

EIOPA Public Event on Reporting

# Q&As on ITS on reporting and disclosure and taxonomy 2.8.0

EIOPA-24-163

22<sup>nd</sup> February 2024

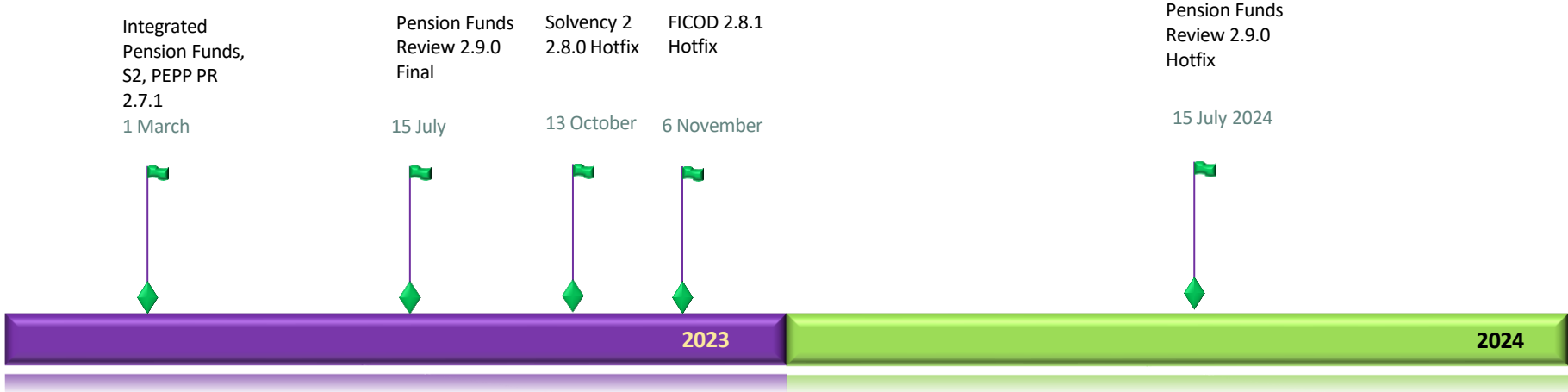
# EIOPA Taxonomy Roadmap

2023-2024

# Taxonomy roadmap

- **2.7.0 and 2.7.1 releases:** PEPP continues to use 2.7.0 release until new taxonomy is announced. Pension Funds (IORPs) continues to use 2.7.1 release until Q4 2024 included (2.9.0 will be applicable from Q1 2025)
- **2.8.0 Hotfix - Solvency II** [(EU) 2023/894 - ITS with regards to the templates for the submission of information necessary for supervision (applicable as of 31/12/2023)]
  - Hotfix was published on 13 October 2023.
  - 2.8.0 will be applicable until a new release is published (possibly during 2025 as well; until 2.10.0 release, based on the revised reporting package following Level 1 and Level 2 proposals under the Solvency II Review)
- **2.8.1 release - FICOD**
  - Hotfix was published on 6 November 2023, applicable from Q4 2023 until new release is announced.
- **2.9.0 release – IORPs revision**
  - Applicable from Q1 2025
  - Final release was published on 17 July 2023; Hotfix is foreseen in July 2024
- **Solvency II 2.10.0 release**
  - *Including ITS amendments on reporting and disclosure and reflecting on the Level 1 and Level 2 legal texts*
  - *Planning to be announced at a later stage*

# EIOPA Taxonomy Roadmap





# Cross-border templates S.04s

## Cross-border templates - refresher

- Annual templates collecting information on business transacted on a cross-border basis
- Required to ensure and facilitate an effective cross-border insurance market by:
  - Meeting statistical exchange obligations (Article 159)
  - Enabling regulators to identify and address the most common issues on cross-border business
- Reconfiguration of cross-border information capture by adopting a matrix approach to capture
  - Who (underwriting entity)
  - What (lines of business)
  - Where (location of underwriting and location of risk)

## Cross-border templates - structure

- Three inter-related templates:
  - S.04.03 – List of underwriting entities
  - S.04.04 – Activity by country - location of underwriting
  - S.04.05 – Activity by country - location of risk
- These templates are not required where all business activity occurs in the home country

## Cross-border templates – questions on scope

- **If you have 100% home country, S.04.03/04/05 are required?**
  - No – cross-border templates do not need to be reported if all business is written in the domestic market.
- **And if you have 99.9% in home country, is S.04.03 required?**
  - Yes. Under Article 159 of the Solvency II Directive, there is an obligation on national authorities to share information on cross-border activities (within the EEA) and the data collected in S.04.03 and S.04.04 are required to meet this obligation
- **How is the content required in S.04.03 different from Contents of Submission for Solo entities?**
  - In the event of a standalone solo entity with no branches, S.04.03 will only contain a single underwriting entity (i.e. no additional content to the Contents of Submission).
  - However, the content differs where an undertaking includes either EEA or non-EEA branches.



## Cross-border templates – questions on thresholds

- **Please confirm, that any of S.04 shouldn't be reported if business outside of home country is less than 95%?**
  - In this case, the cross-border templates shall be reported; the exemption is for 100% home country.
  - If business outside of the home country is less than 95%, it is possible to complete S.04.05 using “other countries” to account for this residual business.
  - However, S.04.03 and S.04.04 must be completed in full for business in the EEA.
- **Is there a threshold on S.04.04 & S.04.05? Based on the description of these template, no threshold of 95%.**
  - The data collected on location of underwriting are required to meet information sharing obligations on cross-border activities under Article 159; as a result no threshold applies to S.04.04.
  - For the location of risk perspective (S.04.05) the 95% threshold will mean that for at least 95% of the gross written premium the reporting will be on country-by-country basis with an option to group residual business as “other countries”.
  - As an example, if a reporter shows 95% of their business split across countries A, B & C and 5% in “other countries”, the correct interpretation is that the 5% is not in country A, B or C.

## Cross-border templates – questions on non-EEA business

- **What about country outside Europe regarding template S.04?**
  - If a company has a business outside Europe this is also to be reported, with the specifics of how the business is written determining which templates are required.
  - If the business is written by a branch of the EEA company located in a third country, countries outside of Europe will be included in both the location of underwriting (S.04.04) and location of risk (S.04.05).
  - If business outside Europe is written directly (e.g. fronted business on a non-admitted basis), it may be that the non-European countries are only included on a location of risk basis (S.04.05).

## Cross-border templates – questions on non-EEA business

- Example:** Irish based reinsurer, no branches, writing a single LoB

S.04.03.01.01			
List of underwriting entities			
Underwriting entity code	Type of entity	Type of branch localisation	Country of establishment
C0010	C0020	C0030	C0040
LEI000000HEADOFFICE	1 - Head office		

S.04.04.01.01			
Line of business		Z0010	Health reinsurance
Underwriting entity code		Z0020	LEI000000HEADOFFICE
		Business underwritten in the country of establishment	Business underwritten through FPS in country different from the country of establishment
		C0010	C0020
Premiums written (gross)	R0020	100,000,000	
Claims incurred	R0030	96,000,000	
Acquisition expenses	R0040	1,000,000	
of which commissions	R0050	800,000	

- Example:** Irish based reinsurer, no branches, writing a single LoB with equal business volumes via head office and branch

S.04.03.01.01			
List of underwriting entities			
Underwriting entity code	Type of entity	Type of branch localisation	Country of establishment
C0010	C0020	C0030	C0040
LEI000000HEADOFFICE	1 - Head office		
LEI000000NONEABRANCH	2 - Branch	2 - Non-EEA branch	SINGAPORE

S.04.04.01.01			
Line of business		Z0010	Health reinsurance
Underwriting entity code		Z0020	LEI000000HEADOFFICE
		Business underwritten in the country of establishment	Business underwritten through FPS in country different from the country of establishment
		C0010	C0020
Premiums written (gross)	R0020	50,000,000	
Claims incurred	R0030	48,000,000	
Acquisition expenses	R0040	500,000	
of which commissions	R0050	400,000	

S.04.04.01.01			
Line of business		Z0010	Health reinsurance
Underwriting entity code		Z0020	LEI000000NONEABRANCH
		Business underwritten in the country of establishment	Business underwritten through FPS in country different from the country of establishment
		C0010	C0020
Premiums written (gross)	R0020	50,000,000	
Claims incurred	R0030	48,000,000	
Acquisition expenses	R0040	500,000	
of which commissions	R0050	400,000	

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- Example:** Irish based reinsurer, no branches, writing a single LoB

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S.04.04.01.01			
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Underwriting entity code		Z0020	LEI000000HEADOFFICE
		Business underwritten in the country of establishment	Business underwritten through FPS in country different from the country of establishment
		C0010	C0020
Premiums written (gross)	R0020	100,000,000	
Claims incurred	R0030	96,000,000	
Acquisition expenses	R0040	1,000,000	
of which commissions	R0050	800,000	

- Example:** Irish based reinsurer, with one branch, writing a single LoB with equal business volumes via head office and branch

S.04.03.01.01			
List of underwriting entities			
Underwriting entity code	Type of entity	Type of branch localisation	Country of establishment
C0010	C0020	C0030	C0040
LEI000000HEADOFFICE	1 - Head office		
LEI000000NONEABRANCH	2 - Branch	2 - Non-EEA branch	SINGAPORE

S.04.04.01.01			
Line of business		Z0010	Health reinsurance
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		Business underwritten in the country of establishment	Business underwritten through FPS in country different from the country of establishment
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Premiums written (gross)	R0020	50,000,000	
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Premiums written (gross)	R0020	50,000,000	
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of which commissions	R0050	400,000	

## Cross-border templates – questions on non-EEA business

- **Do we have to report in S.04.04 and S.04.05 the countries outside Europe one by one or do we have to sum up all the non-EU countries ?**
  - Across the three templates (S.04.03, S.04.04, S.04.05) entities shall report all business from two distinct perspectives: location of underwriting and location of risk. If, for example, a company has a branch outside EU:
    - In S.04.03 the branch information should be captured in C0010 (i.e. a unique ID for this entity), C0030 (i.e. non-EEA branch) and C0040 (i.e. non-EU country).
    - The Z-axis on S.04.04 (Z0020 – Underwriting entity code) should include “each individual underwriting entity as reported in template S.04.03” so there should be a Z0020 entry for the non-EU branch.
    - The sum of C0010 and C0020 should be the total business for the underwriting entity (in this case the non-EU branch)
    - C0010 should capture “Business underwritten in the country of establishment” – irrespective of whether this is EEA or non-EEA.
    - C0020 should include all FPS (and so be the sum of C0030, which should capture, separately for each EEA member, the FPS business), if any, written by that underwriting entity. This should be zero for a non-EU branch.

S.14s

## S.14.01

- On S.14.01, logs are confused, for example, on the average age to consider for "remaining contractual maturity."
- Remaining contractual maturity - C0142 - Confirmation is requested that in cases where there is no predefined contract maturity, the "average remaining life expectancy" corresponds to the average life expectancy of the insured calculated according to the age at the valuation date (e.g., in the case of a 65-year-old person, the average remaining life expectancy is 24 years (5:  $x > 20$  years) while for an 85-year-old person it is 7.5 years (2:  $5 \leq x < 10$ )).
  - If this interpretation is confirmed, it is requested to clarify the cases in which the option "6 - for life" should be used.
  - EIOPA: Agree that whereas the field is labelled as "remaining contractual maturity", seemingly supporting the interpretation as an average remaining maturity (as indicated in your draft answer), the example provided in the log is clearly contradictory to such an interpretation and seems to indicate that the average time period of the contracts (instead of the remaining contractual maturity) should be used. Please report the "remaining contractual maturity". The log will be clarified in the future ITS amendment. In such a case, the "Lifelong" option should be reported. Note that the log file specifies that the determination is based on the assumptions that the contract does not end due to the realisation of a biometrical risk.

## S.14.01

- In addition, clarification and examples are requested on the calculation of this field for: i) products containing both deferred and in pay-out phase annuities (EIOPA: Note that the log file specifies that the determination is based on the assumptions that the contract does not end due to the realisation of a biometrical risk, and that, for the case of an endowment policy this would for example mean that the insured person does not die and the policyholder does not cancel the contract. Hence for these products, the "Lifelong" option should be chosen.); ii) policies with automatic renewal (EIOPA: Note that the log file clearly specifies that the policyholder does not exercise any surrender/cancellation option and exercises all renewal options, and the insurance or reinsurance undertaking does not exercise any option to terminate the contract and exercises all renewal options.). We also ask if, in correspondence, of run-off contracts (as per the Closed List provided in the column 'Product still commercialized? - C0130) we are supposed to leave the cell blank.
  - EIOPA: Run-off portfolio still have a valid maturity so they should be reported.
    - Finally, clarification is requested on the interpretation of intervals (e.g., should products with a contractual term of 10 years be classified as 2 or 3?).
- EIOPA: Where the remaining maturity is, without any rounding, exactly 10 years, the undertaking can decide to choose option 2 or 3. The same applies to exactly 15 years, where 3 or 4 could be selected.



## S.14.01

- Total amount of commissions paid during year - C0071: Clarification and examples are requested on the types of commissions to be considered (purchase/revenue commissions, retention commissions, both types, other).

EIOPA: All types of commissions paid during the year, including trail commissions to distributors and not just the upfront commissions.

- C0270 Exit conditions at reporting date - We ask to clarify the meaning of the expression "notice required".

EIOPA: Notice required referred to whether there is a lag of time between the request from the policyholders to surrender and the actual pay out.

## S.14.01

- Amount on which interest rate is guaranteed - C0280: Clarification is requested as to what is intended with "monetary value at the reference date", especially regarding the amount to which the guaranteed interest rate is to be applied (insured benefit, mathematical reserve, other?).

EIOPA: The value provided in C0280 need to be linked to the guaranteed rate in C0261. The monetary value is therefore the value to which the guaranteed rate is applied. Conceptually, the percentage in C0261 multiplied with the value in C0280 is the amount that the undertaking needs to allocate to the product in the next year to fulfil its guaranteed interest.

- Fiscal treatment of the products - C0055: More interpretative details are requested on the options provided by the field. In particular, confirmation is requested on the following classification: i) all pension products in category 2 ("In case of lapse/surrender past or future tax benefits or other subsidies are lost"); ii) financial products in category 3 (" Other tax related losses not covered above"); iii) Term-life insurance and LTC in category 4 ("not applicable").

EIOPA: For the purposes of this filed, no general classification can be provided. Instead, the classification of a contract will generally depend on the tax regime and on the specifics of the contractual arrangements.

## S.14.02

- General - Does the requested granularity refer to the individual "product" or to the LOB Solvency, except in the case where it is requested to specify particular products (i.e. fire, assistance, pecuniary losses), which in any case should be shown for their total amount and not individually?
  - EIOPA: The reporting should be for all the products falling under the relevant LOB – all together under one line – unless the product fall under a specific product category under C0020. If the product falls under multiple LOB the reporting should be done under the main LOB relating to the risks covered by the product.
- Line of Business (1 to 12) - C0010/Number of contracts at the end of the year - C0050/Number of new contracts during year - C0060: Clarification is requested on the definition of a modular product and the consequent way of unbundling premiums and managing the disclosure of the number of contracts following the instructions of the EIOPA Log.
  - EIOPA: Modular products are products which are bundled and sold together – e.g., household coverage which has the option to have basic coverage or add theft and other coverages such as cyber coverage. They should be unbundled, and the number of contracts should be reported accordingly. In order for the product to be considered modular the difference coverages should also be able to be bought separately.
- In particular, it is requested if products that have a main guarantee and additional guarantees (that can be activated or not) should be considered as modular product or not, i.e. a home product, with the additional guarantee Private Life Liability, is attributable to LOB SII 07 only?
  - EIOPA: If these products which allow consumers to buy different guarantees separately they should be considered modular.

## S.14.02

- Number of contracts at the end of the year - C0050: 1) When counting the number of contracts, for a contract with guarantees that fall under two different LOBs, is the contract counted in both LOBs? 2) Should only existing contracts as of 12/31 of the fiscal year be reported, or should contracts that had at least one day of validity in the current fiscal year also be reported? 3) Should premiums settled in the year following the year of contract conclusion (example: contract concluded and not renewed on 12/31/2022 and settled in January 2023) be counted with reference to the current year?

EIOPA: Not, only under the main LOB.

EIOPA: Only existing contract

EIOPA: Only the existing contract at the end of the year should be counted.

- Which Product category - C0020:
  - Clarification and examples are requested on the level of details for each of the required LoB (7, 11 and 12).
  - Specifically, confirmation is requested as to if rows should also be entered for the entire LoBs 7, 11 and 12 or only for the detail items (7.1, 11.1, etc.).

EIOPA: A separate row should be reported if there are products which fall under the specific product category. In summary, if there are products which fall under the LOB but not under the product category (one row should be reported) and if there are products which fall under the product category two rows for LOB 7 and 11 (and three for 12) should be reported.

## S.14.02

- Number of new contracts during year - C0060: Counting the number of contracts: for a contract with guarantees that fall under two different LOBs, is the contract counted in both LOBs?

EIOPA: See above for C0050. If modular it should be unbundled and the contract be reported under both LOBs.

- Should only existing contracts as of 12/31 of the fiscal year be reported, or should contracts that had at least one day of validity in the current fiscal year also be reported?

EIOPA: All new contracts during the year including those not in-being at the end of the year.

- Total amount of commissions paid during year - C0100: We request confirmation on reporting the commission figures only for written premiums (with reference to the figure reported on column C0090 - Total amount of Gross Written premiums - written via insurance distributors other than credit institutions).

EIOPA: This should be all commissions paid during the year.

- It is requested if in "claims paid" both claims occurred in the current year and claims occurred in previous years should be considered. For example, in the case of motor liability policy not further in place in 2023 which generated a claim in 2022 and paid in 2023, it is requested if the amount related to the payment of that claim should be considered.

EIOPA: Yes, it is correct both types of claims should be considered if paid during the year.

## S.14.02

- Number of insured at the end of the year - C0130 - It is asked if it is correct to count an insured person multiple times if the product is reported on different lines because it has multiple LoB (for example, in the case where there are guarantees).

EIOPA: Yes, it is correct. However, only if the product is a modular product because if not a modular product the product should be reported under one LOB.

- For the products commercialised under this product category/LOB, which proportion (measured by gross written premiums) covers climate related perils? (0-100) - C0030: Clarification and examples are requested for the purpose of identifying the scope of analysis and on the definition of "climate-related perils". Specifically, we request:

- if (1) products impacted by the consequences of climate change, (2) products that impact climate change, or (3) both should be considered;

EIOPA: Should be if they cover risks which can be impacted by climate change.

- if there is an exhaustive list of climate-related risks to be considered for populating this field or if it is left to the company to choose which risks to consider;

EIOPA: It is up to the company to choose risks.

- clarification on the methodologies for calculating the required value (percentage of products).

EIOPA: It should be the percentage of the products being reported under the LOB.

- if there is a materiality threshold to be taken into account.

EIOPA: There is no threshold.



## S.14s Financial stability templates

## S.14.04 & S.14.05 – Liquidity monitoring

- **Question:** S.14.04: Clarification is requested:
  - On the granularity to be used in compiling the QRT (by Company, by product or family of products, etc.).
  - On the frequency of compilation
  - Confirmation is also requested if the frequency of QRTs required for Financial Stability is semi-annual.
- EIOPA: The information in S.14.04 template can be aggregated for products with similar characteristics, i.e. for the various combinations of the options in the closed list for the following columns: Asset held in unit linked and index linked contracts (C0310), fiscal treatment of the products (C0055), country (C0080) and exit conditions at reporting date (C0270). Templates shall be reported with a semi-annual frequency, i.e. Q2 and Q4.
- **Question:** The log concerning the templates S.14.04 & S.14.05 remains insufficient to understand what is expected at a group level. These templates should not be reported by reinsurance companies, but the log does not explicitly explain what happens at a group level when the group owns a reinsurance company without being a reinsurance group.
- EIOPA: S.14.04 & S.14.05 at group level shall be reported incl. reinsurance transactions conducted outside the perimeter of the group (i.e. excluding intragroup transactions).
- **Question:** S.14.04: C0074 Administrative expenses: What is the definition of Administrative expenses? Is the definition the same as that of the Administrative expenses in the S.05.01/R1910?
- EIOPA: C0074 – In the Administrative expenses in S.14.04 shall be reported not only the administrative expenses directly related to insurance activities but also other overhead costs.



## S.14.04 & S.14.05 – Liquidity monitoring

- **Question:** S.14.04: C0300 Net Reinsurance flows (receivables - payable) of the period (year to date): Should we report S.02.01 R0270 reporting period +/- S.02.01 R0270 year-end last year? If so, why is EIOPA interested in these figures? In practice, this could mean that we have to report the accrued reinsurance premiums and claims year-end + the reported reinsurance premiums and claims (year to date) which has not been paid to/received by the reinsurer.
  - EIOPA: Consistently with the figures on claims paid and premia cashed in to date, the net reinsurance shall contain the net reinsurance flows cashed to date.
- **Question:** S.14.04 - Cashed Premium - gross (year to date) - C0290: Clarification is requested on the content of the field since the field title (cashed premiums - gross) would seem to require gross premiums, while the LOG describes data net of reinsurance.
  - EIOPA: S.14.04 - Cashed Premium - gross (year to date) - C0290 shall be reported on a gross basis. Guidelines will be adjusted accordingly in the next amendments.
- **Question:** S.14.05 - Best Estimate - C0180: Clarification is requested on the content of this field and if, as for item C0290 (Cashed Premiums - gross), the value is requested net or gross of reinsurance.
  - EIOPA: S.14.05 - Best Estimate - C0180 shall be reported on a gross basis.
- **Question:** S.14.05 - Unearned premium (year to date) - C0310: Clarification is requested regarding the content of this field and, similar to items C0290 and C0180 if it is to be considered net or gross of reinsurance.
  - EIOPA: S.14.05 - Unearned premium (year to date) - C0310 shall be reported on a gross basis.



# Internal model templates

## Internal model templates

**Question:** In the former sheet S.27.01 was included in the list of IM template. Is this correct? If yes, does this mean that we have to fill IM values in S.27.01? We are requested under Art 112 to report S.27.01 for SF. How can we then both report IM and SF?

- **Answer:** S.27.01 is not an IM template. It should not have been on the slide. So, SF values need to be reported as in previous taxonomies.

**Question:** I have a question regarding S.25.05.21.01 R0400 and R0400, this QRT seem to have the same structure labels as on S.26.08.01.01. However, R0400 in S.25.05.21.01 is R0370 in S.26.08.01.01. Is this simply an error?

- **Answer:** It is an error, and it will be addressed in the next ITS.

**Question:** Will the new S.25.05 template include a multi-row section for companies to describe their own risk components as in S.25.02 & S.25.03.

- **Answer:** No. Wherever this was deemed necessary there are “multi-row” sections so undertakings can report their own structure e.g. S.26.13.

## Internal model templates

**Question:** Regarding template S.25.05 and S.26.08, the risk modules used in these templates are not aligned with Standard Formula Risk Modules (for example, it does not appear "Counterparty risk"). How should we inform Standard Formula Risk Modules?

- **Answer:** Please clarify the question. What does it mean to “inform Standard Formula Risk Modules”? S.25.05 and S.26.08 are IM templates. Undertakings using the Standard Formula do not need to submit them. If you are referring to a partial internal model, then in S.25.05 and S.26.08 C0010 asks for the SCR which is the total one including SF (or only SF if the risk is not modelled). C0070 is the amount modelled which means that in this column only the IM part is reported. When the structure does not fit then the undertaking should report SF figures on best effort basis.



## S.37s Risk concentration templates

## S.37s Risk concentration templates

**Question:** Could you please point out. What "Insurance policies" in QRT S.37.01 means from a reinsurance perspective?

- **Answer:** Please refer to Q&A 2823 currently under internal review.

**Question:** Could you elaborate "Insurance policies" in QRT S.37.01. What kind of insurance risk concentrations should we include and how. Should we sum all the risks and policies together from the same counterparty even if the risks are not in the same risk concentration if you consider two buildings far away from each other.

- **Answer:** Please refer to Q&A 2823 currently under internal review.

**Question:** How should we report "Risk Mitigation techniques" in new S.37.01 per external counterpart? Usually, for example a currency swap, there is no breakdown possible for each counterpart. The same is for Reinsurance programs?!

- **Answer:** Please refer to Q&A 2724 for the reporting of "Risk Mitigation techniques". With regard to insurance exposures, in case of non-proportional reinsurance encompassing more than one counterparty, the deductions should be allocated proportionally or, alternatively, according to justifiable break-down agreed with the group supervisor. In general, where a specific breakdown per counterparty is not possible, a justifiable breakdown can be proposed and agreed with the group supervisor.

## S.37s Risk concentration templates

**Question:** Can you provide an example of risk mitigation techniques applicable for the S.37.01?

- **Answer:** Please refer to Q&A 2724, these can be for example external reinsurance and derivatives.

**Question:** Is it really intended to sum up total assets and off-balance sheet insurance amounts in S.37.01? Currently, this seems to be implemented this way.

- **Answer:** This is correct.

**Question:** For QRT S.37.01 - how is collateral pledged/held to be handled and reported in regard to exposure by counterparty for example for the financial product repos?

- **Answer:** Counterparties in the context of financial product repos are not to be included in the S.37 templates as a separate direct risk exposure.



# ECB template E.04



# Q&A



## "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

**Question:** In the 2.8.0 Solvency II taxonomy, there is the column "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table. The monetary value in this column has to be reported in a currency given in the S.08.01.01.02 table in column "Currency" (C0370). The XBRL taxonomy does not include a reference to the AF dimension with member s2c\_CA:x1.

EIOPA answer is "As these columns are modelled using MD metrics with no dimensions, the multicurrency facts have the information about the "Currency Conversion Approach" (s2c\_dim:AF) dimension with "Expressed in currency of denomination (not converted to reporting currency)" (s2c\_CA:x1) embedded in the MD metric declaration and carried in their label and MD metric details"

We are not totally satisfied of the answer, I think the dimension is missing, we don't take into account the label of metric, it's rather an exception?

- **Answer:** There are three rules dedicated to check the implementation of EIOPA XBRL Filing Rule 3.1 – TV1000, TV1001 and TV1002. TV1000 checks that all the monetary facts provided in the report are expressed in the reporting currency (provided in the General/Basic information template) -> modelled using metric ei1930. For a report, which reporting currency is Euro may be represented as follows:

# "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

```
<xbrli:context id="c">
<xbrli:entity>
  <xbrli:identifier scheme=http://standards.iso.org/iso/17442-Q1W2E3R4T5Y6U7I8O9P0</xbrli:identifier>
</xbrli:entity>
<xbrli:period>
  <xbrli:instant>2023-12-31</xbrli:instant>
</xbrli:period>
</xbrli:context>
<s2md_met:ei1930 contextRef="c">s2c_CU:EUR</s2md_met:ei1930>
```

In general, all monetary facts in an instance document must point from unitRef attribute to xbrli:unit which on xbrli:measure have the same currency code as the one identified by the fact value of s2md\_met:ei1930 metric. For example:

```
<xbrli:unit id="uEUR">
  <xbrli:measure>iso4217:EUR</xbrli:measure>
</xbrli:unit>
<s2md_met:mi251 contextRef="c-2" decimals="-2" unitRef="uEUR">12000</s2md_met:mi251>
```

So XBRL value assertion TV1000 checks if fact units match the reporting currency fact value. However, for specific cases it is expected for the values to be provided in the currency of denomination (e.g. S.16.01 and S.19.01). Such situation was so far captured by TV1001 and focused on multicurrency in semi-open templates. In case of multicurrency in semi-open templates, it is controlled by the two following z-axes:

- *Currency referring to s2c\_dim:OC dimension (Original/exposure currency) and linking to a hierarchy from CU domain listing different currencies,*
- *Currency conversion referring to s2c\_dim:AF dimension (Currency conversion approach) linking to CA domain hierarchy with the following two members:*
  - *s2c\_CA:x0 - Not applicable / Expressed in (converted to) reporting currency,*
  - *s2c\_CA:x1 - Expressed in currency of denomination (not converted to reporting currency).*

# "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

	A	B	C	D	E	F	G	H	I	J	K
1	S.16.01.01.02 - Annuities information		s2c_dim:AF (Currency conversion approach)	s2c_dim:OC (Original/exposure currency)	s2c_dim:AX (Applicable standard)	s2c_dim:RB (Related line of business)					
2											
3	Sheets (TemporaryAxsCode_189083)										
4	Currency conversion "mandatory" (Z0040)		s2c_exp:CA - 1 (Currency conversion approach) starting with x0 (Not applicable / Expressed in (commented to) reporting currency)								
5	Currency "mandatory" (Z0030)			s2c_exp:CU - 1 (Currency) starting with x0 (Total/NA)							
6	Accident year / Underwriting year "mandatory" (Z0020)				s2c_exp:AM - 8						
7	The related non-life line of business "mandatory" (Z0010)					s2c_exp:LB - 31					
8											
9											
10					Undiscounted	Undiscounted	Annually payments	Undiscounted	Number of annuities	Best Estimate for	Undiscounted
11					C0020	C0030	C0040	C0050	C0060	C0070	C0080
12											s2c_dim:RM (Previous)
13											s2c_T:ax50 (N-15)
14											s2c_T:ax49 (N-14)
15											s2c_T:ax48 (N-13)
16											s2c_T:ax47 (N-12)
17											s2c_T:ax46 (N-11)
18											s2c_T:ax44 (N-10)
19											s2c_T:ax48 (N-9)
20	Prior years										s2c_T:ax57 (N-6)
21											s2c_T:ax56 (N-7)
22											s2c_T:ax55 (N-6)
23											s2c_T:ax54 (N-5)
24											s2c_T:ax53 (N-4)
25											s2c_T:ax52 (N-3)
26											s2c_T:ax51 (N-2)
27	Total										s2c_T:ax41 (N)
28											
29											
30											
31											
32											
33											
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# "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

If a fact refers to *xbri:context* whose *xbri:scenario* contains no information about *s2c\_dim:AF* dimension (i.e. its default value *s2c\_CA:x0* applies) then it must follow the General rule described in the filing rules.

However, if a fact refers to *xbri:context* whose *xbri:scenario* contains:

- *s2c\_dim:AF* dimension with *s2c\_CA:x1* member,
- *s2c\_dim:OC* dimension referring to a member from *CU* domain,

then the currency code identified in *xbri:unit/xbri:measure* of that fact must match the currency declared for the *s2c\_dim:OC* dimension (ignoring in this comparison *iso4217* and *s2c\_CU* prefixes), e.g.:

```
<xbri:unit id="uJPY">
  <xbri:measure>iso4217:JPY</xbri:measure>
</xbri:unit>
<xbri:context id="AFx1_AXx4_BLx9_OCJPY_RBx135_RMx50_TBx28_TKx4_VGx80">
<xbri:entity>
  <xbri:identifier scheme=http://standards.iso.org/iso/17442>Q1W2E3R4T5Y6U7I8O9P0</xbri:identifier>
</xbri:entity>
<xbri:period>
```

# "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

```
</xbrli:entity>
<xbrli:period>
  <xbrli:instant>2015-12-31</xbrli:instant>
</xbrli:period>
  <xbrli:scenario>
    <xbrldi:explicitMember dimension="s2c_dim:AF">s2c_CA:x1</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:AX">s2c_AM:x4</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:BL">s2c_LB:x9</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:OC">s2c_CU:JPY</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:RB">s2c_LB:x135</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:RM">s2c_TI:x50</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:TB">s2c_LB:x28</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:TK">s2c_TF:x4</xbrldi:explicitMember>
    <xbrldi:explicitMember dimension="s2c_dim:VG">s2c_AM:x80</xbrldi:explicitMember>
  </xbrli:scenario>
</xbrli:context>
<s2md_met:mi84 contextRef="AFx1_AXx4_BLx9_OCJPY_RBx135_RMx50_TBx28_TKx4_VGx80" decimals="0" unitRef="uJPY">400</s2md_met:mi84>
```

Therefore, the XBRL value assertion TV1001 checks the match between the *s2c\_dim:OC* dimension member local name and *xbrli:unit/xbrli:measure* local name of monetary facts containing in *:context/xbrli:scenario* the *s2c\_dim:AF* dimension with *s2c\_CA:x1* member.

# "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

However, with the introduction of 2.8.0 model there is now another scenario created, with open table. As described in section IV.2 of [EIOPA DPM Documentation 2.8.0 Hotfix.pdf \(europa.eu\)](#) columns of open tables that correspond to data points (i.e. they are not keys neither properties of these data points) are represented by a single metric without any dimensions. Therefore, the above logic applicable to Multicurrency in semi-open templates that is based on explicitly identified `s2c_dim:AF` dimension with `s2c_CA:x1` member cannot be used in such cases. However, MD metric of the multicurrency fact in an open table includes indication of the `AF` dimension in its label and in the `MDMetricDetails.xml`. Example of such metric is `s2md_met:mi2822 Metric: Monetary|TA/Notional amount|VG/Solvency II|BC/Assets and/or liabilities|AF/Expressed in currency of denomination (not converted to reporting currency)|AL/Derivatives`

```
MDMetricDetails.xml
7629 <metric label="Metric: Monetary|TA/Notional amount|VG/Solvency II|BC/Assets and/or liabilities|AF/Expressed in currency of denomination (not
7630 converted to reporting currency)|AL/Derivatives" name="s2md_met:mi2822">
7631 <dimetric label="Monetary" name="s2md_met:mi1"/>
7632 <dimension label="Type of amount" name="s2o_dim:TA">
7633 <domainMember label="Notional amount" name="s2o_AM:x61"/>
7634 </dimension>
7635 <dimension label="Valuation general" name="s2o_dim:VG">
7636 <domainMember label="Solvency II" name="s2o_AM:x80"/>
7637 </dimension>
7638 <dimension label="Basic concepts" name="s2o_dim:BC">
7639 <domainMember label="Assets and/or liabilities" name="s2o_BC:x5"/>
7640 </dimension>
7641 <dimension label="Currency conversion approach" name="s2o_dim:AF">
7642 <domainMember label="Expressed in currency of denomination (not converted to reporting currency)" name="s2o_CA:x1"/>
7643 </dimension>
7644 <dimension label="Type of assets and/or liabilities" name="s2o_dim:AL">
7645 <domainMember label="Derivatives" name="s2o_MC:x32"/>
7646 </dimension>
</metric>
```

This metric is used in `C0131` of `S.08.01` and its `xbri:unit/xbri:measure` must match the value of the currency code identified in `C0370` of this template (for rows joined on the values of `Derivative ID Code` and `Type of code`) expressed by metric `s2md_met:ei1024` referring to `CU` domain hierarchy 1. The above check is enforced by in the taxonomy by XBRL assertion `TV1002 (_1 and _2)` with the following test expression:

# "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

local-name-from-QName(xfi:measure-name(xfi:unit-numerator(xfi:unit(\$v0)))) = local-name-from-QName(\$v1) where \$v0 is filters for *s2md\_met:mi2822/C0131* while \$v1 for *s2md\_met:ei1024/C0370*.

To better describe this new approach EIOPA has decided to update the XBRL Filing Rules ([https://dev.eiopa.europa.eu/Taxonomy/Full/2.8.0\\_Hotfix/Common/EIOPA\\_XBRL\\_Filing\\_Rules\\_2.8.0\\_Hotfix.pdf](https://dev.eiopa.europa.eu/Taxonomy/Full/2.8.0_Hotfix/Common/EIOPA_XBRL_Filing_Rules_2.8.0_Hotfix.pdf)) on 26<sup>th</sup> of January. In addition, please find the example code (snippet of XBRL report) with C0370 indicating GBP below:

```
<xbrli:context id="c-4">
  <xbrli:entity>
    <xbrli:identifier scheme="some.scheme" >test</xbrli:identifier>
  </xbrli:entity>
  <xbrli:period>
    <xbrli:instant>2023-12-31</xbrli:instant>
  </xbrli:period>
  <xbrli:scenario>
    <xbrldi:typedMember dimension="s2c_dim:UI">
      <s2c_typ:ID>123</s2c_typ:ID>
    </xbrldi:typedMember>
    <xbrldi:explicitMember dimension="s2c_dim:SU">s2c_MC:x169</xbrldi:explicitMember>
  </xbrli:scenario>
```



# "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

```
</xbrli:context>  
<s2md_met:ei1024 contextRef="c-4">s2c_CU:GBP</s2md_met:ei1024>
```

Therefore, corresponding fact for the UI dimension value in C0131 must refer to GBP unit:

```
<xbrli:context id="c-1">  
  <xbrli:entity>  
    <xbrli:identifier scheme="some.scheme">test</xbrli:identifier>  
  </xbrli:entity>  
  <xbrli:period>  
    <xbrli:instant>2023-12-31</xbrli:instant>  
  </xbrli:period>  
  <xbrli:scenario>  
    <xbrldi:typedMember dimension="s2c_dim:XB">  
      <s2c_typ:NB>1</s2c_typ:NB>  
    </xbrldi:typedMember>  
    <xbrldi:typedMember dimension="s2c_dim:UI">  
      <s2c_typ:ID>123</s2c_typ:ID>
```

## "Notional amount of the derivative" (C0130) in the S.08.01.01.01 table – question asked during the event

```
</xbrldi:typedMember>
<xbrldi:typedMember dimension="s2c_dim:NF">
  <s2c_typ:ID xsi:nil="true" />
</xbrldi:typedMember>
<xbrldi:typedMember dimension="s2c_dim:IW">
  <s2c_typ:ID xsi:nil="true" />
</xbrldi:typedMember>
<xbrldi:typedMember dimension="s2c_dim:PX">
  <s2c_typ:ID xsi:nil="true" />
</xbrldi:typedMember>
<xbrldi:explicitMember dimension="s2c_dim:SU">s2c_MC:x169</xbrldi:explicitMember>
</xbrli:scenario>
</xbrli:context>
<xbrli:unit id="u-GBP">
  <xbrli:measure>iso4217:GBP</xbrli:measure>
</xbrli:unit>
<s2md_met:mi2822 contextRef="c-1" decimals="2" unitRef="u-GBP">230</s2md_met:mi2822>
```

**Time for your questions!**

**THANK YOU**

For more information visit:  
<https://www.eiopa.europa.eu>