

Mediolanum Group
European Embedded Value December 31, 2008

Supplementary information

INTRODUCTION

In May 2004, the CFO Forum, a group representing the Chief Financial Officers of major European insurance groups published the European Embedded Value ("EEV") Principles with the aim of improving the transparency and consistency of embedded value reporting. Mediolanum adopted the EEV Principles for the first time with the publication of its full year 2005 results. This disclosure provides results as at December 31, 2008 and a comparison with values determined as at December 31, 2007 and at December 31, 2006.

An embedded value is an actuarially determined estimate of the value of a company, excluding any value attributable to future new business. Embedded value is defined as the sum of shareholders' net assets, valuing assets at market value, and the value of in-force business. The value of in-force life business is the present value of the stream of future after-tax statutory profits that are expected to be generated from all the existing policies at the valuation date, adjusted for the cost of maintaining a level of required capital and for the time value of financial options and guarantees. The value of in-force asset management (mutual funds, real estate funds and managed accounts) and banking (current account, deposit account and mortgage) business is calculated in a similar way to the value of in-force life business.

In order to provide more complete information, the embedded values consolidate the value of life and asset management business distributed in Italy and Spain, together with the most significant parts of the Italian banking business.

Mediolanum has completed the internalisation of the models for its life and asset management businesses distributed in Italy and has continued to work closely with Tillinghast, the insurance and financial services consulting business of Towers Perrin, to develop appropriate methodology; Towers Perrin has continued to calculate the embedded value for the business which has not been internalised and has undertaken an overall review of the embedded value of the Group at December 31, 2008.

Mediolanum has chosen to adopt an approach which maintains consistency with the embedded value reporting which has been a characteristic of the Group's transparent reporting since 1994. The value of in-force business continues to represent the discounted value of a stream of best estimate profits adjusted for the cost of holding a certain level of capital. The key differences between Traditional Embedded Value ("TEV") reporting used in prior reporting years and EEV reporting are in the determination of the level of required capital, and in the allowance for risk, which uses a framework based on market-consistent methodology, from which equivalent risk discount rates are derived for the major lines of business.

In calculating the embedded value of the Group, numerous assumptions (some of which are shown below) are required concerning the Mediolanum Group's lines of business with respect to industry performance, business and economic conditions and other factors, many of which are outside the Group's control. Although the assumptions used represent estimates that the Mediolanum Group believe are appropriate for the purpose of embedded value reporting, future operating conditions may differ, perhaps significantly, from those assumed in the calculation of the embedded value. Consequently, the inclusion of embedded value herein should not be regarded as a statement by the Mediolanum Group, Towers Perrin or any other entity, that the stream of future after-tax profits discounted to produce the embedded value will be achieved.

EMBEDDED VALUE

The following table shows the embedded values as at December 31, 2006, 2007 and 2008.

Embedded value as at December 31, <i>Euro millions</i>	2006	2007	2008
published shareholders' net assets	904	896	814
adjustments to net assets ¹	(155)	(156)	(312)
Adjusted shareholders' net assets	749	740	502
value of in-force life business	1,895	1,938	1,662
value of in-force asset management	346	313	251
value of in-force banking business	132	173	129
Value of in-force business	2,373	2,424	2,042
EMBEDDED VALUE	3,122	3,164	2,544

¹ including elimination of goodwill

Shareholders' net assets shown above are equal to the consolidated net assets of the Group, determined on an IFRS basis, before the distribution of dividends payable in the following year. Adjustments are required primarily to reflect the after-tax impact of (i) marking to market value any assets not considered on a market value under IFRS, (ii) the elimination of goodwill, primarily those related to the acquisitions of Fibanc, Gamax, B.A. Lenz and MILL in prior periods, (iii) the exclusion of the accounting items relating to unrealised gains in the life segregated funds, whose projected emergence over time is included in the value of the in-force life insurance business, (iv) the reversal of accounting items related to life insurance products classified under IAS 39 for which the value of in-force business is determined using the statutory profits, and (v) the impact of the taxation of life reserves.

The following table shows the reconciliation between published consolidated IFRS net equity and adjusted shareholders' net asset value.

Reconciliation of adjusted shareholders' net equity to IFRS net equity
Euro millions

	2006	2007	2008
Consolidated IFRS net equity	904	896	814
Goodwill	(162)	(161)	(161)
Taxation on reserves	(12)	(16)	(15)
AFS & other IFRS items	9	10	4
Net UCG not in value of in-force business	10	11	(140)
Adjusted shareholders' net assets	749	740	502

The discount rates used under the EEV methodology vary between lines of business, since they reflect, using the methodology outlined later in this document, the risk profile of the underlying business. The average discount rates, weighted by value of in-force business are 5.49% as at December 31, 2008, 7.21% as at December 31, 2007 and 6.73% as at December 31, 2006.

Sensitivity to the risk discount rate

The discount rate appropriate for any shareholder or investor will depend on his or her specific requirements, tax position and perception of the risks associated with the realisation of future profits. To allow potential investors to analyse the effect of using various discount rates to reflect differing views on risk, the embedded value for the Group as at December 31, 2008 has been calculated at discount rates respectively 1% higher and lower than the central rates. All other assumptions, in particular inflation rates and investment returns, have been kept unchanged when calculating the values at alternative discount rates.

Analysis of the sensitivity to the discount rate of embedded value at December 31, 2008

Euro millions

Discount rate	-1%	Central	+1%
Adjusted shareholders' net assets	500	502	504
value of in-force life business	1,854	1,662	1,497
value of in-force asset management	261	251	241
value of in-force banking business	135	129	123
Value of in-force business	2,250	2,042	1,861
EMBEDDED VALUE	2,750	2,544	2,365

EMBEDDED VALUE EARNINGS

Embedded value earnings, which are defined as the change in embedded value for the year, adjusted for the payment of dividends and other capital movements, provide a measure of performance during the year. The following table shows the embedded value earnings of the Mediolanum Group in 2007 and 2008.

Embedded value earnings <i>Euro millions</i>	2007	2008
Change in embedded value for the period	42	(620)
Dividends paid or accrued	146	146
Other capital movements	(5)	(4)
EV EARNINGS (before Lehman Brothers operation)	-	(478)
Impact of Lehman Brothers operation	-	(108)
EMBEDDED VALUE EARNINGS	183	(586)

Embedded value earnings consist of the following components:

- The expected return on embedded value at the start of the year (“expected return”), equal to the after-tax investment return assumed at the start of the year on shareholders’ net assets less solvency capital, plus a return at the discount rate on the sum of in-force business and solvency capital at the start of the year.
- Variances during the period (“experience variances”), caused by differences between the actual experience of the period and the assumptions used to calculate the embedded value at the start of the year, before the impact of new sales during the period.
- The impact of changes in assumptions at the end of the period for operating experience, excluding economic or fiscal assumptions (“operating assumption changes”).
- Changes in assumptions regarding future experience used to calculate the value of in-force business at the end of the period relating to economic conditions (“economic assumption changes”), including the discount rate and investment returns.
- The effect as at 31 December 2007 of the decrease in the overall Italian tax rate (IRES and IRAP), together with the other changes introduced by the Finanziaria 2008 (“tax assumption changes”), including in particular the change in IRAP on dividends.
- The “value added by new business”, initially calculated at the moment of sale using the end of period assumptions, and then capitalised at the discount rate to the end of the period.
- The impact in 2008 of the collapse of Lehman Brothers, and the consequent devaluation of the structured bonds underlying certain index-linked products, which was covered by the extraordinary capital injection made by the two major shareholders.

The following table shows the components of the embedded value earnings of the Mediolanum Group in 2007 and 2008.

Components of embedded value earnings

<i>Euro millions</i>	2007	2008
Expected return	176	193
Economic experience variances	(173)	(760)
Operating experience variances – unit-linked repricing	(80)	-
Operating experience variances – business other	(31)	30
Operating assumption changes	(89)	(97)
Economic assumption changes	(21)	(35)
Tax assumption changes	12	-
EARNINGS ON INITIAL EMBEDDED VALUE	(206)	(669)
New life business	319	133
New asset management business	52	51
New banking business	18	7
VALUE ADDED BY NEW BUSINESS	389	191
EV EARNINGS (before Lehman Brothers operation)	183	(478)
Impact of Lehman Brothers operation		(108)
EMBEDDED VALUE EARNINGS		(586)

Description of key embedded value earnings items in 2008

Experience variances gave rise to a decrease in the embedded value earnings for the year. The main components are:

- Negative economic experience variances, due to the performance of the financial markets, giving rise to lower than expected investment returns on unit-linked and asset management business (negative impact for 548 million Euro) and in strategic shareholdings (212 million Euro due mostly to the shareholding in Mediobanca);
- Other business components (positive impact for 30 million Euro) due primarily to: i) combined positive effect (60 million Euro) due to a change in the asset mix, a reduction in the investment management costs for the Irish mutual funds (mainly repricing) and the new Best Brand funds of funds, ii) higher performance commissions than those assumed (16 million Euro), iii) lower persistency than expected on asset management business (negative variance of 14 million Euro mostly associated with mutual funds) and on Life business (4 million Euro) , iv) reduction of 30 million Euro related to changes in the mix of current accounts in the banking business.

The remaining effects comprise a series of smaller positive and negative items.

The negative impact of changes to operating assumptions (approximately 97 million Euro) is mainly due to the increase in the longer-duration lapse rate assumptions for the Europension unit-linked products and for the Benefit part of the MyPension products.

The negative impact of changes to economic assumptions (approximately 35 million Euro) is due to the combined effect of the decrease in the discount rate

and in the projected rates of investment return on life and asset management business, and the consequent reduction in interest margins on current account business.

The value added by new life business in the period was 133 million Euro of which 10 million Euro related to business distributed by Fibanc in Spain.

The value added by new asset management business in the period of 51 million Euro, almost entirely related to business distributed in Italy.

New banking business added 7 million Euro, related mostly to proprietary mortgages.

VALUE OF NEW BUSINESS

New business comprises new life insurance policies sold during the period, excluding those resulting from the transformation or switch of existing policies, together with discretionary increases in the level of regular premiums on existing policies. New asset management business is defined as the sum of retail gross inflows net of internal switches within the mutual funds and managed accounts. New banking business comprises the new money collected in the period relating to current accounts and deposit accounts opened in the year and the volume of new mortgages issued.

The value of new business has been determined at the moment of sale using the end-year economic and operating assumptions. The following table shows the value added by new business in 2007 and 2008.

Value of new business at moment of sale

<i>Euro millions</i>	2007	2008
Life insurance (excluding index-linked)	262	105
Index-linked life business	47	25
Asset management business	50	49
Banking business	18	7
VALUE OF NEW BUSINESS	377	186

The discount rates used under the EEV methodology vary between lines of business, since they reflect, using the methodology outlined later in this document, the risk profile of the underlying business. The average risk profile of the new business was similar to that of the in-force business and so the same discount rates were used, namely 5.20% for life business (7.10% in 2007), 6.60% for asset management business (8.00% in 2007) and 7.00% for banking business (7.00% in 2007), giving an average, weighted by new business value of 5.64% in 2008.

In order to evaluate the effect of alternative discount rates on new business, the value of new business in 2008 was calculated using discount rates 1% lower and higher than the central rates. In calculating these values with alternative discount rates, all the other assumptions, including in particular those relating to inflation and return on investments, were kept unchanged.

Analysis of the sensitivity to the discount rate of the value added by new business in 2008

Euro millions

	-1%	central	+1%
Discount rate			
Life insurance (excluding index-linked)	127	105	87
Index-linked life business	25	25	25
Asset management business	52	49	47
New banking business	8	7	6
Total	212	186	165

New business margins

New business margins for the Italian life and asset management business in 2008 and 2007 are shown in the tables below. Profitability is expressed both in terms of a margin on APE (annual premium equivalent defined as annualised regular premiums plus 10% of single premiums) and as a percentage of PVNBP (present value of new business premiums), calculated using the expected lapse and other exit assumptions, discounted at the implied discount rate.

New business margins in 2008 – life and asset management

Euro millions

	Term Ins	Unit- linked	Index- linked	Asset mgmt
Value of new business at moment of sale	1	96	23	50
Regular premiums / pac	1	141	-	99
Single premiums / pic	-	127	1,047	1,086
APE	1	154	105	207
New business margin (% APE)	74.2%	62.4%	22.3%	24.1%
PVNBP	8	1,330	1,047	1,724
New business margin (% PVNBP)	10.8%	7.2%	2.2%	2.9%

New business margins in 2007 – life and asset management

Euro millions

	Unit- linked	Index- linked	Asset mgmt
Value of new business at moment of sale	255	40	46
Regular premiums / pac	264	-	93
Single premiums / pic	622	1,321	1,396
APE	326	132	233
New business margin (% APE)	78.1%	30.5%	19.8%
PVNBP	2,822	1,321	1,942
New business margin (% PVNBP)	9.0%	3.0%	2.4%

The margin on APE for new life business in Spain is approximately 75% in 2008.

The margin of new current accounts as a percentage of the money invested in current accounts opened in 2008 is 0.4%, which is slightly lower than in 2007 due to the reduction in interest margins and lower average new account balances. The profitability of new mortgages sold in 2008 is 1.2%, which is slightly lower than that in 2007, reflecting the 2008 repricing.

METHODOLOGY

The traditional embedded value calculations which Mediolanum used in the past were based on detailed models of the in-force and new business developed in a deterministic environment, using a single set of best estimates for both economic and operating assumptions. In the traditional embedded value framework, risk was allowed for by the use of a single discount rate and an allowance for the cost of holding solvency capital equal to the minimum EU solvency margin. The cost of solvency capital was determined as the present value of the differences between the assumed after-tax return on the assets (mainly bonds) backing solvency capital and the discount rate applied to the projected solvency margin.

In adopting the EEV Principles, Mediolanum chose to adopt an approach which maintains consistency with the prior approach to embedded value reporting. The value of in-force business continues to represent the discounted value of a stream of best estimate profits adjusted for the cost of holding a certain level of capital. The key differences between the traditional reporting and EEV reporting are in the determination of the level of required capital, and in the allowance for risk, which uses a framework based on market-consistent methodology.

The embedded value has been determined using a market-consistent framework to value financial risks, an allowance for non-financial risks, and the deduction of a frictional cost of required capital. To maintain consistency with the previous approach used to report embedded values and embedded value earnings and allow like-for-like comparisons, equivalent risk discount rates have then been derived for the main business lines so as to produce the same results when input into the traditional deterministic models, which use best estimate assumptions, after the cost of solvency capital. This produces an average derived risk discount rate for homogeneous blocks of business. For smaller lines of business, such as the traditional revaluable business, a direct market-consistent approach has been used, given the nature of the business, which has significant financial guarantees.

In theory discount rates can vary between new business and in-force business, according to the respective risk profiles. In practice the derived risk discount rates for new business were very close to those calculated for in-force business, and so the same discount rates by line of business were used for both in-force and new business.

Allowance for risk

Appropriate allowance for risk in the projected profits is a key component of the EEV Principles and Guidance. Risk has been allowed for in three main ways:

Explicit risk margins in the discount rate, to allow for:

- a market-consistent approach to financial risk, which reflects the level of market risk in each cash flow;
- an allowance for non-financial risks which reflects the potential asymmetry of operational risks and the capital requirements for banking business;

Deduction of the cost of holding a level of required capital for life business;

- using EU minimum margins for unit-linked and traditional business
- using risk-based capital for counterparty risk on index-linked business
- assuming a frictional cost of double taxation on the required capital

Explicit deduction for the cost of financial options and guarantees:

- relevant for the traditional participating life business only

Covered business

The covered business includes all the life insurance and asset management business written in Italy and in Spain, together with the main retail banking business in Italy, consistent with these business segments under IFRS reporting. No value has been attributed to in-force or new business for the remaining lines of business, including in particular Gamax, B.A. Lenz and that part of the Irish operations MILL and MIF not related to Italy and Spain, nor to the other minor lines of business of the Mediolanum Group.

Values are reported on a look-through basis, considering all profits and losses emerging in the Group associated with the relevant line of business.

Required capital and cost of capital

In compliance with EEV Principle 5, Mediolanum has made an assessment of the amount of required capital to be attributed to the covered life business. The approach used varies by line of business. For all life business other than index-linked business, EU minimum solvency requirements have been considered appropriate. For index-linked life business, account has been taken of the counterparty risk, using a risk-based capital approach which considers the rating of the issuers of the structured bonds underlying the index-linked guarantees. This gives rise to capital requirements of approximately 1.75% of reserves.

Total required capital for the life business as at December 31, 2008 is 201 million Euro, which corresponds to approximately 140% of the EU minimum margin.

For banking business, the minimum capital requirements based on risk weighted assets for mortgages and loans have been considered as part of the risk margin for non-financial risks, as have the requirements associated with the Basel II regulations regarding operational risk.

To determine the embedded value, the cost of required capital has been determined based on the frictional costs of holding this capital. Since financial

risks are already allowed for on a market-consistent basis, these costs are represented by the taxation incurred on locked-in shareholder assets. As noted, the derived risk discount rates for major business lines have been calculated so as to reproduce the value of in-force business after cost of capital using the traditional embedded value framework.

Risk discount rate – margin for financial risk

Mediolanum has adopted a bottom-up approach to allow for risk, which uses market-consistent methodology to calibrate the risk discount rate to allow for financial, or market-related, risk. In principle, under a market-consistent approach each cash flow is valued in line with its specific profile in terms of financial risk, and thus in a consistent fashion with the market prices of similar cash flows which are traded in the open markets. In practice, Mediolanum has used the certainty-equivalent technique; this is an approach commonly used in the pricing of financial instruments and consists in adjusting the individual cash flows to remove the effects of financial risks, and which then allows for the resulting stream of risk-adjusted profits to be discounted at the risk-free rate. The relevant Euro swap curve with no adjustments was used as the appropriate risk-free rate at each valuation date.

Converting the aggregate impact of financial risks into a margin on the discount rate captures the increase in risk associated with the level of equity investments, but is also influenced by the level of underlying margins in the business, and the relative size of projected expenses compared to income.

Risk discount rate – margin for non-financial risk

In theory, an investor can diversify away the uncertainty around non-financial risks, and, according to modern finance theory, would not require an additional return for such diversifiable risk. Allowance for non-financial risk is made through the choice of best estimate assumptions, taking into account the impact that the potential variability of the assumptions has on the level and therefore cost of capital. Although Mediolanum considers that the best estimate assumptions are appropriate in this context, it is possible that the use of best estimate assumptions may fail to capture the full impact on future shareholder profits where there is the potential for asymmetry in the results, in other words where the adverse experience has a higher impact than favourable experience. Mediolanum has identified that such asymmetry may exist in the area of operational risks, including administrative expenses, management fees, and persistency.

Practice is still evolving regarding the appropriate approach for considering non-financial risk, and Mediolanum is monitoring closely developments in this area, with particular regard also to the potential impacts of Solvency II on the levels of required capital.

In practice, the following approach has been taken for virtually all lines of business. In the first instance, the amount of capital required to meet the Basel II criteria for operational risks has been determined. Secondly, using economic capital techniques, an amount of value of in-force business "at risk" has been determined by applying stress tests on the value of in-force business to the key parameters identified, namely administrative costs, management

fees and persistency. The resulting amount of "economic risk capital" has been subjected to a frictional cost of capital charge equal to the impact of taxation.

In addition, the allowance for non-financial risk also incorporates the cost of holding regulatory minimum capital in respect of mortgages and loans in the banking business.

Derived risk discount rates

The following table shows the components of the derived risk discount rates for the major business lines as at December 31, 2007 and December 31, 2008.

Derived discount rates

	Unit-linked		Asset management		Banking Business	
	2007	2008	2007	2008	2007	2008
Average risk-free rate	4.85%	3.80%	4.65%	3.50%	4.70%	3.50%
Margin for financial risk	1.05%	0.75%	2.15%	2.00%	-	
Margin for non-financial risks	1.20%	0.65%	1.20%	1.10%	2.30%	3.50%
Risk discount rate	7.10%	5.20%	8.00%	6.60%	7.00%	7.00%

The derived risk discount rates are those which reproduce the value of in-force business in the traditional deterministic framework, using best estimate assumptions, after cost of solvency capital. The average risk-free rate has been determined based on the term structure of the projected profits from the certainty equivalent projections, using the risk-free curve. The allowances for financial and non-financial risks as described above have been converted into an equivalent margin on the discount rate, to determine the final derived discount rate used in the models.

The decrease in the average risk-free rates from December 31, 2007 to December 31, 2008 is due to the general decrease in the forward yield curve at all durations. The decrease in the margin for financial risk is mostly associated with a decrease in the equity content of the assets as well as the reduced difference between the risk-free and the best-estimate financial assumptions. The margin for non-financial risks moves between December 31, 2007 and December 31, 2008, primarily as a result of the decrease of the forward curve, which has the effect of decreasing the cost of required capital, due to the reduction in the annual taxation charge on the projected locked-in economic capital.

Financial options and guarantees

The only material financial options and guarantees in Mediolanum's business relate to the traditional revaluable business linked to segregated funds, which have been closed to new business since 1998. The main risk to shareholders is that the return on the assets in the segregated fund is insufficient to meet the financial guarantees during the period to policy maturity, and, for deferred annuities, also during the annuity payout period.

In 2008 Mediolanum has internally implemented a stochastic asset-liability model for its traditional business, in order to calculate both the certainty-equivalent value and the time value of financial options and guarantees. This model calculates the value of future profits by allowing for appropriate interaction between the liabilities and the corresponding assets of a given segregated fund, on the basis of a set of management rules regarding, in particular, the approach to the realisation of gains and losses on segregated fund assets in any given scenario.

The time value of financial options and guarantees has been calculated as the difference between the average value of future profits over a set of 1000 market-consistent scenarios and the value of future profits in the certainty-equivalent scenario. The set of market consistent scenarios has been calibrated to the market conditions at 31 December 2008; the certainty-equivalent scenario has been set up so that all assets earn the risk-free rate and the discount rates are equal to the risk-free curve at 31 December 2008.

The time value of financial options and guarantees, which has been deducted from the overall embedded value as at December, 31 2008, amounts to 7 million Euro.

Expenses and development costs

Expense assumptions are actively reviewed, and are based on the entire consolidated company costs, including depreciation and provisions, as well as all holding company and service company costs.

In setting the assumptions, full allowance has been made for all the expenses in the Group in 2008. Costs have been allocated to the separate lines of business and then fully allocated to acquisition, maintenance and investment activities with the exception of 4 million Euro after tax of restructuring costs in Spain.

Tax

Projected profits have been subjected to normal tax rates in the country of emergence. Account has been taken of the taxation treatment of profits projected to be remitted to Italy (5% of dividends subject to IRES and 50% to IRAP according to the Finanziaria 2008).

Participating business

For the Italian traditional revaluable business, policyholder profit participation has been assumed to continue to follow current company practice.

Residual assets

There are no projected residual assets.

Definition of new business

New life business relates to new policies issued during the year excluding those resulting from the transformation or switch of existing policies, together

with discretionary increases in the level of regular premiums on existing policies. New life business volumes used to calculate the value of new business in 2008 in Italy were 142 million Euro of annualised regular premiums (of which 9 million Euro related to discretionary increases), 127 million Euro of unit-linked single premiums, and 1,047 million Euro of index-linked single premiums.

New asset management business is defined as the sum of retail gross inflows net of internal switches within the mutual funds and managed accounts, and totals 99 million Euro for mutual fund instalment plans and 1,086 million Euro of lump-sum investments in mutual funds.

New life business in Spain comprised 44 million Euro of single premium business, virtually all of which index-linked, and regular premium unit-linked business for 7.8 million Euro. New asset management business in 2008 comprised lump-sum investments of 131 million Euro in Spanish funds, and 8 million Euro of instalment plans and 70 million Euro of lump-sum investments in Irish mutual fund products.

New banking business comprises new current accounts and deposit accounts in the year, for 423 million Euro, and new mortgages issued for 562 million Euro, all of which were proprietary mortgages.

ASSUMPTIONS

The following section sets out the main assumptions used in the embedded value calculations at December 31, 2008, 2007 and 2006.

Best-estimate economic assumptions

Best-estimate “real-world” economic assumptions are actively reviewed and are based on the market yields on risk-free instruments at different durations at the respective valuation dates. The projected total returns on equities have been assumed to yield a 3% margin over the 10-year Euro AAA government bond yield. The return on other assets was set using benchmarks consistent with the base scenario. The following table shows the main economic assumptions.

Economic assumptions at December, 31

	2006	2007	2008
Pre-tax investment returns:			
Benchmark 10-year BTP	4.15%	4.58%	4.35%
Cash	3.65%	4.04%	1.65%
Equity	6.95%	7.38%	6.25%
Inflation			
Consumer prices	2.25%	2.35%	1.50%
Expenses	2.25%	2.60%	1.75%
Taxation			
Italy	38.25%	35.25%	35.25%
Ireland	12.5%	12.5%	12.5%
Spain	35.0%*	35.0%*	30.0%
Average RDR (in-force business)	6.73%	7.21%	5.49%

* reducing to 30% by 2008

Pre-tax rates of returns on assets backing technical reserves were set consistent with the above benchmark rates, taking into consideration the related asset mix, resulting in assumptions for the Italian segregated funds of 4.0% for the 2008 valuation (4.5% in 2007, 4.0% in 2006). These rates of return already include the impact of unrealised capital gains/losses in segregated fund assets. Investment returns on unit-linked funds, and mutual funds and managed accounts business, were determined on the basis of the asset mix of each fund, with average results for the Italian business before costs and taxes, of 5.00% for unit-linked funds (6.22% in 2007, 5.75% in 2006) and of 4.87% for Asset management products (6.20% in 2007, 5.95% in 2006).

The consumer price inflation rate shown above is used to determine the projected automatic premium increases, equal to the growth in the consumer price index plus a percentage chosen by the customer (typically 3%), for products with this characteristic; the internalisation of the models has allowed this feature to be modelled for each single contract. Management expenses expressed as a per-policy amount are assumed to increase at the expense inflation rate.

Market-consistent economic assumptions

The risk-free rates used in the certainty-equivalent projections are calibrated to the Euro swap curve without adjustments, and the implied swaption volatilities to market prices of swaptions for various tenors and option terms, based on year-end market data. The following table shows selected data.

Sample swap rates and implied volatilities

	Term to Maturity				
	1	5	10	15	20
Swap rates					
December 31, 2006	4.08%	4.13%	4.20%	4.27%	4.31%
December 31, 2007	4.70%	4.56%	4.72%	4.86%	4.91%
December 31, 2008	2.55%	3.25%	3.74%	3.92%	3.88%
15 year Swaption volatility					
December 31, 2006	13.5%	13.2%	12.1%	11.5%	11.2%
December 31, 2007	12.3%	11.4%	10.9%	10.4%	10.0%
December 31, 2008	33.8%	22.3%	21.2%	25.1%	28.6%

Source: Bloomberg

Other assumptions

Assumed future rates of mortality, lapse, failure to maintain recurrent premiums and other exits, including total and partial disinvestment rates for the asset management business, were derived from an analysis of the Mediolanum Group's recent operating results and, where appropriate, took into consideration the experience of the life, asset management and banking sectors.

The general and administrative costs incurred by the Group, including depreciation costs, were subdivided by business line, and within each line into the costs pertaining to investment, the acquisition of new business and the management of the in-force business.

Assumed levels of future commission and override payments to agents and sales-people were based on the Mediolanum Group's recent operating experience.

Participation rates and other charges on Life policies and management fees on funds were assumed to be maintained in the future at the prevailing levels on each valuation date. Likewise the charging structure on banking products was assumed to be maintained in the future.

It was assumed that no changes will be made in the principles and technical bases used to calculate technical reserves and surrender values.

The internalisation of the models has allowed Mediolanum to handle performance commission rates more precisely, while still maintaining a conservative approach, based on experience to date. Experience variances, in the analysis of the components of embedded value earnings, have included a positive contribution of 16 million Euro in 2008 (22 million Euro in 2007 and 46 million Euro in 2006), as a result of actual experience exceeding the assumptions used at the beginning of the year.

Allowance was made for reinsurance of in-force life policies outside the Mediolanum Group, which relates mainly to various quota share financing treaties written in the years up to 1994. No new financing reinsurance arrangements have been made since 1995.

The cost of solvency capital which was deducted from the discounted value of future after-tax statutory profits to determine the value of in-force Life business reported above, amounts to 59 million Euro as at December 31, 2008 and 71 million Euro as at December 31, 2007. The decrease between 2007 and 2008 is due primarily to the reduction in the policyholder reserves due to the adverse performance of the financial markets. The cost of solvency capital on new business, which is already allowed for in the value added by Life new business in 2008, is approximately 1.7 million Euro.

Statement by Directors

The directors confirm that the embedded value as at December 31, 2008, and the embedded value earnings including the value added by new business in 2008 have been determined using methodology and assumptions which are compliant with the EEV Principles.

External opinion

Tillinghast, the insurance and financial services consulting business of Towers Perrin, has been engaged by Mediolanum S.p.A. in relation to the disclosure of embedded value information of the Mediolanum Group for 2008, and relating in particular to the life and asset management businesses distributed in Italy and Spain and the most significant parts of the Italian banking business.

Towers Perrin has provided assistance to Mediolanum regarding the methodology and the derivation of assumptions to be used. Mediolanum has calculated values in respect of the most significant parts of its life insurance and asset management businesses, and Towers Perrin has carried out a review of these results, without however undertaking detailed checks of all the models, processes and calculations involved. Towers Perrin has calculated the values for the remaining business, and has undertaken an overall review of the embedded value as at December 31, 2007 and 2008, together with the embedded value earnings of the Group in 2008. including the value of 2008 new business.

Towers Perrin has reported that it considers that the methodology and assumptions used comply with the EEV Principles and Guidance as published by the CFO Forum, and in particular:

- that the methodology makes allowance for the aggregate risks in the covered business through:
 - (i) the incorporation of risk margins in the discount rate used to discount projected future profits determined using best estimate assumptions, using:
 - a) a market-consistent valuation of financial risk,
 - b) an allowance for non-financial risk based on the frictional cost of an amount of capital that would be required to cover operational risk requirements under Basel II and the value at risk with respect to key operating variables such as persistency, costs and management fees,
 - (ii) the deduction of the cost of required capital based on minimum EU solvency margins for non-index-linked life business, and a risk-based capital allowance for index-linked business; and
 - (iii) the deduction of the time value of financial options and guarantees for traditional business;
- that the operating assumptions have been set with appropriate regard to past, current and expected future experience;
- that the economic assumptions used are internally consistent and consistent with observable market data; and
- for revaluable business, the assumed revaluation rates, and the retrocession rates, are consistent with the projection assumptions, established company practice and local market practice.

Towers Perrin has reviewed the calculations of the Mediolanum Group's embedded value, embedded value earnings and the value of new business, as reported in this Supplementary Information, and considers that these results have been determined, in all material respects, in accordance with the methodology and assumptions set out in this Supplementary Information disclosure document.

In arriving at these conclusions, Towers Perrin has relied on data and information made available by Mediolanum S.p.A. and its subsidiaries, which has been examined for reasonableness and consistency with industry knowledge, but Towers Perrin has not undertaken independent checks of the data and other information supplied. This opinion is made solely to Mediolanum S.p.A. in accordance with the terms of Towers Perrin's engagement letter. To the fullest extent permitted by applicable law, Towers Perrin does not accept or assume any responsibility, duty of care or liability to anyone other than Mediolanum S.p.A. for or in connection with its review work, the opinions it has formed, or for any statement set forth in this document.

APPENDIX 1 - SEGMENTAL REPORTING

The following tables show the value of in-force business as at December 31, 2008 and the value of new business in 2008, broken down by business segment.

Value of in-force business as at December 31, 2008 by segment

<i>Euro millions</i>	Italy	Spain	Total
Life insurance (excluding index-linked)	1,619	29	1,648
Index-linked life insurance	14	0	14
Asset management	242	9	251
Current and deposit accounts	102	n/a	102
Mortgages	27	n/a	27
Total	2,004	38	2,042

Value of new business in 2008 by segment

<i>Euro millions</i>	Italy	Spain	Total
Life insurance (excluding index-linked)	97	8	105
Index-linked life insurance	23	2	25
Asset management	50	(1)	49
Current and deposit accounts	0	n/a	0
Mortgages	7	n/a	7
Total	177	9	186

APPENDIX 2 - SENSITIVITY TESTS

This section shows the sensitivity of the value of in-force business as at December 31, 2008 and the value of 2008 new business to changes in key assumptions.

- RDR +1% / RDR -1%: sensitivity to the corresponding change in the discount rate.
- Equity and Property Yield +1%: sensitivity to a 100 basis points increase in the equity/property return.
- Risk free rates +1%: sensitivity to an upward parallel shift of 100 basis points in the underlying market risk free rates, accompanied by an upward shift of 100 basis points in all economic assumptions. The discount rate is then recalculated.
- Risk free rates -1%: sensitivity to a downward parallel shift of 100 basis points in the underlying market risk free rates, accompanied by a downward shift of 100 basis points in all economic assumptions. The discount rate is then recalculated.
- Equity and Property Capital Value -10%: sensitivity to a 10% market value reduction at valuation date for equity and property investments.
- Maintenance expenses -10%: sensitivity to a 10% decrease of maintenance expenses (90% of best estimate maintenance expenses parameters). Investment expenses are unchanged in this test.
- Acquisition expenses -10%: sensitivity to a 10% decrease of acquisition expenses (90% of best estimate acquisition expenses parameters).
- Lapse Rate -10%: sensitivity to a 10% decrease of lapse rates (90% of best estimate lapse rates). This does not apply to partial withdrawals.
- 100% Solvency Margin: sensitivity to required capital on life business at 100% EU minimum.

For each sensitivity test, all the other assumptions remain unchanged, except for those tests which directly affect economic conditions; in these cases the derived risk discount rate has also been recalculated, given the use of market-consistent methodology to set the allowance for financial risk. For the sensitivity to the risk free rates, the calculation has been performed only for linked business and for the projected values only.

For the sensitivity to the equity values the calculation has been performed assuming that the portfolio is rebalanced to achieve the same asset mix as currently persists

The sensitivity to the increase on equity and property returns has no effect, given the use of market-consistent methodology to set the discount rates. The following tables show the sensitivity separately for the life, asset management and banking businesses.

Sensitivity analysis – Life business*Euro millions*

	Value of in-force business	Value of new business
Base value	1,662	130
1% increase in discount rates	(164)	(18)
1% decrease in discount rates	193	21
1% increase in return on equity and property	0	0
1% reduction in risk free rates	28	5
1% increase in risk free rates	(27)	(4)
10% decrease in equity and property values	(48)	(3)
10% decrease in maintenance expenses	16	2
10% decrease in acquisition expenses	n/a	6
10% decrease in lapse rates	62	7
100% solvency margin	2	0

Sensitivity analysis – Asset management business*Euro millions*

	Value of in-force business	Value of new business
Base value	251	49
1% increase in discount rates	(9)	(3)
1% decrease in discount rates	10	3
1% increase in return on equity and property	0	0
1% reduction in risk free rates	1	0
1% increase in risk free rates	(1)	0
10% decrease in equity and property values	(17)	(4)
10% decrease in maintenance expenses	8	1
10% decrease in acquisition expenses	n/a	2
10% decrease in lapse rates	12	4

Sensitivity analysis – Banking business*Euro millions*

	Value of in-force business	Value of new business
Base value	129	7
1% increase in discount rates	(6)	(1)
1% decrease in discount rates	6	1
1% increase in return on equity and property	0	0
10% decrease in maintenance expenses	33	6
10% decrease in acquisition expenses	n/a	2
10% decrease in lapse rates	6	1

APPENDIX 3 – EMBEDDED VALUE EARNINGS

The following table shows the breakdown of the embedded value earnings in 2008 into its key components. Embedded value earnings are separated between the movements in adjusted shareholders' net assets and those in the value of in-force business. Opening and closing EEV are shown inclusive of dividends to be paid in the following year.

Embedded value earnings in 2008

Euro millions

	Adjusted Shareholders' net asset	Value of in-force business	EEV
EEV 31.12.2007	739	2,425	3,164
Expected result	254	(61)	193
Experience variances	(287)	(443)	(730)
Changes in operating assumptions	0	(97)	(97)
Changes in economic assumptions	0	(35)	(35)
Value added by new business	(62)	253	191
Dividends and other capital movements	(34)		(34)
EEV 31.12.2008	610	2,042	2,652
EV earnings (before Lehman Brothers operation)	(95)	(383)	(478)
Impact of Lehman Brothers operation	(108)	-	(108)
EV earnings (including Lehman Brothers operation)	(203)	(383)	(586)
Return on EV (before Lehman Brothers operation)			(15.1%)
Return on EV (including Lehman Bros. operation)			(18.5%)