



**Economic Solvency Ratio Report of
Harel Insurance Company Ltd.
As at June 30, 2024**

This English translation from the Hebrew version of the report (published on November 27, 2024), is for convenience and information purposes only.

In case of any contradiction or discrepancy between this English translation and the original Hebrew version, the Hebrew version shall be the binding version.

The Company makes no representations as to the accuracy and reliability of the financial information in this English translation.

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Harel Insurance Company Ltd.
As at June 30, 2024**

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To: The Board of Directors of Harel Insurance Company Ltd.
Re: Auditors report with respect to the Solvency II-based Economic Solvency Ratio Report of Harel Insurance Company Ltd. ("the Company") as at June 30, 2024

Foreword

We have implemented the procedures set out below with respect to the Solvency II-based Economic Solvency Ratio Report of the Company as at June 30, 2024 ("the Report" or "the Economic Solvency Ratio Report"). Our report relates exclusively to solvency ratio calculations and the method of presentation of the Solvency Ratio Report, and it does not address any of the Company's other activity.

Responsibility

The Board of Directors and Management are responsible for the preparation and presentation of the Report in accordance with the instructions of the Commissioner of the Capital Market, Insurance and Savings ("the Commissioner") with respect to the Economic Solvency of insurance companies based on Solvency II, as included in Chapter 2, Section 2, Part 5 of the Consolidated Circular and related directives (hereinafter together "the Commissioner's Instructions"). The calculations, forecasts and assumptions that formed the basis for preparation of the Information are the responsibility of the Board of Directors and Management. This responsibility includes the selection and application of appropriate methods for preparation of the edited information and the use of assumptions and estimates for individual disclosures, that are reasonable under the given circumstances. Furthermore, this responsibility includes the planning, assimilation and maintenance of systems and processes relevant to preparation of the edited Information so as to avoid the inclusion of material misstatement.

Our responsibility is to express a conclusion on the preparation and presentation of an economic solvency ratio report in accordance with the Commissioner's Instructions, based on the procedures set out below.

Scope of the review

Our engagement was conducted in accordance with the principles of International Standard on Assurance Engagement (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information, published by the IAASB, and in accordance with the Commissioner's directives, as included in the Consolidated Circular, Chapter 7, Section 5, Part 1 concerning external auditors, which prescribes provisions concerning a review of a

quarterly economic solvency ratio report. The work procedures comprised the procedures set out below, with the purpose of assessing whether the calculations conducted by the Company on this matter, as at June 30, 2024, in all material respects, do not comply with the Commissioner's Instructions. Nonetheless, we do not provide a separate conclusion for each disclosure.

The work procedures comprised the following:

- Review of the Solvency Ratio Report and the explanations included therein;
- Conducting inquiries, mainly with those responsible for producing the Solvency Ratio Report and for preparation of the calculations relating to the solvency ratio; including inquiries about material changes that have occurred in the models, methodologies, calculation processes and systems;
- Review of material changes in studies that affected this report, to the extent relevant;
- Conducting analytical review procedures, including assessing the reasonability of any material changes in key items in the Report.
- Our work is considerably more limited in scope than an audit performed in accordance with generally accepted auditing standards in Israel, and it therefore does not enable us to obtain reasonable assurance that we will become aware of any significant matter that might have been identified in an audit. Accordingly, we do not express an audit opinion.

We did not review the reasonability of the TMTP as at June 30, 2024, as presented in Section 3.1.2, other than with respect to the aforementioned work procedures regarding the TMTP amount that does not exceed the projected discounted amount of the Risk Margin and the Solvency Capital Requirement in respect of life and health insurance risks for existing business in the transitional period, based on the pattern of future development of the required capital that affects calculation of the expected capital release, as well as release of the projected Risk Margin, as specified in the provisions concerning calculation of the Risk Margin.

Conclusion

Based on the procedures applied, nothing came to our attention that might cause us to believe that the solvency ratio calculations and method of presentation of the Company's Solvency Ratio Report as at June 30, 2024, were not prepared in accordance with the Commissioner's Instructions, in all material respects.

It is emphasized that the forecasts and assumptions are based mainly on past experience, as arising from actuarial studies conducted from time to time. In view of the reforms in the capital market, insurance and savings, and changes in the economic environment, past data do not necessarily reflect future performance. In some cases, the Information is based on assumptions about future events and management activity, as well as the pattern of future development of the Risk Margin that will not necessarily materialize or that may materialize differently from the assumptions on which the Information was based. Additionally, actual results might differ significantly from the Information, given that the combined scenarios of events may materialize in a manner that is significantly different from the assumptions made in the Information.

We draw attention to Section F - notes and clarifications concerning the solvency ratio, the uncertainty deriving from regulatory changes and exposure to contingent liabilities, the effect

of which on the solvency ratio cannot be estimated, as well as the uncertainty inherent in the actuarial and financial assumptions and forecasts used in the preparation of the Report.

Tel Aviv

Somekh Chaikin, Certified Public Accountants

November 27, 2024

1. Background and Disclosure Requirements

A. Solvency II based Economic Solvency Regime

The information set out below was calculated in accordance with the provisions of Insurance Circular 2020-1-15 dated October 14, 2020, on “Amendment of the Consolidated Circular concerning Implementation of an Economic Solvency Regime for Insurance Companies Based on Solvency II” (“Economic Solvency Regime Provisions”) and based on the additional directives and stipulations of the Commissioner concerning implementation of an Economic Solvency Regime.

The information was prepared in accordance with the provisions of Chapter 1, Part 4 Section 5 of the Consolidated Circular, Insurance Circular 2022-1-8 dated March 13, 2022, on “Amendment of the Consolidated Circular concerning Disclosure of an Economic Solvency Regime and based on the additional directives and stipulations of the Commissioner concerning disclosure regarding an Economic Solvency Regime (“the Disclosure Provisions”).

The Economic Solvency Regime Provisions prescribe a standard model for the calculation of Eligible Own Funds and Solvency Capital Requirement (“SCR”), with the purpose of ensuring that insurance companies hold a buffer to absorb losses arising from the materialization of unforeseen risks to which they are exposed. **The Solvency Ratio is the ratio between the Eligible Own Funds and the Solvency Capital Requirement.**

Eligible Own Funds for the purpose of an Economic Solvency Regime, is composed of Tier-1 and Tier-2 capital. Tier-1 capital includes equity calculated by evaluating an insurance company’s assets and liabilities based on Economic Solvency Regime Provisions and ancillary Tier-1 capital. Ancillary Tier-1 capital and Tier-2 capital include capital instruments with loss-absorbing mechanisms, including subordinated Tier-2 capital instruments, hybrid Tier-2 capital and Tier-3 capital that were issued before the commencement date. Economic Solvency Regime Provisions place limitations on the composition of Own Funds in relation to SCR (see below) so that the components included in Tier-2 capital shall not exceed 40% of the SCR (in the transitional period, specified in Section 1.B below, it is stipulated that the components included in Tier-2 capital shall not exceed 50% of the SCR in the transitional period).

The Eligible Own Funds should be compared with the required capital, where there are two levels of capital requirement:

- Capital required to maintain an insurance company’s solvency (“SCR”). The SCR is risk-sensitive and based on a forward-looking calculation of the materialization of various scenarios, while taking into account the level of correlation of the different risk factors, based on the guidance in the Economic Solvency Regime Provisions.

The purpose of this requirement is to ensure precise and timely intervention by the supervisory authorities.

- Minimum Capital Requirement (“MCR” or “Capital Threshold”). Under the Solvency provisions, the capital threshold equals the amount derived from the level of insurance reserves and premiums (according to their definition in the Solvency provisions) within a range of between 25% and 45% of the SCR.

Eligible Own Funds and SCR are calculated using data and models that are based, among other things, on forecasts and assumptions relying primarily on past experience. These calculations are highly complex.

B. Transitional Measures

(a) The Economic Solvency Regime Provisions include, among other things, transitional measures that prescribe a transitional period in which one of the following must be applied:

- 1) A gradual increase of the required capital by 5% per year, from 60% of the SCR in 2016 up to the full SCR in 2024. The Solvency Capital Requirement in the transitional period to be calculated on the December 31, 2023 and June 30, 2024, data shall not be less than 95% of the SCR.
- 2) Increase of the economic capital by deducting a sum from the insurance reserves to be calculated as detailed below.

The Company chose the second option, and this after obtaining the Commissioner’s approval to include a deduction from the insurance reserve in the calculation of the insurance reserves in the transitional period (“the Deduction”). The Deduction is calculated in accordance with the Commissioner’s directives in a letter to insurance company executives dated October 15, 2020, setting out the principles for calculating the TMTP (“Deduction Principles Letter”) and it is decreased gradually until December 31, 2032.

According to the principles for calculating the TMTP, the TMTP in the transitional period will be calculated according to an allocation into homogenous risk groups, for policies that were issued prior to December 31, 2016. This TMTP will be calculated as the difference between insurance reserves in retention in the Economic Balance Sheet, including the Risk Margin associated with them (net of adjustment for the fair value of designated bonds) and the insurance reserves in retention according to the financial statements. The company must ensure that the value of the TMTP in the transitional period is calculated in a cautious, conservative manner and at each reporting date it is consistent with the

anticipated rate of growth of the solvency ratio, where it is calculated excluding the TMTP in the transitional period and the adjustment for equity risk.

The Company is required to recalculate the TMTP in subsequent periods every two years, or more frequently, if there has been a material change in the Company's risk profile or business structure, or if required by the Commissioner. A recalculation might result in a change in the value of the Deduction.

The Deduction was recalculated at June 30, 2024, due to the significant impact of the rising interest rates in the first half of 2024 on the TMTP. Additionally, a linear subtraction from the amount of the Deduction was also performed. On November 27, 2024, the Company's Board of Directors approved the Deduction amount that was recalculated pursuant to the Commissioner's announcement that he has no comments on the Deduction recalculation as at June 30, 2024.

- (b) Regarding the composition of the Eligible Own Funds, it was determined that the maximum scope of Tier-2 capital in the transitional period will be 50% of the SCR.

Clarification concerning forward-looking information in this report

The data included in this Economic Solvency Ratio Report, including the Eligible Own Funds and Solvency Capital Requirement, are based, among other things, on forecasts, assessments and estimates of future events, the materialization of which is uncertain and that are beyond the Company's control, and should be treated as "forward looking information", according to its definition in Section 32A of the Securities Law, 1968. Actual results may differ from the way they are expressed in this Economic Solvency Ratio Report, due to the fact that all or part of these forecasts, assessments and estimates materialize or may materialize in a manner different from that forecast, in part with respect to actuarial assumptions (including mortality rates, including the mortality tables published from time to time by the Commissioner, morbidity rates, recovery rates, cancellations, expenses, annuity take-up rates and the rate of underwriting profit), assumptions regarding future management actions, the future development of Solvency Capital Requirement and the Risk Margin, risk-free interest rates, yields in the capital market, future revenues and loss in catastrophe scenarios.

C. Provisions on the subject of Own Risk and Solvency Assessment ("ORSA")

On January 5, 2022, a letter of principles and an amendment to the Consolidated Circular were published on the subject of implementing an Own Risk and Solvency Assessment (ORSA) by insurance companies ("ORSA Guidelines"). One of the main principles of ORSA is to create linkage between business strategy, risks and capital management.

According to Section 7.4.28 of Chapter 3, Part 4, Section 5 in the Consolidated Circular, entitled "Reporting to the Commissioner of the Capital Market", insurance companies shall submit a report of their ORSA to the Commissioner once a year, in January.

As a result of the Swords of Iron War, on October 23, 2023, a circular for financial institutions was published on "Emergency Instructions of the Commissioner of the Capital Market, Insurance and Savings - October 2023" ("Commissioner's Emergency Instructions"), extending the date for submittal of the ORSA report by 60 days to March 31, 2024.

The Company submitted the required report to the Commissioner in accordance with the schedule set out in the Commissioner's Emergency Instructions.

D. Definitions

- The Company** - Harel Insurance Company Ltd.
- The Commissioner** - Commissioner of the Capital Market, Insurance and Savings Authority.
- Economic Solvency Regime Provisions** - The provisions of Commissioner's Circular 2020-1-15 on "Amendment of the Consolidated Circular concerning Implementation of an Economic Solvency Regime for Insurance Companies Based on Solvency II" including its stipulations.
- Best Estimate** - Expected future cash flows from insurance contracts and investment contracts throughout their duration, without conservatism margins, discounted by an adjusted risk-free interest rate.
- Long-term health insurance (SLT)** - Similar to Life Techniques. Health insurance that is managed similarly to life insurance.
- Short-term health insurance (NSLT)** - Non-Similar to Life Techniques. Health insurance that is managed similarly to non-life insurance.
- Basic Solvency Capital Requirement (BSCR)** - The capital required from an insurance company to maintain its solvency, calculated in accordance with the Economic Solvency Regime Provisions, without considering the equity required for operational risk, adjustment for the Loss Absorbing Capacity of Deferred Taxes and the required capital for management companies.
- Solvency Capital Requirement (SCR)** - Solvency Capital Requirement. The capital required from an insurance company to maintain its solvency, calculated in accordance with the Economic Solvency Regime Provisions.
- Eligible Own Funds** - Tier-1 and Tier-2 capital of an insurance company, after deductions and amortization in accordance with the provisions of Section B of the Appendix to the Solvency Circular.
- Basic Tier-1 capital** - Excess of assets over liabilities in the Economic Balance Sheet, net of unrecognized assets and dividends that were declared after the reporting date and before initial publication of the report.
- Ancillary Tier-1 capital** - Perpetual capital note, non-cumulative preference shares, hybrid Tier-1 capital instrument, ancillary Tier-1 capital instrument.
- Tier-2 capital** - Tier-2 capital instruments, subordinated Tier-2 capital instruments, hybrid Tier-2 capital and hybrid Tier-3 capital -

		valued in accordance with the provisions of Part A of the Appendix to the Solvency Circular.
Diversification effect among the risk components	-	Effect of the partial correlation among different risks in the Standard Model on their amounts. If the risks are well distributed among the operating segments in the portfolio, then the effect of the correlation will be greater and the overall risk is reduced.
Solvency Ratio	-	The ratio between the insurance company's Eligible Own Funds and its SCR.
Economic Balance Sheet	-	The Company's balance sheet where the value of the assets and liabilities is adjusted in accordance with the provisions of Section 1 of the Appendix to the Solvency Circular.
Risk margin (RM)	-	An amount over and above the Best Estimate that reflects the overall cost of capital that a third party (another insurance company or reinsurer) would require to assume the Company's insurance obligations.
Transitional Measure on Technical Provisions (TMTP)	-	After receiving the Commissioner's approval, insurance companies may apply a transitional deduction to technical provisions, based on the principles prescribed by the Commissioner. The maximum portion deductible shall decrease on a linear basis at the end of each year until 2032.
Minimum Capital Requirement (MCR)	-	Minimum Capital Requirement. The minimum capital required from an insurance company.
Expected Profits Included in Future Premiums (EPIFP)	-	Expected Profit in Future Premiums. Future profit factored into the liabilities for existing life and health insurance contracts attributable to future premiums.
Volatility Adjustment (VA)	-	Volatility Adjustment. An anti-cyclical component that reflects the spreads of an insurance company's representative debt assets portfolio and is added to the adjusted interest rate curve based on the Economic Solvency Regime Provisions.
UFR	-	Ultimate Forward Rate. The latest forward interest rate derived from the expected long term real interest rate and from long term inflation expectations, to which the adjusted interest rate curve converges, based on the Economic Solvency Regime Provisions.
Adjusted risk-free interest		An interest curve determined by the Commissioner and which is based on the real yield to maturity of Israel state bonds, that in the long term converges to a real fixed rate of 2.6% (UFR) and plus a margin (VA) determined by the Commissioner.

- Audited** - An audit conducted by the Company's independent auditors in accordance with the International Standard on Assurance Engagement ISAE 3400 - Review of Prospective Financial Information and in accordance with the Commissioner's directives, as included in Appendix B to the Consolidated Circular in Chapter 7, Part 1 of Section 5 concerning an "Independent Auditor", which sets out instructions for auditing an annual Economic Solvency Ratio Report.
- Reviewed** - A review conducted by the Company's independent auditors in accordance with International Standard on Assurance Engagements (ISAE) 3000 Revised, Assurance Engagements Other than Audits or Reviews of Historical Financial Information and in accordance with the Commissioner's directives, as included in the Consolidated Circular in Chapter 7, Part 1 of Section 5 concerning an "Independent Auditor", which sets out instructions for reviewing a quarterly Economic Solvency Ratio Report.

E. Calculation Methodology

The Economic Solvency Ratio at June 30, 2024, and December 31, 2022, was calculated and prepared in accordance with the Economic Solvency Regime Provisions. Following are the key instructions:

Economic Balance Sheet

The economic balance sheet is calculated in accordance with the detailed instructions published by the Commissioner which are based on the European Solvency II standards, with adjustment for the nature of the products and economic environment in Israel. The purpose of the standards is to reflect the economic value of the balance sheet items according to the Commissioner's approach. According to the instructions, the insurance liabilities are calculated on the basis of a Best Estimate of all expected future cash flows from existing business, without a margin for conservatism, and plus a Risk Margin, which represents the addition to the insurance liabilities that another insurance company would be expected to require for assuming an insurance company's insurance liabilities. According to the instructions, the Risk Margin is calculated using the cost of capital method, at a rate of 6% per year of the expected required capital, in respect of insurance risks, over the life of the existing business. The Economic Balance Sheet is prepared on the basis of the Company's separate financial statements. The Economic Balance Sheet does not include the economic value of deferred acquisition costs and intangible assets, other than insurtech assets recognized by the Commissioner.

Transitional Measure on Technical Provisions

As noted above, the Company chose the transitional measures option according to which the economic capital may be increased by means of a deduction from the

insurance reserves that will gradually decrease through 2032. The Deduction in the transitional period is calculated in accordance with the Deduction Principles Letter, as described in Section 1.B.(a) above.

Solvency Capital Requirement (SCR)

Calculation of the capital required for Solvency is based on an assessment of the exposure of the economic Own Funds to the following risk components prescribed in the Economic Solvency Regime Provisions: life insurance risks, health insurance risks, non-life insurance risks, market risks, counter-party risks and intangible assets risk. These risk components include sub-components with respect to specific risks to which the insurance company is exposed. Exposure of the economic Own Funds to each sub-component is assessed on the basis of a defined scenario set out in the guidance. Determination of the Solvency Capital Requirement is based on a sum of the capital requirements for the said sub-risk components, net of the effect of diversification between the Company's risks according to correlation factors attributed to them according to the instructions, and net of adjustment for the absorption of losses for deferred tax, as specified in the Economic Solvency Regime Provisions. Calculation of the SCR also includes components of capital required in respect of operational risk, and for management companies.

It is emphasized that the results of the models applied in calculating the Eligible Own Funds and SCR are extremely sensitive to the forecasts and assumptions included therein as well as to the way in which the guidance is applied. The economic solvency ratio is highly sensitive to market and other variables and it may therefore be volatile. The capital requirement for each risk is calculated based on the Company's exposure to this risk and taking into account the parameters defined in the instructions. According to the instructions, the amount of required capital represents the volume of own funds that will enable the insurance company to absorb, in the coming year, unforeseen losses and to meet its obligations to policyholders and beneficiaries in a timely manner, with a 99.5% level of certainty.

Adjustment for loss absorbing capacity for deferred taxes

Under the Economic Solvency Regime Provisions, insurance companies may recognize adjustment for loss absorption capacity for deferred taxes up to the net amount of the outstanding reserve for deferred taxes recorded in the Economic Balance Sheet, plus a deferred tax asset held to cover future profits that meet all the following conditions:

- The insurance company is capable of showing the Commissioner that future taxable profits can reasonably be available and that the tax assets held to cover them are exercisable;
- It derives exclusively from non-life insurance activity or NSLT health insurance activity;
- Its value does not exceed 5% of the BSCR.

The adjustment for loss absorbing capacity for deferred taxes is limited by multiplying the tax rate with the balance of the Basic Solvency Capital Requirement (BSCR) and operational risk capital requirements.

F. Comments and Clarifications

1. General

Among other things, the Solvency Ratio includes a forecast based on assumptions and parameters in line with past experience, as emerges from actuarial studies conducted from time to time, and with the Company's assessments regarding the future, to the extent that the Company has relevant and concrete information on which to base it. The information and studies are the same as those which formed the basis for the Company's financial statements at June 30, 2024. Any information or studies compiled after the publication date of the Company's financial statements at June 30, 2024, were not taken into account. It is emphasized that in view of the reforms in the capital market, insurance and savings, and changes in the economic environment, past data do not necessarily indicate future performance and the Company is unable to reliably estimate the impact of these reforms and changes. In some cases, the calculation is based on assumptions about future events and management activity that may not necessarily materialize or that will materialize differently from the assumptions on which the calculation was based. Moreover, actual results might differ significantly from the calculation, given that the combined scenarios of events could materialize in a significantly different manner from the assumptions in the calculation. The model in its current format is extremely sensitive to changes in market and other variables, and the capital position it reflects could therefore be extremely volatile.

2. Future effects of legislation and regulations known on the date of publication of the report and exposure to contingent liabilities

- (a) In recent years, the insurance industry has been exposed to frequent changes in legislation and regulations. In this context, see Section 2.4, in the chapter Summary of the Legislative Arrangements and Provisions of Law in the Group's Operating Segments in the interim report at June 30, 2024.

The legislation and regulatory instructions affect the Company's profitability and cash flows and as a direct consequence, its Economic Solvency.

Calculation of the Solvency Ratio does not include all the future possible repercussions of these laws and regulations, as well as other developments that are not yet reflected in the data at the practical level, given that at the date of this report, the Company is unable to estimate the impact on its business performance and on the Solvency Ratio.

On this, it should be noted that there is significant uncertainty as to the impact of the application of the various components of IFRS 17 which is due

to enter into force in Israel from the financial statements at January 1, 2025. The method of application of this standard in the financial statements could affect the outcome of the solvency ratio calculation and at this stage the Company is unable to estimate this effect.

In March 2024, the Knesset approved the Value Added Tax Order (Tax Rate for Nonprofits and Financial Institutions) (Amendment), 2024. The Order stipulates that from January 1, 2025, the rate for payroll tax and profit tax payable by financial institutions on activity in Israel will be 18%, instead of the present rate of 17%. The deferred tax balances included in the Company's Solvency Ratio Report as at June 30, 2024, take into account the effects that may arise from the aforementioned increase in the tax rate.

- (b) According to the Solvency instructions, the value of the contingent liabilities in the Economic Balance Sheet is determined according to their value in the accounting balance sheet, based on the provisions of IAS 37. This measurement does not reflect their economic value. It is impossible to estimate the implications of the uncertainty stemming from the exposure to contingent liabilities, as described in Note 7A to the financial statements for Q2 2024, including its impact on future profit and on the Solvency Ratio.

2. Solvency Ratio and MCR**A. Economic Solvency Ratio**

	<u>June 30, 2024</u>	<u>December 31, 2023</u>
	<u>(Reviewed)</u>	<u>(Audited)</u>
	<u>NIS million</u>	
Own Funds for the purpose of SCR - see Section 4	<u>16,566</u>	<u>15,841</u>
Solvency Capital Requirement (SCR) - see Section 5	<u>8,959</u>	<u>9,428</u>
Capital surplus	<u>7,607</u>	<u>6,413</u>
Economic Solvency Ratio	<u>185%</u>	<u>168%</u>
Effect of material capital transactions that took place in the period between the date of the calculation and the publication date of the Economic Solvency Ratio Report:		
Capital raising (redemption)	-	(182)
Own Funds for the purpose of SCR	<u>16,566</u>	<u>15,659</u>
Capital surplus	<u>7,607</u>	<u>6,231</u>
Economic Solvency Ratio	<u>185%</u>	<u>166%</u>

For information about the Economic Solvency Ratio without application of the transitional provisions to the transitional period and regarding the economic solvency ratio target and limitations that apply to the Company with respect to distribution of a dividend, see Section 8 below.

Swords of Iron War ("the War")

Due to the nature of its activity, the Company is exposed to falling prices in the financial markets, the slowdown of business activity as well as to other risks arising from the War.

As a direct outcome of the War, there was an insignificant increase in payments for claims in risk of death and health insurance in the first half of 2024. Additionally, the War caused Israel's financial markets to fluctuate and the risk-free interest rate curve to rise in the first half of 2024. Some of these fluctuations have a contrary effect on the Company's Solvency Ratio so that in aggregate it is impossible to determine, with certainty, whether or not the War had a direct, material impact on the Solvency Ratio in the first half of 2024.

Key changes that occurred compared with comparative figures in main items

The Company's capital position at June 30, 2024, was affected by its ongoing business development, dividend distribution, changes in market variables, revised actuarial studies, ongoing model updates and recalculation of the TMTP. As noted above, some of the effects are also attributable to the repercussions of the War on business activity and market variables, including the rising interest rate curve.

- The calculation as at June 30, 2024, includes the distribution of a dividend of NIS 200 million, declared by the Company in August 2024 and paid on September 26, 2024.
- At June 30, 2024, against the backdrop of the increase in the risk-free linked shekel interest curve, the Deduction amount was recalculated and a linear subtraction was performed, consistent with the transitional period. The Deduction update to NIS 1,028 million reduced the Company's capital surplus and Economic Solvency Ratio.
- The significant increase in the risk-free, linked shekel interest curve in the first half of 2024, caused a reduction in the value of the insurance liabilities in savings products, long-term care and non-life insurance products and a decrease of the capital requirements for some insurance scenarios. In contrast, the higher interest rate reduced the value of debt assets. Taken together, these changes led to a significant increase of the Company's capital surplus and economic solvency ratio without taking the transitional provisions into account, and to a lesser degree affected the solvency ratio (taking the transitional provisions into account), in light of the effect of the rising interest rate curve on reducing the Deduction amount in the transitional period as noted above.
- In the Reporting Period, the Consumer Price Index rose by 1.9% and led, in aggregate, to a reduction of the Company's capital surplus and Economic Solvency Ratio.
- The capital position was positively affected by the amortization of capital requirements and Risk Margin for existing business, that were partially offset by capital requirements and Risk Margin for new business sold in the Reporting Period.
- On July 24, 2024, the Capital Market, Insurance and Savings Authority published a circular on "Amendment of the Provisions of the Consolidated Circular on the Measurement of Liability - Revised demographic assumptions in life insurance and pension funds" ("Updated Mortality Tables"). The Circular includes an update of the default assumptions applied in calculating the liabilities and guaranteed annuity options in life insurance policies and pension funds. Application of the Circular caused a decrease of the Company's capital surplus and Economic Solvency Ratio.
- Amendment of the VAT Order with respect to increasing the rate of profit tax and payroll tax to 18% from January 1, 2025 - led to a change in the tax rate applied in calculating deferred taxes from 34.19% to 34.75% causing an insignificant decrease in the Company's capital surplus and solvency ratio.

In accordance with the Economic Plan (Legislative Amendments for the Implementation of Economic Policy for Fiscal Years 2023 and 2024) Bill, it was determined that anyone who has a full coverage insurance (from the first shekel) policy, purchased on or after February 1, 2016 through September 30, 2023, and belongs to the Supplementary Health Services (SHS) plan of one of the HMOs, will, from June 1, 2024, be transferred to a policy for surgery that supplements the SHS plan, which provides cover only after the member has exercised his

rights through the Supplementary Health Services, unless he informs the insurance company that he does not wish to be transferred but wishes to remain in the full coverage policy. This move did not significantly affect the capital surplus. For information about the Solvency Ratio without applying the transitional provisions to the transitional period and without adjustment for equity risk and regarding the capital surplus target and limitations that apply to the Company with respect to distribution of a dividend, see Section 8 below.

Material changes after the date of the calculation

At the date of publication of the Solvency Ratio Report, the risk-free linked shekel interest curve fell slightly, against the background of the Swords of Iron War, the macroeconomic situation and global interest rate trends. This decrease is expected to insignificantly reduce the Company's capital surplus and economic solvency ratio.

At this stage there is uncertainty regarding the further development, scope and duration of the War. The financial markets and interest rate curve remain volatile in the period between the date of the calculation and publication of the report. Accordingly, there is uncertainty regarding the future impact of the War on the Company's solvency ratio.

For additional information about the repercussions of the War on the Company's activity, see also Note 1B in the Interim Report as at September 30, 2024.

B. Minimum Capital Requirement (MCR)

	<u>June 30, 2024</u>	<u>December 31, 2023</u>
	<u>(Reviewed)</u>	<u>(Audited)</u>
	<u>NIS million</u>	
MCR - see Section 6.A	<u>3,039</u>	<u>2,984</u>
Own Funds for the purpose of MCR - see Section 6.B	<u>12,694</u>	<u>11,724</u>

3. **Information about the Economic Balance Sheet**

The fair value of the assets and liabilities in the Economic Balance Sheet was calculated in accordance with provisions included in the chapter on measurement of assets and liabilities for the purposes of the financial statements in the Consolidated Circular (Chapter 1, Part 2, Section 5) (“Measurement Chapter in the Consolidated Circular”), except for items prescribed otherwise in the Economic Solvency Regime Provisions, as follows:

(1) **Consolidated Statement of Financial Position**

The data in the Economic Balance Sheet are presented on the basis of the Company’s separate financial statements.

(2) **Assets**

(a) **Intangible assets** - pursuant to Part A, Chapter 2, subsection (a), insurance companies will assess the value of intangible assets at zero, other than an investment in insurtech according to its definition in the Solvency Circular, that received the Commissioner’s approval as necessary.

(b) **Deferred Acquisition Costs** - pursuant to Part A, Chapter 2, subsection (a), insurance companies will assess the value of acquisition costs at zero.

(c) **Investment in investees that are not insurance companies** - pursuant Part A, Chapter 2, subsection (b), the calculation was made according to the adjusted equity method, based on the provisions of the Circular regarding investees that are not insurance companies. Accordingly, the Company’s share in the investees was included on the basis of its proportionate share of their surplus assets over their liabilities, calculated in accordance with the economic value of the assets and liabilities according to the Circular, which is calculated on the basis of their financial statements after writing off the intangible assets. In investees where the economic balance sheet reflects a surplus of liabilities over assets, the value of the investment will be zero rather than a negative amount, when its value in the accounting balance sheet is positive. The economic value of the investees does not include the profits inherent in these companies. In management companies, 35% of the balance of the original difference attributed to this company is added to the economic value.

(d) **Non-marketable debt assets** - pursuant to Part A, Chapter 1, the fair value of non-marketable debt assets is calculated using the discounted cash flow model where the discounting interest rates are determined by a company that provides price and interest rate quotes for financial institutions.

(e) **Designated bonds** - pursuant to Part A, Chapter 2, subsection (e), insurance companies adjust the value of designated bonds to the Economic Balance Sheet.

(3) **Liabilities for insurance contracts and investment contracts, Risk Margin (RM) and reinsurance assets**

Liabilities for insurance contracts and investment contracts are calculated, pursuant to Part A, Chapter 4 of the Economic Solvency Regime Provisions, on a Best Estimate (BE) basis, based on assumptions that are mainly the result of projecting present experience with respect to past events onto the future, in the environment in which the Company

operates and without conservatism factors. Life and health insurance liabilities (SLT) were generally calculated according to the method of calculating the Embedded Value (EV) for insurance contracts in Israel, and the non-life insurance liabilities were calculated on the basis of the share relating to the BE - in the chapter on measurement in the Consolidated Circular relating to best practice for calculation of insurance reserves in non-life insurance for the purpose of financial reporting.

Measurement of the insurance liabilities in the Economic Balance Sheet is based on discounting the expected future cash flows, including future profit, at a risk-free interest rate plus VA and taking the UFR into account, on the basis of a best estimate that does not include conservatism margins, where the risk is reflected in the RM component which is a separate liability. This, unlike the financial statements in which the insurance liabilities are assessed with conservatism margins using the methods and discounting rates describe in Note 3C to the 2023 annual financial statements.

The insurance liabilities for long-term life and health insurance were calculated by discounting the Company's expected future cash flows, using a model applied to information in the Company's operating systems, with respect to the insurance coverages, and to numerous demographic, economic and behavioral assumptions. The expected cash flows include, for example, projected premiums in light of the anticipated cancellation rates, net of the expenses that the Company will incur for the coverages, including commissions paid to agents, anticipated claims, etc.

This cash flow is discounted according to an interest rate curve determined by the Commissioner and which is based on the yield to maturity of Israel Government bonds ("risk-free interest rate"), that in the long term converges to a fixed rate of 2.6% (UFR) plus a margin (VA) determined by the Commissioner.

Calculation of the liabilities does not include cash flows in respect of future sales, but it does include an assumption that premiums will continue to be received for existing business (other than for policies without an insurance risk, including investment contracts). Additionally, the calculation assumes that the business will continue to operate as a "going concern", i.e. that the Company's structure will not change and therefore some of the fixed expenses in the future will not be attributed to the present portfolio, but rather to new business which is expected to be sold in the future.

It is fair to assume that the actual cash flows will differ, in one way or another, from the estimates prepared on the Best Estimate basis, even if the parameters underlying the calculation remain unchanged. See also Section 1.F above - Comments and clarifications.

Limitations and reservations in calculating the Best Estimate

- The assumptions underlying the models were generally formulated on the basis of studies and analyses based on the Company's experience over the past few years, that did not include extreme events. Although there is a low probability that extreme events will take place, the Company is unable to estimate either this probability or the extent of the impact of those events. Accordingly, such events were not taken into account in determining the assumptions on which the models are based.

- Due to insufficient data, in calculating the Best Estimate, no assumption was made and the Company did not examine the correlation between the demographic and operating assumptions and those pertaining to market conditions (such as the interest rate), that might have significantly affected the Best Estimate.
- Determination of the Best Estimate should be based on an estimate of the distribution of the possible estimate results. In the absence of adequate statistical data which correspond with the estimated distribution and Best Estimate for all the demographic and operational factors in life and health SLT insurance, the Company used real assumptions for each and every parameter, according to the expected value of each relevant factor and without taking into account any dependence or correlation between the different assumptions or between the assumptions for exogenous economic parameters such as taxation, interest or employment levels in the economy.
- In many cases, the future cash flows refer to many years in the future. The studies on which the assumptions underlying the cash flows are based, are based on management's best knowledge, mainly in line with events in recent years. There is a considerable degree of uncertainty as to whether the assumptions underlying the cash flows will in fact materialize.

Assumptions applied in calculating the insurance liabilities

The assumptions underlying the calculation were determined according to the Company's best possible estimates regarding relevant demographic and operational factors, and they reflect the Company's expectations for the future regarding these factors. The demographic assumptions included in the calculation were taken from the Company's internal studies, to the extent that there are any, and are based on relevant experience and/or on a combination of information from external sources, such as information received from reinsurers and mortality and morbidity tables published by the Commissioner.

The operational assumptions (general and administrative expenses) were calculated according to the results of an internal pricing model prepared by the Company for expenses associated with the relevant insurance liabilities, including: allocation of the expenses to the different operating segments and activities (production, ongoing management, investments, claims management, etc.) and assumptions relating to their future development (in line with the CPI, volume of premiums, number of coverages, volume of assets, etc.).

Following are the key assumptions on which we based the calculations:

(a) Economic assumptions

- Discounting interest rate - a risk-free interest rate curve which is based on the yield to maturity of CPI-linked Israel Government bonds ("risk-free interest rate"), that in the long term converges to a fixed rate of 2.6% (UFR) plus a margin (VA) calculated by the Capital Market, Insurance and Savings Authority, all as determined by the Commissioner.
- The yield on the assets backing the unit-linked life insurance products is the same as the discounting interest rate.

- Designated bonds are evaluated at their fair value, taking into account their specified interest rate and the Best Estimate of the Company's future eligibility to acquire them.

(b) Operational assumptions (for life and health insurance)

General and administrative expenses - the Company analyzed the expenses associated with the relevant insurance segments in the financial statement and allocated them to different products and types of cover, and to different operations such as ongoing operation of the coverages, management of investments, claims handling, payment of annuities, etc. A study of the expenses is revised periodically and the different categories of expenses are loaded on to the future cash flow with respect to the relevant variables, such as number of coverages, quantity of premiums, reserves or number of claims. Determination of the future expenses and their allocation to future cash flows include the Company's estimates and numerous considerations that affect the total liabilities.

(c) Demographic assumptions

- Cancellations (discontinued premium payments, policy surrenders, withdrawals)
- Mortality of insureds and pensioners
- Morbidity (rate and length of claims) in long-term care products, work disability and health
- Annuity tracks and take-up rate

(d) Non-life insurance assumptions

Cost of claims, for future losses and outstanding claim based on the Company's past experience in the different lines of business in relation to the percentage of claims, amount of the claims and rate of payment of claims in long-tail branches.

(4) **Risk Margin**

In addition to the insurance liabilities on a Best Estimate basis, a Risk Margin component is calculated reflecting the overall cost of capital that another insurance company would be expected to require in order to assume the insurance company's insurance liabilities, calculated on a Best Estimate basis, in full. The Risk Margin is calculated according to the Commissioner's instructions based on a cost of capital of 6% and discounted at an adjusted risk-free interest rate, but excluding the VA component. The future capital requirement is calculated according to the "risk factor method" by changing the capital requirement components calculated at the reporting date, except for a capital requirement for market risks, based on the projected development of the risk factors associated with them. These factors are designed to reflect development of the risks over time.

Limitations and reservations in calculating the Risk Margin

As noted above, the Risk Margin is calculated using the cost of capital method, at a rate of 6% per year of the expected required capital for insurance risks, over the life of the existing business. This method of calculation was defined by the Commissioner and

does not necessarily reflect the overall cost of the capital that another insurance company or reinsurer would be expected to require for assuming the Company's insurance liabilities. Additionally, the capital requirements are based on the Best Estimate, including its limitations as described above.

Furthermore, the extreme scenarios and correlations defined in the standard model for calculating the capital requirements are based on a series of scenarios and assumptions that were defined by the Commissioner and they in no way reflect the Company's actual experience.

(5) **Other liabilities**

- (a) **Contingent liabilities** - on the value of contingent liabilities included in the Economic Balance Sheet, see Section 1.F.2(b) above.
- (b) **Deferred tax liabilities, net** - pursuant to Part A, Chapter 2, subsection (c), the calculation is based on the difference between the value attributed to the assets and liabilities in the Economic Balance Sheet and the value attributed to them for tax purposes according to the instructions for the recognition, measurement and presentation in International Accounting Standard 12 (IAS 12). Deferred tax assets may be recognized only if the Company passes the tests in the Solvency directives, in addition to the tests included in the aforementioned accounting standard. The balance also includes a deferred tax liability arising from the Deduction in the transitional period.
- (c) **Trade and other payables** - pursuant to Part A, Chapter 1, some of the retained amounts in this section were calculated in accordance with the general principles applicable to the Economic Balance Sheet.
- (d) **Financial liabilities** - pursuant to the principles set out in the Solvency Directives and subject to the instruction in Part A, Chapter 3, according to which changes that occurred in the Company's risk should not be taken into account other than for changes in the risk-free interest rate. In other words, the discounting interest rate is a risk-free interest rate plus the capital spread on the date of issue.

(6) **Value of the TMTP in the transitional period as at June 30, 2024**

The Deduction was calculated in accordance with the provisions in the Solvency Circular and in the letter to insurance company executives: "Principles for calculating a deduction for the transitional period in an Economic Solvency Regime based on Solvency II, dated October 15, 2020 ("Deduction Principles Letter").

The Deduction was calculated as the sum of the positive differences between insurance reserves in retention in the Economic Balance Sheet, including the Risk Margin (net of adjustment for the fair value of designated bonds) and the insurance reserves in retention according to the financial statements at that date. These differences were calculated by groups of products and in accordance with the instructions in the letter of principles.

The Deduction was recalculated as at June 30, 2024, in view of the substantial impact of the rising interest rates on the TMTP amount in the first half of 2024. Additionally, a

linear subtraction from the Deduction amount was also performed, consistent with the transitional period. On November 28, 2024, the Company's Board of Directors approved the recalculated TMTP amount after receiving notice from the Commissioner that he has no comments on the Deduction recalculation as at June 30, 2024. The Deduction at June 30, 2024, was NIS 1,028 million (after a linear subtraction in accordance with the transitional period).

A. Economic Balance Sheet	June 30, 2024		December 31, 2023	
	(Reviewed)		(Audited)	
	<u>Balance sheet according to accounting standards</u>	<u>Economic balance sheet</u>	<u>Balance sheet according to accounting standards</u>	<u>Economic balance sheet</u>
	NIS million	NIS million	NIS million	NIS million
Assets:				
Intangible assets	1,247	236	1,215	245
Deferred tax assets, net	1	-	1	-
Deferred Acquisition Costs	2,571	-	2,500	-
Fixed assets	1,374	1,374	1,354	1,354
Investments in investees that are not insurance companies				
Management companies	30	30	30	30
Other investees	1,320	1,318	1,265	1,263
Total investments in non-insurance company investees	1,350	1,348	1,295	1,293
Investment property for unit-linked contracts	1,803	1,803	1,898	1,898
Investment property - other	2,335	2,335	2,419	2,419
Reinsurance assets	5,305	2,163	5,429	2,102
Trade and other receivables	2,124	2,100	1,701	1,667
Financial investments for unit-linked contracts	73,050	73,050	71,117	71,117
Other financial investments				
Marketable debt assets	8,063	8,063	7,861	7,861
Non-marketable debt assets, other than designated bonds	8,548	8,539	8,577	8,557
Designated bonds	5,286	6,551	5,231	6,935
Stocks	1,966	1,966	1,894	1,894
Other	4,516	4,516	4,342	4,342
Total other financial investments	28,379	29,635	27,905	29,589
Cash and cash equivalents for unit-linked contracts	6,372	6,372	6,733	6,733
Other cash and cash equivalents	2,397	2,397	2,434	2,434

Other assets	<u>1,365</u>	<u>1,365</u>	<u>1,627</u>	<u>1,627</u>
Total assets	<u>129,673</u>	<u>124,178</u>	<u>127,628</u>	<u>122,478</u>
Total assets for unit-linked contracts	<u>382,35</u>	<u>82,376</u>	<u>80,608</u>	<u>80,627</u>
<u>Capital</u>				
Basic Tier-1 capital	<u>3,996</u>	<u>12,017</u>	<u>4,046</u>	<u>10,843</u>
Total equity	<u>3,996</u>	<u>12,017</u>	<u>4,046</u>	<u>10,843</u>
<u>Liabilities</u>				
Liabilities for non-unit-linked insurance contracts and investment contracts	<u>31,908</u>	<u>10,506</u>	<u>31,514</u>	<u>12,172</u>
Liabilities for unit-linked insurance contracts and investment contracts	<u>81,619</u>	<u>77,851</u>	<u>79,675</u>	<u>75,991</u>
Risk margin (RM)	-	<u>9,127</u>	-	<u>9,987</u>
Transitional Measure on Technical Provisions (TMTP)	-	<u>(1,028)</u>	-	<u>(1,907)</u>
Deferred tax liabilities, net	<u>575</u>	<u>4,847</u>	<u>717</u>	<u>4,248</u>
Trade and other payables	<u>65,02</u>	<u>4,901</u>	<u>5,447</u>	<u>5,325</u>
Financial liabilities	<u>6,448</u>	<u>5,856</u>	<u>6,001</u>	<u>5,591</u>
Other liabilities	<u>101</u>	<u>101</u>	<u>228</u>	<u>228</u>
Total liabilities	<u>7125,67</u>	<u>112,161</u>	<u>123,582</u>	<u>111,635</u>
Total equity and liabilities	<u>129,673</u>	<u>124,178</u>	<u>127,628</u>	<u>122,478</u>

B. Liabilities for insurance contracts and investment contracts

	June 30, 2024		
	Best Estimate (BE) for liabilities		
	Gross	Reinsurance	Retention
	(Reviewed)		
	NIS million		
Liabilities for non-unit-linked insurance contracts and investment contracts			
Life insurance contracts and long-term health insurance (SLT)	472	(838)	1,310
Non-life insurance contracts and short term health insurance (NSLT)	10,034	2,817	7,217
Total liabilities for insurance contracts and non-unit-linked investment contracts	10,506	1,979	8,527
Liabilities for insurance contracts and unit-linked investment contracts - life insurance contracts and long-term health insurance contracts (SLT)	77,851	184	77,667
Total liabilities for insurance contracts and investment contracts	88,357	2,163	86,194
	December 31, 2023		
	Best Estimate (BE) for liabilities		

	<u>Gross</u>	<u>Reinsurance</u>	<u>Retention</u>
	<u>(Audited)</u>		
	<u>NIS million</u>		
Liabilities for non-unit-linked insurance contracts and investment contracts			
Life insurance contracts and long-term health insurance (SLT)	2,157	(927)	3,084
Non-life insurance contracts and short term health insurance (NSLT)	<u>10,015</u>	<u>2,857</u>	<u>7,158</u>
Total liabilities for insurance contracts and non-unit-linked investment contracts	<u>12,172</u>	<u>1,930</u>	<u>10,242</u>
Liabilities for insurance contracts and unit-linked investment contracts - life insurance contracts and long-term health insurance contracts (SLT)	<u>75,991</u>	<u>172</u>	<u>75,819</u>
Total liabilities for insurance contracts and investment contracts	<u>88,163</u>	<u>2,102</u>	<u>86,061</u>

Key changes that occurred compared with comparative figures in main items

The effect of the rising interest rate curve applied in discounting the insurance liabilities, the increase in the CPI and changes in the insurance portfolio together led to a decrease of the total liabilities for non-unit-linked insurance contracts and investment contracts in the first half of 2024.

For information about the reasons that produced material changes compared with comparative figures in key items, see Section 2.A above.

4. Own funds for the purpose of SCR

	June 30, 2024			
	Tier-1 capital			
	Basic Tier-1 capital	Ancillary Tier-1 capital	Tier-2 capital	Total
	(Reviewed)			
	NIS million			
Own funds	12,017	364	54,90	17,286
Deductions from Tier-1 capital (A)	(294)	-	-	(294)
Subtractions (B)	-	-	-	-
Deviation from quantitative limitations (C)	-	-	(426)	(426)
Own funds for the purpose of SCR	11,723	364	4,479	16,566
Of which - Expected Profits Included in Future Premiums (EPIFP) after tax	13,069			13,069

December 31, 2023

	Tier-1 capital			
	Basic Tier-1 capital	Ancillary Tier-1 capital	Tier-2 capital	Total
	(Audited)			
	NIS million			
Own funds	10,843	394	4,825	15,062
Deductions from Tier-1 capital (A)	(110)	-	-	(110)
Subtractions (B)	-	-	-	-
Deviation from quantitative limitations (C)	-	-	(111)	(111)
Own funds for the purpose of SCR	10,733	394	4,714	15,841
Of which - Expected Profits Included in Future Premiums (EPIFP) after tax	12,937			12,937

- (a) Deductions from Tier-1 capital - in accordance with the definition of "Basic Tier-1 capital" in the Appendix to subsection B, Chapter 2, Part 2 of Section 5 of the Consolidated Circular - Economic Solvency Regime ("Economic Solvency Regime Appendix"). These deductions include the sum of the assets held to cover liabilities for non-unit linked insurance contracts and investment contracts, in contrast with the Investment Rules, the

amount of repurchase of ordinary shares and dividend declared after the reporting date and before the report is first published.

- (b) Deductions - in accordance with the provisions in Chapter 6, Part B - "Provisions Concerning the Own Funds of Insurance Companies" to the Economic Solvency Regime Appendix.
- (c) Deviation from quantitative limitations - in accordance with the provisions in Chapter 2, Part B in the "Provisions Concerning the Own Funds of Insurance Companies" to the Economic Solvency Regime Appendix.
- (d) Composition of own funds for the purpose of SCR

	June 30, 2024	December 31, 2023
	(Reviewed)	(Audited)
	NIS million	
Tier-1 capital:		
Basic Tier-1 capital	11,723	10,733
Ancillary Tier-1 capital:		
Hybrid Tier-1 capital instruments	<u>364</u>	<u>394</u>
Total Ancillary Tier-1 capital	<u>364</u>	<u>394</u>
Total Tier-1 capital	<u>12,087</u>	<u>11,127</u>
Tier-2 capital:		
Tier-2 capital instruments	3,540	3,160
Hybrid Tier-2 capital instruments	1,365	1,376
Hybrid Tier-3 capital instruments	-	289
Net of the subtraction for deviation from quantitative limitations	<u>(426)</u>	<u>(111)</u>
Total Tier-2 capital	<u>4,479</u>	<u>4,714</u>
Total own funds for the purpose of (SCR)	<u>16,566</u>	<u>15,841</u>

For information about the reasons that produced material changes compared with comparative figures in key items, see Section 2.A above.

For details of information about own funds for the purpose of SCR without application of the transitional provisions for the transitional period, see Section 7 "Effect of Application of the Instructions on the transitional period" below.

5. Solvency Capital Requirement (SCR)

	June 30, 2024	December 31, 2023
	Reviewed	Audited
	NIS million	
Basic Solvency Capital Requirement (BSCR)		
Capital required for market risk component	5,121	5,368
Capital required for counterparty risk component	346	440
Capital required for life insurance underwriting risk component	4,109	4,147
Capital required for health insurance underwriting risk component (SLT + NSLT)	8,134	8,568
Capital required for non-life insurance underwriting risk component	2,153	2,171
Total	19,863	20,694
Effect of the diversification among the risk components	(6,773)	(7,020)
Capital required for market intangible assets risk component	118	123
Total BSCR	13,208	13,797
Capital required for operational risk	492	499
Adjustment for loss-absorbing capacity of deferred taxes	(4,761)	(4,888)
Capital required on account of management companies:		
Tzva Hakeva Saving Fund - Provident Funds Management Company Ltd.	10	10
Leatid Pension Funds Management Company Ltd.	10	10
Total capital required on account of management companies	20	20
Total SCR	8,959	9,428

For information about SCR without application of the transitional provisions for the transitional period, see Section 7 "Effect of Application of the Instructions in the transitional period" below.

Material changes that occurred compared with comparative figures

For the reasons that produced material changes compared with comparative figures in key items, see Section 2.A above.

- The reduced capital requirement for market risks is attributable mainly to the effect of an increase in the interest rate curve on the assets and liabilities that are sensitive to interest and to a change in the debt assets, that led to a reduction of the interest rate

risk capital requirement. The decrease in the interest rate risk capital requirement was partially offset by an increase in the capital requirement for equity risk, partly as a result of a change in the asset portfolio and exacerbation of the scenario due to an increase in the Symmetric Adjustment (SA) component.

- During the Reporting Period, the risk-free, linked shekel interest rate curve increased significantly, causing a reduction of the capital requirements for some insurance scenarios, and as a consequence causing the Company's capital surplus and economic solvency ratio to increase.
- In the Reporting Period, the Consumer Price Index rose by 1.9% and led to an increase of the capital requirements in some of the insurance scenarios and as a consequence causing the Company's capital surplus and Economic Solvency Ratio to be reduced.
- Amortization of the capital requirements for existing business led to an increase of the Company's capital surplus and economic solvency ratio and capital requirements for new business sold in the Reporting Period led to a reduction of the Company's capital surplus and Economic Solvency Ratio.

6. MCR

(A) MCR

	June 30, 2024	December 31, 2023
	(Reviewed)	(Audited)
	NIS million	
MCR according to the MCR linear formula	3,039	2,984
Lower boundary (25% of SCR in the transitional period)	2,240	2,357
Upper boundary (45% of SCR in the transitional period)	4,032	4,243
Minimum Capital Requirement (MCR)	3,039	2,984

(B) Own funds for the purpose of MCR

	June 30, 2024		
	Tier-1 capital	Tier-2 capital	Total
	(Reviewed)		
	NIS million		
Own funds for the purpose of solvency capital requirement (SCR) (after deductions and subtractions)	12,087	4,479	16,566
Deviation from quantitative limitations due to MCR (*)	-	(3,872)	(3,872)
Own funds for the purpose of MCR	12,087	607	12,694

	December 31, 2023		
	Tier-1 capital	Tier-2 capital	Total
	(Audited)		
	NIS million		
Own funds for the purpose of solvency capital requirement (SCR) (after deductions and subtractions)	11,127	4,714	15,841
Deviation from quantitative limitations due to MCR (*)	-	(4,117)	(4,117)
Own funds for the purpose of MCR	11,127	597	11,724

(*) In accordance with the provisions in Chapter 3, Part B to the Economic Solvency Regime Appendix, Tier-2 capital shall not exceed 20% of MCR.

7. Effect of application of the instructions in the transitional period

June 30, 2024				
	Including application of the TMTP and adjustment for equity risk	Effect of inclusion of the Deduction in the transitional period	Effect of a rate of 50% Tier-2 capital in the transitional period	Without application of the TMTP and adjustment for equity risk
(Reviewed)				
NIS million				
Total insurance liabilities, including Risk Margin (RM)	96,456	(1,028)	-	97,484
Basic Tier-1 capital	11,723	671	-	11,052
Own funds for the purpose of SCR	16,566	671	896	14,999
Solvency capital requirement (SCR)	8,959	-	-	8,959
December 31, 2023				
	Including application of the TMTP and adjustment for equity risk	Effect of inclusion of the Deduction in the transitional period	Effect of a rate of 50% Tier-2 capital in the transitional period	Without application of the TMTP and adjustment for equity risk
(Audited)				
NIS million				
Total insurance liabilities, including Risk Margin (RM)	96,243	(1,907)	-	98,150
Basic Tier-1 capital	10,733	1,255	-	9,478
Own funds for the purpose of SCR	15,841	1,014	943	13,884
Solvency capital requirement (SCR)	9,428	(602)	-	10,030

For information about the reasons that produced material changes compared with comparative figures in key items, see Section 2.A above.

The Deduction was recalculated at June 30, 2024, due to the significant impact of the rising interest rate curve in the first half of 2024 on the Deduction amount. Additionally, a linear subtraction from the amount of the Deduction was performed, consistent with the transitional period. On November 27, 2024, the Company's Board of Directors approved the recalculated Deduction amount, further to notice from the Commissioner that he has no comments on the recalculation of the Deduction at June 30, 2024.

8. Restrictions on dividend distribution

It is the Company's policy to hold a robust capital base to ensure its solvency and ability to meet its obligations to policyholders, to maintain its ability to continue its business activity and so that it is able to produce a yield for its shareholders. The Company is subject to the capital requirements and defined regulations with respect to the distribution of dividends.

On May 29, 2023, the Company's Board of Directors approved the revised capital management plan and at this stage, threshold conditions were determined for the distribution of a dividend, which include a minimum economic solvency ratio of 135%, taking the transitional provisions into account, and a minimum solvency ratio of 110%, without taking into account the provisions in the transitional period.

On February 28, 2021, the Company's Board of Directors approved the distribution of a dividend of at least 35% of comprehensive income as long as Harel Insurance meets the minimum targets for the Solvency II based solvency ratio.

The threshold conditions are intended to allow Harel Insurance to cope with crises without significantly compromising its operations and its compliance with the applicable capital requirements. Nonetheless, the foregoing is not intended to ensure that the Company will remain in compliance with the prescribed threshold conditions at all times.

According to a letter published by the Commissioner in October 2017 ("the Letter"), insurance companies may distribute a dividend only if, following the distribution, the company has a solvency ratio, based on the Economic Solvency Regime, of at least 100%, calculated without taking the transitional provisions into account and subject to the solvency ratio target set by the Company's Board of Directors. This ratio will be calculated without the relief provided in respect of a difference in origin attributed to the purchase of provident fund activity and management companies.

Below is information about the Company's economic solvency ratio, calculated without the transitional provisions and based on the solvency ratio target determined by the Company's board of directors with respect to the solvency ratio calculated without taking the provisions in the transitional period into account, as required in the Letter. This ratio is in compliance with the solvency ratio required according to the Letter.

Without application of the transitional provisions to the transitional period:

	June 30, 2024	December 31, 2022
	(Reviewed)	(Audited)
	NIS million	
Own funds for the purpose of SCR	14,999	13,884
Solvency capital requirement (SCR)	8,959	10,030
Capital surplus	6,040	3,854
Solvency ratio (in percent)	167%	138%

Effect of material capital transactions that took place in the period between the date of the calculation and the publication date of the solvency ratio report:

Raising (redemption) of capital instruments	-	-
Own funds for the purpose of SCR	14,999	13,884
Capital Surplus	6,040	3,854
Solvency ratio	167%	138%

Capital status after capital transactions in relation to the Board of Directors target:

Economic solvency ratio target set by the Board of Directors	110%	110%
Capital surplus in relation to the target	5,144	2,850

For information about the reasons that produced material changes compared with comparative figures in key items, see Section 2.A above.

November 27,
2024

Date

Guy Rotkopf
Chairman of the
Board

Nir Cohen
CEO

Adva Inbar
Chief Risk Officer