is partly because regular Dutch insurers aren't able (or willing) to insure certain risks, such as cyber risks. A general recommendation for better supervision is the increase of sharing knowledge about insurers/intermediaries and products within Europe. For example via data-sharing about key ratios of insurers (combined ratio, provision ratio, costs ratio, claim ratio etc...) .

Additional information not covered above :

Brokers: 83% of Insurance Brokers have a staff headcount of less than 10; a turnover and/or balance sheet of less than €2m.

Brokers: 17% of Insurance Brokers have a staff headcount of 10 or more; a turnover and / or a balance sheet of €10m or more.

Brokers - There are no insurance brokers which have a staff headcount of 250 or more; a turnover of €50m or more or a balance sheet of €43m or more.

Agents: 55% of Insurance Agents have a staff headcount of less than 10; a turnover and/or balance sheet of less than €2m.

Agents: 45% of Insurance Brokers have a staff headcount of 10 or more; a turnover and / or a balance sheet of €10m or more.

Agents- There are no insurance agents which have a staff headcount of 250 or more; a turnover of €50m or more or a balance sheet of €43m or more.

Insurance Managers - 63% of Insurance managers have a staff headcount of less than 10.

Insurance Managers - 27% of Insurance managers have a staff headcount of 10 or more.

Insurance Managers - There are no Insurance Managers with a staff headcount of 50 or more.

Moreover, the AFM has noticed that consumers are not always aware that insurance companies sell their portfolios to other (foreign) insurance companies, especially when consumers have taken out their insurance with help of an intermediary. This mostly occurs with life insurances.

NORWAY

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁹³	5,425	1.2%
(Re)insurance GWP (in million) ⁹⁴	22,877.888	1.7%
Number of (re)insurance undertakings ⁹⁵	59	3.4%
Number of registered insurance intermediaries	2217	0.3%

National competent authority:

The Financial Supervisory Authority of Norway

⁹³ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

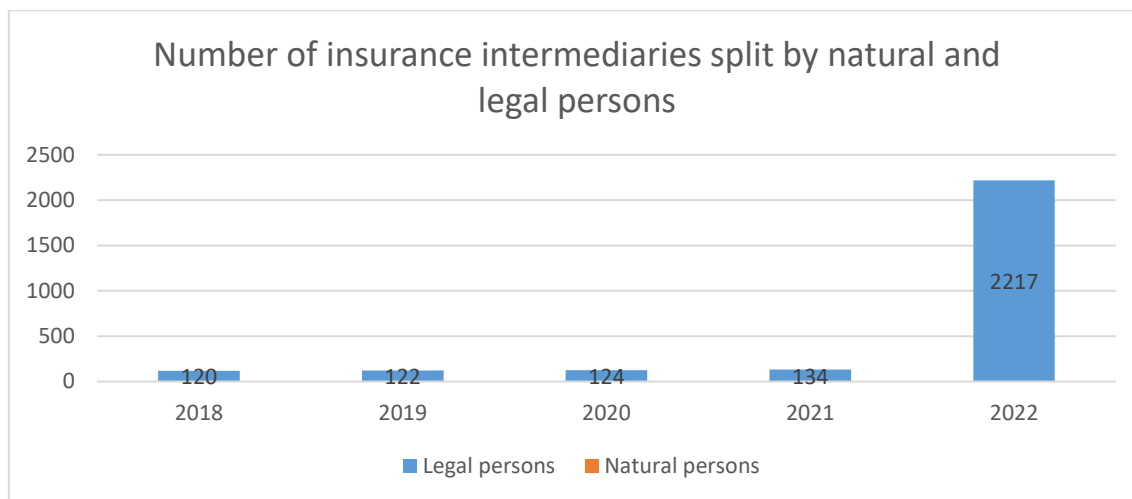
⁹⁴ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁹⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



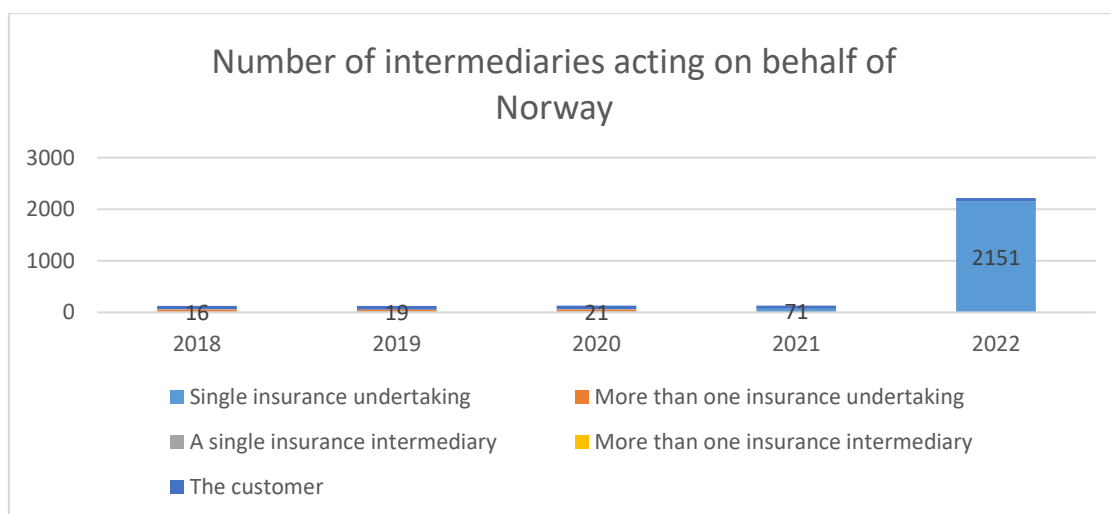
Comments provided by the NCA on the figures included in the chart above:

From 1.1.2022, it is required that all insurance agents are listed in the Financial Supervisory Authority's register. Previously, only insurance agents for foreign insurance companies had to be registered with the Financial Supervisory Authority. Norwegian insurance companies kept their own agent register. The number of insurance intermediaries (agents) in the Financial Supervisory Authority's register has therefore increased significantly from 2021 to 2022.

Online registration system:

We have created application forms to be submitted electronically via Altinn.no. When the application is approved, the companies are registered in the business register on our website, Finanstilsynet.no. This register is updated every hour.

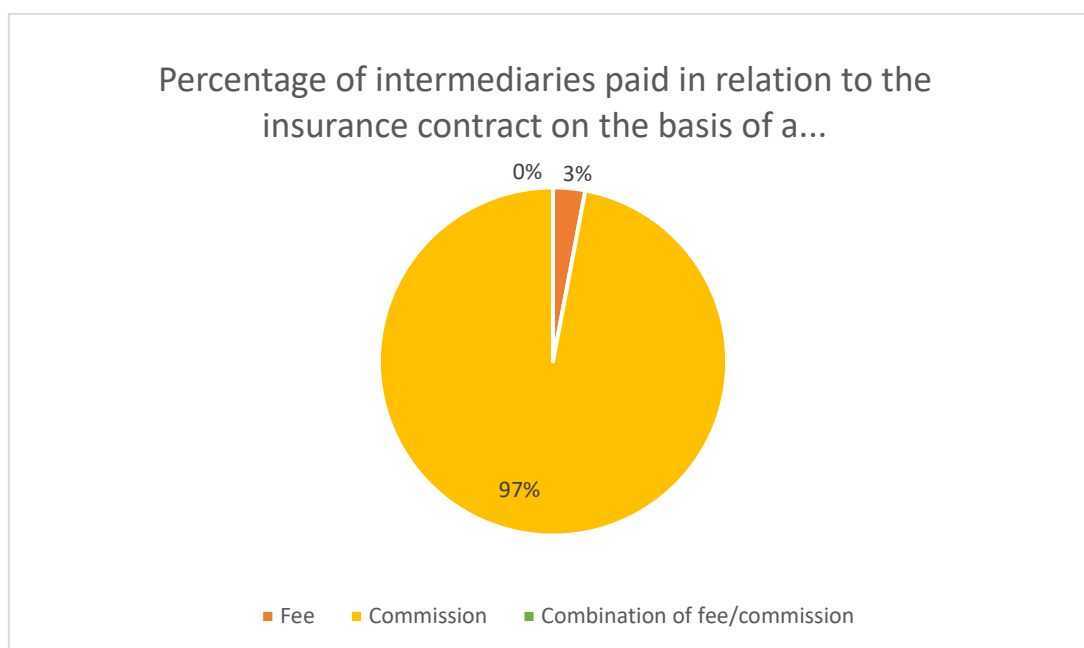
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

Finanstilsynet distinguishes between agents and brokers. Brokers are acting on behalf of customers while agents are acting on behalf of one or more insurance companies and/or the insurance agent companies they have an agreement with. Finanstilsynet have started to register who insurance companies the agents have agreements with in our business register, but this is not complete yet. Who the agents have agreements with, can also change.

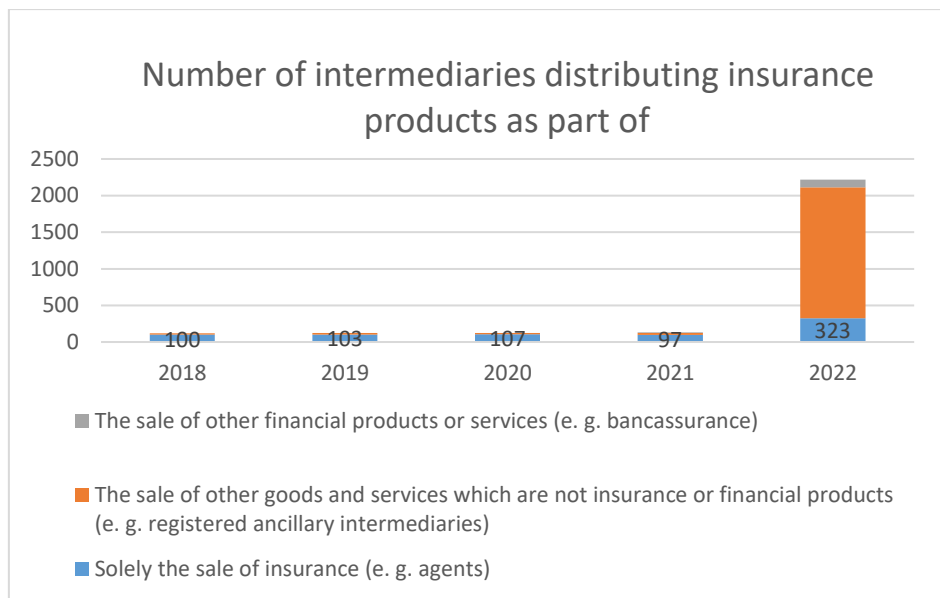
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

Insurance brokers can only get paid directly by the consumer, because they must be completely independent. Insurance agents can get paid from both the insurance company and the customer, but they have to inform the customer about the payment. We have asked insurers that represent at least 60% of the national market. All of them have reported that all their agents get remuneration included in the insurance premium.

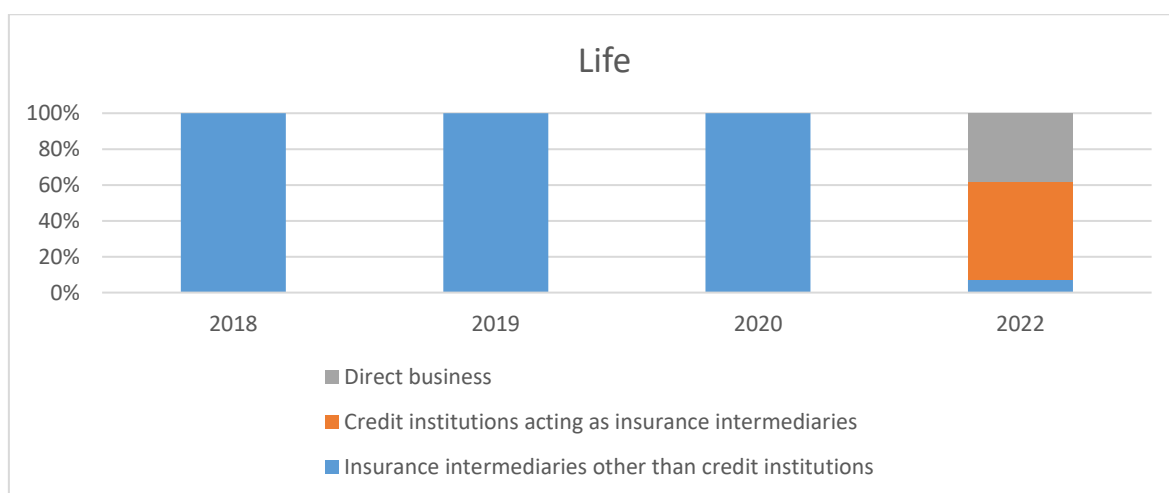
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

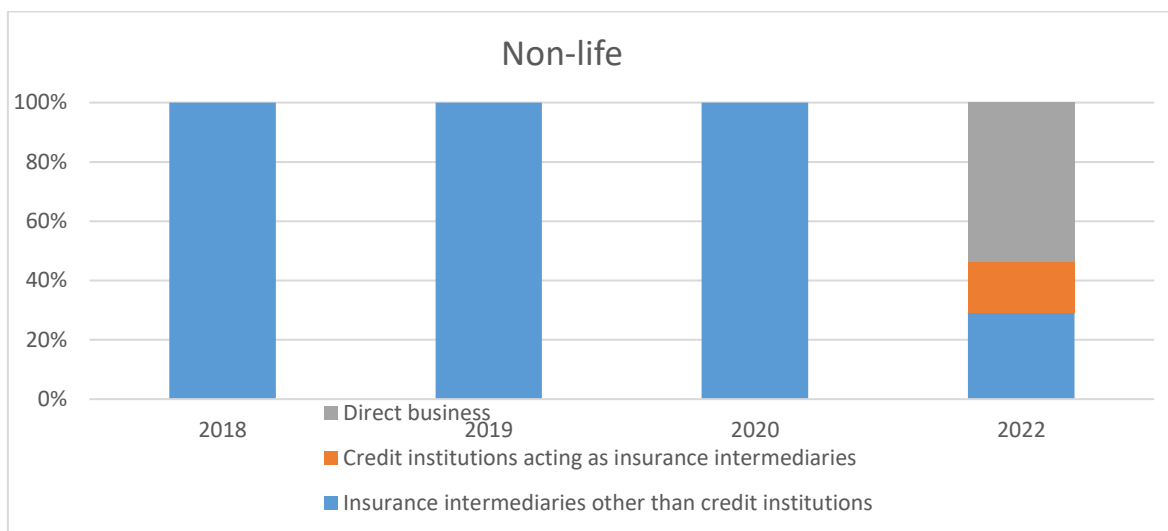


Comments provided by the NCA on the figures included in the chart above:

Companies offering other financial products must be registered as agents and not accessory agents. The category of insurance intermediaries distributing insurance products as part of the sale of other financial products is therefore included in the category of intermediaries distributing insurance product as part of solely the sale of insurance.

GWP split by distribution channels:





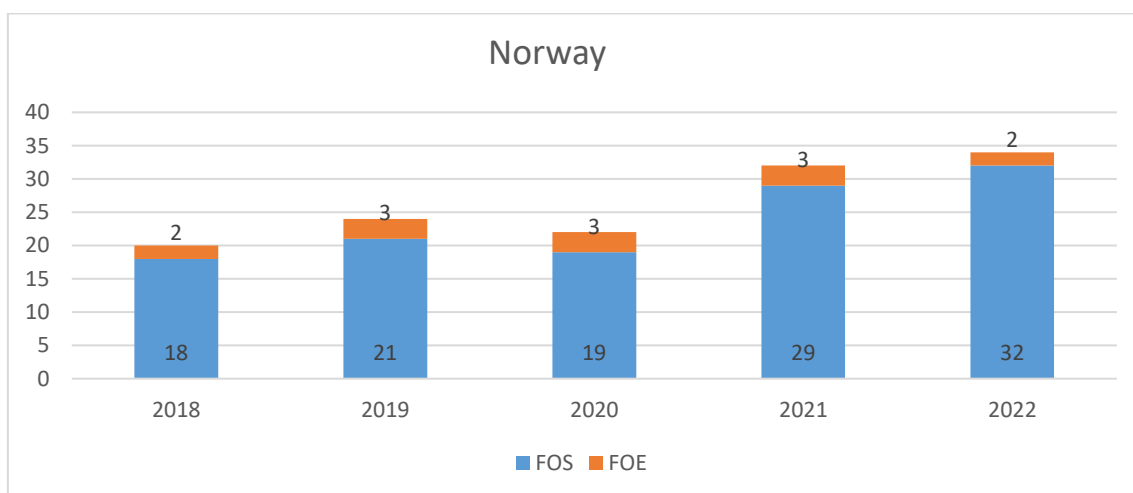
Comments provided by the NCA on the figures included in the charts above:

We have asked Norwegian insurers about this question (representing at least 60%).

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

About 5 % of of the sales is online only

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:⁹⁶

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	7	0	7
<i>Belgium</i>	14	0	14
<i>Bulgaria</i>	7	0	7
<i>Cyprus</i>	11	0	11
<i>Croatia</i>	7	0	7
<i>Czech Republic</i>	9	0	9
<i>Denmark</i>	19	1	20
<i>Estonia</i>	11	0	11
<i>Finland</i>	20	0	20
<i>France</i>	9	0	9
<i>Germany</i>	12	0	12
<i>Greece</i>	13	0	13
<i>Hungary</i>	7	0	7
<i>Iceland</i>	16	0	16
<i>Ireland</i>	8	0	8
<i>Italy</i>	10	0	10
<i>Latvia</i>	12	0	12
<i>Liechtenstein</i>	7	0	7
<i>Lithuania</i>	12	0	12
<i>Luxembourg</i>	8	0	8
<i>Malta</i>	9	0	9
<i>Netherlands</i>	14	0	14
<i>Norway</i>	0	0	0
<i>Poland</i>	11	0	11
<i>Portugal</i>	8	0	8
<i>Romania</i>	8	0	8
<i>Slovakia</i>	6	0	6
<i>Slovenia</i>	6	0	6
<i>Spain</i>	10	0	10
<i>Sweden</i>	30	1	31

⁹⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

Total EEA	321	2	323
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General qualitative description of the “patterns of cross-border activity”:

There are most cross-borders to other nordic countries (Sweden, Finland, Denmark and Iceland)

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

Due to more work with registration of insurance agents, this has been prioritized from mid- 2022 to mid-2023. In the end of 2023 we have the opportunity to prioritize more supervisory follow-up in general. We also have somewhat more resources due to recruitment of employees in late 2022.

POLAND

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ⁹⁷	37,654	8.3%
(Re)insurance GWP (in million) ⁹⁸	15,444.623	1.1%
Number of (re)insurance undertakings ⁹⁹	52	3.00%
Number of registered insurance intermediaries	30525	3.5%

National competent authority:

Polish Financial Supervision Authority

⁹⁷ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

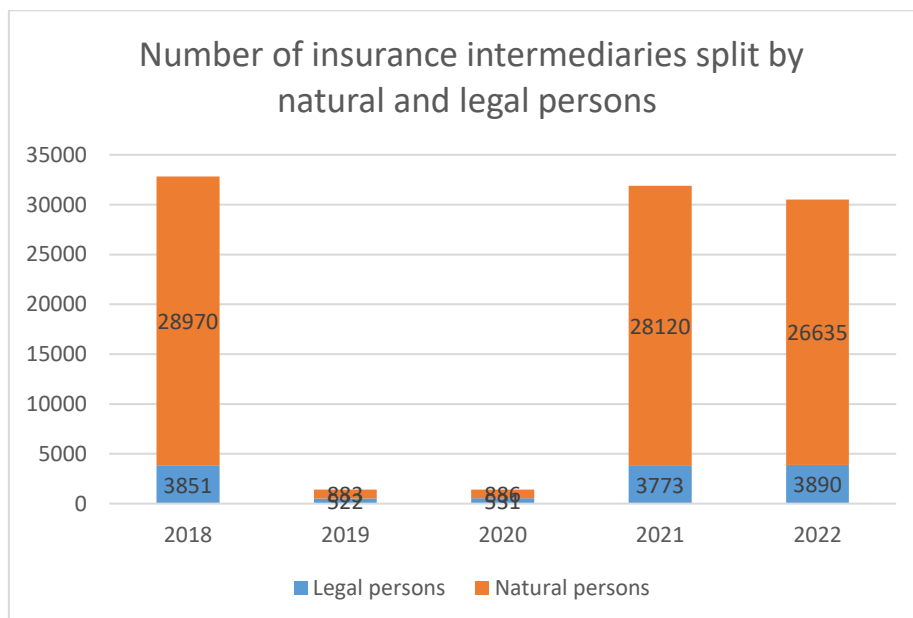
⁹⁸ (Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

⁹⁹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

Please be informed that for 2019 and 2020 we can present number of legal and physical person only in the relation of the insurance brokers.

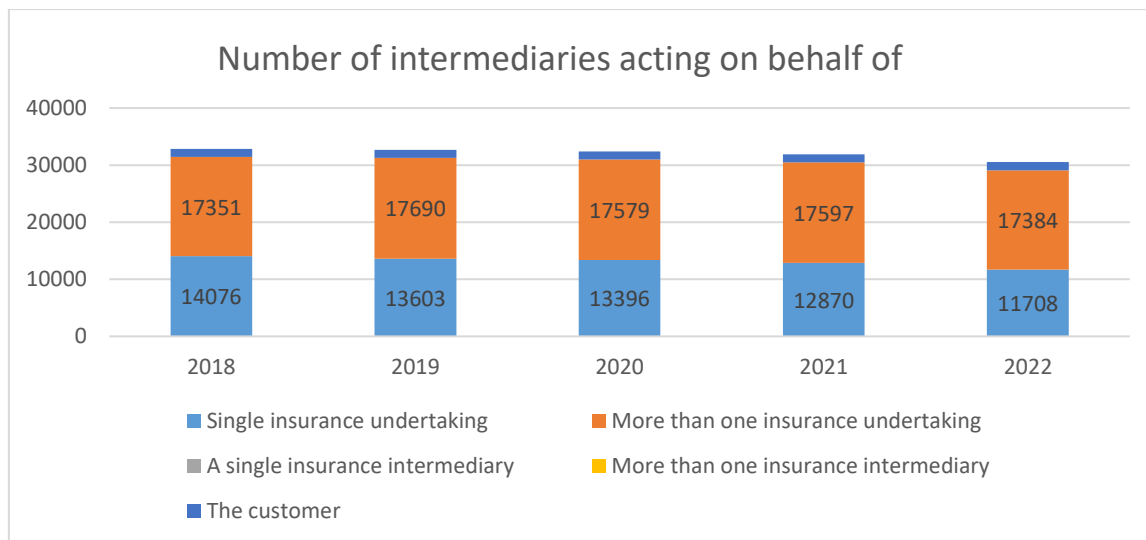
The position "Legal persons" includes:

- legal persons (as defined in PL Civil Code)
- another entities, which are not natural persons (e.g. associations, companies that are not legal persons)

Online registration system:

The register of insurance intermediaries is composed of a part of brokers and agents. Applications for registration, modification and deletion of insurance agents are sent electronically to the register by insurance undertakings. After registration, the insurance undertaking receives feedback about the registrations. The on-line register is updated every 24 hours.

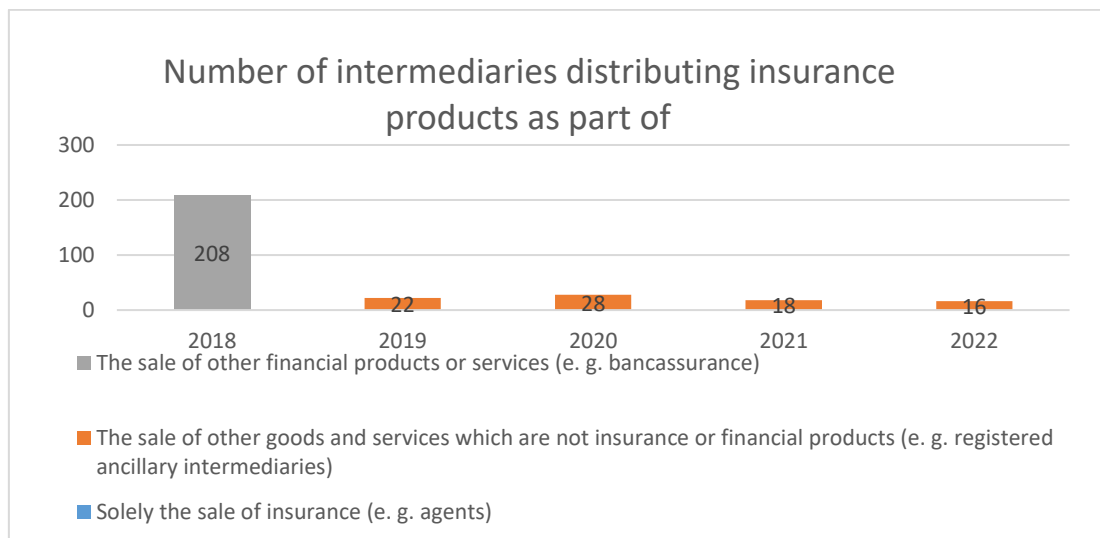
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

In Poland intermediary could not be represented by another intermediary, so categories of insurance intermediaries acting on behalf of a single insurance intermediary and on behalf of more than one insurance intermediary do not apply. Insurance agents are represented in categories of insurance intermediaries acting on behalf of single insurance undertaking and on behalf of more than one insurance undertaking, insurance brokers in category of insurance intermediaries acting on behalf of the customer.

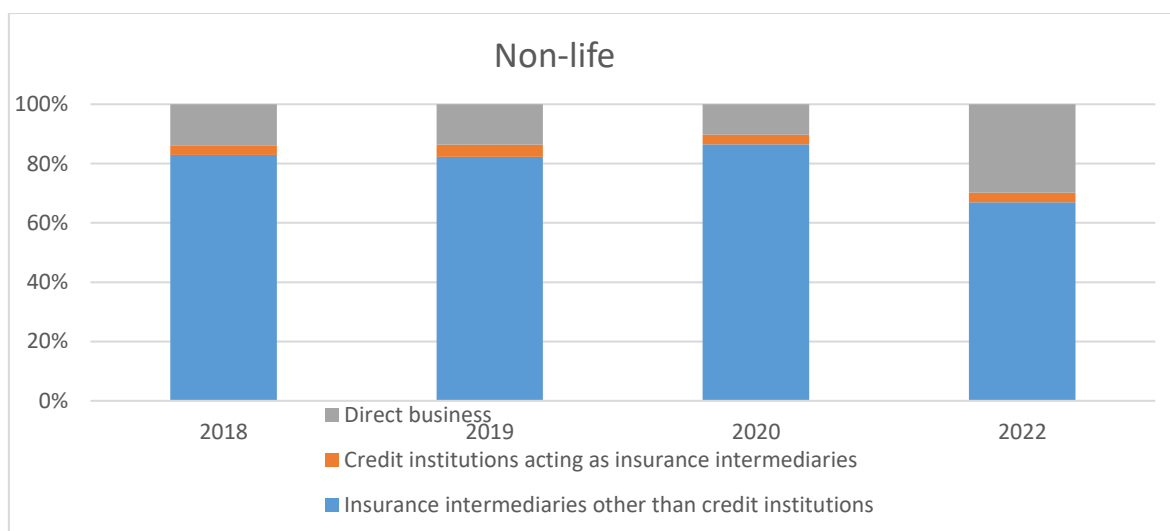
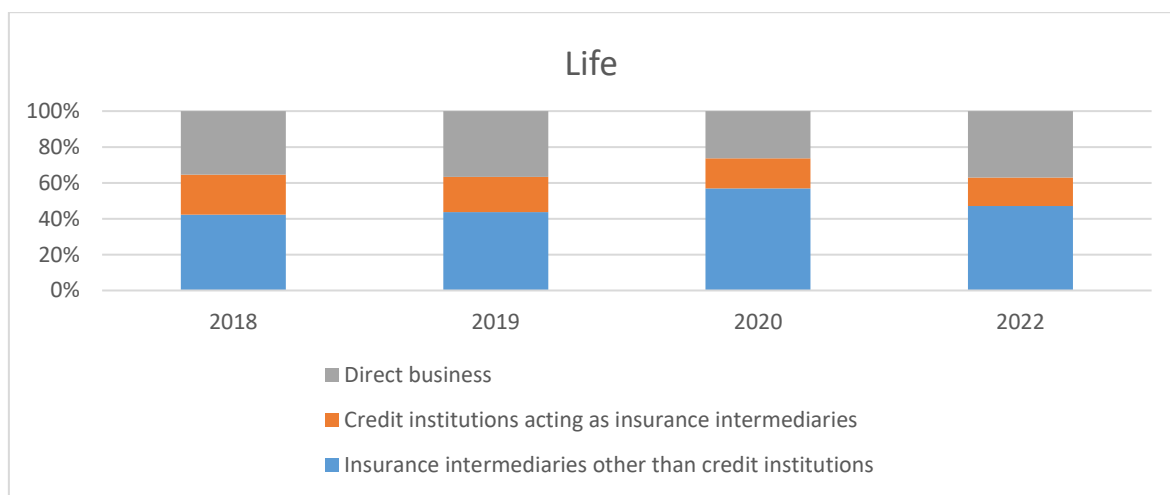
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



Comments provided by the NCA on the figures included in the chart above:

KNF does not collect in the register information about the type of intermediary in accordance with categories indicated by EIOPA in the table or similar categories. As a rule, intermediaries are categorized in our register as insurance agents, insurance brokers or ancillary insurance agents - we cannot distinguish intermediaries that solely sell insurance and these that distribute insurance products as a part of other financial products or services. For that reason we could only estimate the number of registered ancillary intermediaries, which is given the category of the sale of other goods and services which are not insurance or financial products).

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

Data comes from national specificity reporting.

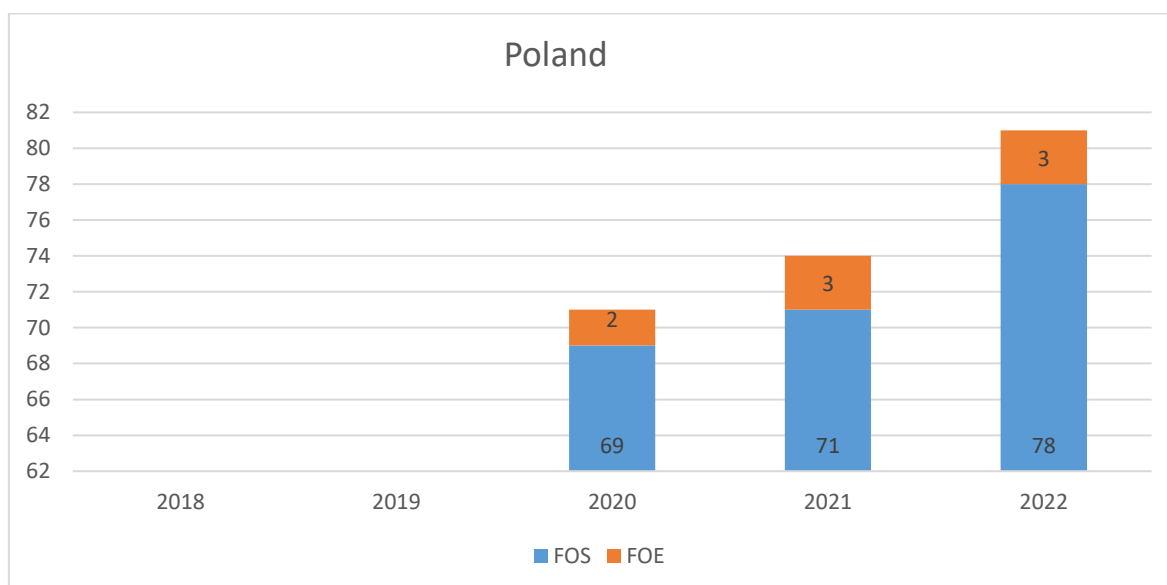
In the category named "credit institutions acting as an insurance" there was presented only data for Banks and Co-operative Savings and Credit Unions acting as an insurance.

In the category named "insurance intermediaries other than credit institutions" we presented GWP without direct business, banks and credit unions in order to present true "total" values.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

Life = 0,01%;

Non-life 1,91%

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹⁰⁰

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	37	0	37
<i>Belgium</i>	30	0	30

¹⁰⁰ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Bulgaria</i>	25	0	25
<i>Cyprus</i>	26	0	26
<i>Croatia</i>	16	0	16
<i>Czech Republic</i>	48	1	49
<i>Denmark</i>	32	0	32
<i>Estonia</i>	35	0	35
<i>Finland</i>	28	0	28
<i>France</i>	39	0	39
<i>Germany</i>	57	0	57
<i>Greece</i>	23	0	23
<i>Hungary</i>	36	0	36
<i>Iceland</i>	6	0	6
<i>Ireland</i>	35	0	35
<i>Italy</i>	30	1	31
<i>Latvia</i>	35	0	35
<i>Liechtenstein</i>	6	0	6
<i>Lithuania</i>	41	0	41
<i>Luxembourg</i>	29	0	29
<i>Malta</i>	28	0	28
<i>Netherlands</i>	34	0	34
<i>Norway</i>	8	0	8
<i>Poland</i>	0	0	0
<i>Portugal</i>	29	0	29
<i>Romania</i>	38	1	39
<i>Slovakia</i>	39	0	39
<i>Slovenia</i>	26	0	26
<i>Spain</i>	34	0	34
<i>Sweden</i>	33	0	33
<i>Total EEA</i>	883	3	886

Additional information not covered above :

In 2022 insurance brokers share in GWP accounted for 13,68% in life insurance and 19,86 % in non-life insurance.

Information on the powers of the NCA

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

In our opinion KNF is sufficiently empowered to do proper conduct of business supervision, however we do not exclude further increase of our resources if necessary.

PORTUGAL

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹⁰¹	10,352	2.3%
(Re)insurance GWP (in million) ¹⁰²	11,999.855	1%
Number of (re)insurance undertakings ¹⁰³	37	2%
Number of registered insurance intermediaries	10687	1.2%

National competent authority:

¹⁰¹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

¹⁰² "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

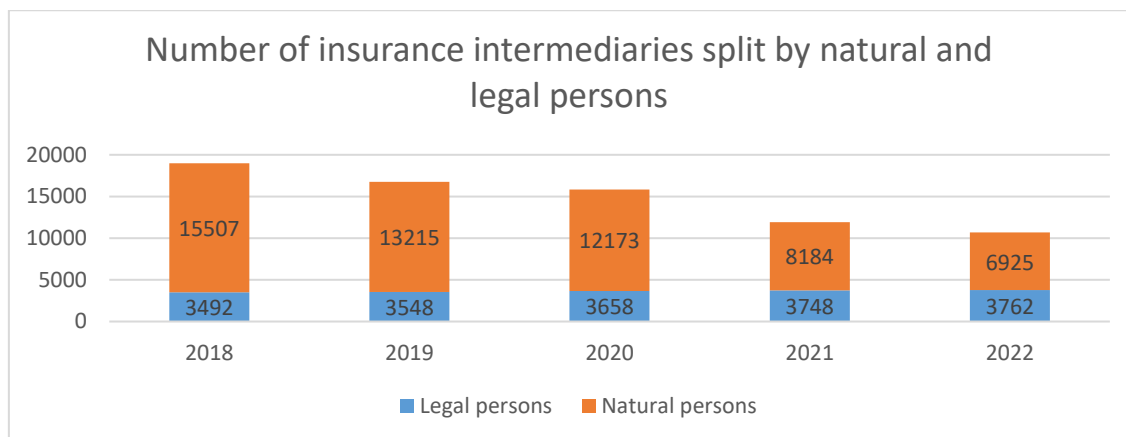
¹⁰³ Number of (re)insurance undertakings (year-end 2022) include the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

To ensure that the information about "(Re)insurance GWP (in million)", based on annual report, corresponds to the "Number of (re)insurance undertakings", based on an annual average, "(Re)insurance GWP (in million)" refers to the 37 insurance undertakings (instead of 35 insurance undertakings as indicated in the 4th quarter report)."

Portuguese Insurance and Pension Funds Supervisory Authority

Registered insurance intermediaries split by natural and legal persons:



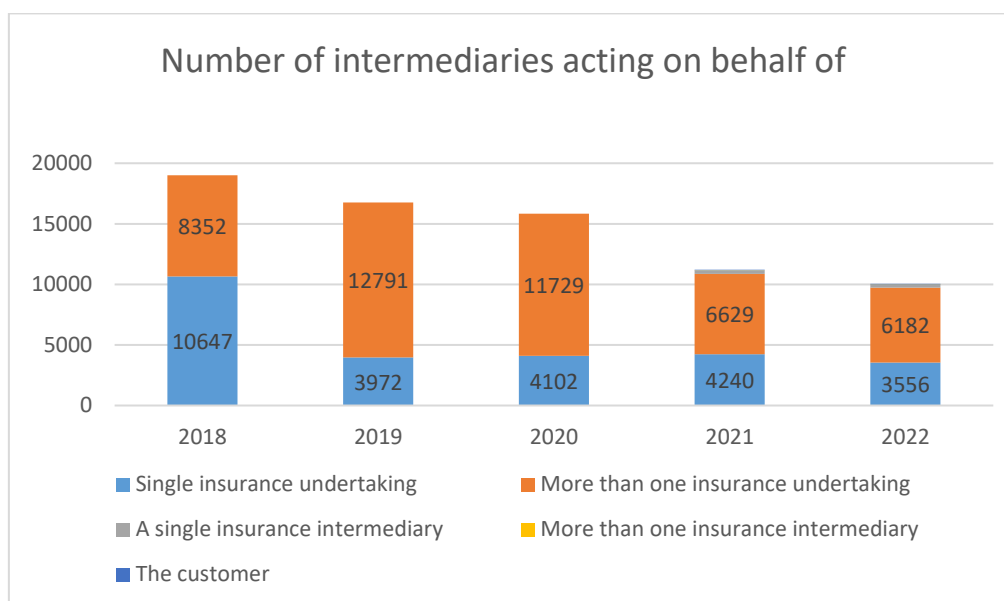
Comments provided by the NCA on the figures included in the chart above:

The decrease of registered intermediaries is probably due to the additional requirements regarding the proper qualification requirements provided for in the legal regime that transposed the IDD.

Online registration system:

The Portuguese online registration system is in place since 2007 and the information on the number of registered insurance, reinsurance and ancillary insurance intermediaries is daily available.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

The criteria used in 2021 and 2022 is different from the one applied in the previous years (2018; 2019; and 2020), on the number of intermediaries acting on behalf of a single insurance undertaking.

In 2018, the criteria applied was based on the number of registered tied insurance intermediaries and the number of registered intermediaries (insurance agents) acting on behalf of a single insurance undertaking.

In 2019 and 2020, the criteria was based on the number of registered intermediaries (insurance agents) acting on behalf of a single insurance undertaking.

In 2021 and 2022, the criteria was based on the reporting of remuneration paid to the intermediaries.

It should be stressed that this latter criteria doesn't provide the exact number of insurance intermediaries acting nationally, since it depends on the fulfillment of the report duty by all the undertakings and intermediaries (including from another MS). However, the number is very close to the actual figures.

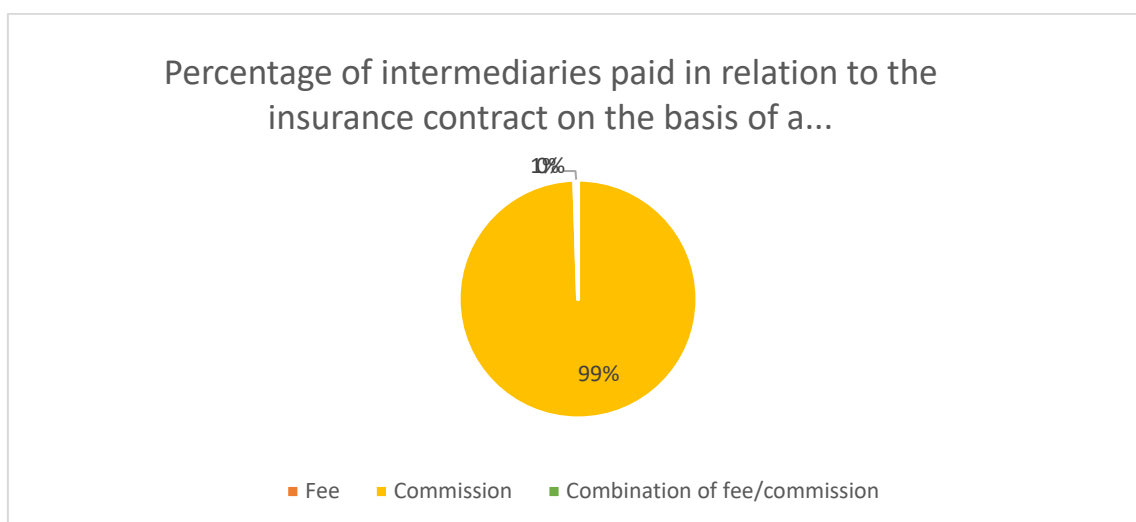
It should be highlighted that the data provided regards to the information registered at 31st of December of each year (2022).

In order to enhance the comparison possibilities, please consider the 2020 figures, aligned with the criteria followed in 2021 and 2022:

Number of insurance intermediaries acting on behalf of:

1. a single insurance undertaking: 5609
2. more than one insurance undertaking: 7149
3. a single insurance intermediary: 233
4. more than one insurance intermediary: 18
5. the customer: 67
6. Total number of registered intermediaries (6=1+2+3+4+5): 13076

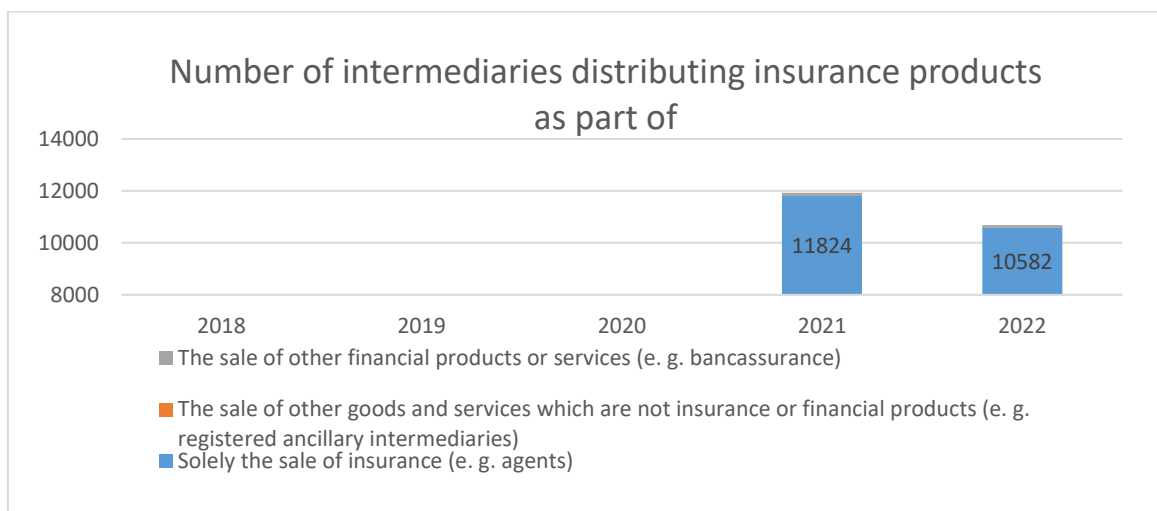
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

The data indicated above reflects our estimates based on the ongoing supervisory activity (for instance, analysis of mediation agreements and exchange of information with the operators during onsite and offsite inspections).

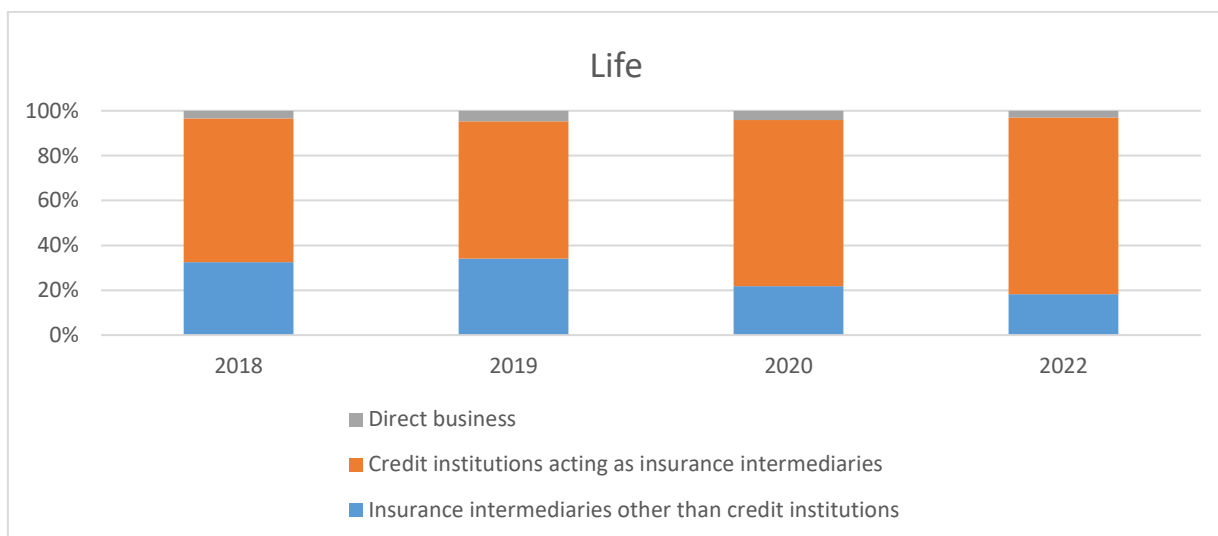
Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

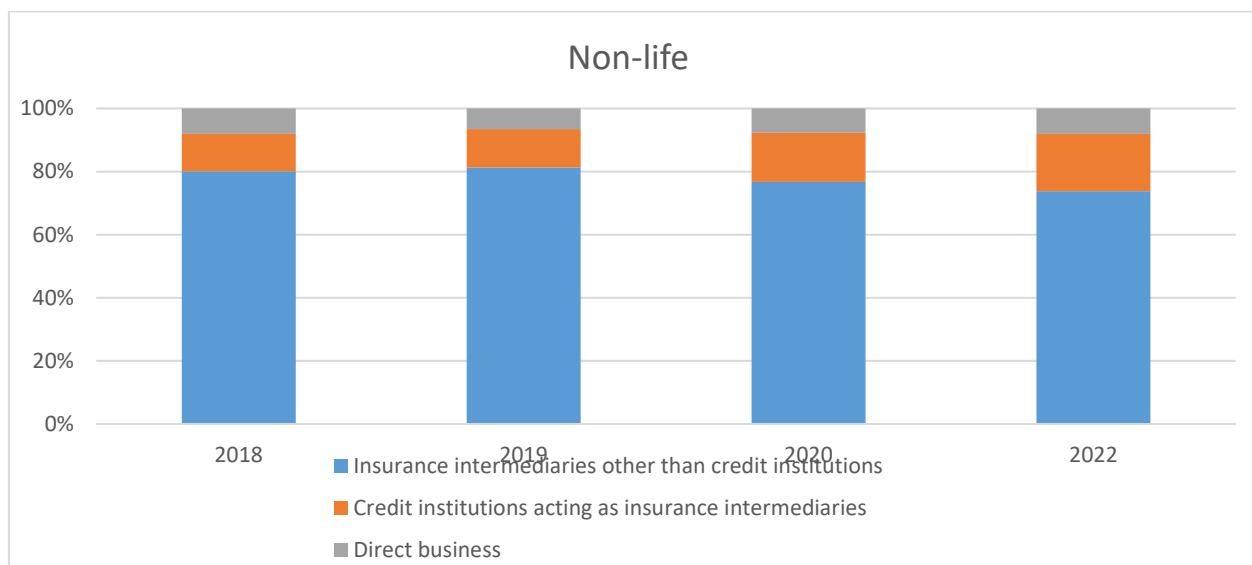


Comments provided by the NCA on the figures included in the chart above:

The data indicated in the category of the sale of other financial products or services (e.g. bancassurance) is based on information available on Banco de Portugal's website (National Banking Supervisory Authority) since it is not possible for ASF to obtain this information directly.

GWP split by distribution channels:





Comments provided by the NCA on the figures included in the charts above:

The data is still provisional and is based on the report made by insurance undertakings to ASF.

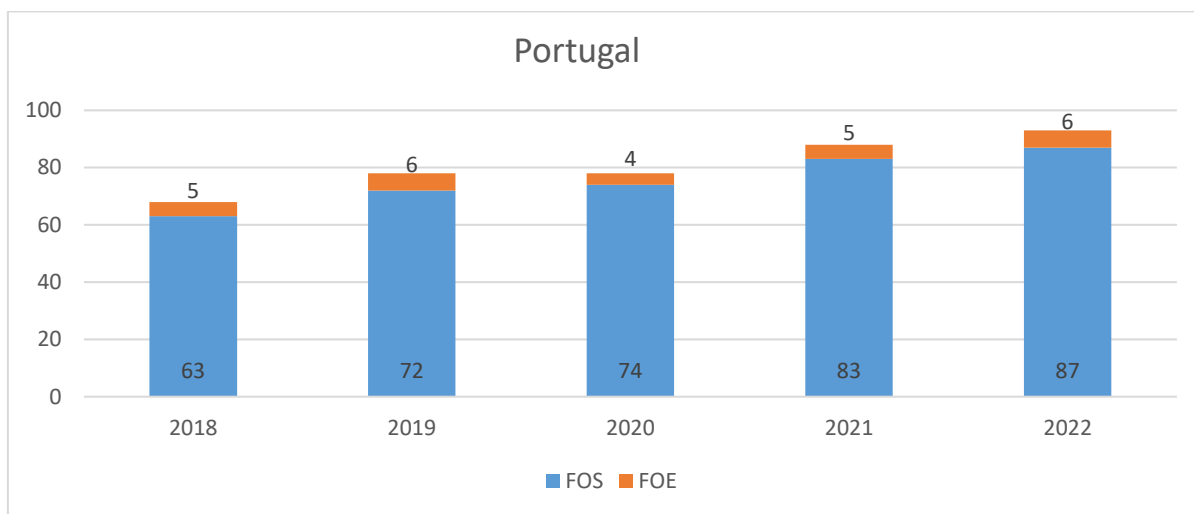
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

0,28%

Comments provided by the NCA on the data above:

The data above only takes in consideration the information reported by insurance undertakings regarding the proportion of online intermediation/sales via websites direct business, since ASF does not have access to the same data from insurance intermediaries.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹⁰⁴

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	7	0	7
<i>Belgium</i>	18	0	18
<i>Bulgaria</i>	6	0	6
<i>Cyprus</i>	7	0	7
<i>Croatia</i>	4	0	4
<i>Czech Republic</i>	5	0	5
<i>Denmark</i>	6	0	6
<i>Estonia</i>	4	0	4
<i>Finland</i>	5	0	5
<i>France</i>	24	2	25
<i>Germany</i>	15	0	15
<i>Greece</i>	7	0	7
<i>Hungary</i>	5	0	5
<i>Iceland</i>	3	0	3
<i>Ireland</i>	13	0	13
<i>Italy</i>	14	0	14
<i>Latvia</i>	3	0	3
<i>Liechtenstein</i>	2	0	2

¹⁰⁴ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Lithuania</i>	4	0	4
<i>Luxembourg</i>	14	0	14
<i>Malta</i>	6	0	6
<i>Netherlands</i>	11	0	11
<i>Norway</i>	4	0	4
<i>Poland</i>	8	0	8
<i>Portugal</i>	0	0	0
<i>Romania</i>	6	0	6
<i>Slovakia</i>	5	0	5
<i>Slovenia</i>	6	0	6
<i>Spain</i>	74	4	76
<i>Sweden</i>	9	0	9
<i>Total EEA</i>	87	6	90

General qualitative description of the “patterns of cross-border activity”:

The majority of insurance intermediaries registered in Portugal that carry out cross-border activities operates under the freedom to provide services (approximately 98%) and with regards to non-Life insurance classes. The cross-border activity is carried out mostly in Spain (approximately 30%) and France (approximately 10%) possibly due to the geographical proximity of Spain and to the high number of Portuguese living in France.

Information on the powers of the NCA

New statutory powers to implement the IDD received since 2022

ASF did not receive any new statutory powers since 2022 to ensure the implementation of the IDD.

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

We did not verify any areas regarding which ASF has not been sufficiently empowered to do proper conduct of business supervision.

ROMANIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹⁰⁵	19,042	4.2%
(Re)insurance GWP (in million) ¹⁰⁶	2,772.753	0.2%
Number of (re)insurance undertakings ¹⁰⁷	25	1.4%
Number of registered insurance intermediaries	60973	7.1%

National competent authority:

Financial Supervisory Authority

¹⁰⁵ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

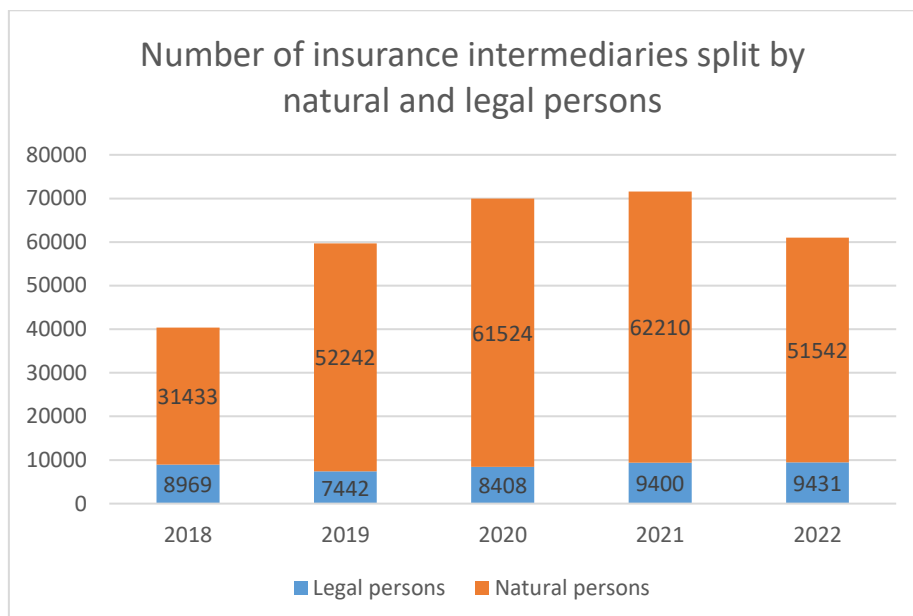
¹⁰⁶ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹⁰⁷ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

Based on our own internal register (Secondary Intermediaries Register which was implemented starting with 2019), we can extract data in real time. For year 2022, the information provided were available at the 15th of May, 2023. Also, please note that for 2022, the agents were counted only once, without taking into account the multiple registrations made by each insurance undertaking with which they have contract with. (for agents which are selling insurance for more than one insurance undertaking (ie: bancassurance))

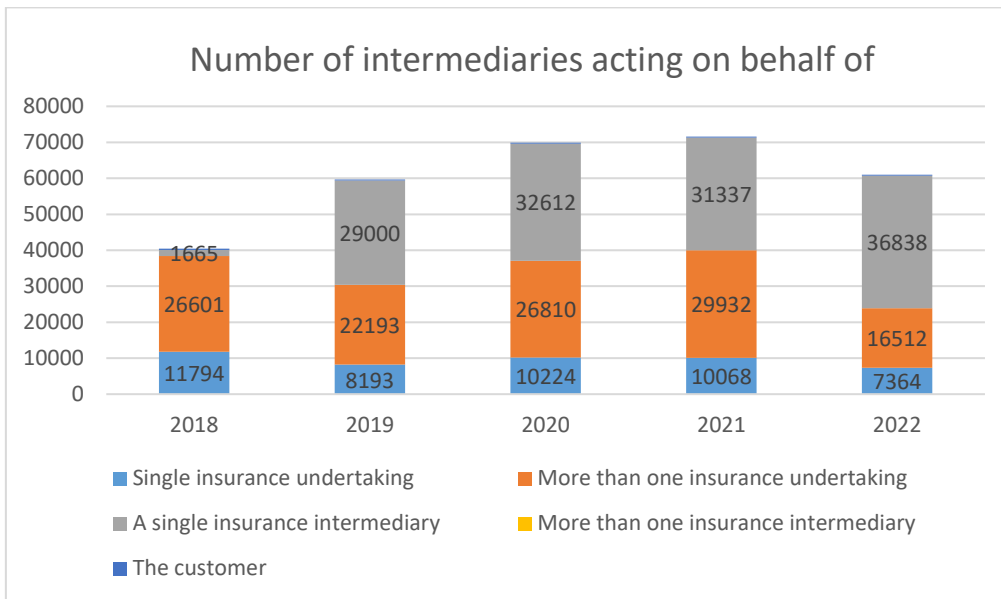
Online registration system:

All insurance intermediaries are registered in FSA registers, as follows:

1. principal intermediaries are registered in RIP, directly by FSA;
2. secondary intermediaries are registered in RIS (which is under the administration of FSA), by the insurance undertakings or by the principal intermediaries.

All registrations are made after strictly verifying the national registration conditions which are presented in the national secondary legislation. The data are uploaded in real time.

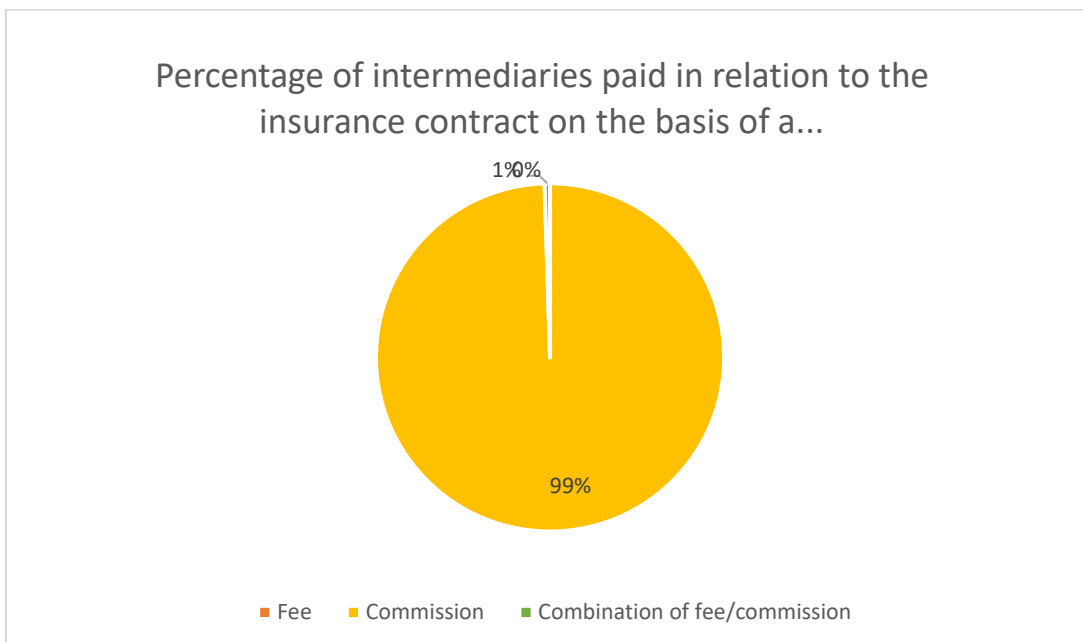
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Comments provided by the NCA on the figures included in the chart above:

Please note that for 2022 year, the agents were counted only once, without taking into account the multiple registrations made by each insurance undertaking with which they have contract with. About the trend, we have noticed that the number of insurance intermediaries acting on behalf of a single insurance intermediary has been increased in 2022. Also, for the last 5 years, there is a descendent trend for the number of principal intermediaries.

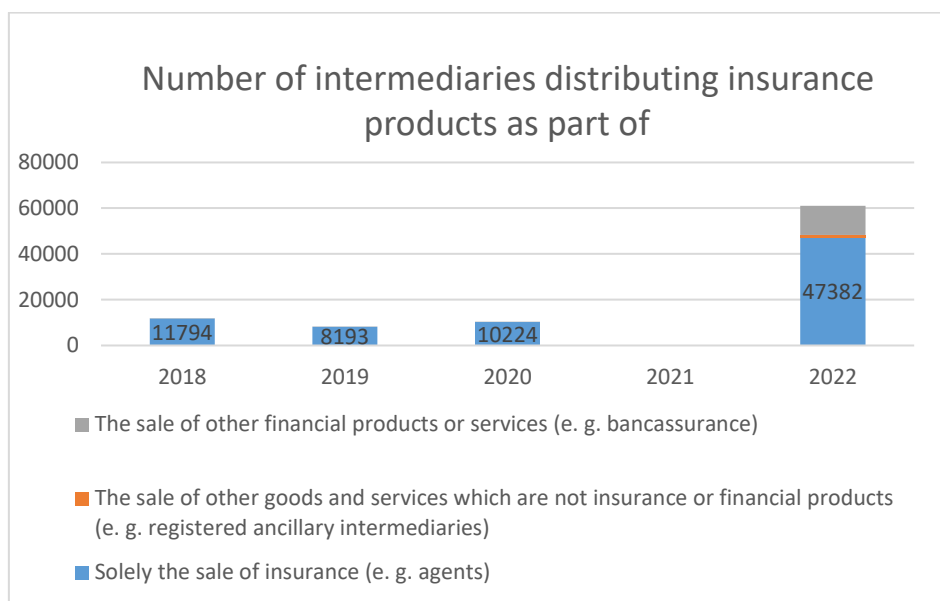
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



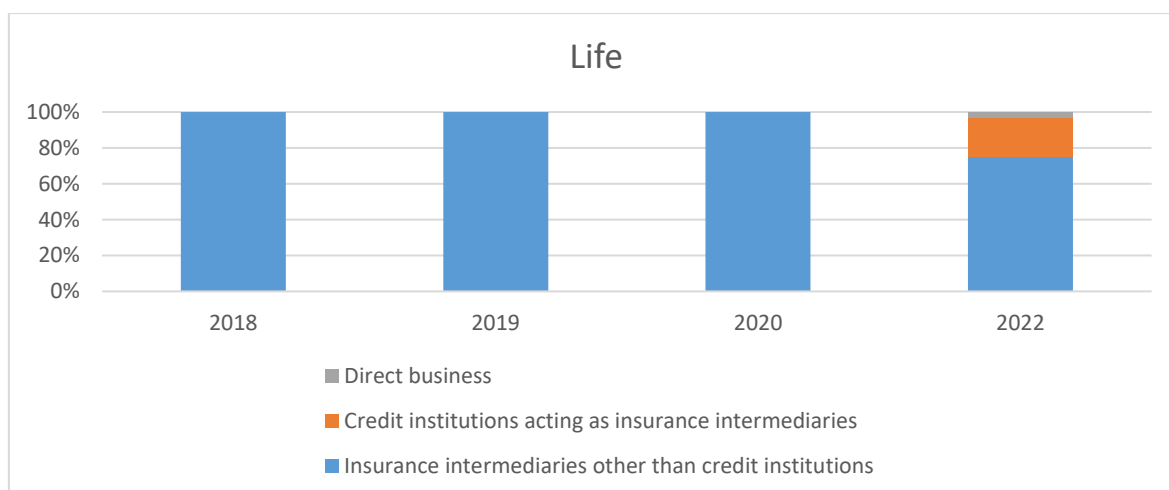
Comments provided by the NCA on the figures above :

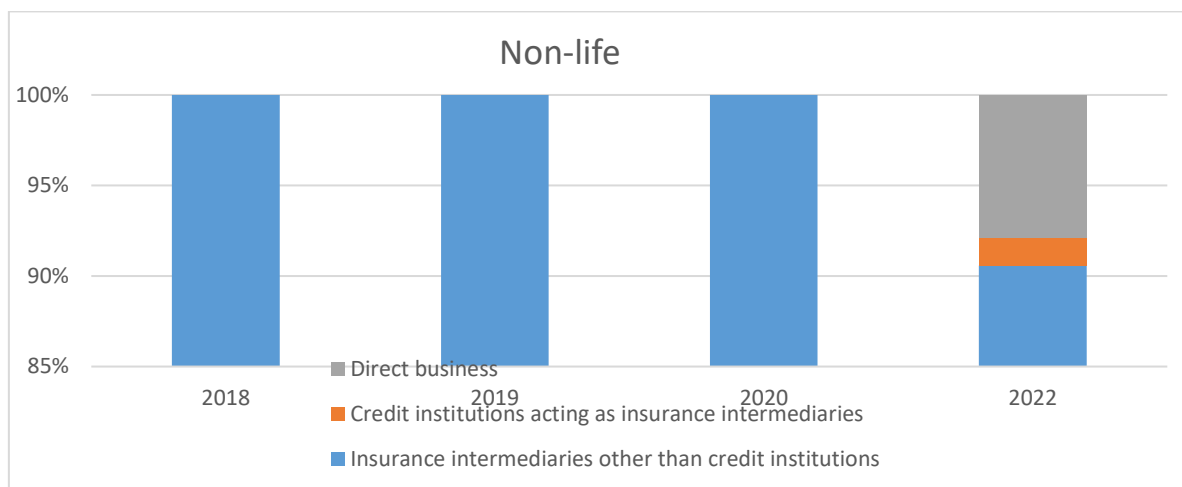
99% of the principal intermediaries' income was obtained on the basis of the commissions paid by the insurance undertakings. The secondary intermediaries who are distributing under the insurance undertakings' responsibility are remunerated also on the basis of commissions.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



GWP split by distribution channels:





Comments provided by the NCA on the figures included in the charts above:

Quarterly reports on insurance distribution

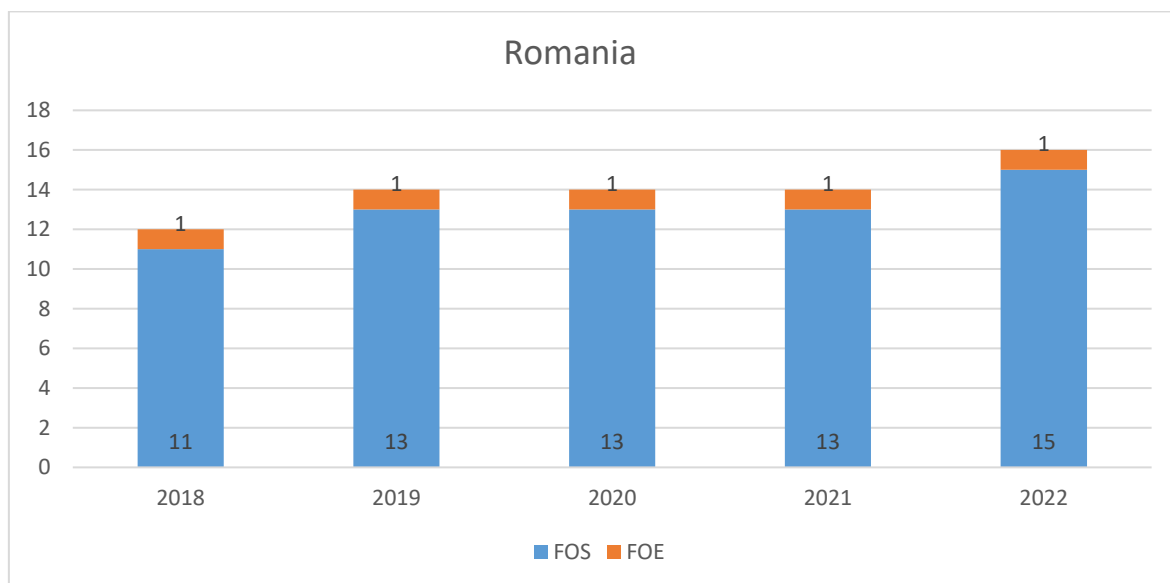
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

Based on the quarterly reports on insurance distribution, insurance undertakings reported sales directly via websites and mobile apps 0,38% out of total sales.

Comments provided by the NCA on the data above:

This was a small increase compared to 2021, when the e-sales represented 0,26% out of total sales

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE):



Comments provided by the NCA on the figures included in the chart above:

For 2021-2022, out of the number of intermediaries mentioned above, only 2 insurance intermediaries carried out mediation activities under FOS. Based on the quarterly reports, the insurance premium distributed are related mainly to the insurance class A13 (general liability) & class A2 (health insurance).

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹⁰⁸

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	4	0	4
<i>Belgium</i>	5	0	5
<i>Bulgaria</i>	11	1	11
<i>Cyprus</i>	6	0	6
<i>Croatia</i>	6	0	6
<i>Czech Republic</i>	7	0	7
<i>Denmark</i>	5	0	5
<i>Estonia</i>	6	0	6
<i>Finland</i>	5	0	5
<i>France</i>	7	0	7
<i>Germany</i>	4	0	4

¹⁰⁸ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Greece</i>	5	0	5
<i>Hungary</i>	7	0	7
<i>Iceland</i>	0	0	0
<i>Ireland</i>	3	0	3
<i>Italy</i>	7	0	7
<i>Latvia</i>	5	0	5
<i>Liechtenstein</i>	0	0	0
<i>Lithuania</i>	5	0	5
<i>Luxembourg</i>	5	0	5
<i>Malta</i>	4	0	4
<i>Netherlands</i>	5	0	5
<i>Norway</i>	2	0	2
<i>Poland</i>	6	0	6
<i>Portugal</i>	4	0	4
<i>Romania</i>	0	0	0
<i>Slovakia</i>	5	0	5
<i>Slovenia</i>	5	0	5
<i>Spain</i>	6	0	6
<i>Sweden</i>	5	0	5
<i>Total EEA</i>	15	1	15

SLOVAKIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹⁰⁹	5,435	1.2%
(Re)insurance GWP (in million) ¹¹⁰	1,867.249	0.1%
Number of (re)insurance undertakings ¹¹¹	10	0.6%
Number of registered insurance intermediaries	20938	2.4%

National competent authority:

National Bank of Slovakia

¹⁰⁹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

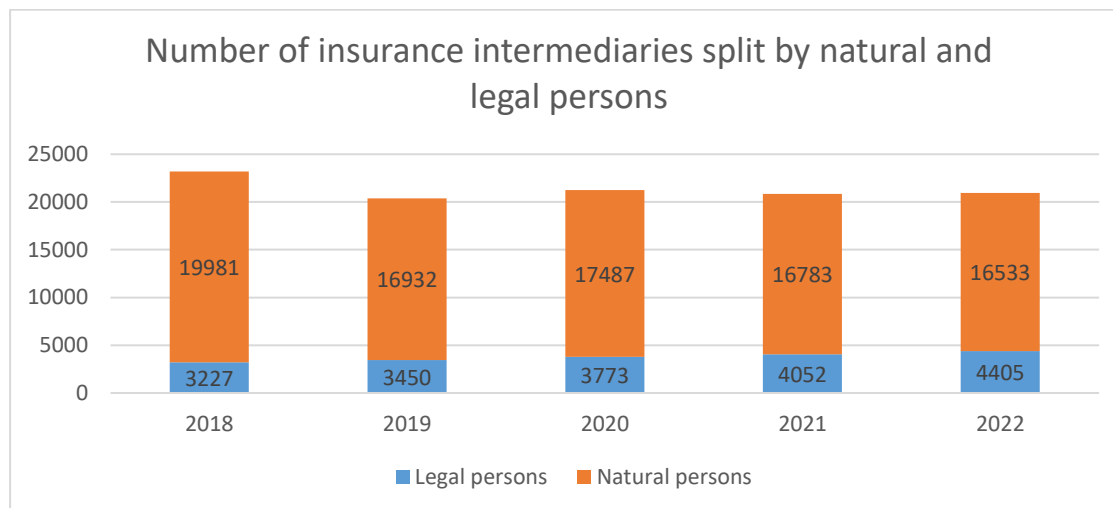
¹¹⁰ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹¹¹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:



Online registration system:

National bank of Slovakia has established Register, which is divided into sub-registers for particular sectors as follows:

- (a) insurance and reinsurance;
- (b) capital market;
- (c) deposit-taking;
- (d) credit-granting, including housing loans and consumer loans;
- (e) supplementary pension scheme;
- (f) old-age pension scheme.

The sub-register under paragraph (a) shall be divided into the lists of:

- (a) independent financial agents;
- (b) tied financial agents;
- (c) subordinate financial agents;
- (d) financial advisers;
- (e) financial intermediaries from other Member States operating in the insurance or reinsurance sector;

(f) ancillary insurance intermediaries.

The sub-register under paragraph (b) shall be divided into the lists of:

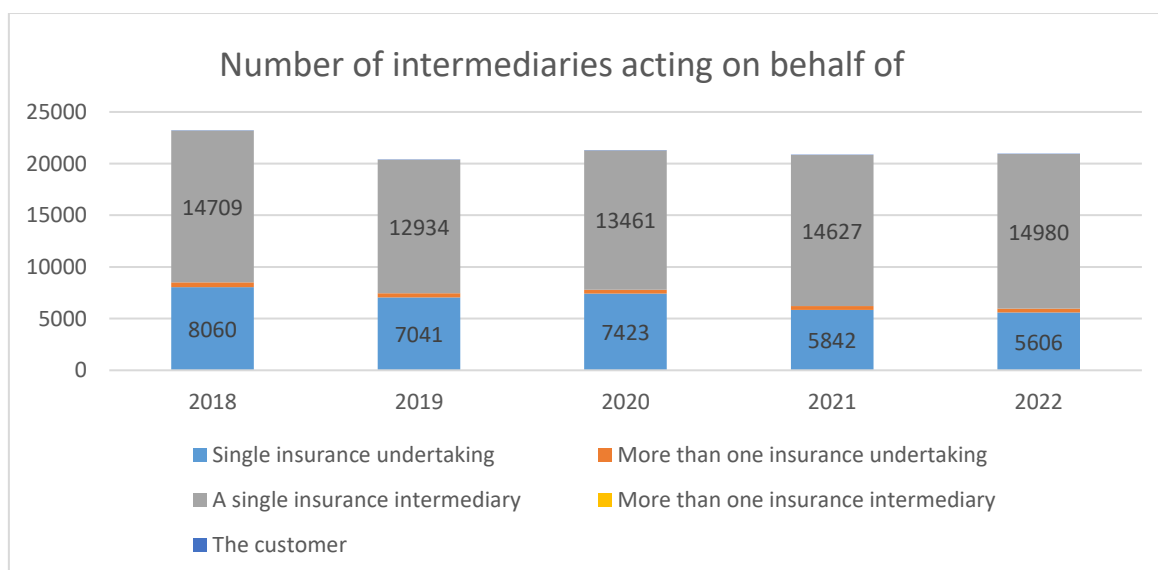
- (a) independent financial agents;
- (b) tied financial agents;
- (c) subordinate financial agents;
- (d) financial advisers;
- (e) tied investment agents.

The sub-registers under paragraph (c) to (f) are divided into lists for:

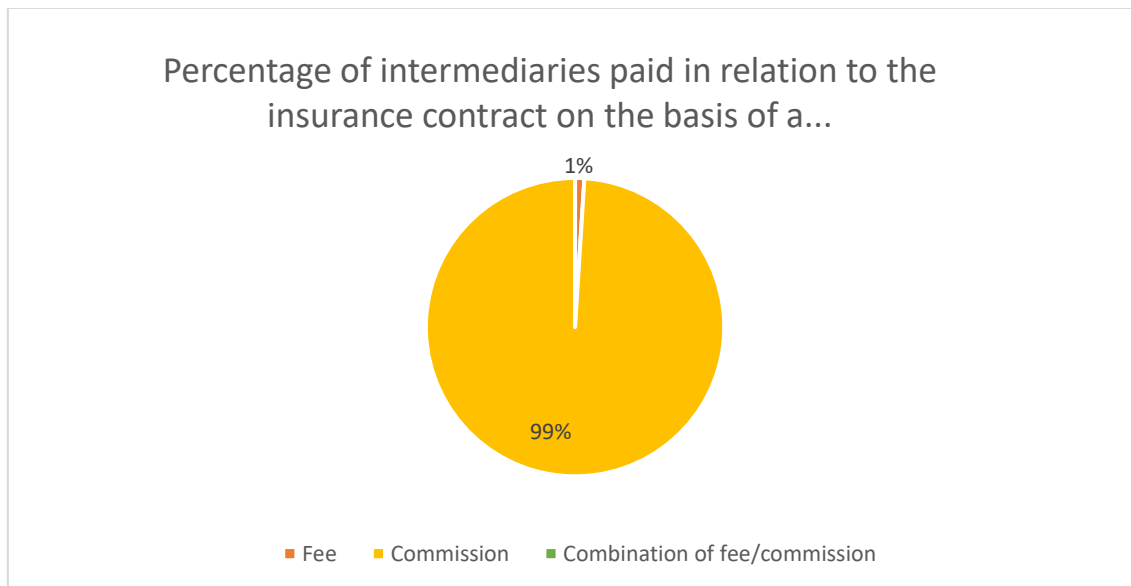
- (a) independent financial agents;
- (b) tied financial agents;
- (c) subordinate financial agents;
- (d) financial advisers;
- (e) financial intermediaries from other Member States engaged in the provision of housing loans, included in the sub-register mentioned in paragraph (d).

Each person may be registered concurrently only in one of the relevant lists. The information on the number of registered intermediaries are daily updated.

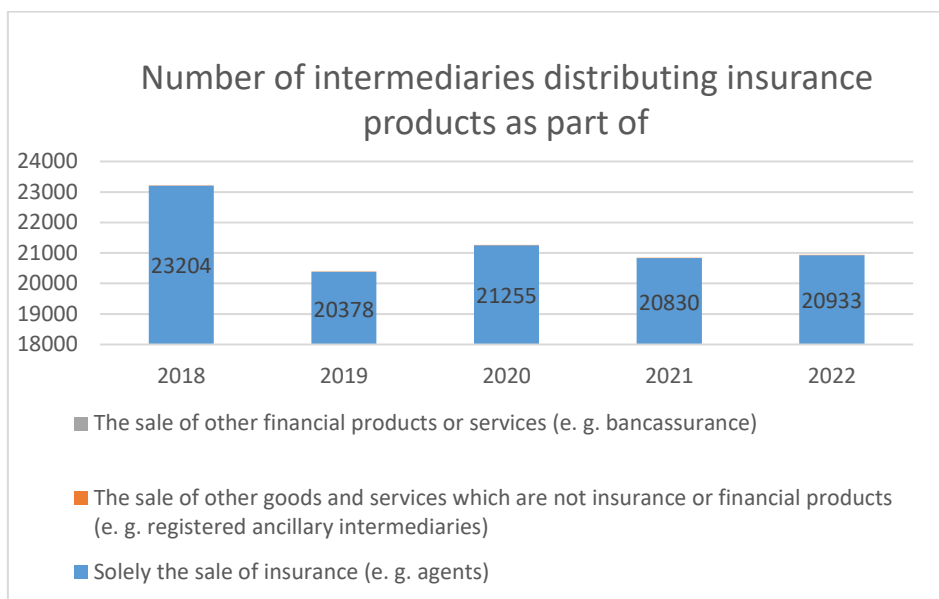
Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

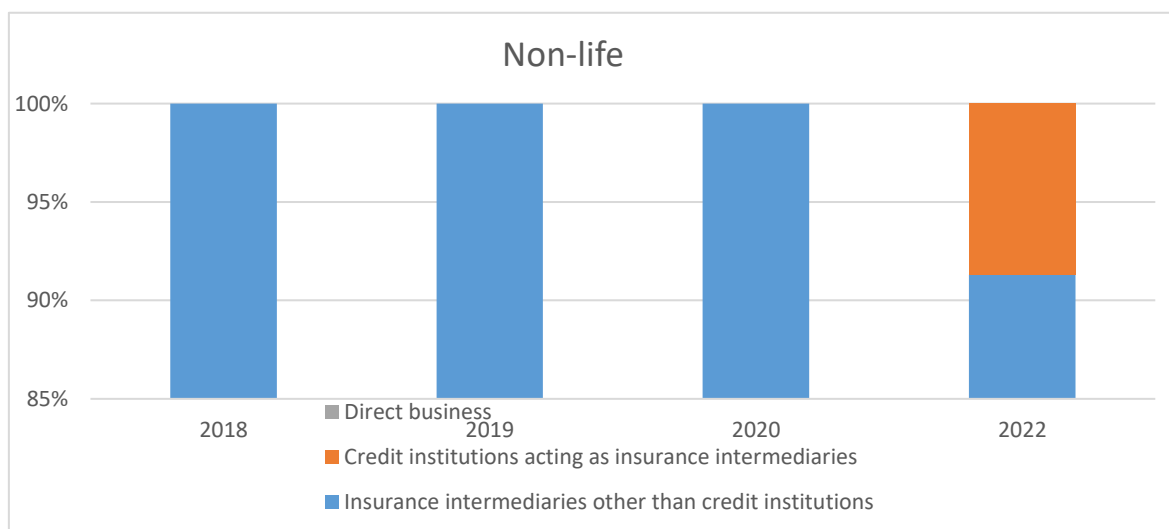
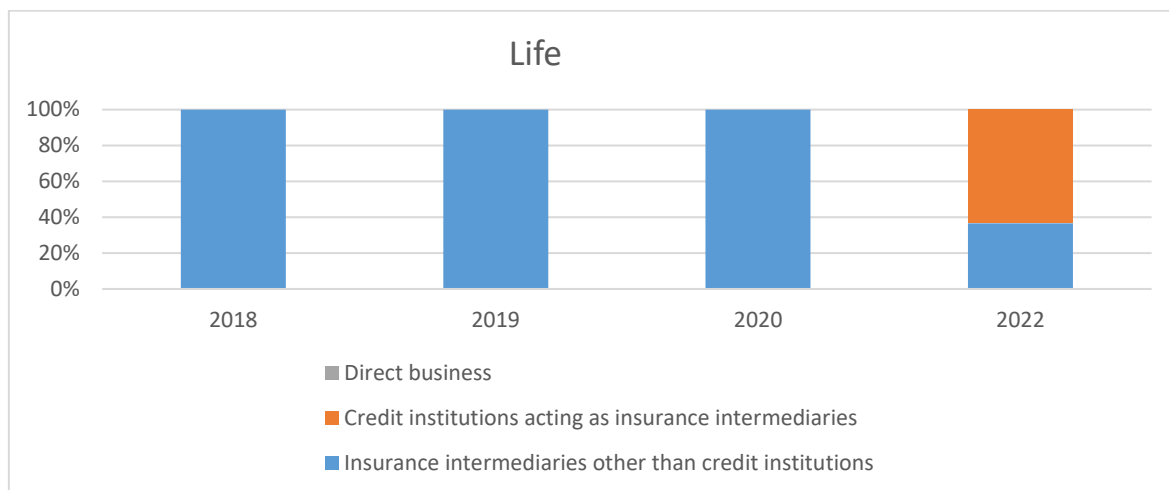


Comments provided by the NCA on the figures included in the chart above:

1. The sale of other financial products or services (e.g bancassurance) : data is not available.
2. The sale of other goods and services which are not insurance or financial products : Registered ancillary intermediaries.

3. Solely the sale of insurance : Agents (independent agents, tied financial agents, subordinate financial agents; financial advisors)

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

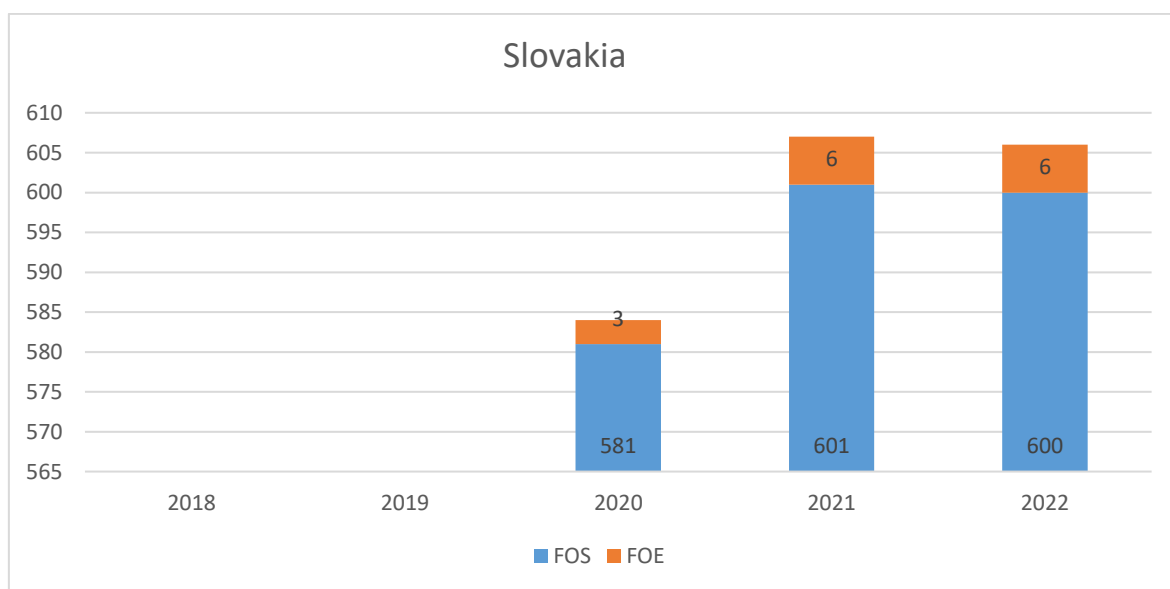
Annual report from insurance intermediaries (Independent Financial Agents). Direct business we can not provide any numbers.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

We are able to provide solely approximate estimation due to the fact that we do not have any such database comprising of online websites, mobile applications etc. It is not possible to tell the

proportion in our market. We estimate there are tens of website offering online intermediation and/or sale. We have no estimation regarding mobile applications, it could be tens, too.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Comments provided by the NCA on the figures included in the chart above:

To the date 31.12.2021 are 2 domestic insurance intermediaries passport out on a FOS basis and at the same time on a FOE basis. To the date 31.12.2022 are 2 domestic insurance intermediaries passport out on a FOS basis and at the same time on a FOE basis.

Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹¹²

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	457	0	457
<i>Belgium</i>	14	0	14
<i>Bulgaria</i>	15	1	16
<i>Cyprus</i>	11	0	11
<i>Croatia</i>	21	0	21
<i>Czech Republic</i>	581	6	587
<i>Denmark</i>	11	0	11

¹¹² The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Estonia</i>	12	0	12
<i>Finland</i>	11	0	11
<i>France</i>	11	0	11
<i>Germany</i>	19	0	19
<i>Greece</i>	12	0	12
<i>Hungary</i>	467	0	467
<i>Iceland</i>	1	0	1
<i>Ireland</i>	11	0	11
<i>Italy</i>	16	0	16
<i>Latvia</i>	12	0	12
<i>Liechtenstein</i>	1	0	1
<i>Lithuania</i>	12	0	12
<i>Luxembourg</i>	13	0	13
<i>Malta</i>	12	0	12
<i>Netherlands</i>	12	0	12
<i>Norway</i>	3	0	3
<i>Poland</i>	470	0	470
<i>Portugal</i>	12	0	12
<i>Romania</i>	18	0	18
<i>Slovakia</i>	0	0	0
<i>Slovenia</i>	16	0	16
<i>Spain</i>	12	0	12
<i>Sweden</i>	12	0	12
<i>Total EEA</i>	2275	7	2282

General qualitative description of the “patterns of cross-border activity”:

A large proportion of Agents passport to Czech Republic, Hungary, Austria and Poland on a FOS basis. In terms of FOE are small amount of Agents passported.

Additional information not covered above :

From Insurance intermediaries we collect information about number of contracts by each category split in life/non life, insurance undertaking and positive/negative cash flow.

SLOVENIA

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹¹³	2,107	0.5%
(Re)insurance GWP (in million) ¹¹⁴	3,091.949	0.2%
Number of (re)insurance undertakings ¹¹⁵	13	0.7%
Number of registered insurance intermediaries	15924	1.8%

National competent authority:

Insurance Supervision Agency

¹¹³ Based on eurostat data for 1 January 2022:

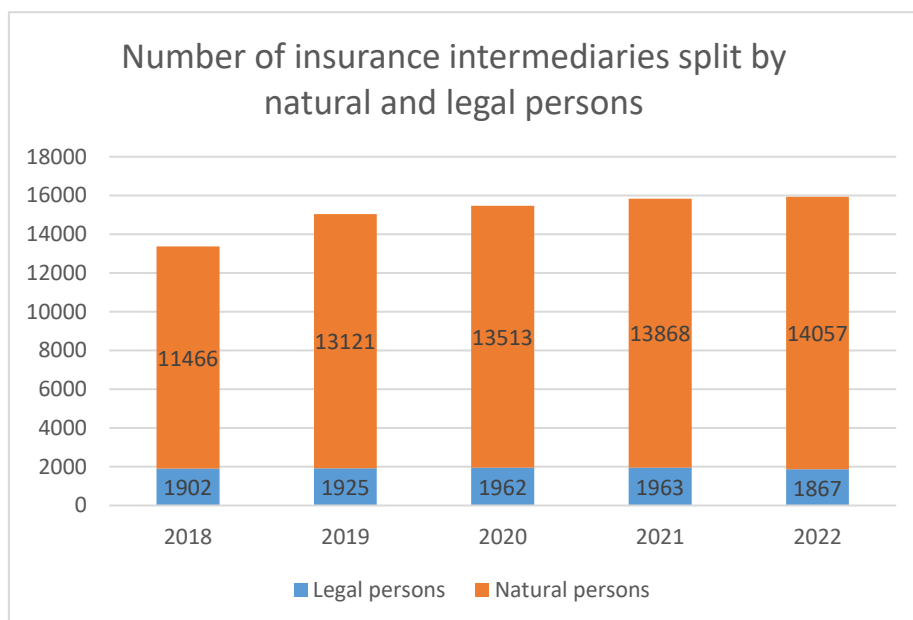
<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

¹¹⁴ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹¹⁵ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

Registered insurance intermediaries split by natural and legal persons:**Online registration system:**

The Slovenian Insurance Supervision Agency provides online registration (<https://azn.e-obcina.si/objave/364>). On yearly basis the Agency receives only 5 applications over online registration tool.

Comments provided by the NCA :

We do not have the requested data available. We can not match the data from our register to the requested categories.

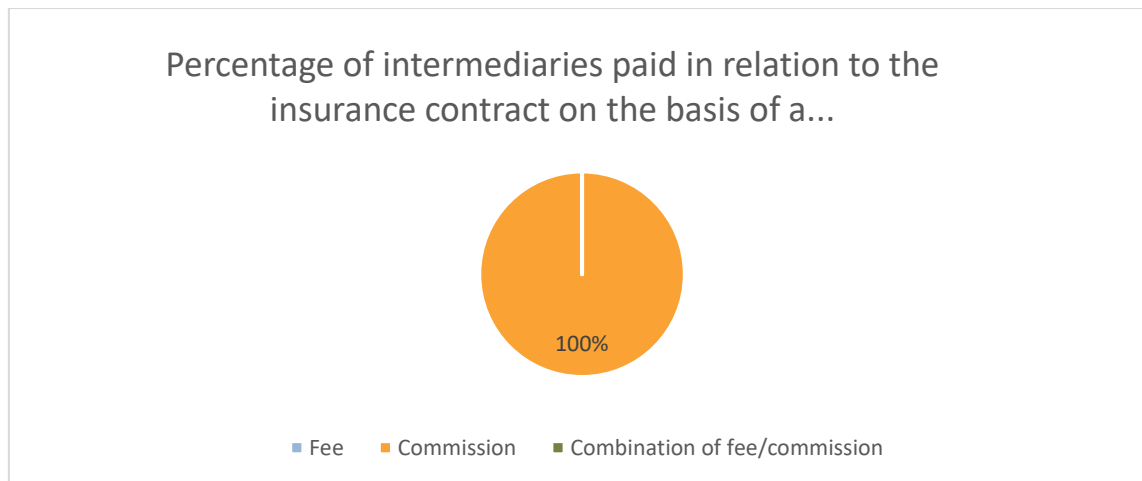
Category of insurance intermediaries acting on behalf of the customer - In Slovenia the agents and brokers are not paid by the customers. Brokerage companies act on behalf of the customer, but are paid by the insurance undertakings.

Category of insurance intermediaries acting on behalf of more than one insurance intermediary - As a rule, the insurance intermediaries act on behalf of one insurance intermediary and not more.

Category of insurance intermediaries acting on behalf of a single insurance intermediary - We do not have the data on how many of the registered natural persons are employed by the insurance intermediaries, and how many of the registered legal persons are working on behalf of a single insurance intermediary.

Categories of insurance intermediaries acting on behalf of a single insurance undertaking and on behalf of more than one insurance undertaking - We do not have the data on how many of the agents and agencies are tight agents or exclusive agencies, therefore we can not provide this data. Brokers as a rule cooperate for more than one insurance undertakings.

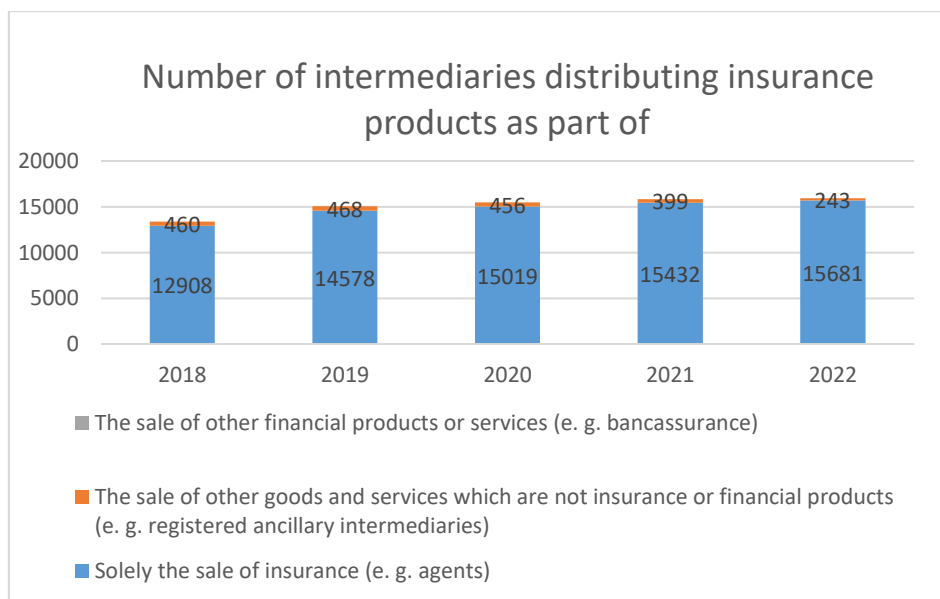
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

The remuneration has been always included in the insurance premium in the Republic of Slovenia. We haven't noticed any other way of remuneration in our supervisory activities. All (100%) of the insurance intermediaries (agents, brokers, tight agents, etc.) fall under commission for every year.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:

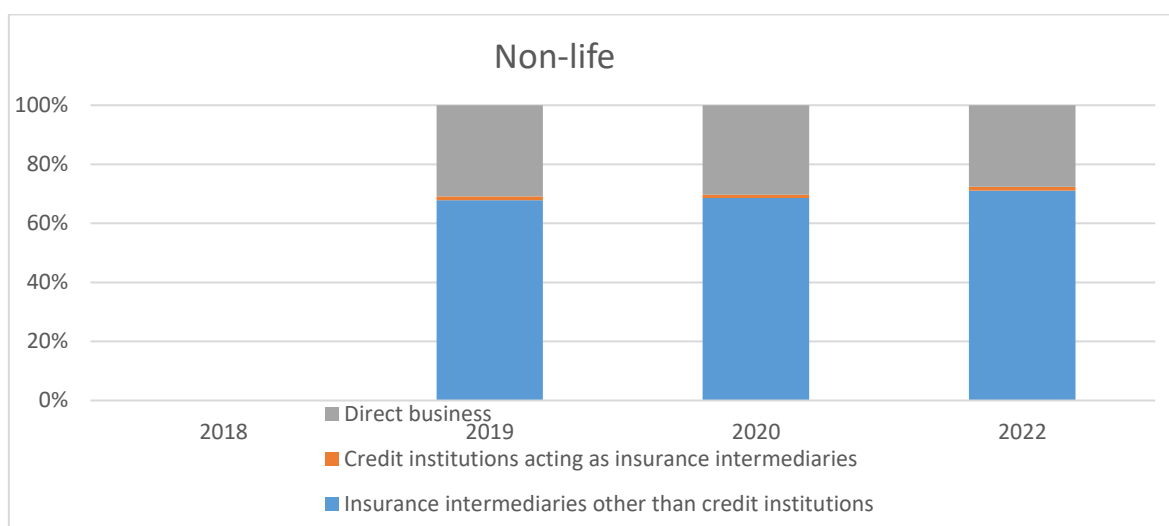
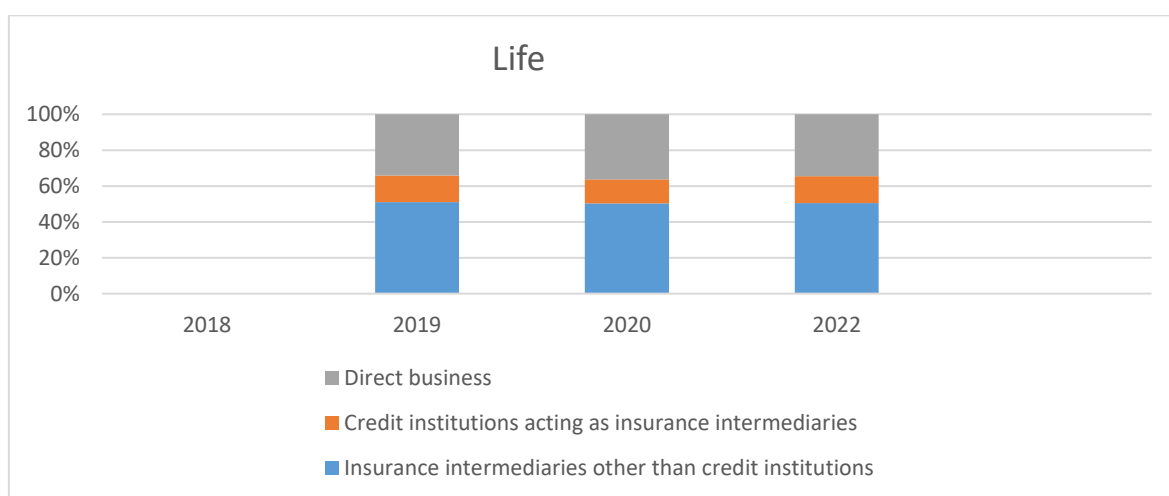


Comments provided by the NCA on the figures included in the chart above:

The Agency has special register and licence only for the ancillary intermediaries. Others can distribute all insurance products.

With regards the sale of other goods and services which are not insurance or financial products : the decrease in licences under the sale of other goods and services which are not insurance is primarily the termination statement; 14 licences were taken due to lack of regulatory reporting to the AZN.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

The source of given statistical data is Slovenian insurance association. Statistical data includes GWP of insurance companies with head office in Slovenia and of branches of insurance companies

with head offices in EEA countries, operating in Slovenia on the basis of "freedom of establishment" clause.

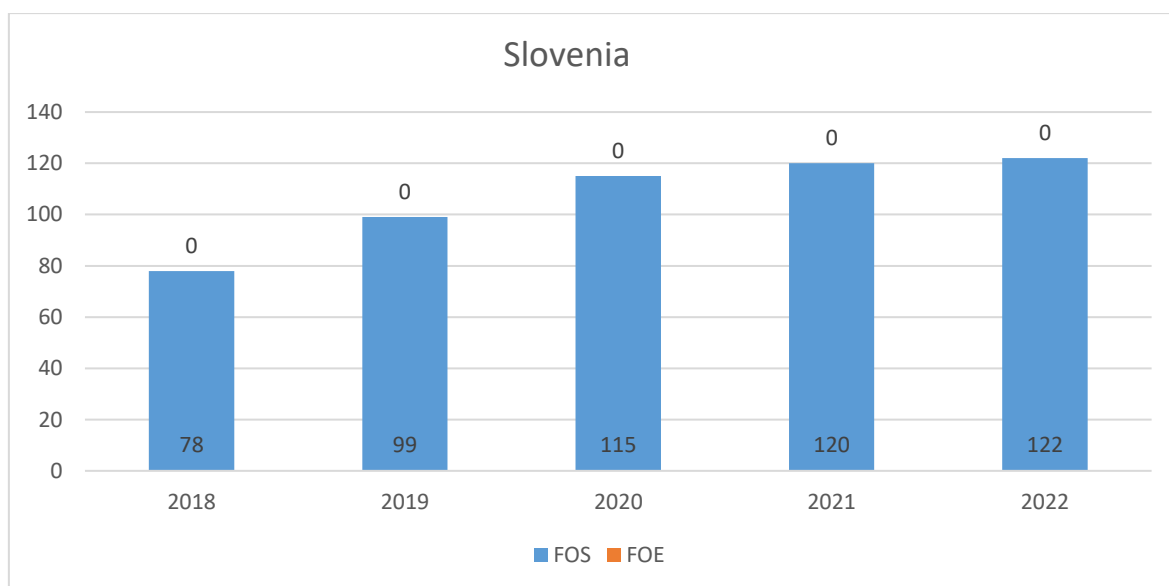
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

In 2022 it equals to 1,3% (non life 1,8%, life 0,1%)

Comments provided by the NCA on the data above:

Data is obtained from the Slovenian Insurance association, where the majority of the insurance undertakings (including branches) are members. Therefore the data represent the whole market picture.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹¹⁶

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	23	0	23

¹¹⁶ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Belgium</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Bulgaria</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Cyprus</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Croatia</i>	<i>104</i>	<i>0</i>	<i>104</i>
<i>Czech Republic</i>	<i>3</i>	<i>0</i>	<i>3</i>
<i>Denmark</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Estonia</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Finland</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>France</i>	<i>2</i>	<i>0</i>	<i>2</i>
<i>Germany</i>	<i>7</i>	<i>0</i>	<i>7</i>
<i>Greece</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Hungary</i>	<i>3</i>	<i>0</i>	<i>3</i>
<i>Iceland</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Ireland</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Italy</i>	<i>9</i>	<i>0</i>	<i>9</i>
<i>Latvia</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Liechtenstein</i>	<i>3</i>	<i>0</i>	<i>3</i>
<i>Lithuania</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Luxembourg</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Malta</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Netherlands</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Norway</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Poland</i>	<i>1</i>	<i>0</i>	<i>1</i>
<i>Portugal</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Romania</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Slovakia</i>	<i>2</i>	<i>0</i>	<i>2</i>
<i>Slovenia</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Spain</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Sweden</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Total EEA</i>	<i>160</i>	<i>0</i>	<i>160</i>

Comments provided by the NCA on the figures included in the table above:

14 intermediaries have passport for the whole EU and they are not included in a spreadsheet above.

Information on the powers of the NCA

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

The AZN is by the existing Insurance Act not empowered to set up more detailed legal provisions/background (e.g. subacts) to Delegated Regulation on POG arrangements (Commission Delegated Regulation (EU) 2017/2358) for issuing supervisory measures. It is also not empowered to perform the mystery shopping activities as supervisory approach.

SPAIN

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹¹⁷	47,433	10.5%
(Re)insurance GWP (in million) ¹¹⁸	70,691.118	5.2%
Number of (re)insurance undertakings ¹¹⁹	150	8.7%
Number of registered insurance intermediaries	62167	7.2%

National competent authority:

Directorate-General for Insurance and Pension Funds

¹¹⁷ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

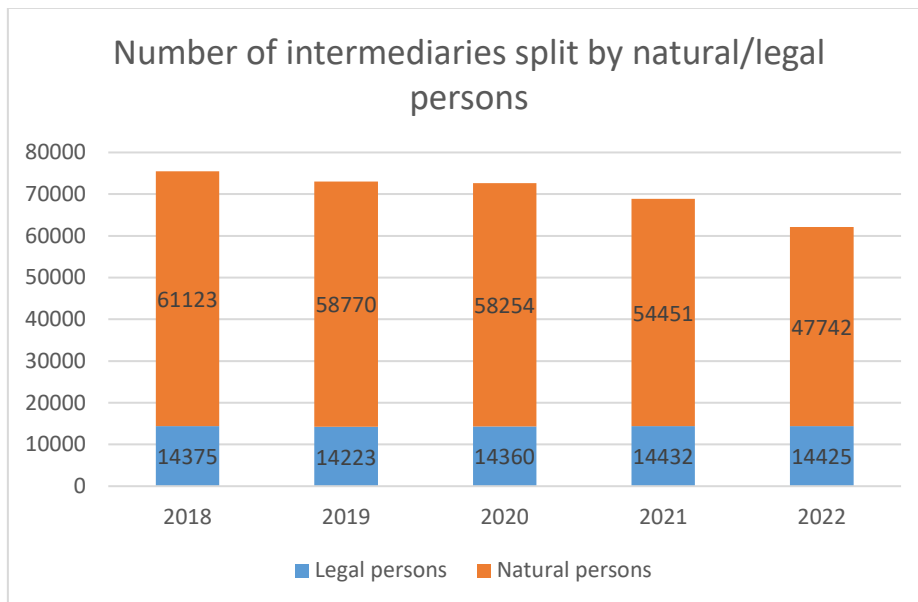
¹¹⁸ "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹¹⁹ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

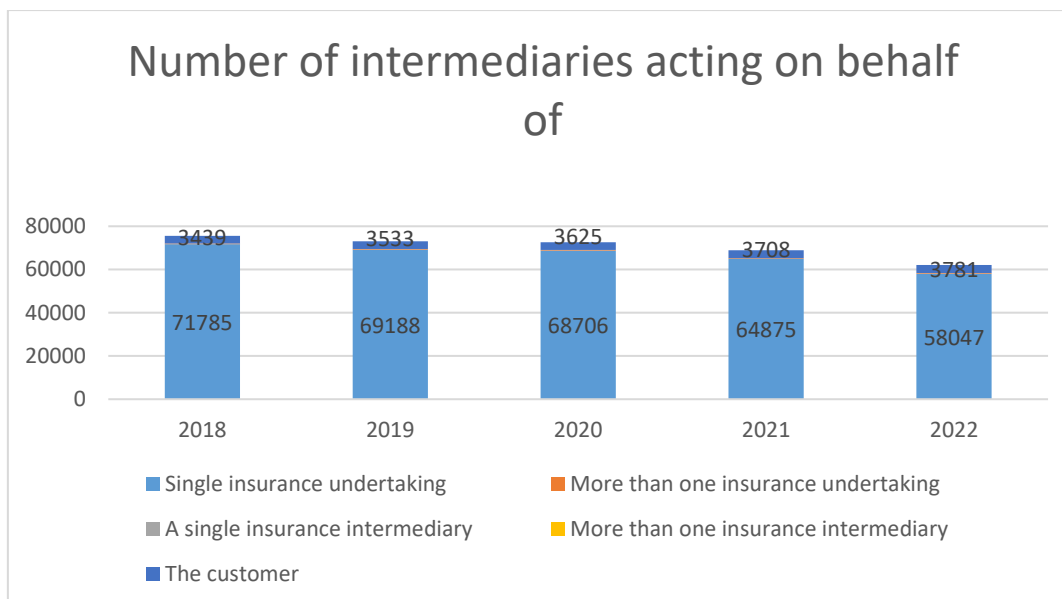
Registered insurance intermediaries split by natural and legal persons:



Online registration system:

An on-line portal was set out in order to intermediaries can carry out their registration or modification. The information on the number of registered intermediaries is updated every afternoon.

Registered insurance intermediaries split by categories based on the activities of insurance intermediaries:



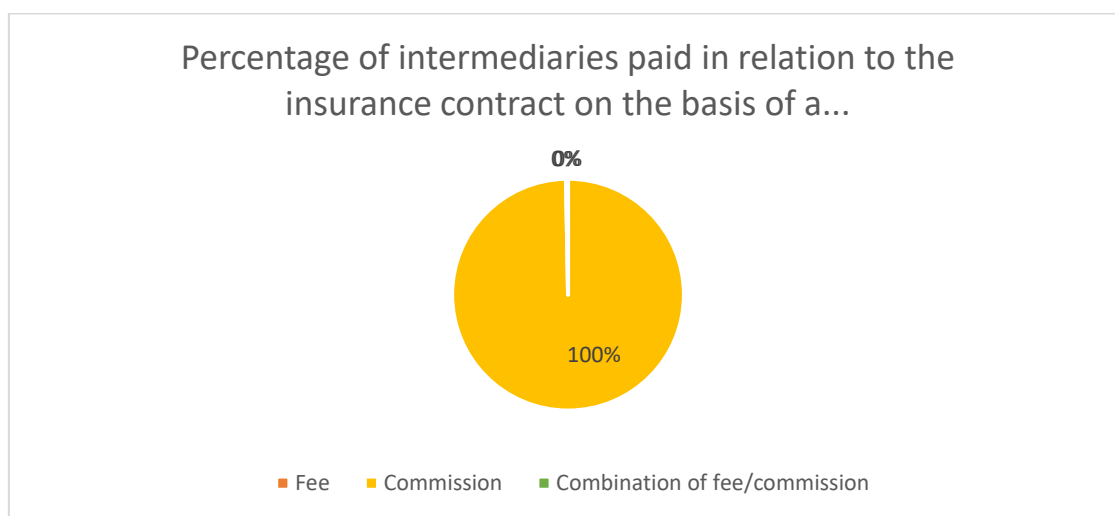
Comments provided by the NCA on the figures included in the chart above:

In the category of single insurance undertaking are included all exclusive agentes (which can work with one insurance undertaking and in some cases with 2 insurance undertakings, previous authorization granted by the first insurance undertaking).

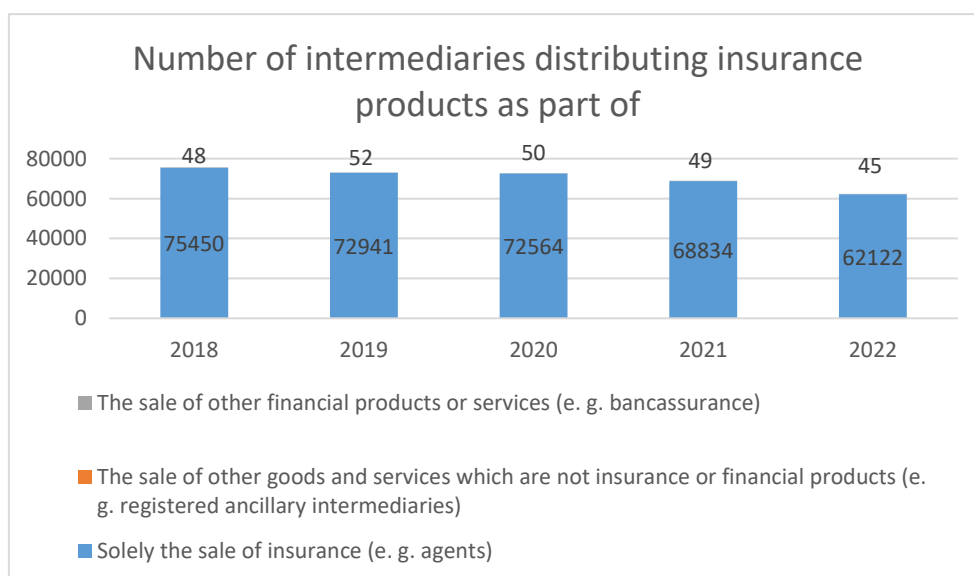
In the category of more than one insurance undertaking are included tied agents.

In the category of the customer are included all brokers.

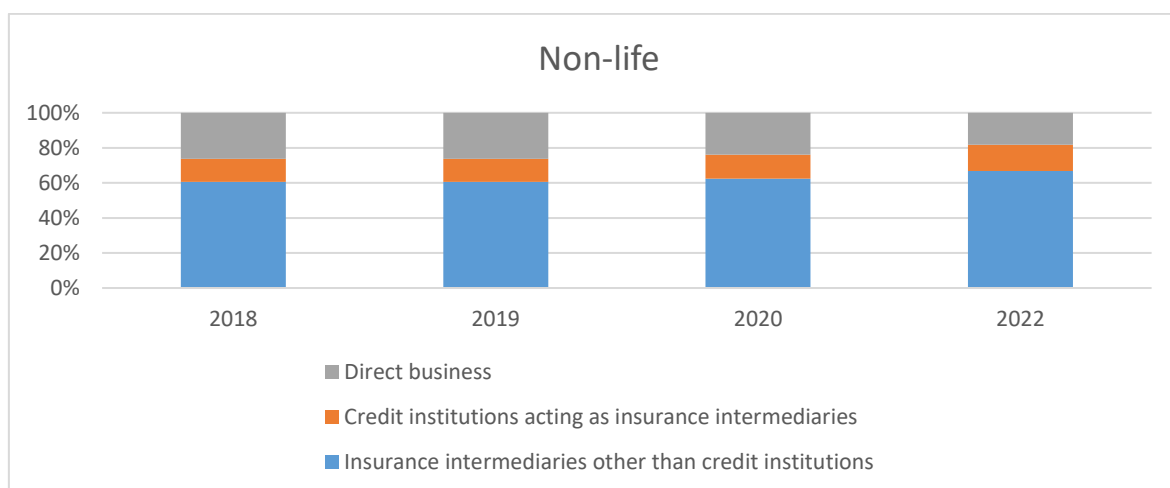
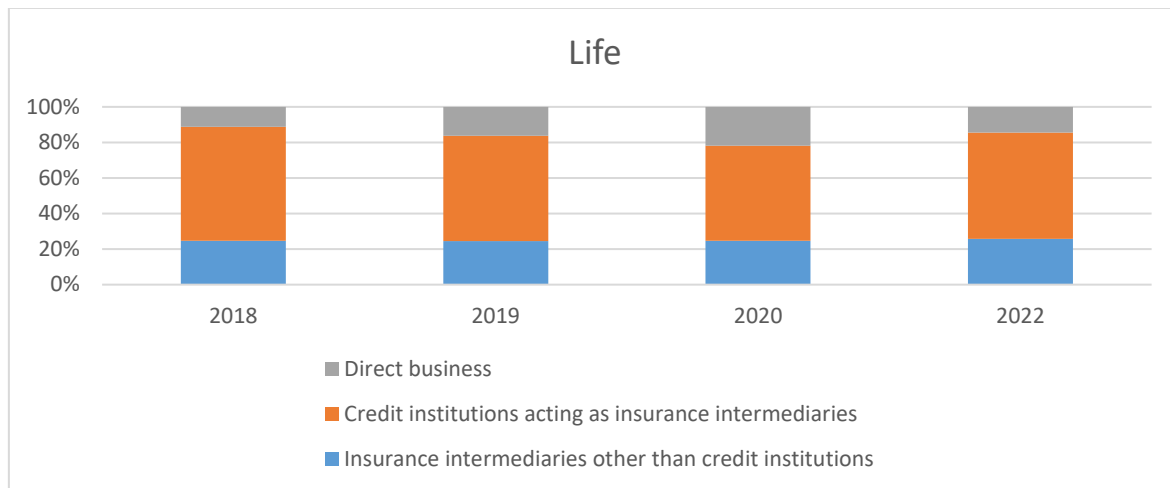
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

The relevant information is as of 31/12/2022.

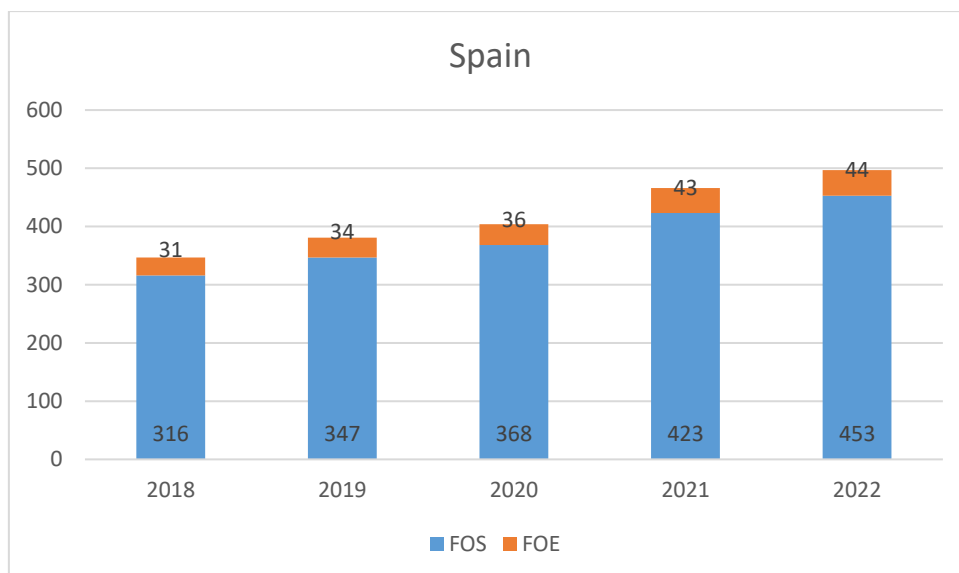
Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

As of 31/12/2022 the proportion of online intermediation (via websites) in terms of the total volume of gross written premiums were 351.660.545,44 Euros. Approximately 0,66%.

Comments provided by the NCA on the data above:

The relevant information is as of 31/12/2022.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹²⁰

<i>Host Member State</i>	<i>1. FOS</i>	<i>2. FOE</i>	<i>3. TOTAL</i>
<i>Austria</i>	114	1	115
<i>Belgium</i>	66	1	67
<i>Bulgaria</i>	87	2	89
<i>Cyprus</i>	56	0	56
<i>Croatia</i>	51	0	51
<i>Czech Republic</i>	41	0	41
<i>Denmark</i>	60	0	60
<i>Estonia</i>	51	0	51
<i>Finland</i>	50	0	50
<i>France</i>	54	0	54
<i>Germany</i>	57	0	57
<i>Greece</i>	172	6	178
<i>Hungary</i>	67	1	68
<i>Iceland</i>	54	0	54
<i>Ireland</i>	79	1	80

¹²⁰ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Italy</i>	30	0	30
<i>Latvia</i>	124	6	130
<i>Liechtenstein</i>	53	0	53
<i>Lithuania</i>	29	0	29
<i>Luxembourg</i>	55	0	55
<i>Malta</i>	72	0	72
<i>Netherlands</i>	61	0	61
<i>Norway</i>	41	0	41
<i>Poland</i>	81	1	82
<i>Portugal</i>	74	1	75
<i>Romania</i>	323	28	351
<i>Slovakia</i>	95	4	99
<i>Slovenia</i>	57	0	57
<i>Spain</i>	65	0	65
<i>Sweden</i>	62	0	62
<i>Total EEA</i>	453	44	474

Information on the powers of the NCA

Extent to which NCA has not been sufficiently empowered to ensure the implementation of the IDD:

DGSFP has enough powers to carry out a proper conduct of business supervision. However, mystery shopping exercise can only be done by DGSFP staff and nowadays it is not possible to use an external provider.

SWEDEN

Information on the insurance intermediaries' market structure and patterns of cross-border activity

General data of the national market (2022):

	Amounts	Share total EEA
Population (in 1000) ¹²¹	10,452	2.3%
(Re)insurance GWP (in million) ¹²²	38,954.113	2.9%
Number of (re)insurance undertakings ¹²³	113	6.6%
Number of registered insurance intermediaries	5963	0.7%

National competent authority:

Finansinspektionen

¹²¹ Based on eurostat data for 1 January 2022:

<https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>

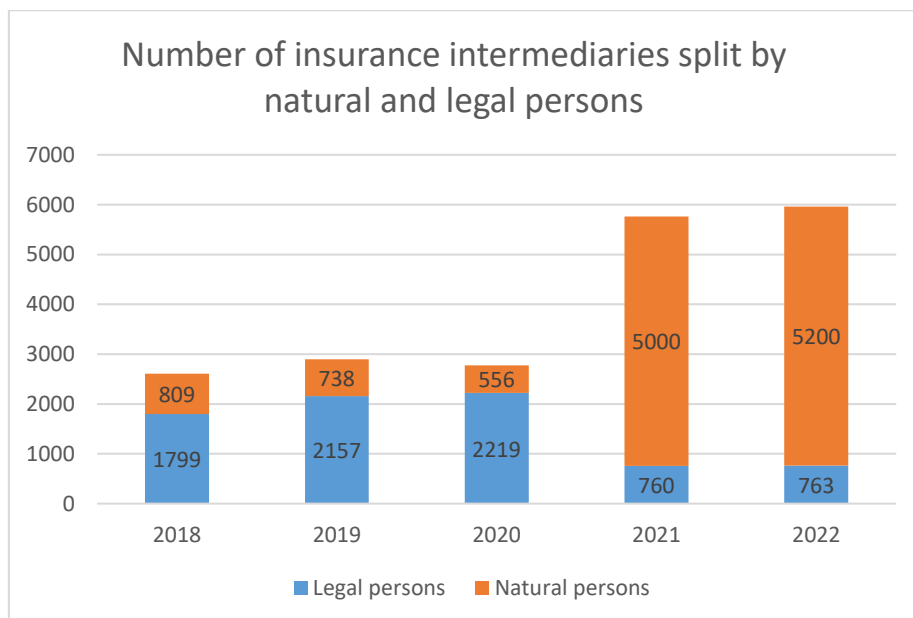
¹²² "(Re)insurance GWP includes life and non-life premiums generated by domestically registered undertakings year-end 2022 based on annually reported SII information:

https://www.eiopa.europa.eu/publications/european-insurance-overview-report-2023_en

¹²³ Number of (re)insurance undertakings (year-end 2022) includes the domestically registered undertakings. Based on SII information:

https://register.eiopa.europa.eu/layouts/15/download.aspx?SourceUrl=https://register.eiopa.europa.eu/Publications/Insurance%20Statistics/SQ_Premiums_Claims_Expenses.xlsx

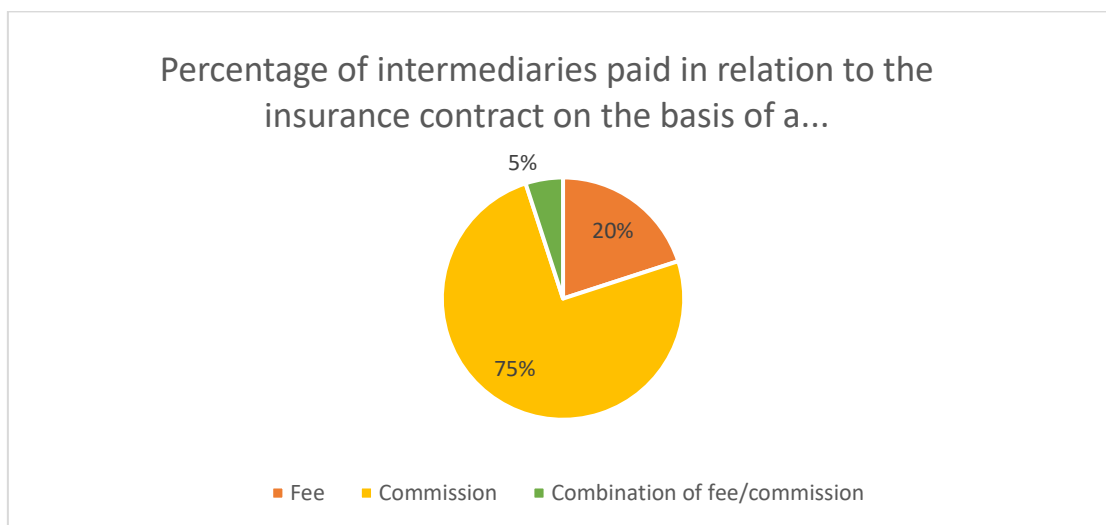
Registered insurance intermediaries split by natural and legal persons:



Comments provided by the NCA on the figures included in the chart above:

The market structure of insurance intermediaries consists of legal entities with sometimes many employees. The employer is reported in the "legal persons" box and the employees are reported in the "natural persons" box. "Natural persons" thus consists of employees in legal persons but also natural persons who operate on their own intermediary license. The reported figures do not include tied agents or different types of ancillary insurance intermediaries. Due to changes in systems the figures for 2021-2022 is different than previous years.

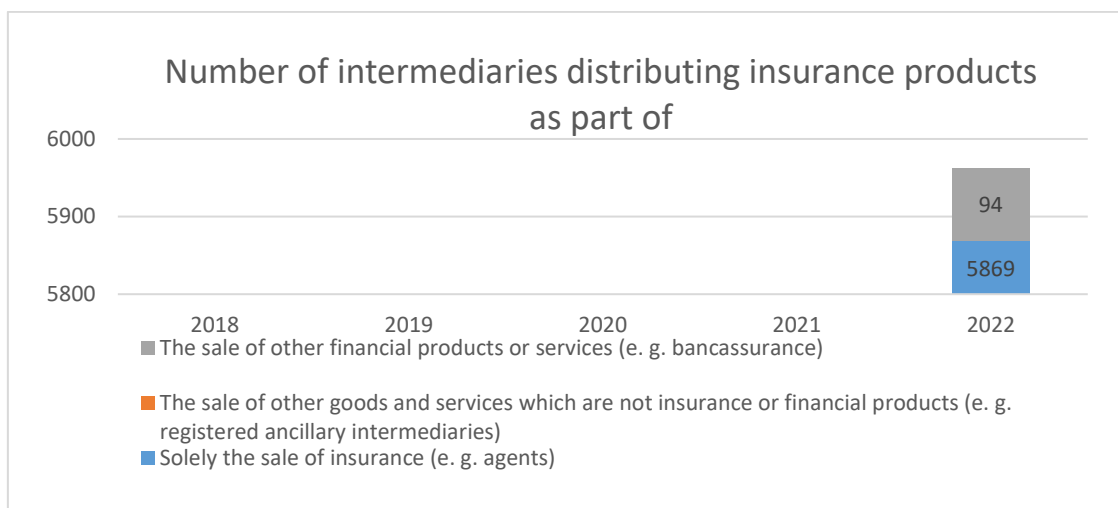
Way of remuneration of insurance intermediaries in relation to the insurance contract in 2022:



Comments provided by the NCA on the figures above :

We do not have these figures however using our supervisory judgement we are of the opinion that most intermediaries work with commission-based.

Registered insurance intermediaries split by categories based on the basis in which they sell insurance products:



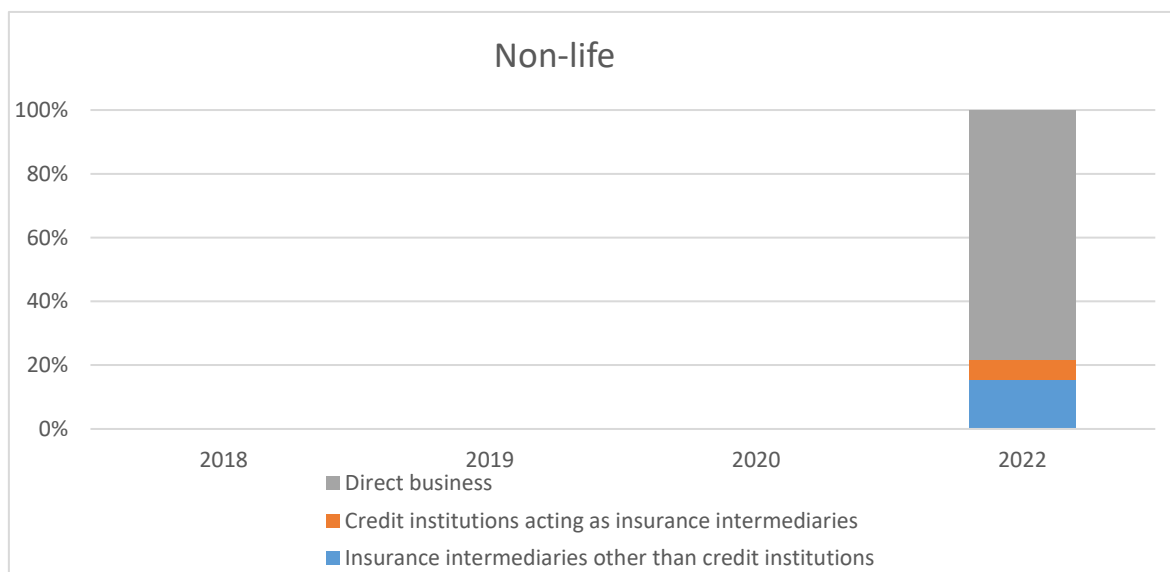
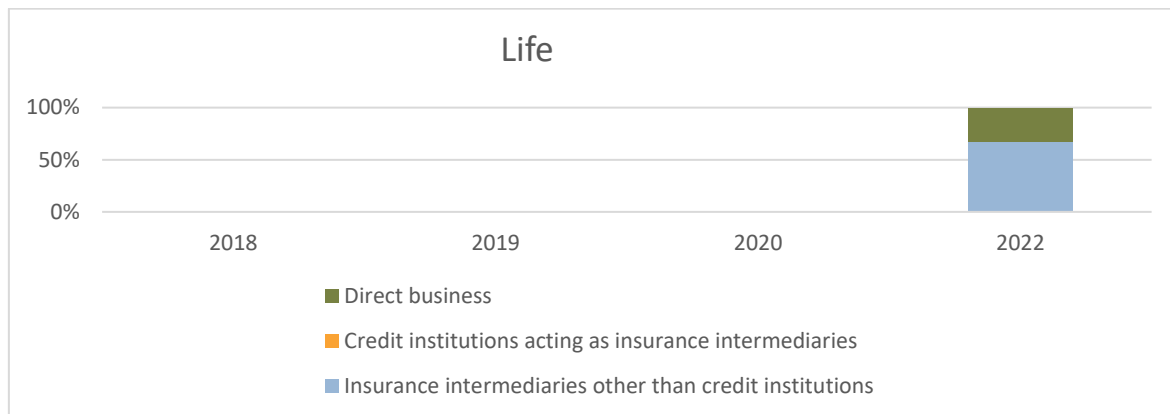
Comments provided by the NCA on the figures included in the chart above:

Among the category of the sale of other financial products or services are banks, credit institutions, savings banks and securities companies.

Additionally, not included in the figures above, tied intermediaries and different types of ancillary intermediaries registered at the Bolagsverket (Companies Register) in Sweden are approximately

2000 which consists of car companies, car financing companies, real estate agents and other companies attached to insurance companies.

GWP split by distribution channels:



Comments provided by the NCA on the figures included in the charts above:

We have made approximations based on GWP Billion SEK 2022-12-31 for the insurance market as a whole and then allocated according to life distribution channels. We have not at this time asked the insurance companies.

We have used data from :

<https://www.svenskforsakring.se/statistik/livforsakring/distributionskanaler-vid-forsaljning-av-livforsakringar/> and statistical database based on NCA figures. It should be noted that for the life

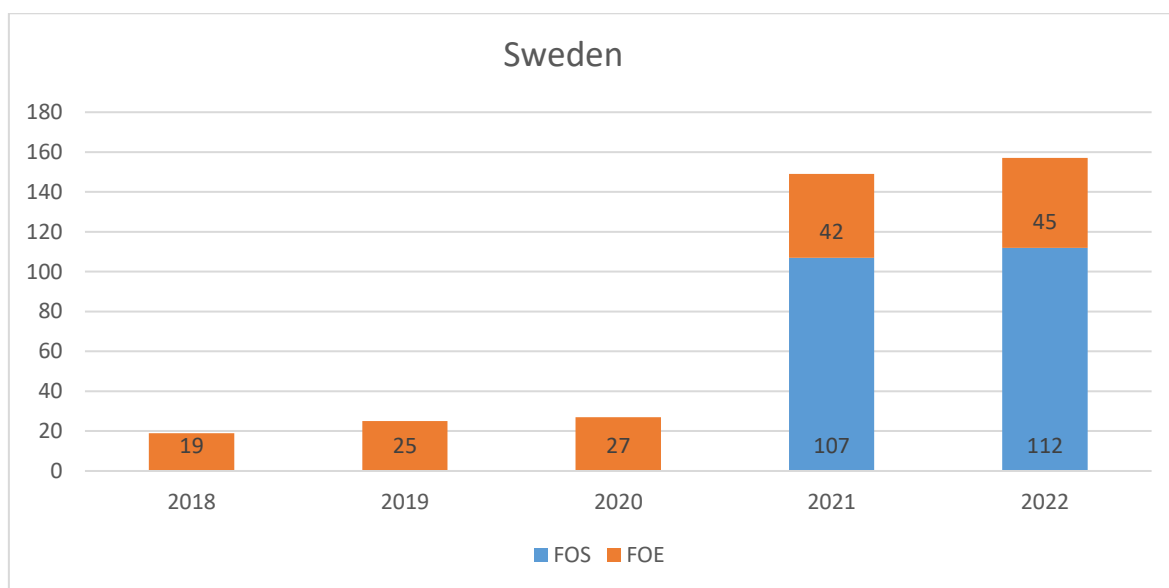
figures additional 29% is distributed by so called choice centrals which is part of occupational pensions collective bargaining schemes, and other is 6% adding up to 76,6 billion SEK.

For non-life we have made allocation according to supervisory judgement.

Proportion of online intermediation/sales (e.g. directly via websites, mobile applications, e-mails) in terms of the total volume of gross written premiums:

We are not in a position and have data on a granular level.

Number of domestic insurance intermediaries with a passport to carry out insurance distribution activities under freedom to provide services (FOS) or under freedom of establishment (FOE)



Number of insurance intermediaries with a passport to carry out insurance distribution activities under FOS or under FOE at the reference date 31.12.2022 split by host Member State:¹²⁴

	1. FOS	2. FOE	3. TOTAL
<i>Austria</i>	54	0	54
<i>Belgium</i>	56	1	57

¹²⁴ The row "Total EEA" and the column "3. TOTAL" count the same insurance intermediary only once where the insurance intermediary operates both under FoS and FoE or in several Member States at the same time.

<i>Bulgaria</i>	37	0	37
<i>Cyprus</i>	52	0	52
<i>Croatia</i>	29	0	29
<i>Czech Republic</i>	44	0	44
<i>Denmark</i>	77	12	89
<i>Estonia</i>	59	1	60
<i>Finland</i>	79	10	89
<i>France</i>	63	0	63
<i>Germany</i>	65	1	66
<i>Greece</i>	45	0	45
<i>Hungary</i>	46	0	46
<i>Iceland</i>	48	0	48
<i>Ireland</i>	53	1	54
<i>Italy</i>	53	1	54
<i>Latvia</i>	56	1	57
<i>Liechtenstein</i>	39	0	39
<i>Lithuania</i>	58	1	59
<i>Luxembourg</i>	49	0	49
<i>Malta</i>	52	0	52
<i>Netherlands</i>	63	0	63
<i>Norway</i>	89	14	103
<i>Poland</i>	59	1	60
<i>Portugal</i>	54	0	54
<i>Romania</i>	38	0	38
<i>Slovakia</i>	43	0	43
<i>Slovenia</i>	43	0	43
<i>Spain</i>	65	1	66
<i>Sweden</i>	0	0	0
<i>Total EEA</i>	1568	45	1613

Additional information not covered above :

The insurance mediation market has further consolidated.

We do not have any statistics on intermediaries however the tradassociation published 29th of May a report describing the non-life market however most figures are from 2021. It should be noted that system changes result in domestic FOE and FOS makes the figures in previous years not comparable with current figures.