

Danish report of 6 September 2024 – translation made on 19 September 2024

Report under section 125(4) of the Danish Bank- ruptcy Act

Alpha Insurance A/S in bankruptcy, CVR no (business registration no) 21064440

The Bankruptcy Division of the Danish Maritime and Commercial High Court - K 1623/18-B

As the trustee of the above bankruptcy estate I hereby present my report under section 125(4) of the Danish Bankruptcy Act regarding the affairs of the bankruptcy estate.

Firstly, I refer to my previous report under section 125(1) of the Bankruptcy Act of 29 May 2018, the report under section 125(2) of the Bankruptcy Act of 7 September 2018 as well as my previous reports under section 125(4) of the Bankruptcy Act of 7 March 2019, 6 September 2019, 6 March 2020, 8 September 2020, 8 March 2021, 8 September 2021, 8 March 2022, 8 September 2022, 8 March 2023, 8 September 2023 and most recently of 8 March 2024.

The estate's assets at this point in time are as follows:

1. ASSETS

1.1 Accounts

When Alpha Insurance A/S (now in bankruptcy) ("Alpha" or the "bankruptcy estate") went bankrupt it had a total of 37 open bank accounts with Sydbank A/S, 13 bank accounts with DNB, including eight in Norway and five in the UK, and six accounts with UBS in Switzerland.

As part of continuing the bankruptcy estate's operations the trustee decided for practical reasons to keep a number of the bankruptcy estate's bank accounts so that it was still possible to receive payments and

make payments in connection with the continued operations. Keeping the bankruptcy estate's bank and account set-up also ensures separation between the bankruptcy estate's unencumbered and registered assets as the funds related to the bankruptcy estate's unencumbered assets are deposited in a separate client account with the trustee from which payments are also made of expenses relating to the unencumbered assets. Reference is made to the previous reports which contain accounts of the previous changes/adjustments in respect of the bankruptcy estate's accounts.

The trustee has not found any reason to make any changes to the bankruptcy estate's account set-up for the past six months, and as a consequence the bankruptcy estate still had 22 open bank accounts (including custody accounts) with Sydbank A/S and 11 open bank accounts with DNB as at 31 July 2024. The powers of attorney for the bankruptcy estate's accounts have been adjusted on an ongoing basis in connection with departures of employees.

It is expected that bank accounts will be closed on an ongoing basis as the insurance activities are wound up/terminated.

1.2 Registered assets

The registered assets have been provided as security for the insurance obligations in compliance with section 167(4) of the then current Danish Financial Business Act, see paragraph 2.1 below. It primarily means the claimants' claims for compensation and the policyholders' claims for return premium under the insurance contract. The registered assets also cover the necessary costs relating to closing out the portfolio as specified.

The registered assets below are based on the asset groups that Alpha had reported to the Danish FSA as being Alpha's registered assets before the bankruptcy order was issued.

The registered assets as at 31 July 2024 were booked at:

1. Deposits

The bankruptcy estate's deposits in the bank as at 8 May 2018 amounted to DKK 61,277,557. As at 31 July 2024, the bankruptcy estate's deposits amounted to DKK 809,417,468. It has been taken into account in connection with the calculation that approximately DKK 765,210,000 in total has been paid to the Guarantee Fund for Non-life Insurers and that a fee on account has been paid to the trustee. Moreover, the reason for the increase in the deposits from when the company went bankrupt is primarily a result of the

bankruptcy estate's sale and maturity of securities and interest income of DKK 617,910,000 (item 2 - please note that the capital gain is not included in this amount), payments of reinsurance receivables of DKK 1,028,560,000 (item 4), payments of interest of DKK 12,460,000 after the expiry of the agreement on fixed-term deposits, repayment of payroll tax of DKK 2,970,000 as well as payments of receivables from coverholders/claims examiners of DKK 181,530,000 (item 5). The reason for the deviation compared to item 5 below is that bigger actual payments have been made to the bankruptcy estate than what was booked in respect of the individual items. The deviation will presumably be eliminated over time. A number of expenses relating to continuing the operations of the bankruptcy estate in the amount of approximately DKK 205,000,000 in total have also been paid throughout the entire period after the issue of the bankruptcy order. Reinsurance premium and profit commission of DKK 19,620,000 (item 4) and other costs including translation adjustments etc of DKK 15,190,000 in total have also been paid.

DKK 809,417,468.00

2. Securities

As at 8 May 2018, the bankruptcy estate's securities were booked at DKK 659,853,899. As at 31 July 2024, the bankruptcy estate's portfolio of securities amounted to DKK 1,605,125. The reduction in the portfolio of securities is a result of the bankruptcy estate's sale and maturity of shares and bonds and relating interest which amount to approximately DKK 658,250,000 in total. It is noted that bonds of approximately DKK 250,000 were called and a gain of approximately DKK 200,000 was made in the previous period. The proceeds from the securities have been included in the deposits in item 1 above.

DKK 1,605,125.00

3. The part of the reinsurance of the provision for claims outstanding (expected receivable)

The bankruptcy estate has a booked asset consisting of expected claims against reinsurers, which is the part of the reinsurance of the expected calculated provisions for unearned premiums and the provisions for claims outstanding (items 28 and 29). The value of the asset may vary depending on the fluctuations in the calculation

of the bankruptcy estate's provisions for unearned premiums and the provisions for claims outstanding (items 28 and 29) that are made regularly. When a loss has been established, notified and examined and the receivable from the reinsurer has consequently become a fact, the receivable will be included in item 4 below. As at 8 May 2018, the receivable amounted to DKK 1,266,860,089. As at 31 July 2024, the receivable amounted to DKK 744,034,687.

The primary reason for the difference in the value of the receivable is a reduction in the provisions for claims outstanding of DKK 472,740,000 (item 29), a reduction in the provisions for unearned premiums of DKK 218,200,000 and an increase in the provisions for excess of loss of DKK 307,310,000, translation adjustments of DKK 26,860,000 and various adjustments, including of profit commission, of DKK 112,340,000 in total.

DKK 744,034,687.00

4. Receivables from reinsurers (actual receivable)

The bankruptcy estate has an actual receivable from reinsurers which amounted to DKK -2,315,273 as at 8 May 2018. It means that at the time the bankruptcy estate owed the reinsurers. As at 31 July 2024, the receivable amounted to DKK 206,550,526.

The primary reason for the difference is that the bankruptcy estate's reinsurance receivable relating to return premiums has increased by DKK 322,300,000, that the reinsurers have paid DKK 1,028,560,000 in total (DKK 51,510,000 during the past six months) to the bankruptcy estate which has been added to the deposits (item 1), and that the part of the reinsurance relating to the provisions for claims outstanding has increased by DKK 989,750,000 because a number of claims have been processed which resulted in the loss on the insurance contracts having been determined and calculated (the provisions for claims outstanding in item 29 were written down at the same time). There have also been translation adjustments of DKK 15,180,000 in total, total payments of premiums and profit commission of DKK 19,620,000 to the reinsurers and various adjustments of approximately DKK 106,780,000 have been made.

DKK 206,550,526.00

5. Receivables from coverholders and claims examiners

On 8 May 2018, the receivable amounted to DKK 244,299,656. At that point in time debt to coverholders and claims examiners was included in this item. A division has now been made, and the debt can now be found in item 32. As at 31 July 2024, the booked receivable amounted to DKK -19,826,276. The reason is that the bankruptcy estate is awaiting reporting which is expected to eliminate the item over time and there will consequently be a positive receivable.

The primary reason for the reduction in the receivable from the time of the bankruptcy is that the trustee has made a technical bookkeeping amendment to the bankruptcy estate's booked receivables with the result that the bankruptcy estate's outstanding payable premiums are now being deducted from the provisions (item 30) under section 5, para (4), of the then current Statutory Order on registration of assets in insurance companies and company pension funds. As the bankruptcy estate's outstanding payable premiums are paid to the bankruptcy estate the funds will be added to the deposits (item 1). The bankruptcy estate has also received payments of DKK 187,730,000 in total (compared to the booked items) which have been included in the deposits (item 1), including, *inter alia*, as a result of the trustee's collection of premiums owed by coverholders and funds in claims examiners' claim accounts of DKK 108,450,000, payments of claims for contribution and settlement amounts of DKK 60,640,000 in total and repaid premium tax and profit commission of DKK 18,640,000 in total. The bankruptcy estate has also paid claims handling costs of DKK 68,150,000. Finally, a number of technical bookkeeping amendments have been made regarding, *inter alia*, loss on receivables, adjustments for time lag and translation adjustments of DKK 144,540,000 in total. For the time being the asset is included at a value for memory purposes of

DKK

1.00

6. Fee from Danish Labour Market Insurance for work carried out

The trustee has carried out work relating to Labour Market Insurance in connection with its payments to claimants in the period until Labour Market Insurance was able to arrange for the administration of the industrial injury portfolio (later passed on to the

Guarantee Fund for Non-life Insurers). The trustee has invoiced the work that amounted to DKK 93,750 inclusive of VAT which has been included in the deposit in the account (item 1). DKK 0.00

7. Unearned coverholder commission

The bankruptcy estate has a claim for unearned coverholder commission against the coverholders that previously sold insurance on Alpha's behalf. The total claim amounted to approximately DKK 282,000,000 which the trustee started to collect. As at 31 July 2024, the bankruptcy estate had collected approximately DKK 6,986,540 which is part of the deposit in the account (item 1). Court cases are still pending in this regard, see paragraph 5.1.3.1 below, and the extent to which the former coverholders will be able to pay the bankruptcy estate's claims in full is also uncertain, which is why for now the calculated asset is included at a value for memory purposes of DKK 1.00

Registered assets in total DKK 1,761,607,808.00

The above calculation does not take into account any discounting of the assets.

1.3 Unencumbered assets

The unencumbered assets are to be used to pay all the bankruptcy estate's other creditors, including the ordinary creditors relating to the operations, as well as the part of the insurance claims that will perhaps not be covered by the registered assets, see paragraph 1.2 above.

The unencumbered assets as at 31 July 2024 were booked at:

8. Deposit in client account

As at 31 July 2024, the deposit amounted to DKK 41,403,924. Expenses relating to the unencumbered assets have regularly been paid out of the deposit, including payment of the admitted and filed claims under section 94, external fees and expenses in connection with the pending legal actions under the unencumbered assets as well as an interim fee to the trustee. Interest expenses were previously paid (now the interest rates are positive). Moreover, the deposit includes the VAT refund made by the Danish Tax Agency for 2019 and 2020

and payroll tax for 2020 of DKK 9,827,015 in total, which have been arranged to be divided proportionately between the unencumbered and registered assets, see paragraph 5.1.4.9 below. The bankruptcy estate has also received a dividend amount of DKK 2,823,823.08 from the bankruptcy estate of Beta Re AG and EUR 180,000 (DKK 1,364,864.04) according to a settlement agreement (paragraph 13) and paid a total excess amount of DKK 138,873.86 (after deducting expenses paid) which have been moved/reclassified to the registered assets. Finally, total expenses of DKK 8,267,272.98 relating to the administration and the claims handling of the Danish industrial injury portfolio have been paid so far. This amount will subsequently be paid by either the registered assets or by the Guarantee Fund for Non-life Insurers, see paragraph 5.1.5.4 below, when it has been finally clarified whether the Guarantee Fund for Non-life Insurers holds a special position in the bankruptcy estate.

DKK 41,403,924.00

9. Receivable from New Nordic Holding Limited

The bankruptcy estate has entered into a settlement agreement with New Nordic Holding Limited on payment of DKK 65,000,000 plus interest of 10% annually in full and final settlement of the outstanding balance. DKK 68,383,561.64 inclusive of interest was subsequently deposited into the bankruptcy estate's account and is part of the deposit in the client account (item 8).

DKK 0.00

10. Receivables from consolidated companies

The bankruptcy estate has receivables of DKK 99,047,370 in total from the consolidated companies, Alpha Holding A/S in bankruptcy, Ahpla ApS in bankruptcy and Ahpla SPV ApS in bankruptcy. As bankruptcy proceedings have been commenced against all consolidated companies and only limited or no dividend is expected, the asset has, for the time being, been included at a value for memory purposes of

DKK 1.00

11. Receivable from Intercede 2408 Limited

The bankruptcy estate has a receivable of DKK 42,709,725 including interest from Intercede. As, according to information received, the company (despite re-establishment) does not have any funds, the actual value of the asset is still uncertain. For this reason the asset is

DKK 1.00

included for the time being at a value for memory purposes of

12. Staff loan

An employee with Alpha received a loan from Alpha of DKK 1,500,000 before the bankruptcy. A payment agreement was entered into after the bankruptcy with monthly payments of DKK 25,000 and an annual addition of interest of 3%. On 3 November 2020, an agreement was concluded on the payment of DKK 800,000 in full and final repayment of the amount outstanding which the bankruptcy estate has received. DKK 1,575,000 in total has consequently been deposited into the bankruptcy estate's account and is part of the deposit in the client account (item 8).

DKK 0.00

13. Receivable from Beta Re AG (now closed following bankruptcy)

The receivable as at 8 May 2018 was booked at DKK 8,000,000. A payment agreement on repayment of the debt was entered into after Alpha went bankrupt and a total of DKK 640,000 (DKK 726,844.34 inclusive of interest) was paid to Alpha. In continuation of the estate administration of Beta Re AG, Alpha has received a dividend amount of DKK 2,823,823.08 and EUR 180,000 (DKK 1,364,864.04) respectively according to a settlement agreement with Beta Re AG's former owner which is included as part of the deposit in the client account (item 8).

DKK 0.00

14. Tools and equipment

The bankruptcy estate's tools and equipment consist of various office furniture, computers, monitors and other office supplies. The tools and equipment as at 31 July 2024 were booked at DKK 0. When the company went bankrupt, the assets were valued at DKK 277,600 by SFT Group ApS at a forced sale. But the assets are still being used in the day-to-day operations, which is why for the time being the asset has been included at a value for memory purposes of

DKK 1.00

15. Rent deposit

The bankruptcy estate's offices are leased premises. As at 8 May 2018, the rent deposit was booked at DKK 2,120,056. As at 31 July 2024, the asset was booked at DKK 748,378.13 (adjusted in connection with

a move to smaller leased premises). It is noted that Qudos Insurance A/S in bankruptcy and Gefion Finans A/S in bankruptcy have paid deposits of DKK 982,912.01 and DKK 262,109.88 respectively to Alpha under the concluded leases. The paid deposits have not yet been adjusted because of the move to smaller leased premises. The bankruptcy estate is obliged to repair the leased premises which is why, for the time being, the asset is included at a value for memory purposes of

DKK 1.00

16. Receivable regarding sublet premises

Before the bankruptcy Alpha sublet premises to CBL Insurance Services ApS (now in the process of being compulsorily dissolved). No rent was paid for 2018. The receivable as at 8 May 2018 was booked at DKK 86,614. A settlement agreement on the payment of DKK 28,871.40 inclusive of VAT in full and final payment of the receivable was subsequently concluded. The settlement amount has been paid into the bankruptcy estate's account and is included in the deposit in the client account (item 8).

DKK 0.00

17. Vehicles

When the bankruptcy order was issued the bankruptcy estate owned a Mercedes-Benz, model Viano, 3.0 CDI MPV Lang Aut. The vehicle was sold for DKK 150,000 exclusive of VAT on 8 June 2018 and the amount has been paid into the bankruptcy estate's account and is included in the deposit in the client account (item 8).

DKK 0.00

18. Intangible assets

The intangible assets relate to software equipment used in the operation of the bankruptcy estate. The asset as at 31 July 2024 was booked at DKK 0, which is why it is assessed that the asset has no value.

DKK 0.00

19. Art and designer furniture

The bankruptcy estate owns designer furniture and art, including paintings. The asset as at 31 July 2024 was booked at DKK 70,000. The assets were valued by SFT Group ApS in connection with the issue of the bankruptcy order at DKK 318,600 at a forced sale. The bankruptcy estate has sold art by Maria Rubinke for DKK 13,440

exclusive of VAT and various designer furniture (see paragraph 5.2.1) below for DKK 81,991.90 exclusive of VAT which is included in the deposit in the client account (item 8). For the time being the asset is consequently included at a value for memory purposes of

DKK 1.00

20. Sale of various minor assets

The trustee has sold three iPhones X, one iPhone 8, one Google Pixie, one Samsung S7 Edge, one Lenovo ThinkCentre, one Fujitsu Siemens Esprimo, two Lenovo ThinkPads, two Dell monitors, two Lenovo ThinkPad Ultra Dock, one Canon printer and mice and keyboards. The bankruptcy estate has received total proceeds of DKK 24,920 exclusive of VAT for the sale of such items which are included in the deposit in the client account (item 8).

DKK 0.00

21. Sale of furniture

The bankruptcy estate has sold several of the bankruptcy estate's assets, including four desks and five chairs for a total price of DKK 11,500 exclusive of VAT. Two conference tables, six chairs, one rug, one wine refrigerator, one printer, 19 shelving units and four drawer units were also sold for DKK 19,500 in total exclusive of VAT. The amounts are included in the deposit in the client account (item 8).

DKK 0.00

22. Repayment from Dagbladet Børsen (a Danish newspaper)

The trustee has terminated the bankruptcy estate's newspaper subscription and has consequently received a repayment of DKK 6,586.07 which has been deposited into the bankruptcy estate's account and is part of the deposit in the client account (item 8).

DKK 0.00

23. Repaid taxes from Italy

The bankruptcy estate has received repaid taxes from Italy of EUR 878,879.39 (translated into DKK 6,557,670.68). The amount of DKK 6,557,670.68 has subsequently been deposited into the bankruptcy estate's account and is included in the deposit in the client account (item 8).

DKK 0.00

24. Repaid duties from the Danish Motor Vehicle Agency

The bankruptcy estate has received a repayment of prepaid duties of DKK 2,402.50 (for the period from 3 April 2018 to 31 August 2018)

regarding a previously leased Porsche from the Danish Motor Vehicle Agency. The amount has been paid into the bankruptcy estate's account and is included in the deposit in the client account (item 8). DKK 0.00

25. Claims for repayment

The bankruptcy estate has raised claims for repayment against the former members of the management and their connected persons for paid private expenses, see paragraph 3 below. DKK 25,710 and DKK 100,000 have consequently been paid into the bankruptcy estate's account and are included in the deposit in the client account (item 8). The asset is included at a value for memory purposes for the time being as appeal proceedings are still pending in relation to a connected person DKK 1.00

26. Legal action against a former coverholder in Great Britain

Prior to the bankruptcy, Alpha issued a writ of summons against a former coverholder in Great Britain, claiming payment of approximately DKK 125 million (subsequently adjusted to approximately DKK 116 million). The bankruptcy estate subsequently became a party to the legal action. The opposing party admitted a subdivided claim of DKK 2,151,899.79 during the trial hearing, and the amount has been paid into the bankruptcy estate's account and is included in the deposit in the client account (item 8). The coverholder was ordered by a judgment of 19 January 2024 to pay DKK 9,991,866.65 to the bankruptcy estate plus statutory interest as from 1 December and legal costs of DKK 462,500. The coverholder subsequently appealed against the judgment and the bankruptcy estate cross-appealed the claim for payment in full. The coverholder went into administration in July 2023 and the estate in administration did not subsequently become a party to the legal action, see paragraph 5.1.4.7 below. For the time being the asset is therefore included at a value for memory purposes of DKK 1.00

27. Claim for damages against two former members of the management and the company's former auditor

The trustee has lodged a writ of summons on behalf of the bankruptcy estate against the former members of the management and the company's former auditor, see paragraph 5.2.4 below. For the time being DKK 1.00

the asset is included at a value for memory purposes of

Unencumbered assets in total	DKK 41,403,932.00
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2. LIABILITIES

2.1 Liabilities relating to the registered assets

The liabilities that are assumed on the existing basis to have a priority right to receive cover from the bankruptcy estate's registered assets are listed below, see paragraph 1.2 above.

Reference is made to the previous reports in which the trustee has stated that it is the trustee's assessment that the notified claims for return premium can be paid by the bankruptcy estate's registered assets.

28. Expected claims for return premium

The provisions for unearned premiums have been calculated as a premium paid by the policyholders but which Alpha had not yet earned because of the bankruptcy, which is why the amount is expected to be offset by claims for the return of premiums raised by policyholders. The booked provisions for unearned premiums amounted to DKK 555,790,663 as at 8 May 2018. As at 31 July 2024, the booked provisions for unearned premiums amounted to DKK 177,874,256.

The primary reason for the difference is accrual of premium until the termination of the policies prescribed by law (11 August 2018 at the latest), transfers of portfolios and that the various guarantee fund schemes are repaying the premiums to the policyholders (but to a very limited extent during the past six months). It is expected that the repayments and the consequent decrease in the provisions for unearned premiums will be offset by corresponding claims from the various guarantee fund schemes. Translation adjustments are also to be taken into account.

It must be emphasised that the trustee is still of the opinion that the claims for repayment of premiums have become barred by limitation. The trustee does not therefore expect any further claims for return premium which is why going forward the item is included without any value.

DKK	0.00
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29. Expected insurance claims

The provisions for claims outstanding are the amount set aside to cover the claimants' insurance claims. The claim is a calculated value and may consequently vary depending on the development in the actual insurance claims. As at 8 May 2018, the provisions for claims outstanding were booked at DKK 2,176,518,057. As at 31 July 2024, the booked provisions amounted to DKK 1,542,168,929.

The primary reason for the difference is that the various guarantee fund schemes have made payments and that the provisions for claims outstanding have been adjusted on an ongoing basis including in particular in respect of the excess of loss and the Danish industrial injuries. It is noted for the avoidance of doubt that there could be insurance claims that have also been proved directly by a creditor under the registered assets (item 31), which is why there may be a certain overlap between items 29 and 31. It is expected that this overlap will be eliminated over time.

DKK 1,542,168,929.00

30. Deduction of half of the outstanding payable premiums

Under section 5, para (4), of the then current Statutory Order on registration of assets in insurance companies and company pension funds, the bankruptcy estate is entitled to deduct up to half of the outstanding payable premiums. As at 31 July 2024, the receivable amounted to DKK 16,447,490. As the bankruptcy estate's outstanding payable premiums are paid to the bankruptcy estate the funds will be added to the deposits (item 1). As at 31 July 2024, the deduction amounted to

DKK -8,223,745.00

31. Claims proved so far in respect of the registered assets

As at 31 July 2024, claims proved in respect of the registered assets amounted to DKK 2,894,799,520.59 in total. It is noted that this is still only a provisional calculation of the proved claims as the various guarantee fund schemes are still making payouts and updating their proofs of claim on an ongoing basis. In addition, some creditors have proved current claims as well as expected future claims. This creates significant uncertainty as to the final calculation of the claims under the registered assets, and it must also be expected that several claims have

been proved twice. It is expected that an overview of the claims that have been proved twice can only be made in connection with the examination of claims. It is expected that the number of claims that have been proved twice will be eliminated over time.

DKK 2,894,799,520.59

32. Debt to coverholders and claims examiners

As at 31 July 2024, the bankruptcy estate had booked debt to coverholders and claims examiners of DKK 36,273,768. The debt was previously included in item 5.

DKK 36,273,768.00

Liabilities in total

DKK 4,465,018,472.59

It is noted in respect of the above calculation that later on in the estate administration the expected claims for return premium and the insurance claims will be replaced by actual claims (as stated in items 28 and 29 above) as the claims for repayment of premiums are calculated and the insurance claims are finalised. Moreover, there will subsequently be final claims from the Guarantee Fund for Non-life Insurers and other national guarantee fund schemes that are subrogated to the policyholders' and the claimants' claims against the bankruptcy estate under the registered assets, see paragraph 5.1.4.4 below. The various guarantee fund schemes are still making payouts and no final claims have therefore been received from the biggest creditors.

As at 31 July 2024, the various guarantee fund schemes had reported to the bankruptcy estate that they had paid a total of DKK 2,223,164,847 to cover both the accepted insurance claims and the claims for the return premium. The trustee has not yet started to examine the claims filed against the bankruptcy estate including the subrogation claims of the respective guarantee fund schemes.

As previously mentioned, the trustee still assumes that some creditors have proved claims twice which obviously affects the calculation of the expected liabilities. This is why the trustee does not expect that there will be liabilities of approximately DKK 4.6 billion linked to the registered assets when the bankruptcy estate is wound up. It is the trustee's preliminary estimate that the liabilities linked to the registered assets will be in the range of approximately DKK 3.5 billion when the bankruptcy estate is wound up.

2.2 Other liabilities relating to the unencumbered assets

The liabilities covered by the bankruptcy estate's unencumbered assets are specified below, see paragraph 1.3 above.

Proofs of claim lodged under section 82 of the Bankruptcy Act	DKK	117,923,113.23
Proofs of claim lodged under section 93 of the Bankruptcy Act	DKK	76,140.00
Proofs of claim lodged under section 94 of the Bankruptcy Act (<i>paid</i>)	DKK	1,388,181.13
Proofs of claim lodged under section 95 of the Bankruptcy Act	DKK	34,101,391.31
Proofs of claim lodged under section 97 of the Bankruptcy Act	DKK	264,671,070.78
Proofs of claim lodged under section 98 of the Bankruptcy Act	DKK	155,553,209.41
Other liabilities in total	DKK	573,713,105.86

The claims filed under section 94 of the Bankruptcy Act were paid to the creditors following the examination of claims on 20 August 2019 when the filed claims were admitted.

3. LITIGATION REGARDING AVOIDANCE AND CLAIMS FOR REPAYMENT

The trustee has concluded the investigations relating to avoidance in the bankruptcy estate. Reference is made to the previous reports for a detailed account in this regard.

As for the bankruptcy estate's possible claim for avoidance of DKK 562,500 which was subsequently reduced as part of the trustee's further investigations to DKK 284,715, it is noted that the suspension agreement is still in force. Further investigations and discussions are currently taking place with the benefitting party for the purpose of payment to the bankruptcy estate.

Litigation, the bankruptcy estate's claim for repayment against a connected person of a former member of the management

As written in the previous reports, the trustee brought a legal action on behalf of the bankruptcy estate against two connected persons of two former members of the management. One of the cases has been concluded.

As for the legal action brought against a connected person of a former member of the management with a claim for payment of a total amount of DKK 589,025, it is noted that the Court of Helsingør found for the connected person by its judgment of 21 October 2022 as it found that the issue did not fall within

section 210 of the Danish Companies Act. The trustee appealed the judgment of 3 November 2022 on behalf of the bankruptcy estate to the Danish Eastern High Court.

The trial hearing of the case had been scheduled for 25 June 2024, but it was cancelled the day before the trial hearing because the opposing counsel was ill. The trial hearing was subsequently rescheduled for 26 January 2026.

The trustee has consequently spent time on preparing for the trial hearing including preparing the case summary, trial bundle and bundle of authorities.

The work relating to the above case is still being performed.

4. CRIMINAL OFFENCES

It is regularly investigated in connection with the estate administration whether there is any basis for the trustee filing a police report under section 110(4) of the Bankruptcy Act. The trustee's examinations in this regard have been concluded for the time being and reference is made to previous reports.

5. THE ESTATE ADMINISTRATION AND THE TIME SPENT IN THE PAST PERIOD

The work by the trustee in the period 1 February 2024 to 31 July 2024 has continued to be every extensive. Because of the extent of the work performed, a general account is provided below of the main groups on which the trustee has mainly spent time in the previous period including broken down by work relating to the *registered assets* and the *unencumbered assets*:

5.1 The time spent on the registered assets and the relating liabilities

5.1.1 Securities

The bankruptcy estate's portfolio of securities still primarily consists of corporate bonds and government bonds in several currencies including DKK, EUR, GBP, NOK and USD kept in custody accounts with Sydbank A/S. The portfolio of securities as at 31 July 2024 was booked at DKK 1,605,125, see paragraph 1.2, item 2, above.

Funds were also transferred to deposit accounts with DNB with a preliminary agreement on a fixed term of 12 months (expires on 20 December 2024):

- DKK 70 million

- NOK 115 million
- EUR 45 million
- GBP 20 million

In the previous period, the trustee continued to manage the portfolio of securities and regularly assessed the bankruptcy estate's securities investment policy, including also in respect of the need for liquidity to pay for the day-to-day operations. This work will take place as long as the bankruptcy estate keeps operating.

A usual withdrawal of approximately DKK 250,000 was made from the company's custody account in that connection (over the past six months) which has been added to the deposit.

Approximately 23 hours have been spent by lawyers on such work since the most recent report.

5.1.2 Reinsurance

The bankruptcy estate's most important asset in the registered assets is still the receivables relating to the bankruptcy estate's reinsurance contracts, the reinsurance part of the provisions for unearned premiums and the provisions for claims outstanding respectively, and the receivables from the reinsurers, see paragraph 1.2, items 3 and 4 above.

The trustee's work relating to the reinsurance has generally resulted in the payment of approximately DKK 1,028,560,000 in total to the bankruptcy estate from the reinsurers since the company went bankrupt (calculated as at 31 July 2024). Approximately DKK 51,510,000 was paid from the reinsurers to the bankruptcy estate in the past six months.

The handling of the bankruptcy estate's reinsurance has continued to focus on calculating and collecting the bankruptcy estate's reinsurance receivables from the reinsurers on an ongoing basis. Dealing with the reinsurance still involves complicated issues, which the trustee is assessing and handling on an ongoing, and daily, basis. In that connection the trustee has continued to have discussions with the reinsurers and the bankruptcy estate's employees on a daily basis regarding calculations, reporting, reconciliation and payment of receivables from reinsurers to the bankruptcy estate as well as other operational matters. It is expected that this work will be performed as long as there are open claims with reinsurance coverage.

As also written in the most recent report, the trustee conducted close examinations of a number of custody accounts opened in the reinsurers' names including to clarify the position of such accounts in respect of the bankruptcy estate. In the previous period, the trustee was in dialogue with the relevant reinsurers

including also in respect of the requirements for more deposits in such custody accounts. A reinsurer has asked questions about the set-off made by the bankruptcy estate. The work in this connection is still taking place.

As part of dealing with the reinsurance the trustee is still focused on ensuring that to the extent possible the payments from the reinsurers are made directly to the bankruptcy estate and not through the bankruptcy estate's insurance brokers. As mentioned in the previous reports, it has not been possible to implement the procedure on direct payments for a number of Asian reinsurers to the bankruptcy estate. Payments are still made for these reinsurers to the insurance broker that then makes the payment to the bankruptcy estate. Moreover, the communication still goes through the broker.

The trustee has been in continued dialogue with one broker about one reinsurer that has not paid the bankruptcy estate as expected for a long period of time. The trustee has gone through the contractual basis and calculated the bankruptcy estate's entire receivable from the reinsurer and has also taken the first steps to commence arbitration proceedings including drafted a notice of arbitration. The trustee has informed the reinsurer that the bankruptcy estate will commence arbitration proceedings if the receivable is not paid to the bankruptcy estate. The work relating to the mentioned receivable from this reinsurer is still taking place.

The trustee has also continued to deal with and make sure on an ongoing basis that excess of loss is reported to the reinsurers efficiently and on time which secures the bankruptcy estate's collection of its receivable from reinsurers.

It is noted in this connection that several excesses of loss must still be indexed annually to take into account the price development from the date of the loss until a final payout is made. The English courts have decided that in addition to coverage of the claims concerning a number of English excesses of loss the claimants are to receive a lifelong periodic payment order (PPO). The trustee collects this coverage from the reinsurers on an ongoing basis and the trustee is also still looking into the possibility of transferring claims with PPOs due to the very long run-off which often spans 30-50 years. The trustee is in dialogue with the relevant funds.

In the previous period the trustee also received confirmation through a liaison lawyer that an Asian reinsurer will pay an excess of loss. The process and the collaboration between the trustee and the liaison lawyer has been taking place for years.

The trustee has also continued the work in the previous period of looking into the possibilities of commutation where the handling of specific claims and the relating costs can be determined with a high degree of probability. The trustee is still determining the possibilities of commutation of so-called "quota share

contracts". It is noted that the PPO indexation mentioned above will affect the maximum amount to some degree for which the reinsurers are liable under the "quota share contracts". This issue is therefore part of the trustee's discussions and considerations in connection with the commutation negotiations and it affects the general collection in respect of the quota share contracts on an ongoing basis.

But where a loss has developed into a "PPO matter", the loss is kept out of commutation as it is not possible to determine the claim costs in the matter and it could vary by several million Danish kroner. Moreover, a number of excesses of loss will also be kept out of the commutation if the uncertainty as to the final amount of loss is found to be too big. In any case the final commutation amount will depend on a negotiation and an individual agreement between the bankruptcy estate and the individual reinsurers.

In the previous period, the trustee also held status meetings on a regular basis between the trustee and the bankruptcy estate's employees to ensure progress in the commutation process and in the determination of the bankruptcy estate's reserves. The trustee has also started new negotiations and continued existing negotiations with a number of reinsurers concerning commutation agreements, including discussions with the reinsurers and drafted commutation offers. This work is still taking place.

It was written in the most recent report that the trustee had entered into a commutation agreement with an Asian reinsurer on behalf of the bankruptcy estate, according to which the reinsurer was to pay EUR 278,384, NOK 867,814 and GBP 294,184 to the bankruptcy estate. It is noted for the avoidance of doubt that the bankruptcy estate received the commutation amount in full in the previous period.

The work relating to commutation is still taking place and a commutation agreement on a small amount was entered into in the previous period. The trustee expects that more commutation agreements will be entered into in the coming period.

Finally, the trustee has spent time on pending arbitration proceedings. As written in the most recent report, a number of formalities had to be fulfilled by the bankruptcy estate in that connection before the proceedings could actually start. Third-party issues drew out the start of the proceedings, but all formalities were finally fulfilled in the previous period. The trustee has continued to spend time on discussions on an ongoing basis with the bankruptcy estate's liaison lawyer, and since the most recent report the trustee has also drafted a reply in collaboration with the liaison lawyer after having received the opposing party's defence. The work relating to the arbitration proceedings is still taking place.

Approximately 674 hours have been spent by lawyers on such work since the most recent report.

5.1.2.1 Danish industrial injury

Firstly, it is noted that the general tendency in respect of the open claims for the portfolio of Danish industrial injury is that their development is negative/the provisions increase, which is also reflected in the bankruptcy estate's ongoing reporting to the relevant reinsurers. The reinsurers follow the development closely and have several questions to the bankruptcy estate that are especially about the reason for the increases in covered losses and reserves.

In the previous period, the trustee continued to have correspondence and discussions on an ongoing basis with the bankruptcy estate's external claims examiner about clarifying the practical and general questions relating to the claims examiner's work for the bankruptcy estate/the Guarantee Fund for Non-life Insurers.

The discussions in the previous period continued to relate, among other things, to calculating losses with incomplete information, ie unknown losses, losses without a policy number or losses where it has not been possible to identify the claimant.

In the previous period, the trustee also spent time on going through and approving the claims examiners' fees for the ongoing claims handling. The claims handling expenses are paid from a separate client account with the trustee in accordance with the chargee administration agreement entered into between the bankruptcy estate and the Guarantee Fund for Non-life Insurers, see below for further details.

It is noted in this connection that the trustee previously had a dialogue with Danish Labour Market Insurance and its representative about the conclusion of the chargee administration agreement, but due to the transfer of the Danish industrial injury portfolio to the Guarantee Fund for Non-life Insurers the chargee administration agreement never became final and was not signed. Since the trustee's most recent report the chargee administration agreement has become final and it was signed by the bankruptcy estate and the Guarantee Fund for Non-life Insurers.

The work concerning the Danish industrial injuries is still taking place.

Approximately 54 hours have been spent by lawyers on such work since the most recent report.

5.1.3 *Receivables from coverholders, claims examiners, etc*

The bankruptcy estate's receivables from coverholders and claims examiners under the registered assets amounted to DKK -19,826,276 as at 31 July 2024, see paragraph 1.2, item 5 above, which means that according to the bookkeeping there was a debt to the coverholders and claims examiners. The reason is that the bankruptcy estate is awaiting reporting from the claims examiners which is expected to eliminate the item over time and there will consequently be a positive receivable. It is primarily a consequence of a

period deferment in the reporting. Reference is made to the previous reports for a detailed account of the trustee's work in relation to the bankruptcy estate's receivables from coverholders, claim examiners, etc.

The trustee has collected outstanding excess amounts from policyholders in 41 cases in total. All of the claims were closed but one case was reopened in the previous period. The bankruptcy estate has received an additional excess amount of DKK 6,000 in that connection.

It is the trustee's assessment that the excess amounts are part of the registered assets and the trustee therefore arranged for the amounts to be reclassified to the registered assets after the deadline for this report. It is noted in this connection that there are still discussions with the Guarantee Fund for Non-life Insurers about whether the Guarantee Fund has a right as a secured creditor to the excess amounts of the insurance claims that the Guarantee Fund for Non-life Insurers has covered.

The work regarding the bankruptcy estate's other receivables is therefore still ongoing.

Approximately 33 hours have been spent by lawyers on such work since the most recent report.

5.1.3.1 Reclaiming unearned coverholder commission

The trustee has raised claims on behalf of the bankruptcy estate for repayment of unearned coverholder commission against a number of the bankruptcy estate's former coverholders. Reference is made to the previous reports for a detailed account of the work previously performed by the trustee.

At this point in time three legal actions are pending regarding claims for unearned coverholder commission against former coverholders, see below. Suspension agreements are also in force with several coverholders.

1) Legal action brought against a former coverholder in Great Britain

On 6 May 2021, the trustee brought a legal action in Denmark on behalf of the bankruptcy estate against a former coverholder in Great Britain, claiming payment of GBP 615,541.28 (approximately DKK 5.5 million). The trustee subsequently reduced the claim amount to GBP 581,274.53 (approximately DKK 5 million) as a result of the judgment of the Danish Maritime and Commercial High Court in a similar case concerning recovery of unearned coverholder commission.

In the previous period, the trustee held meetings with the opposing counsel and had exchanged a large number of pleadings with the opposing party with a view to reaching an agreement between the parties on the data used (the figures) to avoid an expert survey and appraisal.

The trustee has spent time on drafting and submitting an additional pleading in the case including in connection with the parties' efforts to reach agreement on the data (the figures).

The case is currently stayed until 30 August 2024 so that the parties can reach an agreement on and adjust the data.

This work is therefore still taking place.

2) Legal action brought against a former coverholder in Italy

On 7 May 2022, the trustee brought a legal action on behalf of the bankruptcy estate against a former coverholder in Italy, claiming payment of EUR 47,032 (approximately DKK 350,000). The claim amount was subsequently increased to EUR 576,831.42 (approximately DKK 4,292,000) as the trustee learned of an additional premium receivable from the coverholder.

Judgment in default was delivered in the case since the most recent report. According to the judgment in default, the bankruptcy estate was awarded EUR 576,831.42 and legal costs of DKK 206,198 to which should be added interest on the amount claimed. The opposing party has not appealed against the judgment. Nor has the opposing party tried to reopen the case.

The coverholder in question has entered into liquidation, making the collection of the amount awarded to the bankruptcy estate difficult. The trustee has therefore engaged an Italian liaison lawyer to determine whether there is any basis and right to take legal steps in Italy.

This work is therefore still taking place.

3) Legal action brought against a former coverholder in French Polynesia

The trustee has brought a legal action on behalf of the bankruptcy estate against a former coverholder residing in French Polynesia, claiming payment of EUR 662,693.59 (approximately DKK 4,930,000). The case is pending before the Danish Maritime and Commercial High Court.

As written in previous reports, the opposing party claimed that the forum was not in Denmark, which is why the deadline for the opposing party to file an additional pleading concerning the issue of forum was 10 July 2023. But no pleading was filed within the deadline, which is why the trustee has asked for a ruling to be given.

On 23 August 2023, the Danish Maritime and Commercial High Court gave a ruling according to which the case is proceeded with before the Danish Maritime and Commercial High Court.

In the previous period, the trustee participated in a preliminary hearing with the opposing counsel, and the trustee also drafted a reply in the case.

The opposing party has a deadline of 20 September 2024 to file the rejoinder in the case.

The trial hearing in the case has been scheduled for 3 and 4 March 2025.

This work is therefore still taking place.

The trustee's work relating to claiming back the coverholders' unearned commission is therefore still taking place.

Approximately 198 hours in total have been spent by lawyers since the most recent report on the legal actions concerning recovery of the coverholders' unearned commission.

5.1.4 The work relating to dealing with the operations

5.1.4.1 Claims handling

Reference is made to the previous reports for a detailed account of the continuation and management of the claims handling. The claims handling continued in the previous period.

The trustee's work relating to the continued claims handling still took up a lot of time in the previous period. The work has included ensuring on an ongoing basis correct and proper claims handling by the respective claims examiners. As several insurance portfolios have now been closed as the handling of the claims has been completed, the trustee is focused on ensuring that correct reporting is made/continues to be made in the claims bordereaux as well as reporting of accepted insurance claims to the bankruptcy estate for the purpose of registration in the bankruptcy estate's register of debts and claims, see paragraph 5.1.5.1 for details.

In that connection the trustee has continued to have in-depth discussions and correspondence with the attached claims examiners regarding the process of reporting the accepted claims that are not covered by any guarantee fund scheme to the bankruptcy estate for the purpose of registration in the register of debts and claims. This work is still taking place.

The trustee has also been involved in a number of big and complicated personal injury cases, including about determining the reserves, which has also required a dialogue with and ongoing information to the bankruptcy estate's reinsurers in order to ultimately secure the bankruptcy estate's significant receivables from reinsurers.

55 insurance portfolios out of 91 insurance portfolios in total still have open claims of which several insurance portfolios were already run-off cover for claims raised before the company went bankrupt. The number of open claims as at 31 December 2023 could be calculated to be 2,066 open claims in total based on the claims examiners' reporting to the bankruptcy estate. The increase in the number of open claims compared to the number given in the most recent report (1,623 open claims) must be seen in light of the bankruptcy estate having received reporting from the French guarantee fund scheme (FGAO) in which connection more open claims were established than previously reported.

The trustee is going through the individual loss portfolios on an ongoing basis for the purpose of verifying the claims examiners' reporting/the number of open claims.

It is noted that the trustee's employees are still present in person at the company to ensure the progression of the claims handling.

Approximately 716 hours have been spent by lawyers on such work since the most recent report.

5.1.4.2 Position on other bilateral agreements

The trustee continued to spend time on administering and approving payments regarding the contracts to which the bankruptcy estate has become a party because of the continued operations. This work will be performed as long as the bankruptcy estate has operations.

It is noted in this connection that in the previous period the bankruptcy estate moved to smaller leased premises with a reduced rent.

The trustee also continued to spend time on reviewing the costs that the bankruptcy estate has paid regarding the service charges of the leased premises and other operating expenses and re invoicing to Qudos Insurance A/S in bankruptcy and Gefion Finans A/S in bankruptcy respectively for the proportionate part of the costs paid in relation to the service charges of the leased premises and other operating expenses under the concluded agreements. Reference is made to the previous reports for a detailed account in this regard.

The work will be performed as long as the lease is maintained and the premises are sublet to Qudos Insurance A/S in bankruptcy and Gefion Finans A/S in bankruptcy respectively.

Approximately 47 hours have been spent by lawyers on such work since the most recent report.

5.1.4.3 The bankruptcy estate's employees and attached consultants

In the previous period, the trustee continued to deal with usual employee matters as in any other operating business, including regarding illness, holiday, resignations, etc.

The work also includes consideration and adjustment of the employee resources on an ongoing basis as the operations partly focus on winding up the insurance activities and partly ensure that the workload in the various staff functions is taken into account. One employee left the bankruptcy estate's finance department in the previous period.

Approximately 28 hours have been spent by lawyers on such work since the most recent report.

5.1.4.4 Talks with guarantee funds

In the previous period, the trustee continued to have regular talks and meetings with the Guarantee Fund for Non-life Insurers, green card agencies, including the Danish Motor Insurers' Bureau (DFIM), and other national guarantee fund schemes, including the FSCS (Great Britain), FGAO (France), CONSAP-F.G.V.S. (Italy) and the Norwegian guarantee scheme.

The talks have primarily been about matters relating to the process of lodging the subrogation claims of the guarantee fund schemes against the bankruptcy estate including the documentation requirements for the trustee's subsequent examination of the claims. The talks are still taking place.

It is noted in that connection that the various guarantee funds are still examining and paying out cover for insurance claims to the policyholders/claimants, and the trustee is still involved on an ongoing basis in the guarantee funds' processing and payouts of the notified insurance claims. According to the bankruptcy estate's information, return premiums have only been repaid to the policyholders to a very limited extent within the past six months.

The trustee's talks and coordination with the various guarantee funds are still taking place and will take place as long as there are open insurance claims in the jurisdictions of the various guarantee fund schemes.

Approximately 87 hours have been spent by lawyers on such work since the most recent report.

5.1.4.5 Correspondence with policyholders and claimants

In the previous period, the trustee continued to have regular correspondence with the policyholders and the claimants about their claims for return of premiums and insurance claims against Alpha.

It is noted that the trustee has received more than 6,500 inquiries in the email inbox that the trustee's office is dealing with on an ongoing basis (approximately 50 new inquiries in the last six months). Add to this that a large number of emails was also sent to the trustee's office and employees, inquiries over the telephone, post and service of documents.

The emails are still primarily questions from the policyholders about when they can expect to receive the payouts from the guarantee funds and/or the bankruptcy estate as well as questions about specific insurance claims handled by the attached claims examiners or attorneys. The trustee coordinates and discusses the status with the various guarantee fund schemes on an ongoing basis, and the trustee is also registering the filed claims in the register of debts and claims.

In the previous period, the trustee also continued to ensure that the bankruptcy estate's website (www.alphagroup.dk) is updated with relevant information about the estate administration.

Approximately 66 hours have been spent by lawyers on such work since the most recent report.

5.1.4.6 Legal actions brought against the bankruptcy estate after the issue of the bankruptcy order

The trustee has continued to spend time on the legal actions brought against Alpha after the issue of the bankruptcy order. Reference is made to the previous reports for a detailed account of the work previously performed by the trustee including the bankruptcy estate's instructions for the external liaison lawyers to claim dismissal in these cases.

As judgments are being delivered in more legal actions, the trustee has intensified the focus on the processes and the procedures for entering/registering the claims in the bankruptcy estate's register of debts and claims. The work has included in-depth analysis of the reporting by the liaison lawyers and studying the serviced documents. This work is still taking place.

Avoidance proceedings commenced against the bankruptcy estate after the issue of the bankruptcy order, pending in Auckland, New Zealand

On 26 October 2022, a law suit was filed against Alpha before a court in Auckland, New Zealand, by a bankrupt reinsurer residing in New Zealand. The case is about avoidance of two payments to Alpha, including a payment to Alpha made on 16 February 2018 of EUR 25 million and a payment of EUR 397,000 to Alpha made on 14 February 2018. It is noted in this connection that Alpha has a counterclaim against the bankrupt reinsurer of approximately EUR 50 million (which is adjusted on an ongoing basis due to the fixed provisions for claims outstanding).

The trial hearing in the case took place on 6-9 November 2023 in Auckland and the trustee was present at the trial hearing.

A judgment was delivered in the case on 8 April 2024 where the court found that the two payments were voidable and that Alpha was consequently to repay EUR 25 million and EBP 397,000 respectively plus interest and legal costs to the bankrupt reinsurer.

The bankruptcy estate appealed against the judgment to the Court of Appeal of New Zealand on 6 May 2024.

There was also a separate dialogue between the trustee and the liquidator of the bankrupt reinsurer about the balance.

The case is still pending.

Approximately 377 hours in total have been spent by lawyers on legal actions brought after the issue of the bankruptcy order since the most recent report.

5.1.4.7 Legal actions to which the bankruptcy estate has become a party or which have been brought by the bankruptcy estate

The trustee continued to spend time on the legal actions to which Alpha was a party before the issue of the bankruptcy order and on the legal actions brought by the trustee on behalf of the bankruptcy estate. Please find below an account of the court cases that do not concern unearned coverholder commission (described in paragraph 5.1.3.1 above).

1) Legal action brought against a former coverholder and claims examiner in Great Britain before the issue of the bankruptcy order

Alpha had brought a legal action before it went bankrupt against a former coverholder and claims examiner in Great Britain before the Copenhagen City Court, claiming approximately DKK 125,151,364.15. The subject-matter of the case was damages in contract. On 24 August 2018, the bankruptcy estate became a party to the case, see section 136(1) of the Danish Administration of Justice Act.

The claim for payment was adjusted in the period leading up to the trial hearing in the case before the city court where the amount claimed amounted to DKK 116,794,647.06. The claim consisted of three claims in part, including DKK 95,322,423.53 relating to the agreement on a call for tenders for equipment insurance, DKK 1,765,947.10 relating to the agreement on a call for tenders for motor racing insurance and DKK 19,706,276.43 relating to the agreement on a call for motorcycle insurance.

During the trial hearing the coverholder acknowledged the claim in part concerning the agreement on a call for tenders for motor racing insurance and the bankruptcy estate consequently received DKK 2,151,899.79.

On 19 January 2021, the Copenhagen City Court delivered its judgment in the case and the court found that the coverholder had committed material breach of the parties' agreement on a call for tenders for equipment insurance. But the court did not find that the loss suffered by Alpha had been proved, which is why the coverholder was not liable for the claim. As for the agreement on a call for tenders for motorcycle insurance, the court found that the coverholder had breached the agreement and the coverholder was ordered to pay DKK 9,991,866.65 to the bankruptcy estate and legal costs of DKK 462,500.

On 2 February 2021, the coverholder appealed against the judgment on the agreement on a call for tenders for motorcycle insurance to the Danish Eastern High Court. On 15 March 2021, the trustee filed the defence in the appeal proceedings and at the same time requested an expert survey and appraisal in light of the bankruptcy estate's loss on the written equipment insurance.

On 17 July 2023, the coverholder went into administration and the matter was stayed pending the decision of the estate in administration on becoming a party to the legal proceedings. The trustee filed the full claim on behalf of the bankruptcy estate against the estate in administration of the coverholder (GBP 20,131,622.03 in total).

On 4 December 2023, the estate in administration informed the trustee that the estate did not want to become a party to the case and continue the case, see section 141(1) of the Bankruptcy Act. Despite the

information that the estate in administration did not want to become a party to the case, the estate in administration commented on the case including on the issue of the award of legal costs.

On 17 January 2024, the trustee stated on behalf of the bankruptcy estate that as the estate in administration had not become a party to the case there was no basis for continuing the exchange of pleadings in the case and against such background asked the High Court to deliver a judgment on the evidence.

The High Court has set a deadline of 4 September 2024 for the bankruptcy estate to declare what, in the bankruptcy estate's opinion, should happen with the trial hearing and with the issue of an expert survey and appraisal.

2) Legal action brought against a former coverholder in Germany *after* the issue of the bankruptcy order

On 3 May 2019, the trustee brought a legal action on behalf of the bankruptcy estate against a former coverholder in Germany, claiming payment of EUR 891,073 which was part of the total insurance premium owed by the former coverholder to Alpha. The trial hearing took place on 2 June 2020 before the Copenhagen City Court.

On 30 June 2020, the Copenhagen City Court delivered its judgment in the case where the former coverholder was ordered to pay EUR 2,212,952.33 to Alpha plus statutory interest under the Danish Interest Act as from 10 February 2019. Alpha was also awarded legal costs of DKK 456,718.75.

The former coverholder subsequently appealed against the judgment in its entirety within the period allowed for appeal. The trustee then drafted and filed the defence in appeal proceedings in the case which subsequently resulted in the former coverholder withdrawing the appeal.

On 26 April 2021, the parties entered into an instalment agreement on the payment of the awarded judgment amount of EUR 2,212,952.33. EUR 12,000 is currently being repaid every month.

As at 31 July 2024, the bankruptcy estate had received EUR 492,000 (approximately DKK 4,483,000) in total. The trustee is checking on an ongoing basis whether the bankruptcy estate receives the instalments in compliance with the payment terms of the instalment agreement.

3) Legal action brought against a former coverholder in Great Britain *after* the issue of the bankruptcy order

On 26 March 2020, the trustee brought a legal action on behalf of the bankruptcy estate against a former

coverholder in England, claiming payment of GBP 4,536,923.95, which was the former coverholder's non-payment of insurance premium to Alpha. Due to the jurisdiction clause of the parties' Binder Agreement, the legal action was brought before the Business and Property Courts of England and Wales. The bankruptcy estate engaged an English lawyer to safeguard Alpha's interests in the case.

The parties subsequently entered into a settlement agreement in the case on payment of GBP 3,560,000 (approximately DKK 31,630,900) and GBP 600,000 (approximately DKK 5,330,000) of which GBP 600,000 was to be paid by several instalments.

On 3 January 2024, the coverholder entered into liquidation.

On 12 March 2024, the trustee filed a claim of GBP 625,000 against the estate in administration on behalf of the bankruptcy estate. The liquidators of the estate in administration stated on 23 March 2024 that it is not expected that there will be any dividend to the unsecured creditors.

Approximately 54 hours have been spent by lawyers on the above legal actions since the most recent report.

5.1.4.8 Compliance and audits

In the previous period, the trustee's work included planning the audits of several of the bankruptcy estate's claims examiners in respect of 2024. So far, audits of five claims examiners have been planned in 2024. The audits of the claims examiners will be conducted by external or internal auditors. The internal audit is being conducted by the bankruptcy estate's employees in the legal department.

In connection with the planning of the audits the trustee and the bankruptcy estate's employees had ongoing discussions and correspondence with the claims examiners about coordinating the audits, including drawing up specific instructions for the auditors with guidelines for conducting the audit of the various claims examiners. This work is important for the ongoing claims handling including in respect of securing the bankruptcy estate's receivable from reinsurers. In addition to focusing on the quality and progress of the claims handling by the claims examiners, the trustee updates the instructions on an ongoing basis based on the experiences gained from the audits that were previously carried out. Discussions and correspondence about the focal points of the audit are still taking place.

The trustee has continued to spend a lot of time on ensuring that the operations of the bankruptcy estate are wound up in compliance with the General Data Protection Regulation to the widest extent possible. Reference is made to the previous reports for a detailed account in this regard.

The work in the previous period included drafting and updating data processing agreements with the bankruptcy estate's attached business associates. There has also been a lot of work relating to the compulsory supervision and updating of the risk assessment of the claims examiners, drawing up and updating the data processing agreements and coordination, including matters regarding termination of agreements, return of data, etc. This work will be performed as long as the external claims examiners examine claims.

Finally, the trustee's work has included taking a decision on the exchange of personal data in connection with various legal actions and investigations, etc.

Approximately 108 hours have been spent by lawyers on such work since the most recent report.

5.1.4.9 Audit and bookkeeping

As stated in the previous reports, Deloitte Statsautoriseret Revisionspartnerselskab ("Deloitte") is assisting the bankruptcy estate with the accounts including preparing the annual reports. But KPMG Acor Tax Partnerskab ("KPMG") is assisting the bankruptcy estate with a number of specific tax matters.

On behalf of the bankruptcy estate KPMG has asked the Danish Tax Agency to reopen the bankruptcy estate's payroll tax liability and tax liability for 2021, and in this connection KPMG has asked for repayment of payroll tax liability of DKK 630,873 and of DKK 10,768,711 for VAT liability. The Danish Tax Agency received documentation of the amended declarations as it had requested and there have been discussions in this connection. The trustee is currently waiting for the final decision by the Danish Tax Agency on the amended declarations for 2021.

The trustee and the bankruptcy estate's employees are currently going through the bankruptcy estate's VAT declarations for 2022.

It is noted in respect of the bookkeeping that the trustee's employees are still assisting daily with approving payments by the bank and declaring direct and indirect taxes on an ongoing basis.

As for the periodical reporting of direct and indirect taxes abroad, the trustee has continued to correspond with the external tax consultants and tax authorities that handle the declaration of direct and indirect taxes abroad on an ongoing basis.

Reclaiming insurance premium taxes (IPT)

In the previous period, the trustee continued to spend time on reclaiming the bankruptcy estate's insurance premium taxes (IPT) relating to the terminated policies. In that connection the trustee is still in dialogue with the tax authorities in Great Britain, France and Germany.

As written in the most recent report, the trustee has appealed on behalf of the bankruptcy estate against the rejection by the English tax authorities of the bankruptcy estate's claim for repayment. An extensive amount of time has been spent in the previous period on preparing for dealing with procedural law matters including surrender of documents to the English tax authorities and preparing for the examination of witnesses. The case is still pending and is handled in collaboration with a local liaison lawyer in Britain.

Moreover, the trustee has appealed on behalf of the bankruptcy estate against the rejection by the French tax authorities of the bankruptcy estate's claim for repayment. As is the case in Britain, this case is being handled by the trustee in collaboration with a local liaison lawyer.

As for the reclaim of premium taxes in Germany, it is noted that the German tax authorities have informed the trustee that a German coverholder has already requested and received a refund of premium taxes. The German agent subsequently solemnly declared that the premium taxes received do not concern insurance written by Alpha and therefore Alpha is not entitled to the premium taxes. Based on the above information, the insurance type and the volume of the portfolio the trustee has assessed that a claim cannot be raised against the German coverholder on this basis. But the trustee is still in dialogue with the German tax authorities about the repayment of IPT in German.

The work concerning reclaiming insurance premium taxes (IPT) is therefore still taking place.

Approximately 87 hours have been spent by lawyers on such work since the most recent report.

5.1.5 Examination of claims proved in respect of the registered assets

The trustee has spent a lot of time on planning the future examination of the claims filed under the registered assets. The purpose is to commence the examination of claims when the claims have become final including from the respective guarantee fund schemes, claims examiners and individual policyholders whereby it is expected that there will be clarity and an overview as to the liabilities.

The trustees currently expects to commence the examination of the claims filed under the registered assets during 2025 or 2026. But it depends on receipt of final claims from, among others, the respective

guarantee fund schemes including documentation of their subrogation claims, see below for details. The examination of insurance claims cannot therefore commence before the receipt of final claims.

5.1.5.1 Insurance claims

The trustee has had extensive work concerning the planning of structured processes to ensure that accepted insurance claims not covered by the guarantee funds will be reported by the respective claims examiners to the bankruptcy estate for the purpose of registration in the bankruptcy estate's register of debts and claims. Reference is made to the previous reports for a detailed account of the processes for registering the claims in the bankruptcy estate's register of debts and claims, including the prepared reporting sheets for the reporting.

The planned processes include a structured review of the contractual basis and claims bordereaux to determine the number/extent of closed accepted insurance claims not covered by the guarantee funds to be registered in the register of debts and claims. The work is performed in collaboration with the bankruptcy estate's employees and weekly meetings will be held in that connection to discuss and go through the individual loss portfolios.

As previously stated, the quality of the reported claims bordereaux from the claims examiners varies and it has therefore been necessary to a certain extent and following a specific assessment for the bankruptcy estate's employees to manually update/correct the bordereaux based on knowledge about the development in claims in the portfolio so that the overview of claims will be true. This work is still taking place.

It is noted that despite the fact that several claims examiners have stated that it is expected that only a small number of claims will be reported to be registered in the register of debts and claims, it is nevertheless still the trustee's expectation that a large number of claims will be filed against the bankruptcy estate in the next period.

The trustee has also planned processes for obtaining the underlying data/proof of the accepted insurance claims not covered by the guarantee funds and also insurance claims that have been rejected by the claims examiner in the period after the issue of the bankruptcy order. The purpose of this is to ensure that the trustee has all the documentation concerning the individual insurance claims. The work of obtaining the underlying documentation has started and it will be intensified in the next period as several loss portfolios are being closed.

The trustee has also participated in several meetings and has had discussions with the various guarantee fund schemes about the process of notifying their final subrogation claims relating to the insurance claims and the documentation requirements in that connection. It is noted in that connection that all the

guarantee fund schemes have received the same reporting sheet and guide for the reporting of the underlying claims to which the respective guarantee fund schemes have subrogated.

The discussions with the respective guarantee fund schemes are still taking place.

Approximately 341 hours have been spent by lawyers on such work since the most recent report.

5.1.5.2 Return premium

The trustee has continued the work of planning the initial steps in the process of examining the claims for return premium including both in relation to the merits of the claims and the examination of claims process in general. This work is still taking place.

Approximately 96 hours have been spent by lawyers on such work since the most recent report.

5.1.5.3 Complaints

Reference is made to the previous reports for a detailed account of the types of complaint and the process concerning the handling of the complaints.

As at 31 July 2024, 74 complaints had been made and registered in the bankruptcy estate through the complaint form (no changes for the past six months).

The trustee continued to plan the examination of claims in the complaints in the previous period.

Approximately 98 hours have been spent by lawyers on such work since the most recent report.

5.1.5.4 The creditors' special status, if any, in relation to receivables from reinsurers and other assets

1. Examination of claims concerning the legal position in the bankruptcy estate of the Guarantee Fund for Non-life Insurers in relation to reinsurance payments

The Guarantee Fund for Non-life Insurers has filed a preliminary claim against the bankruptcy estate of approximately DKK 2.8 billion. The Guarantee Fund for Non-life Insurers has claimed in that connection that it has a right of priority/a right as a secured creditor to the amounts that have already been paid out or which should be paid out in future through the bankruptcy estate's reinsurance programme and which relate to the losses for which the Guarantee Fund for Non-life Insurers has paid or should pay compensation to policyholders or claimants in future.

The trustee planned a process in agreement with the Guarantee Fund for Non-life Insurers for the purpose of examining the filed claim as the trustee fundamentally disagrees with the points of view made by the Guarantee Fund for Non-life Insurers, including the interpretation of current law. In this connection it has also been agreed with the Guarantee Fund for Non-life Insurers that it is most expedient if the examination of claims should be based on some specific reinsurance payments to the bankruptcy estate that concerned losses covered by the Guarantee Fund for Non-life Insurers.

In this connection it was the trustee's overall opinion that the point of view presented by the Guarantee Fund for Non-life Insurers was fundamentally in conflict with the principle of equal treatment under bankruptcy law and was not supported by the necessary statutory authority.

On 21 September 2022, the trustee formally rejected the claim filed by the Guarantee Fund for Non-life Insurers. On 5 October 2022, an examination of claims meeting was held where the trustee maintained the rejection.

On 1 November 2022, the Guarantee Fund for Non-life Insurers lodged a writ of summons against the bankruptcy estate and the parties subsequently exchanged a large number of pleadings in the case. Reference is made to the previous reports for a detailed account of the case and the work previously performed.

The trial hearing of the case was scheduled to take five days in court, ie on 7, 8, 14, 15 and 16 May 2024.

The trustee has spent a lot of time in that connection on preparing for the trial hearing including on drafting the opening statement, the closing arguments, questions to witnesses, supporting exhibits and preparing the bundle of authorities.

The Danish Maritime and Commercial High Court passed its judgment in the case on 5 July 2024 where the court found for the bankruptcy estate. The Danish Maritime and Commercial High Court ruled in that connection that according to its wording section 9(2) of the Guarantee Fund Act must be understood to mean that the Guarantee Fund for Non-life Insurers only has a right of priority to payments from reinsurers that relate to claims for compensation covered by the Guarantee Fund for Non-life Insurers if the payments are included in the bankruptcy estate's assets (ie the unencumbered assets). As the reinsurance contracts concerning Alpha are included in the registered assets and consequently not part of the assets of the estate, it follows that the Guarantee Fund for Non-life Insurers does not have a right of priority to payments from such reinsurance contracts.

The Guarantee Fund for Non-life Insurers filed a notice of appeal with the Danish Eastern High Court

on 12 July 2024 and the trustee has spent time on going through the notice of appeal. The trustee has also spent time on drafting a defence in appeal proceedings which was filed after the deadline for this report.

The work on the appeal proceedings are still taking place.

Approximately 688 hours have been spent by lawyers on such work since the most recent report.

2. Examination of claims concerning whether it is possible for the Guarantee Fund for Non-life Insurers to take out capital under the then current section 54 of the Danish Workers' Compensation Act

The Guarantee Fund for Non-life Insurers filed a claim on 14 March 2022 of DKK 488.2 million against the bankruptcy estate concerning Danish industrial injury. The claim was filed with precedence over all the other creditors against the bankruptcy estate, including other insurance creditors, so that the Guarantee Fund is paid before such creditors.

In agreement with the Guarantee Fund for Non-life Insurers the trustee has planned, in the same way as described in item 1 above, a process for the purpose of examining the filed claim as the trustee disagrees with the points of view made by the Guarantee Fund for Non-life Insurers, including the interpretation of current law.

On 10 May 2023, the trustee formally rejected the claim filed by the Guarantee Fund for Non-life Insurers. On 1 June 2023, an examination of claims meeting was held at the trustee's office where the trustee maintained the rejection of the claim.

On 27 June 2023, the Guarantee Fund for Non-life Insurers lodged a writ of summons against the bankruptcy estate and the parties subsequently exchanged a large number of pleadings in the case. Reference is made to the previous reports for a detailed account of the case and the work previously performed .

The trial hearing of the case will take four days in court and has been scheduled for 4, 5, 11 and 12 September 2024. In the previous period, the trustee spent time on drafting the rejoinder in the case, going through the opposing party's pleading, drafting the case summary and preparing for the trial hearing including preparing the supporting exhibits and the bundle of authorities.

The work in the case is still being performed.

Approximately 85 hours have been spent by lawyers on such work since the most recent report.

3. Examination of claims concerning whether it is possible for the Guarantee Fund for Non-life Insurers to receive payment for its costs from the bankruptcy estate

The Guarantee Fund for Non-life Insurers has filed a claim against the bankruptcy estate of approximately DKK 38.5 million concerning paid costs. The claim contained a number of reservations to file additional claims for costs. On 9 December 2022, the Guarantee Fund for Non-life Insurers adjusted its filed claim to be approximately DKK 91.3 million with a calculation of the costs and other claims.

In agreement with the Guarantee Fund for Non-life Insurers the trustee has planned, in the same way as for the other two cases, a process for the purpose of examining the filed claim as the trustee disagrees with the points of view made by the Guarantee Fund for Non-life Insurers, including the interpretation of current law. The trustee has started the work of drafting a rejection.

Reference is made to the previous reports for a detailed account of the work previously performed.

The work in the case is still taking place.

Approximately 16 hours have been spent by lawyers on such work since the most recent report.

It means that approximately 3,876 hours in total have been spent on work relating to the registered assets.

5.2 The time spent on the unencumbered assets and the claims filed in respect of the unencumbered assets

5.2.1 Sale of furniture and various chattels

In connection with the move to smaller leased premises the trustee went through the bankruptcy estate's furniture and office supplies with a view to a sale. The trustee arranged the sale of three Arne Jacobsen Egg chairs, one Arne Jacobsen Series 7 chair (leather), one Poul Henningsen Artichoke lamp in copper and 12 Rud Thygesen Kings chairs with a table as well as various height adjustable tables, office chairs, shelving systems, sofa, rug, cabinets, lamps, coffee machines, wine refrigerator, etc. The sale generated DKK 102,489.88 inclusive of VAT (the equivalent of DKK 81,991.90 exclusive of VAT).

The trustee's work has therefore included the sale and dialogue with the auction house.

Approximately 7 hours have been spent by lawyers on the above work since the most recent report.

5.2.2 *Receivable from Intercede 2408 Limited*

Intercede 2408 Limited ("Intercede") owes the bankruptcy estate an amount of DKK 42,709,725 according to a loan agreement of 21 December 2012 between the parties. Reference is made to the previous reports for a detailed account of the receivable and the work previously performed by the trustee.

The bankruptcy estate received DKK 128,350.20 in the previous period that was repaid by the liquidator of Intercede relating to the security previously provided of GBP 18,000 (DKK 156,033.00).

Approximately 9 hours have been spent by lawyers on such work since the most recent report.

5.2.3 *Litigation regarding claims for avoidance and repayment*

In the previous period, the trustee has spent time on the pending legal action against a connected person of a former member of the management. An account of the trustee's work can be found in paragraph 3 above.

The trustee's work is still taking place.

Approximately 85 hours have been spent by lawyers on such work since the most recent report.

5.2.4 *Investigations relating to management and auditor liability*

As stated in previous reports, the trustee identified a number of irregular issues at the beginning of the estate administration that gave rise to further investigations. The trustee had been in dialogue with the Guarantee Fund for Non-life Insurers regarding the identified issues and had also obtained external expert accounting assistance for the investigations.

It is the trustee's general opinion that unwarrantable/incorrect recognition and valuations of a number of assets and liabilities were systematically made that had a decisive effect on Alpha's financial ratios and solvency ratio. It is also the trustee's opinion that the operations in Alpha continued beyond the point of no return, which has resulted in Alpha, and ultimately the creditors, having suffered a significant loss.

On 3 March 2021, the trustee brought a legal action on behalf of the bankruptcy estate against the two former members of the management and the company's former auditor with a preliminarily claim for

payment of an amount of approximately DKK 208 million. The case was brought before the Copenhagen City Court and is still pending, see immediately below.

On 30 June 2021, the members of the management and the former auditor of the company filed defences in the case.

On 8 April 2022, the trustee filed a reply with questions for the expert on behalf of the bankruptcy estate in the legal action. The overall objective of the questions for the expert is to get an independent expert to assess and clarify whether a number of detailed assets and liabilities had been recognised incorrectly/culpably and how, including by which amounts, the respective assets and liabilities should have been recognised. The questions for the expert also concern the calculation of the loss in connection with the continued operations after the point of no return. The reply also contained a request for discovery by litigants in relation to the former auditor's working papers concerning a number of specific issues.

On 11 April 2022, the trustee filed a disciplinary complaint on behalf of the bankruptcy estate with the Danish Disciplinary Board on Auditors concerning the signing auditors' (lack of) audit procedures and endorsement of the 2016 annual reports of Alpha which the bankruptcy estate has claimed were contrary to generally accepted auditing standards.

On 1 February 2023, the management filed a preliminary rejoinder in the case and on 30 June 2023 the former auditor of the company filed the rejoinder in the legal action.

The Copenhagen City Court decided by a ruling of 6 November 2023 that the requested expert survey and valuation was to be suspended pending the decision by the Danish Disciplinary Board on Auditors in the complaint.

The Copenhagen City Court decided on 2 April 2024 to stay the decision by the court on the bankruptcy estate's request for discovery by litigants pending a decision in the complaint by the Danish Disciplinary Board on Auditors. The court also decided that an oral hearing is to be held of one day's duration concerning the request for discovery. The court hearing was scheduled for 6 May 2025.

The former auditor of Alpha asked the court on 29 April 2024 to fix a deadline for the bankruptcy estate's position on the contents of the auditor's rejoinder of 30 June 2023 including that the bankruptcy estate takes a position on the requests made.

The court then fixed a deadline of 1 September 2024 for comments on the request by the former auditor of Alpha of 29 April 2024. The trustee therefore spent time in the previous period on drafting an extensive pleading containing among other things the bankruptcy estate's position on the auditor's 38 requests.

The majority of the requests concern issues relating to the bankruptcy estate's statement of loss including the bankruptcy estate's legal actions concerning unearned coverholder commission, the assumptions made by the bankruptcy estate in the statement of loss and the reports produced by the bankruptcy estate concerning the statement of loss.

In the other complaint pending in parallel before the Danish Disciplinary Board on Auditors the trustee has also spent time on going through and taking a position on the respondent's rejoinder of 26 April 2024 and the comprehensive case summary of 10 June 2024 of 151 pages in total excluding exhibits. The trustee has also spent time on drafting a comprehensive case summary for the Danish Disciplinary Board on Auditors that was filed with the Board also on 10 June 2024. Finally, the trustee has spent time on preparing for and participating in the meeting before the Danish Disciplinary Board on Auditors that was held on 24 June 2024 and on clarifying a number of issues that arose in that connection. The Danish Disciplinary Board on Auditors has informed the parties that it is expected that a ruling will be made in October 2024.

A trial hearing has not yet been scheduled in the action for damages against the two former members of the management and the former auditor of Alpha as the date for the hearing of the case will, as mentioned, depend on the decision by the Danish Disciplinary Board on Auditors in the complaint proceedings and the expert survey and valuation.

The work relating to the above court case is consequently still taking place.

Approximately 766 hours have been spent by lawyers on such work since the most recent report.

5.2.5 *Examination of claims*

The trustee is still examining the claims filed under section 95 of the Bankruptcy Act. No examination of claims meeting has yet been convened but is expected in 2024/2025.

Approximately 8 hours have been spent by lawyers on such work since the most recent report.

5.2.6 *Other estate administration*

Since the most recent report approximately 72 hours have been spent by lawyers on the general estate administration, including corresponding with the creditors and the bankruptcy court, registering the proved claims in the bankruptcy estate's register of debts and claims under the unencumbered assets and on preparing this report.

It means that 947 hours in total have been spent by lawyers on the unencumbered assets since the most recent report.

6. SUMMARY OF THE TIME SPENT

It means that approximately 4,823 hours in total have been spent on the estate administration, including approximately 3,876 hours by lawyers on work relating to the registered assets, see paragraph 1.2 above, and approximately 947 hours by lawyers relating to the unencumbered assets, see paragraph 1.3 above, in the period from 1 February 2024 and to 31 July 2024.

7. INTERIM FEE

The trustee has not asked the bankruptcy court to pay any interim fee since the most recent report.

8. THE FUTURE ESTATE ADMINISTRATION AND THE WINDING-UP OF THE BANKRUPTCY ESTATE

The estate administration in the next period will still focus on the operations of the bankruptcy estate as the continuation of the operations is still necessary to secure the bankruptcy estate's assets and limit its liabilities.

As a consequence of the many estimates relating to both the calculation of the assets and the liabilities and the outcome of the pending legal actions, it is still not yet possible to estimate the expected dividend in the bankruptcy estate, including the cover from the registered assets and the unencumbered assets.

It is also not possible at this point in time to estimate when it can be expected that the bankruptcy estate will be wound up.

9. NEXT CREDITOR INFORMATION

The next creditor information under section 125(4) of the Bankruptcy Act will be sent on 8 March 2024 (sic) at the latest to the bankruptcy court and the creditors.

Copenhagen, 6 September 2024

Boris Frederiksen
Partner, Attorney