

Resolution Life Australasia Limited
New Zealand Branch

Climate-Related Disclosure

2024

Introduction

Welcome

At Resolution Life, our commitment to sustainability is aligned with our mission and our purpose. Globally, we support the long-term growth of the life insurance industry, for the benefit of society, protecting the financial futures entrusted to us. As outlined in our first guiding principle, we always seek to ‘do the right thing’, whether it concerns the companies we work with, our policyholders and our regulators, or our people, our communities and the planet.

As part of our commitment to sustainability, we acknowledge that addressing climate change is a key challenge. In recent years, there have been many notable climate-related events, which underscore the ongoing impacts of climate change and the need for continued global action. We intend to take a pragmatic and thoughtful approach to our role as an organisation in navigating these challenges. In line with our approach, Resolution Life’s focus at a Group level this year was to improve data quality and reduce our global emissions. We continued to build our emissions data and measurement capabilities to get a fuller picture of our carbon footprint.

In December 2024, Resolution Life announced the acquisition of 100% of its shares by Nippon Life, subject to regulatory approval. Having a single well-capitalised parent will allow Resolution Life to strengthen our position in the market, create more opportunities to build capabilities and continue our growth. Nippon Life has a more advanced sustainability agenda than we do and we look forward to working with them in the coming years. Following the acquisition, Resolution Life Australasia Limited will be combined with Nippon Life’s Australian company, MLC, to form *Acenda*, a new primary life insurer open to new business, which will be run as a joint venture between Nippon Life and Resolution Life.

We are pleased with our progress in 2024, with this report being our second Climate Statement for New Zealand. It reflects our desire for transparency and acknowledgement that data and standardisation of disclosure requirements will enable more informed decisions and better outcomes for us as a company and as an industry. Our intention is to build on the foundations laid out in this report, leverage our learnings, refine our approach and develop our internal capabilities to better understand and manage the climate-related risks and opportunities we are exposed to. We will couple this with continued good work on our wider sustainability agenda, driving forward our efforts to provide a fair and inclusive working environment for our people, delivering benefits to the communities in which we operate and reducing our global emissions so that we can better meet the needs of our stakeholders and contribute to addressing the challenge of climate change.

About this report

Resolution Life Australasia Limited (RLAL) is a Climate Reporting entity (CRE) under the Financial Markets Conduct Act 2013 (FMCA), as it is a licensed insurer that is large as per the terms defined in the FMCA. As an overseas company, RLAL is required to prepare Group climate-related disclosures in respect of its New Zealand business, and we refer to the business and operations within this reporting boundary of Resolution Life Australasia Limited New Zealand Branch as ‘RLAL-NZ’ in this report. The RLAL-NZ entity reports on financials in relation to the Life Insurance and Wealth Protection performance of the business for New Zealand.

This report is our second in response to the Aotearoa New Zealand Climate Standards (NZ CS) issued by the External Reporting Board (XRB). This report covers the period 1 January 2024 to 31 December 2024.

Introduction

Adoption provisions

There are adoption provisions in the Aotearoa New Zealand Climate Standards 2 (Adoption of Aotearoa New Zealand Climate Standards: 'NZ CS 2') that allow RLAL-NZ to opt out of certain disclosure requirements, initially in the first year of reporting only. Those were extended in November 2024. RLAL-NZ will use the time extension to continue working towards fulfilling the requirements in its future reporting.

For the second-year reporting, the adoption provisions employed by RLAL-NZ (referenced in our disclosures, where applicable) are:

- 2. Adoption provision 2: Anticipated financial impacts
- 4. Adoption provision 4: Scope 3 GHG emissions applied partially, excluding Category 15: Investments
- 5. Adoption provision 5: Comparatives for Scope 3 GHG emissions
- 7. Adoption provision 7: Analysis of trends
- 8. Adoption provision 8: Scope 3 GHG emissions assurance

Where relevant, these adoption provisions are stated throughout RLAL-NZ disclosures.

Important information

These climate statements reflect our current views and expectations of future events and have been prepared based on information available to Resolution Life Australasia Limited New Zealand Branch (RLAL-NZ) as at 31 December 2024.

They contain forward-looking statements and statements of opinion, including statements regarding potential climate-related scenarios, risks and opportunities, climate projections, forecasts, and estimates. These statements also include assumptions, forecasts and projections about RLAL-NZ present and future strategies and the environment in which RLAL-NZ will operate in the future. Actual results, performance and outcomes may differ from those forecasted as each of those factors are subject to inherent uncertainty, challenges and risks, and the information available at the time.

While RLAL-NZ has made every effort to fairly present this climate-related disclosure, RLAL-NZ (or any other entity in the Resolution Life Group) provides no representation, guarantee, warranty or assurance about the accuracy, reliability, or completeness of the information contained in these statements. RLAL-NZ does not accept any liability whatsoever for any loss arising directly or indirectly from any use of the information contained in these climate statements.

These climate statements will not be updated for any changes or events occurring subsequently, unless required by law.

This climate disclosure is signed on behalf of Resolution Life Australia Limited New Zealand Branch and is authorised for issue on 30 April 2025.



Rebecca Tindall, New Zealand Chief Executive Officer,
Resolution Life Australasia Limited New Zealand Branch

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Governance

Our approach to governance

RLAL and RLAL-NZ are owned and ultimately governed by the Resolution Life Australasia Non-Operating Holding Company (RLA NOHC), which in turn is a part of Resolution Life Group Holdings (RLGH), a global life insurer and reinsurance business.

In 2024, sustainability reporting and oversight occurred both at Group and Local Boards and Committees. Quarterly Sustainability scorecard reporting continued, alongside the introduction of a RLAL Investment Management Working Group and newly formed RLAL Sustainability Working Group (replacing the RLAL ESG Committee). Both Working Groups include oversight of Sustainability for RLAL-NZ.

Board and Management Committee detail

The RLAL Chief Risk Officer is the responsible executive for RLAL and RLAL-NZ approach to overseeing and monitoring managing climate risks and opportunities, and sustainability performance reporting outcomes. The below provides details on how climate risk and opportunities are governed by Boards and Committees within RLAL and RLAL-NZ.

Figure 1 | Climate Governance Framework¹

| NOHC & RLAL Board | | |
|-----------------------|---------------------------------|-----------------------|
| Board Committees | | |
| Risk & Compliance | Investment | |
| Management Committees | | |
| Risk & Compliance | Asset, Liability and Investment | Sustainability (RLGH) |
| Working Groups | | |
| Sustainability | Responsible Investment | |

¹ The governance framework presented in this report outlines the specific Board and Management Committees responsible for climate-related matters at RLAL and RLAL-NZ and does not encompass our organisation's entire governance structure.

Governance

NOHC & RLAL Board

Chair: Chairperson

Frequency: Meets four times per year and ad hoc as required

The NOHC & RLAL Board schedules concurrent meetings and is responsible in assessing climate change and broader sustainability matters. Its responsibilities remain unchanged from last year. This includes approving policies in relation to sustainability, receiving quarterly scorecard reporting, and ensuring senior management is monitoring and managing financial and non-financial risks, and meeting regulatory requirements. They are also responsible for approving climate-related policies, monitoring investment outcomes and approved strategy and risk appetite statements, which includes climate-related risks.

The NOHC & RLAL Board considers climate-related risks and opportunities when endorsing RLAL and RLAL-NZ strategy, a position that remains unchanged since last year's public disclosures. When managing the firm's strategic ambitions and implementation, the Board reviews how our current practices mitigate climate-related risks or enhance climate-related opportunities, while also assessing if any changes are needed to ensure these practices remain within our defined risk tolerances.

Board Risk & Compliance Committee

Chair: Chairperson

Frequency: Meets four times per year and ad hoc as required

The Board Risk & Compliance Committee is responsible for overseeing the development and implementation of risk management systems and processes designed to identify, manage and mitigate material risks. It provides recommendations to the NOHC & RLAL Board on matters such as the risk appetites and effectiveness of the risk management framework. The Committee also updates the NOHC Board on key risks including those related to climate change through the CRO reports and through ad-hoc reports and analyses. In addition, the Committee ensures a robust risk culture is embedded across the organisation.

Board Investment Committee

Chair: Chairperson

Frequency: Meets four times per year and ad hoc as required

The Board Investment Committee is responsible for overseeing investment portfolio transactions, development and maintenance of our investment strategy, and investment risk management policies. It ensures effective risk management exposure, policies and guidelines are in place. Additionally, the Committee reviews investment management performance and oversees the activities of investment managers. It also oversees and approves our ESG Investment Policy, ensuring alignment with our commitment to responsible and sustainable investing.

Asset, Liability and Investment Committee

Chair: RLAL Chief Investment Officer

Frequency: Meets four times per year and ad hoc as required

The Committee supports the RLAL CEO and RLAL Chief Investment Officer (CIO) with Investment and Asset Liability Management-related decisions under existing delegations on behalf of the RLAL Boards, and where required reviewing and endorsing any matters relating to Trusts of the business. The Committee oversees and monitors financial risks and exposures across RLAL in relation to asset and liability management matters including considerations of climate and sustainability risks. It also monitors investment strategies, performance and risk management of investment and insurance contracts. The Committee also reviews the ESG Investment Policy as required.

Risk and Compliance Management Committee

Chair: RLAL Chief Risk Officer

Frequency: Meets twelve times per year and ad hoc as required

RLA's Risk and Compliance Management Committee oversees risk management across the business. Its role is to ensure the business remains resilient, sustainable and compliant. The quarterly sustainability scorecards, which includes data from RLAL-NZ, are reviewed quarterly by this Committee. The Committee assesses sustainability risks that are raised in line with the Risk Taxonomy.

Management Sustainability Committee (RLGH Committee)

Chair: RLGH Group Chief Operating Officer and RLGH Group General Counsel

Frequency: Meets four times per year

The Resolution Life Group Management Sustainability Committee provides oversight of sustainability activities, ensuring they are conducted in accordance with established policies and standards, and that associated risks are effectively managed. It is responsible for responding to sustainability and climate regulatory requirements, as well as the development and implementation of the sustainability strategy and action plan to drive progress on our commitments. The committee also identifies and develops mitigation plans for climate-related risks and opportunities across the Group. A scorecard, collating information against environmental, social and governance metrics is presented and discussed at each Committee meeting.

Governance

Sustainability Working Group

Chair: Chapter Lead, Corporate Services

Frequency: Meets four times per year

The Sustainability Working Group tracks and reports on broader sustainability outcomes aligned with our Group Policy and strategy, including climate change. It is responsible for gathering RLAL and RLAL-NZ inputs to compile quarterly sustainability scorecards that are reviewed by the Risk & Compliance Management Committee and NOHC Board. It reports progress to the Global Sustainability Committee. The Working Group discusses progress made on climate reporting and monitors trends for ways to improve sustainability outcomes. The Sustainability Working Group's broader responsibilities remain unchanged and include advancing operational change to meet the organisation's sustainability objectives and updating the RLAL Sustainability Policy.

Responsible Investment Working Group

Chair: Chapter Lead, Investment Management

Frequency: Meets twice per year

The RLAL Investment Management Centre of Excellence (CoE) this year formed the Responsible Investment Forum (RIF). The Forum's purpose is to bring together key Investment Management stakeholders to discuss and effectively manage beliefs and commitments to address environmental and social factors in our investments. The RIF provides a platform to discuss and drive forward climate-specific items including our reporting requirements, policy updates, asset manager engagement activities as well as developing and ratifying plans around our strategy and risk appetite. The RIF aligns data-driven decisions and external inputs in reviewing investment standards.

Training on climate issues

The NOHC & RLAL Board consists of highly experienced directors with deep expertise across insurance, finance, actuarial and funds management, enabling effective oversight of climate-related risks and opportunities within our organisation. All Board members have experience leading in a rapidly changing regulatory environment. The experience of these Directors, across listed and non-listed entities, supports RLAL's ability to manage the risk and opportunities from climate change.

RLAL Sustainability Working Group has conducted training on climate disclosure trends and focus, in preparation for this report. The Leadership group continues to deliver to the sustainability objectives and strategy aligned with Resolution Life Group.

RLAL has continued to invest in its people by developing knowledge and building awareness on sustainability risks and opportunities for our business. RLAL aligned with the University of Cambridge Institute for Sustainability Leadership as the approved programme, with a number of employees completing courses both there, and through the PRI Academy for responsible investment training, in 2024. The organisation continues to consider sustainability initiatives that can be adopted to increase awareness and provide training across RLAL.

Sustainability metrics and monitoring

RLAL has continued to improve its approach to sustainability with investment in data, knowledge and processes to support our understanding of impacts from climate change. One area of focus has been understanding our Scope 3, Category 15: Investment emissions data.

The Resolution Life Australasia Remuneration Framework, which considers business performance and risk management in consideration of remuneration setting, does not explicitly link management or director pay to climate-related outcomes.

Strategy

Business model

Resolution Life is a global life insurance group focusing on the acquisition, reinsurance, and ongoing management of portfolios of life insurance policies. We provide reinsurance taking on the risks and responsibilities created by life insurance companies, and we acquire portfolios of existing life and annuity portfolios from established insurers. This in turn allows the primary life insurance market to use capital to sell policies in new, faster growing territories, securing the future of life insurance, which we believe is a societal good. For RLAL-NZ, our business strategy is aligned to the overall RLGH strategy, to focus on ongoing management of life insurance policies.

RLAL-NZ’s market offering is categorised by the following:

- Wealth Protection products (Wealth Protection): death, total permanent disability (TPD), trauma and income protection.
- Savings and Investments products (S&I): traditional participating whole of life and endowment, investment account and investment linked.

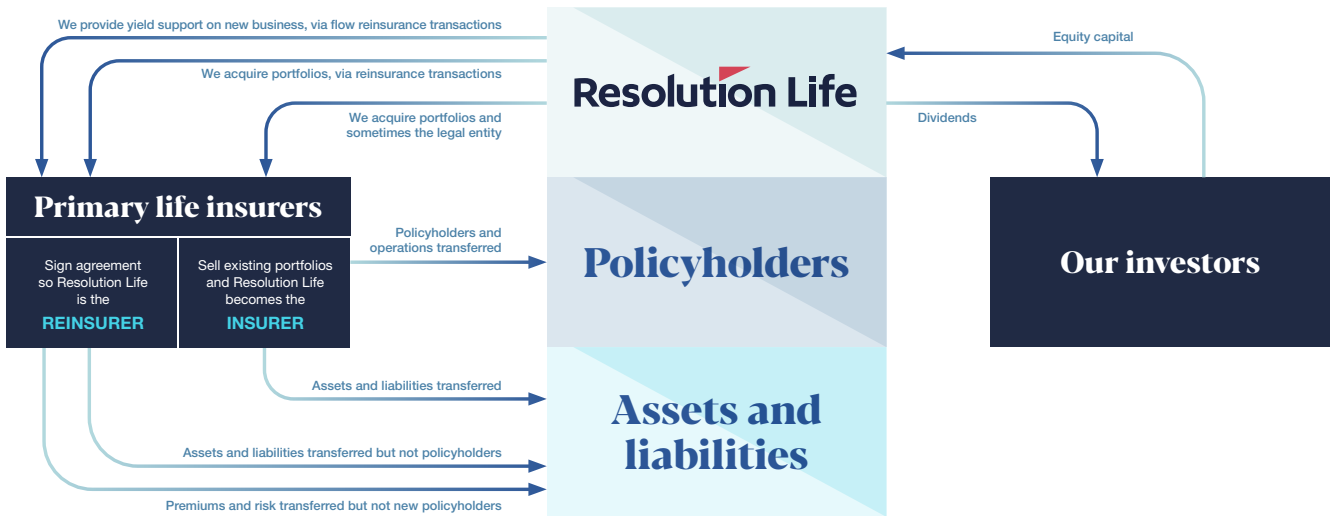
Figure 2 | Resolution Life’s business model

In our business model, we:

Provide reinsurance and acquire high quality in-force portfolios of life and annuity policies from established life insurers who want to simplify and reinvest

Use our deep industry knowledge, and investments in talent and technology, to manage those policies and our operations more efficiently

Actively manage and rotate our assets in a responsible way to generate sustainable returns for our policyholders and investors



Strategy

RLAL aligns to our Group Sustainability framework which reflects our commitment to responsible business practices and our recognition of the growing importance of sustainability across our sector. The framework outlines our three sustainability themes; People, Environment and Communities. These themes – underpinned by sound governance, meeting our compliance and risk management obligations – act as guardrails in our decision making. By adopting this framework, we aim to contribute to a more sustainable future and create long-term value for our stakeholders.

Figure 3 | Resolution Life's Sustainability Strategy



Our work in 2024 that was guided by our sustainability framework included:

- Measuring our operational global greenhouse gas (GHG) emissions and offsetting our global business travel through a partnership with Trees4Travel.
- Updating our supplier code of conduct and due diligence process to prioritise suppliers who are either carbon neutral or have carbon reduction initiatives in place.
- Holding our first Responsible Investment Forum.
- Implementing S&P TruCost as our investment ESG and climate risk platform, providing us with improved access to data needed to inform future strategies.

Strategy

Climate-related impacts²

Time-bound risks and opportunities

RLAL-NZ has identified key climate-related risks and opportunities that are relevant to our business. This encompasses both transition risks – arising from shifts in policy, technology and market dynamics – and physical risks associated with acute and chronic climate impacts. We have also highlighted the opportunities that may be unlocked.

Table 1 | Climate-related impacts (risks and opportunities), and their materiality on customers and RLAL-NZ assets:

- Short-term: 0-3 years
- Medium-term: 3 -10 years
- Long-term: 10+ years

| | Short to medium term | Medium to long term |
|--------------------------------------|--|---|
| Climate-related risks | | |
| Transition risks | <p>Changes in regulation could render assets as non-compliant, potentially generating transaction costs and loss of income when replacing certain assets.</p> <p>A sudden change in investor sentiment against carbon-intensive sectors could have a large impact on asset liquidity and valuation leading to higher unrealised losses in the investment portfolio.</p> | <p>Value and quality of all assets may decline if issuers struggle to adapt or mitigate the impacts of transitioning to a low carbon economy. This leads to the risk of holding 'stranded' assets in carbon-intensive sectors over the long-term if the companies we support via our investment portfolios, highest asset exposure in sectors such as Finance, Industrials and Utilities, are significantly impacted by these transition risks.</p> |
| Physical risks | <p>Reduction in return from certain asset classes such as infrastructure and real estate that may be damaged during extreme weather events and natural disasters such as hurricanes, floods and wildfires.</p> <p>Short-term liquidity risk due to increased mortality, morbidity and hospitalisation due to extreme weather events and natural disasters.</p> <p>Any outsourced business operations in areas with higher levels of physical risk and substandard infrastructure may be at risk due to weather events such as extreme heatwaves or droughts.</p> | <p>Long-term general disruption to the life insurance market due to increased mortality, morbidity and hospitalisation due to extreme weather events and natural disasters.</p> <p>Companies/issuers we are invested in, with business operations concentrated in areas with higher levels of physical risk, may see a decline in equity/debt valuation over the long term.</p> |
| Climate-related opportunities | | |
| Transition opportunities | <p>Maintain transparency and trust with stakeholders through positive reputation with rating agencies, policyholders and investors. This can also lead to greater access to financing, increase attractiveness to investors and potential talent.</p> <p>Partnering with organisations that are committed to achieving net zero in order to lower our own emissions.</p> <p>Higher risk-adjusted return expectations from cleaner assets in our investment portfolios.</p> | <p>Increased risk-adjusted return from investing in technology providers that create/advance solutions to manage transition risk in our industry.</p> <p>Companies/issuers, such as those in the finance industry, that have proactively built resilience and align closely with low-carbon goals could present valuable investment opportunities over the long term.</p> |
| Physical opportunities | <p>Enhanced returns for infrastructure and real estate assets that are resilient to extreme weather events and natural disasters such as floods, hurricanes and wildfires.</p> <p>Maintain transparency and trust with stakeholders through positive reputation with rating agencies, policyholders and investors. This can also lead to greater access to financing, increase attractiveness to investors and potential talent.</p> <p>Higher risk-adjusted return expectations from investment portfolios.</p> | <p>Increased risk-adjusted return from investing in infrastructure projects or real estate that help manage physical risks (e.g. forestry and other carbon capture projects).</p> <p>Companies/issuers that have proactively built resilience against physical risks and align closely with low-carbon goals could present valuable investment opportunities over the long term.</p> |

² RLAL-NZ has employed Adoption Provision 2 of the NZ CS 2, as amended in November 2024, which provides an exemption from disclosing anticipated financial impacts in our second reporting period.

Strategy

Investment and capital deployment approach

When considering climate risk within our investment portfolios, our first line of defence (Investment Management team) requires our asset management partners to consider all factors that may impact an issuing company's ability to pay the relevant coupons, dividends and principal across the lifetime of each asset. This approach requires our asset managers to consider climate risk in a holistic way on a bottom-up basis. The first line of defence is then able to engage on these areas as part of quarterly review meetings with the asset managers on a portfolio level.

More formally, our asset managers' process for integrating and reporting climate-related analysis for their respective portfolios is further discussed as part of an annual ESG questionnaire.

This questionnaire is designed, and answers reviewed by, the Investment Governance Team with the support of our portfolio managers.

Further to the above, portfolio level carbon intensity and climate scenario analysis is then carried out by the Investment Governance Team to assess how exposed the company's investment portfolios are to climate risk. This generates areas of focus to consider more broadly as part of the company's Sustainability Strategy.

RLAL-NZ currently considers funding requirements in its annual business performance review process. For 2024 this included:

- A work programme and resource commitment towards climate-related disclosures
- Supporting employee learning and training in accredited programmes and attending industry events
- Engaging external consultants (Baringa, Deloitte Touche Tohmatsu, Green Moves) to provide the required support for our climate disclosures including greenhouse gas emissions calculations, reporting and assurance.

Climate scenario analysis

RLAL-NZ utilises climate scenario analysis to project potential future climate-related impacts and their implications on our business. The analysis is designed to test severe but plausible scenarios that can test RLAL-NZ business strategy and resilience. It considers a range of scenarios to assess the potential physical and transitional risks. Our Strategy section also outlines our time horizons to assess the potential impacts of climate-related risks which include short-term (0-3 years), medium-term (3-10 years), long-term (10+ years).

During 2024, we performed a qualitative climate scenario analysis heat mapping exercise to support us in identifying these risks and opportunities across short-, medium- and long-term time horizons. This was a standalone exercise, and we will look to embed this into our strategy processes in due course. The scenario analysis has been signed off by the NOCH & RLAL Board. Due to current data limitations, we were unable to provide quantitative information regarding the specific financial impacts of physical and transition impacts identified. We are actively working to refine our data collection and analysis methods to enable more precise quantification of financial impacts in the future.

Figure 4 | Identified significant climate-related risks and opportunities to RLAL-NZ in 2024

| Scenario | Climate risk or opportunity | Impact type | Time horizons where these impacts become significant to RLAL-NZ | | |
|----------------------------|---|------------------------------|---|--------|------|
| | | | Short | Medium | Long |
| Orderly (1.5°C) | Changing customer and employee preferences | Transition risk | | | |
| | Integrate climate risks and opportunities into investment decisions | Opportunity | | | |
| | Early adopters in the climate change space | Opportunity | | | |
| Too Little Too Late (>2°C) | First order insurance risk – changing claim patterns | Physical risk | | | |
| | Integrate climate risks and opportunities into investment decisions | Opportunity | | | |
| Hothouse (>3°C) | First order insurance risk – changing claim patterns | Physical risk | | | |
| | Second order insurance risk – impacts on finances of customers | Transition and physical risk | | | |
| | Technology adoption – investment | Transition risk | | | |
| | Physical financial systems risk | Physical risk | | | |
| | Understand climate risks from an insurance loss perspective | Opportunity | | | |

■ Long-term (out to 2050+)
 ■ Medium-term (out to 2030)
 ■ Short-term (out to 2025)

Strategy

Scenarios used

In our 2023 Climate-Related Disclosures report, we performed qualitative climate scenario analysis across three scenarios and time horizons that were selected by the Financial Services Council. We reported in 2023 that we would review this scenario analysis every three years, the full outcomes can be reviewed in RLAL-NZ Climate-Related Disclosures³.

In 2024, we elected to conduct a deep dive on the qualitative scenario analysis of different scenarios from the International Energy Agency (IEA):

- **Net Zero emissions by 2050 (NZE)** – shows a narrow but achievable path for the global energy sector to achieve net zero CO₂ emissions by 2050, with advanced economies reaching net zero in advance of others. It is consistent with limiting global temperature rise to 1.5°C.
- **Announced Pledges Scenario (APS)** – takes into account all recent government commitments relating to climate change, including Nationally Determined Contributions (NDCs), and assumes they will be met in full and on time. It is consistent with limiting global temperature rise to 1.7°C.

We chose the IEA scenarios because the qualitative narrative available is much more extensive at a sector level. This has allowed us to go into granular detail for each sector which we otherwise may not have been able to do using other scenarios. We have also aligned our scenario analysis to RLGH, who have also used the IEA scenarios.

Methodology

Climate risks and opportunities were identified at a sector level at different time horizons across various assessment lenses, including Policy, Technology, Reputation and Market (aligned to TCFD categories), out to 2050. Each sector receives a risk and opportunity score ranging between 1 (“low” impact) and 4 (“high” impact) as per the scoring scales below, with the overall sector score an average across assessment lenses and time horizons.

Our investment portfolio was mapped to these sector scores to identify where the portfolio is concentrated, and where the risks and opportunities might lie.

Figure 5 | Scoring scale for risks and opportunities



3 Our RLAL-NZ Climate-Related Disclosures can be found on our website or through the following link: https://resolutionlife.co.nz/sites/newzealand/files/pdf_document/NZ/RLAL_NZ_Climate_Related_Disclosures_2023.pdf

Strategy

Results

The results in table 2 reflect an initial assessment of scenario analysis and supports us prioritising areas of focus for additional risk and opportunities analysis, such as performing risk and opportunity analysis of individual issuers within the portfolio, and for further embedding into risk management and strategic planning processes.

We have presented the findings from our scenario analysis in a heatmap below. The data shows a sector-level overview of the key findings from our transition risk and opportunity assessment. It does not capture physical risks and opportunities. Given the diversity of our investments which span multiple sectors, we have highlighted specific industries in the heatmap that could face higher risks and opportunities based on our qualitative scenario analysis methodology. This approach ensures that we have a comprehensive understanding of sectors we may invest in to allow us to make informed decisions.

Table 2 | Subset of material sectors analysed

| Sectors | Risk Score – APS | Risk Score – Net Zero | Opportunity Score – APS | Opportunity Score – Net Zero |
|--|---------------------|--------------------------|----------------------------|---------------------------------|
| Air & Space Transport | -1.8 | -2.5 | 1.3 | 1.4 |
| Business, Cultural & Civil Services | -0.5 | -0.5 | 0.5 | 0.5 |
| Coal | -1.8 | -2.2 | 0.7 | 0.8 |
| Electricity Supply | -0.9 | -1.3 | 1.7 | 2.4 |
| Finance & Insurance | -1.3 | -1.6 | 1.2 | 1.4 |
| Mining & Metals (excl. Coal and Steel) | -1.6 | -1.7 | 1.8 | 2.3 |
| Oil and Gas | -1.9 | -2.4 | 1.2 | 1.3 |
| Power Production – Fossil Fuels Segment | -2.2 | -2.6 | 1.0 | 0.9 |
| Power Production – Low Carbon | -0.8 | -1.0 | 2.1 | 2.6 |
| Real Estate | -1.6 | -1.9 | 1.9 | 2.5 |
| Road Transport | -1.3 | -2.0 | 1.5 | 2.1 |
| Software, Technology, Hardware and Equipment | -0.5 | -0.6 | 1.0 | 1.1 |

Next steps

We plan to continue leveraging and enhancing our scenario analysis capabilities during 2025. We have already begun exploring potential approaches, such as quantitative scenario analysis modelling, whilst acknowledging that our capabilities will need to continue to be enhanced over the coming years, including:

- Improvements to our climate-related data
- Developing a bottom-up quantitative climate scenario analysis approach
- Developing a plan for the investment portfolios to meet certain climate targets

Our transition plan development

We recognise the need to develop a comprehensive transition plan and are working towards this. As we lay the groundwork, our efforts focus on evaluating our existing performance committees, risk controls, and operational processes to identify the necessary inputs for an effective and robust transition plan. Over the past year, we have further developed necessary climate change planning tools. This includes improving our greenhouse gas inventory and exploring ways to integrate climate change considerations into our stress-testing framework.

Furthermore, we are prioritising engagement with internal and external stakeholders to align on transition priorities, building awareness and expertise across teams, and continuing to assess sector-specific pathways to achieve a lower carbon future. We are also focusing on improving data collection and methodologies, particularly around emissions.

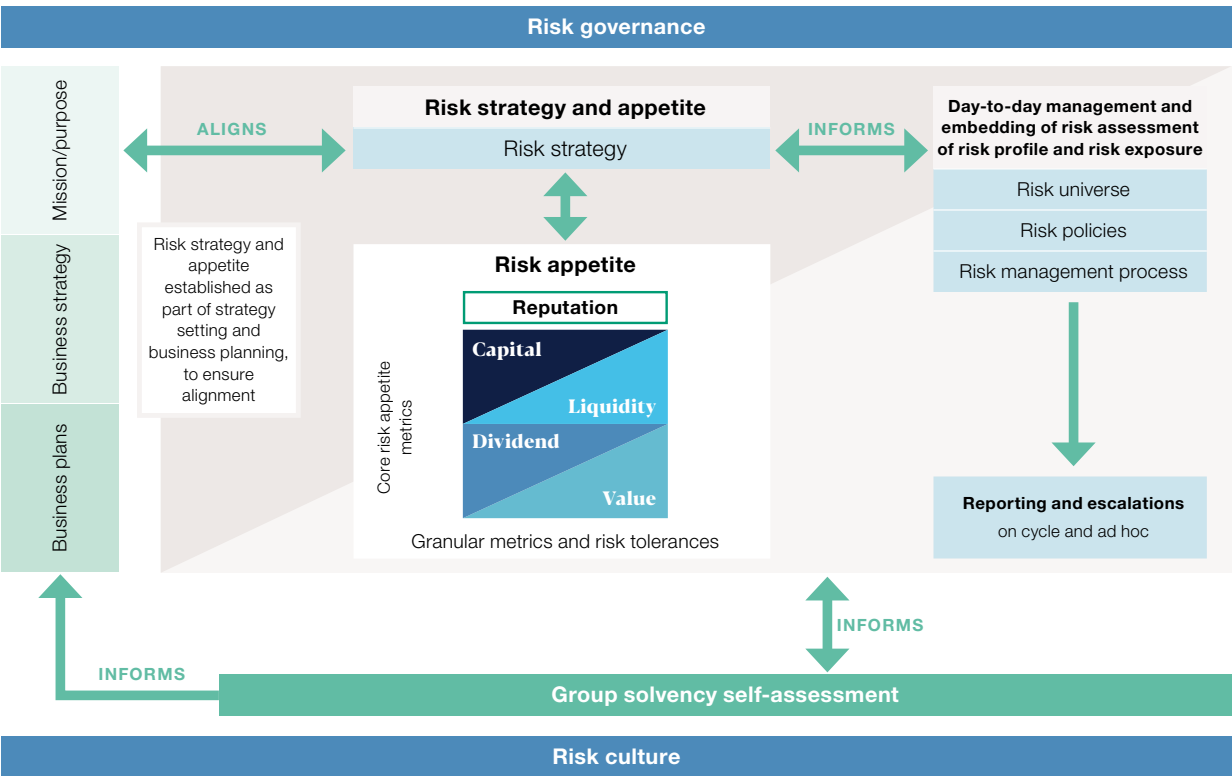
In December 2024, Resolution Life announced the acquisition of 100% of its shares by Nippon Life. As a result of this transaction, and pending regulatory approvals, Resolution Life's Australian and New Zealand business will combine with Nippon Life's Australian company, MLC Life Insurance, to form a merged group. Following the successful completion of this transaction, it is anticipated that the new merged entity will establish policies, procedures and performance targets for the new entity. Nippon Life's global reach and international presence will also provide Resolution Life with access to a broader range of mature policies and frameworks in areas such as Sustainability to assist in accelerating our transition planning efforts.

Risk Management

Overall approach to managing risks

The RLGH Risk Management Framework (RMF) provides a holistic and consistent way in which to identify, measure, manage, monitor and report on all types of risks within our organisation, including climate risks. RLAL-NZ has adopted this framework, allowing for materiality and proportionality, considering the nature, scale and complexity inherent to our business.

Figure 6 | Resolution Life Risk Management Framework



Risk Management

Strong risk management is at the heart of our strategy. The RMF sets out the minimum requirements in respect of the key risk management processes. Specific Investment Risk capability and playbooks have been developed by the organisation to ensure we have the appropriate capabilities to manage current risks and to monitor changes.

RLAL-NZ's risk strategy and risk preferences are aligned with its business strategy. The risk strategy sets out the risk philosophy, desired risk outcomes and risk preferences. It sets out qualitative statements and provides visibility on how risk management is incorporated consistently across all levels of the business. The risk strategy (which includes climate risks) is reviewed and approved annually by the Board as part of the strategy review and strategic planning process.

Risk universe

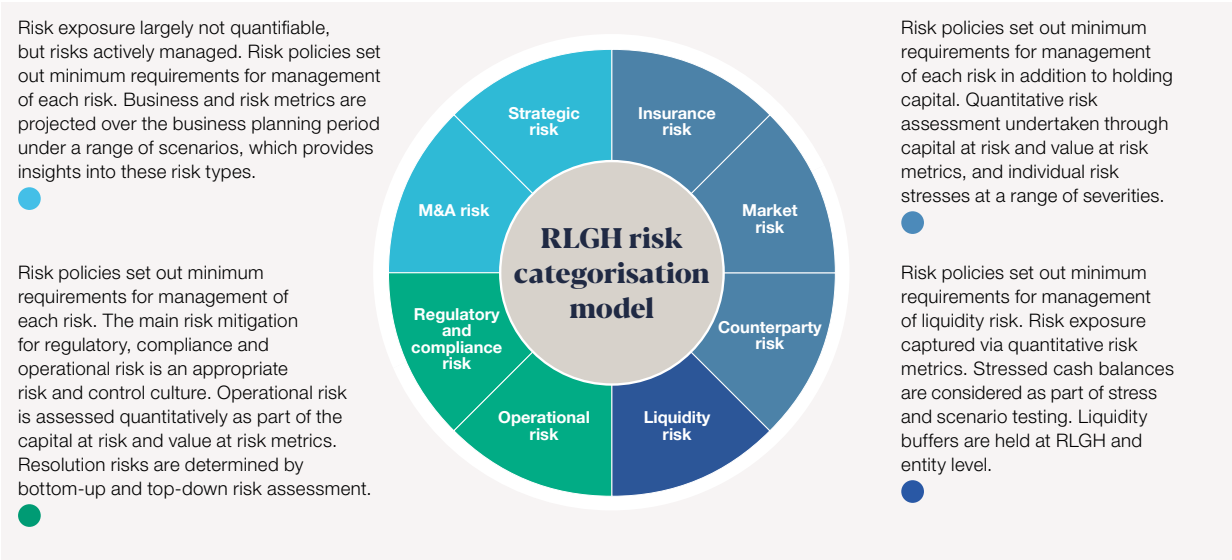
RLAL-NZ has processes to maintain a catalogue identifying all reasonably foreseeable and relevant risks facing the business, including climate risk. The potential impact and materiality of these risks are regularly assessed throughout the year in accordance with a risk matrix that considers both financial and non-financial risk impacts. The measurement process includes an evaluation or comparison of the risk exposure to the stated risk appetite tolerances, as well as mitigating factors that may

bring a risk within tolerance. During 2024, RLAL-NZ invested time and resources analysing the climate change risk profile of the investment portfolios for the first time. The leadership teams spent time to understand the outputs and conclusions of this work and to further define the company's climate risk management strategy and appetites which continue to evolve. We plan to develop a specific climate risk appetite statement over the course of the next two years.

The risk wheel below sets out how RLAL-NZ measures and manages its material risks. RLAL-NZ measures and reports on risk exposures with relevant metrics, reported in a consistent format and on a regular basis. This provides a sound basis for monitoring the company's risk profile in relation to its risk appetite. Trends, as well as the absolute risk level, are important indicators. In recognising the need to consider climate change within our business, Sustainability has been included as a Level 2 risk and sits within the strategic risk category in our risk universe. Sustainability is classified as such due to its long-term impact on business sustainability, climate-related risks and opportunity considerations, regulatory compliance, and financial stability, making it important enough to be a standalone category within the risk taxonomy for dedicated management and accountability.

Stress and scenario testing (including climate risk stress testing) is performed at least annually.

Figure 7 | Risk categorisation at Resolution Life



Risk Management

Risk policies

The Sustainability Policy is a component of the company's governance framework. In developing the policy, we considered a range of international standards to guide our approach and have committed to continuously monitor the evolving risk and regulatory landscape from both a global and local perspective to ensure our business operations are in line with current standards. The policy sets out controls and minimum standards including ensuring RLAL-NZ understands where its sustainability practices can be improved, both in terms of design and implementation. RLAL-NZ supports Resolution Life Group in complying with PRI disclosure requirements and demonstrates to external stakeholders that it meets its sustainability exposure reporting requirements.

Risk management process

We manage climate change risk within our risk framework in the same manner as other key risks. Climate change risk is subject to the same identification, measurement, management, monitoring and reporting requirements as the other risks that we manage. RLAL-NZ now records climate change risks in a consistent manner in our risk system, which will enable consideration and mitigation of climate change risks effectively. The new risk system went live in October 2024.

RLAL-NZ's risk management programme (RMP) is comprised of RLAL Risk Management Strategy and Framework and the RLAL Risk Guardrails (Risk Appetite Statement). The RMP, together with other specific policies and procedures, ensure consideration of the impact of climate risks on the investment portfolio is addressed sufficiently.

Risk identification

The company has a process to maintain a catalogue identifying all reasonably foreseeable and relevant risks facing the business. This process includes regularly evaluating the potential impact and materiality of all the identified risk types, including risks related to climate change.

Risk measurement/assessment

The company has processes to evaluate and measure all identified risks, both qualitatively and, where appropriately, quantitatively, regularly throughout the year. The measurement process includes an evaluation or comparison of the risk exposure to the stated risk appetite tolerances and considers mitigants currently in place.

The RMF was updated in 2024 to include Sustainability Risk within the overall company risk taxonomy. In addition, we have defined high-level principles to guide our Sustainability Strategy within our Sustainability Policy. As such, climate-related risks are assessed in the same way as all our other types of risks.

Risk monitoring

Risk exposures are monitored on an ongoing basis. Where appropriate, control points are established for heightened monitoring, and limits are established that should not be breached. The risk management system includes early warnings or triggers that allow timely consideration of, and adequate response to, material risks. Key risk indicators are used to monitor risk on a day-to-day basis allowing for the proactive management of risks.

Risk monitoring and reporting is carried out by the responsible managers in the first line of defence, with appropriate oversight and assurance from the second and third lines of defence.

Three lines of defence model

To support the execution of its risk management processes, RLGH has adopted a 'three lines of defence' model. RLAL-NZ uses this model.

- The first line is the owner of the business area, who owns and takes responsibility for identifying, assessing and reporting on the different risks within their business area. The business manager is also responsible for designing and maintaining effective processes and controls. In the context of climate risk, their role is essential in integrating climate considerations into business strategies and operations.
- The second line, consisting of the Risk and Compliance teams, plays a crucial role in climate risk management by developing risk management frameworks, policies and procedures, and ensuring compliance with regulatory requirements and internal standards. These teams design and implement the risk framework and recommend the company's risk appetite to the Board. They also monitor and challenge the actual risk profile of the company and each entity against the preferred level of risk appetite. Furthermore, they assess the effectiveness of the control environment and report thereon to the Risk Committee.
- The third line is performed by internal audit, which provides independent assurance of the effectiveness of governance, risk management practices and the control environment, including how climate risks are being managed across the first and second lines of defence.

Risk Management in the value chain

No parts of our value chain are excluded as Risk Management is required across the entirety of RLAL-NZ.

Metrics & Targets

Our emissions reporting

We have been partnering with Green Moves, an Australian sustainability consultancy, since 2022 to standardise and consolidate our global environmental operational data. In 2023, we publicly disclosed our operational emissions data for the first time and in 2024 we again measured our operational emissions. Initially we defined our baseline global carbon footprint using 2021 emission data, however in 2021 our business activities were significantly affected by COVID-19, meaning data from that year was not a reasonable base for measuring future progress. Therefore, in 2023, we decided to change our baseline year to 2022, which will allow for a more realistic and consistent comparison over time.

In 2024, we began calculating our financed emissions, which represent the largest proportion of RLAL-NZ's overall emissions. We plan to continue our analysis internally and will look to share this information publicly in future reporting.

In addition to our emissions data, we have scorecards that are populated by each of our insurance entities. These are presented to our Working Group, Risk & Compliance Committee and RLGH Sustainability Management Committee on a quarterly basis. Data collected in the scorecards allow us to determine our areas of focus.

Metrics & Targets

Scope 1, 2, 3 emissions (excluding investments)⁴

| Emissions Source | Base Year CY 2022 tCO ₂ e | CY 2023 tCO ₂ e ⁵ | CY 2024 tCO ₂ e |
|--|--|--|-------------------------------|
| Total Emissions Scope 1 (Direct) | 0.0 | 0.0 | 0.0 |
| Electricity (location-based) | 8.0 | 5.5 | 2.2 |
| Total emissions Scope 2 (indirect from electricity) | 8.0 | 5.5 | 2.2 |
| Category 1: Food & catering | 1.9 | 6.0 | 2.4 |
| Category 1: ICT | 1,326.6 | 167.0 | 28.0 |
| Category 1: Office Services & equipment | 59.0 | 567.0 | 1.0 |
| Category 1: Post & courier | 0.0 | 555.5 | 446.1 |
| Category 1: Professional services | 73.5 | 2,487.5 | 2,531.7 |
| Category 1: Water | 0.0 | 0.0 | 0.0 |
| Category 3: Fuel & Energy T&D | 0.6 | 0.6 | 0.2 |
| Category 5: Waste | 10.3 | 1.1 | 0.2 |
| Category 6: Travel – Accommodation | 1.4 | 0.6 | 7.1 |
| Category 6: Travel – Air | 18.0 | 43.1 | 66.4 |
| Category 6: Travel – Land | 0.7 | 0.1 | 0.4 |
| Category 7: Staff commute | 33.7 | 33.8 | 47.6 |
| Category 7: Working from Home | 9.8 | 7.1 | 3.1 |
| Category 8: Leased Assets | 0.0 | 0.4 | 3.0 |
| Total emissions Scope 3 (indirect other sources) | 1,535.0 | 3,869.9 | 3,137.1 |
| Total Scope 1, 2 and 3 emissions | 1,543.6 | 3,875.5 | 3,139.3 |
| Total Scope 1, 2 and 3 emissions (Location-based) | 1,543.6 | 3,875.5 | 3,139.3 |
| Total Emissions including Credits tCO₂e | 1,543.6 | 3,027.6 | 2,970.8⁶ |

Emissions intensity

We measure emission intensity as tCO₂e (tonnes of carbon dioxide equivalent) per \$m/NZD revenue.

| FY23 | FY24 |
|------|------|
| 7.91 | 7.36 |

GHG emissions data

Our GHG emissions inventory is prepared using the operational control approach under The GHG Protocol: A Corporate Accounting and Reporting Standard and the International Standards Organisation ISO 14064-1:2018. This GHG inventory has been subject to independent assurance for Scope 1 and 2 emissions data only.

Emission factors used for this inventory were obtained from the following sources:

- New Zealand Government Emission Factors 2024
- NZ spend based factors from 'thinkstep' ANZ for 2024
- UK GHG Conversion Factors 2024

Priority was given to New Zealand-specific emission factors, where available. Global Warming Potential ('GWP') values were obtained from the Intergovernmental Panel on Climate Change ('IPCC') Fifth Assessment Report (2014). The use of these values are in alignment with the United Nations Framework Convention on Climate Change ('UNFCCC').

The consolidation approached used to report on GHG Emissions continues to be Operational Control.

Scope 1 Emissions All material Scope 1 emissions have been reviewed and there are no Scope 1 emissions to account for this period. RLAL-NZ does not own assets or have operational control over assets that would be deemed Scope 1.

Scope 2 Emissions utilises data from electricity measured in kWh from energy bills directly procured and in control of RLAL-NZ Branch. The electricity data provided is directly from utility companies and accuracy level is high. The only assumption is that the data provided by the utility company is accurate and correct.

We disclose Scope 2 emissions using a location-based method only. We expect to report a market-based method in the future as we transition to procure electricity through supplier specific contracts, renewable energy certificates or similar market instruments that will reduce our emissions profile.

⁴ RLAL-NZ has employed Adoption Provision 4 of the NZ CS 2, as amended in November 2024, which provides a partial exemption from disclosing Scope 3 GHG emissions, in this case we not reporting on Scope 3 Category 15 Investments, in our second reporting period. RLAL-NZ has also employed Adoption Provision 5 and 7 of the NZ CS 2, as amended in November 2024, which provides an exemption from disclosing comparatives for Scope 3 GHG emissions in our second reporting period, an analysis of main trends in our second reporting period, respectively. RLAL-NZ has employed Adoption Provision 8 of the NZ CS 2, as amended in November 2024, which provides an exemption from including scope 3 GHG emissions disclosures within the scope of the assurance engagement for accounting periods ending before 31 December 2024.

⁵ During the preparation of our 2024 Climate-related Disclosure, a classification error was identified with leased assets incorrectly reported under Scope 2 emissions. Upon review of our 2024 emissions, these have been reclassified to Scope 3, Category 8: Leased Assets. 2023 Scope 2 emissions disclosed 6.5 tCO₂e. The 2023 scope 3 emissions disclosed 3,869 tCO₂e and the 2023 Total Scope 1, 2 and 3 emissions (Location) was 3,874.9 tCO₂e. Comparative information for the 2023 reporting period has been restated in this disclosure.

⁶ Total Emissions with credits applied equates to 168 tCO₂e less in 2024. This refers to carbon credits applied where reputable carbon offsets have been purchased and retired on behalf of RLAL-NZ, or where suppliers in the supply chain have been verified carbon neutral for Scope 1 and 2 emissions.

Metrics & Targets

Scope 3 Category Emissions are stated where there is use and data to report on, the following is of note:

- **Category 1:** Purchased Goods and Services. No reporting in place for tracking paper use. Reporting for Category 1 has been provided from Profit and Loss data and includes spend for purchase of paper and related products.
- **Category 3:** Fuel and Energy. Data from utilities for purchased electricity transport and distribution is included and originates from energy bills provided by energy retailer. Accuracy level is high. Data and assumptions for base building energy and coworking office have been included in Scope 3 under category 8 Leased Assets due to the lack of operational control and ability to influence the procurement of energy.
- **Category 5:** Waste from Operations is measured monthly and total emissions calculated annually. This data is provided by Building Management cleaning contractor and the assumption made that the data is accurate.
- **Category 6:** Business Travel. Data used is kms travelled per person/class/distance and hotel nights stayed per person, taxi and other land travel calculated using either kms/mode travelled or \$ values. Data is from our travel management reporting and profit and loss reports. Credible offsets have been purchased to offset all travel and neutralise emissions from this category.
- **Category 7:** Staff Commute and Working from Home. The staff commute data was based on a 2024 survey that measured length of travel, taking into account working from home days and only included travel to and from the relevant office for the number of days travelled. This survey data was extrapolated over the RLAL-NZ workforce to provide a final impact. The assumption made is that data obtained from survey provides an accurate representation of the modes and distance travelled to and from the office and WFH days.
- **Category 8:** This includes the base building energy and estimated energy from shared working spaces (both have been calculated using the asset-based method). Based building accuracy level is high and energy data provided by the building management. The shared office space energy use is an estimate provided by Urban Hub and no further details are available. Assumption made is that the data provided by Urban Hub is accurate.
- **Category 15:** Investments. Data is excluded and not disclosed for this reporting period.

Total emissions including credits

Total emissions with credits include carbon neutral certified third-party service providers, providers who have publicly reported they are carbon neutral for Scopes 1 and 2, and travel carbon credit offsets purchased by RLGH through Zero Group (Certified Emission Reduction Credits), to neutralise emissions from all travel.

Limited Assurance

FY24 GHG emissions data relating to Scope 1 and 2⁷ only and has been the subject of a limited assurance engagement with Deloitte Touche Tohmatsu. More information on the assurance and scope can be found in the limited assurance report provided in Appendix One.

Industry-based metrics used

As we are using Adoption Provision 4 for Scope 3, Category 15: Investments. We are not disclosing industry-based metrics at this time such as the weighted average carbon intensity (WACI) in this year's report, but we will be reviewing this in our subsequent reports as we look to enhance our Scope 3 emissions reporting.

Transition and physical risk exposure

Transitional Risk Exposure

Carbon pricing is one of the key transition risks. To help navigate this, our independent provider of climate-related market analysis has developed a dataset projecting possible future carbon prices. This dataset allows for stress testing of an investee's ability to manage potential costs over time. Central to this assessment is the quantification of an Unpriced Carbon Cost (UCC), which is the difference between what a company pays for emitting carbon today and what it may pay in the future.

The UCC varies depending on the industry, the geographic regions where emissions occur, the selected scenario, and the reference year. Both the High and Moderate scenarios anticipate that by 2050, carbon pricing will reach levels necessary to limit global warming to within 2°C above pre-industrial levels, though the Moderate scenario assumes delayed action in the short term. The Low scenario, while not aligned with the 2°C target, is based on the implementation of Nationally Determined Contributions. These scenarios are informed by research from the OECD and IEA.

For this assessment, RLAL-NZ has selected the medium timeframe of 2030, given the first period of Residual High Risk, for all three scenarios. The results are provided below.

High Scenario: EBITDA at Risk = **0.8%**

Medium Scenario: EBITDA at Risk = **0.75%**

Low Scenario: EBITDA at Risk = **0.49%**

When compared with the scenarios included in our 2023 report, there has been an increase in the EBITDA⁸ at Risk in our Low and Medium scenarios, while the figure for the High Scenario has declined slightly. We attribute this to a change in the make-up of our portfolios, as well as an improvement in the coverage we now have within the database we use for climate-related analysis.

⁷ RLAL-NZ has employed Adoption Provision 8 of the NZ CS 2, as amended in November 2024, which provides an exemption from including Scope 3 GHG emissions disclosures within the scope of the assurance engagement for accounting periods ending before 31 December 2025.

⁸ The reported findings using the EBITDA measurement is based on RLA's full security look through holdings across the New Zealand business. For ESG disclosures, RLA is currently utilising S&P's CapIQ Pro platform. The underlying proprietary ESG security data is provided and collated by S&P and aggregated/calculated applying worldwide ESG standards for reporting.

Metrics & Targets

Physical Risk Exposure

To assess the physical impacts of climate change, we conducted an assessment for the medium term (2030) using two scenarios from the Intergovernmental Panel on Climate Change (IPCC): SSP1 – 2.6 and SSP3 – 7.0.

These scenarios were analysed against a 1.5°C scenario, and a 3.0°C or greater scenario.

The physical risk assessment framework considers eight major climate hazards: wildfires, extreme cold, extreme heat, water stress, coastal flood, river line flood, tropical cyclone and drought.

The assessment produces two key outputs: Exposure Scores – which provide a point-in-time measure of exposure to climate hazards – and Financial Impacts – which represent the projected financial consequences of changing climate hazard exposure relative to a baseline, expressed as potential climate-related losses such as those from capital expenditure, operational expenditure or business interruptions.

Both metrics are calculated as investment-weight averages of constituent scores/impacts at the portfolio or benchmark level. The results of the assessment using the 2030 timeline indicate:

1. For the **Low SSP1 – 2.6 scenario**, a **Physical Risk Exposure Score** of **12.77** and a **Financial Impact** of **1.89%**.
2. For the **Medium-High SSP3 – 7.0 scenario**, a **Physical Risk Exposure Score** of **13.37** and a **Financial Impact** of **1.96%**.

In each case, the Financial Impact is broadly in line with the metrics reported in last year's statement, however we have experienced a decline in the Physical Risk Exposure Scores. Over the course of 2024, RLAL-NZ has worked to improve our coverage ratio within the database we use for climate-related analysis. At the same time, there has been transition of assets within our New Zealand portfolios. These two factors have contributed to a decline in the Physical Risk Exposure Score.

Capital investment deployment

Our Investment Management team requires our Asset Management Partners to consider climate risk in a holistic way on a bottom-up basis. A more detailed description of this approach can be found in the Strategy section of this report on page 10. Our funding into the monitoring and reporting on climate change impacts continues to be allocated within our operational budgets.

Internal emissions price

We do not currently implement an internal price for emissions.

Climate-linked remuneration

At present, our remuneration framework is not linked to managing climate-related risks and opportunities.

Targets and Performance Indicators

As Resolution Life is a young company, we are in the early stages of our sustainability journey. At this point, our focus has been on measuring our global operational emissions, improving our data quality, offsetting our business travel, and responsible investment.

We have been measuring our global operational GHG emissions since 2021. In 2024, this is the first year we invested time to measure our Scope 3, Category 15: Investments. This information will allow us to be informed and address gaps in data accuracy in preparation for future reporting.

We continue to seek to minimise our carbon emissions, however we are yet to set specific carbon reduction targets for several reasons, including our own growth journey and changing business ownership.

We do not currently use other key performance indicators to measure and manage climate-related risks and opportunities.

Appendix

Independent limited assurance report on Selected Greenhouse Gas ('GHG') Disclosures included within the Climate Statements

To the Shareholders of Resolution Life Australasia Limited –
New Zealand Branch

Limited assurance conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the gross GHG emissions, additional required disclosures of gross GHG emissions, and gross GHG emissions methods, assumptions and estimation uncertainty, within the scope of our limited assurance engagement (as outlined below), included in the Climate Statements of Resolution Life Australasia Limited – New Zealand Branch (the 'Company') and its subsidiaries (the 'Group') for the year ended 31 December 2024 (the 'Selected GHG Disclosures'), are not fairly presented and not prepared, in all material respects, in accordance with Aotearoa New Zealand Climate Standards ('NZ CSs') issued by the External Reporting Board ('XRB'), as explained on pages 17 to 18 of the Climate Statements.

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Appendix

Scope of assurance engagement

We have undertaken a limited assurance engagement over the Selected GHG Disclosures on pages 17 to 18 of the Climate Statements for the year ended 31 December 2024:

| Subject matter: Selected GHG Disclosures | Reference ¹ |
|---|------------------------|
| GHG emissions: gross emission in the metric tonnes of CO ₂ e classified as: <ul style="list-style-type: none"> • Scope 1 • Scope 2 (calculated using the location-based method) | Page 17 |
| Additional requirements for the disclosure of gross GHG emissions per paragraph 24 of Aotearoa New Zealand Climate Standard 1: <i>Climate-related Disclosures</i> ('NZ CS 1'), being: <ul style="list-style-type: none"> • The statement describing the GHG emissions have been measured in accordance with International Standard ISO 14064-1 <i>Greenhouse gases – Part 1: Specification with guidance at the organisation level for quantification and reporting of greenhouse gas emissions and removals</i> ('ISO 14064-1:2018') and the <i>Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard</i> (2004) (the 'GHG Protocol'); • The disclosure that the GHG emissions consolidation approach used is operational control. • Sources of emission factors and the global warming potential ('GWP') rates used or a reference to the GWP source; and • The summary of specific exclusions of sources, including facilities, operations, or assets with a justification for their exclusion. | Pages 17 to 18 |
| Disclosures relating to GHG emissions methods assumptions and estimation uncertainty per paragraphs 52 to 54 of Aotearoa New Zealand Climate Standard 3: <i>General Requirements for Climate related Disclosures</i> ('NZ CS 3'): <ul style="list-style-type: none"> • Description of the methods and assumptions used to calculate or estimate GHG emissions, and the limitations of those methods. • Description of uncertainties relevant to the Branch's quantification of its GHG emissions, including the effects of these uncertainties on the GHG emissions disclosures. | Pages 17 to 18 |

¹ Page numbers are based on the Branch's prior year reporting and will be updated to reflect the current year Climate-related Disclosure Report page numbers when we issue our report.

Our limited assurance engagement does not extend to any other information included, or referred to, in the Climate Statements on pages 17 to 18. We have not performed any procedures with respect to the excluded information and, therefore, no conclusion is expressed on it.

Other matter – comparative information

The comparative GHG disclosures (that is GHG disclosures for the periods ended 31 December 2023 and 31 December 2022) have not been the subject of an assurance engagement undertaken in accordance with New Zealand Standard on Assurance Engagements 1: *Assurance Engagements over Greenhouse Gas Emissions Disclosures* ('NZ SAE 1'). These disclosures are not covered by our assurance conclusion.

Directors' responsibilities for the GHG disclosures

Directors are responsible for the preparation and fair presentation of the Selected GHG disclosures in accordance with NZ CSs, which includes determining and disclosing the appropriate standard or standards used to measure its GHG emissions. This responsibility includes the design, implementation and maintenance of internal controls relevant to the preparation of GHG disclosures that are free from material misstatement whether due to fraud or error.

Inherent uncertainty in preparing Selected GHG Disclosures

Non-financial information, such as that included in the Group's Climate Statements, is subject to more inherent limitations than financial information, given both its nature and the methods used and assumptions applied in determining, calculating, and sampling or estimating such information. Specifically, as discussed on pages 17 to 18 of the Climate Statements, GHG quantification is subject to inherent uncertainty because of incomplete scientific knowledge used to determine emissions factors and the values needed to combine emissions of different gases.

As the procedures performed for this engagement are not performed continuously throughout the relevant period and the procedures performed in respect of the Group's compliance with NZ CSs are undertaken on a test basis, our limited assurance engagement cannot be relied on to detect all instances where the Group may not have complied with the NZ CSs. Because of these inherent limitations, it is possible that fraud, error or non-compliance may occur and not be detected.

In addition, we note that a limited assurance engagement is not designed to detect all instances of non-compliance with the NZ CSs, as it generally comprises making enquires, primarily of the responsible party, and applying analytical and other review procedures.

Our responsibilities

Our responsibility is to express an independent limited assurance conclusion on the Selected GHG Disclosures based on the procedures we have performed and the evidence we have obtained.

We conducted our limited assurance engagement in accordance with New Zealand Standard on Assurance Engagements 1: *Assurance Engagements over Greenhouse Gas Emissions Disclosures* ('NZ SAE 1') and International Standard on Assurance Engagements (New Zealand) 3410: *Assurance Engagements on Greenhouse Gas Statements* ('ISAE (NZ) 3410'), issued by the XRB. These standards require that we plan and perform this engagement to obtain limited assurance about whether the Selected GHG Disclosures are free from material misstatement.

Appendix

Our independence and quality management

We have complied with the independence and other ethical requirements of NZ SAE 1, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

We have also complied with the following professional and ethical standards:

- Professional and Ethical Standard 1: *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)*;
- Professional and Ethical Standard 3: *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* which requires us to design, implement and operate a system of quality management including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements; and
- Professional and Ethical Standard 4: *Engagement Quality Reviews*.

Other than in our capacity as assurance practitioner and our role as the statutory auditor of the financial statements, our firm also carries out other assignments for the Group in the area of taxation advice. These services have not impaired our independence as assurance practitioner of the Group. In addition to this, partners and employees of our firm deal with the Group on normal terms within the ordinary course of trading activities of the business of the Group. Our firm has no other relationship with, or interest in the Group.

As we are engaged to form an independent conclusion on the Selected GHG Disclosures prepared by the Group, we are not permitted to be involved in the preparation of the GHG information as doing so may compromise our independence.

Summary of work performed

Our limited assurance engagement was performed in accordance with NZ SAE 1 and ISAE (NZ) 3410. This involves assessing the suitability in the circumstances of Group's use of NZ CSs as the basis for the preparation of the Selected GHG Disclosures, assessing the risks of material misstatement of the Selected GHG Disclosures whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the Selected GHG Disclosures.

A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgement and included enquiries, observations of processes performed, inspection of documents, analytical procedures, evaluating the appropriateness of quantification methods and reporting policies, and agreeing or reconciling with underlying records.

In undertaking our limited assurance engagement on the Selected GHG Disclosures, we:

- Obtained, through inquiries, an understanding of the Group's control environment, processes, and information systems relevant to emissions quantification and reporting. We did not evaluate the design of particular control activities or obtain evidence about their implementation.
- Evaluated whether the Group's methods for developing estimates are appropriate and had been consistently applied. Our procedures did not include testing the data on which the estimates are based or separately developing our own estimates against which to evaluate the Group's estimates.
- Performed analytical procedures on particular emissions categories by comparing the expected GHGs emitted to actual GHGs emitted and made inquiries of management to obtain explanations for any significant differences we identified.
- Considered the presentation and disclosure of the GHG disclosures.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether Selected GHG Disclosures are fairly presented and prepared, in all material respects, in accordance with NZ CSs.

Appendix

Use of our Report

Our assurance report ('our Report') is intended for users who have a reasonable knowledge of GHG related activities, and who have studied the GHG related information in the Climate Statements with reasonable diligence and understand that the GHG disclosures are prepared and assured to appropriate levels of materiality.

Our assurance report is made solely to the Company's shareholders, as a body. Our assurance engagement has been undertaken so that we might state to the Company's shareholders those matters we are required to state to them in an assurance report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company's shareholders as a body, for our work, for this report, or for the conclusions we have formed.



Deloitte Touche Tohmatsu



Annalisa Amiradakis

Partner

Sydney, Australia

30 April 2025

This limited assurance report relates to the Selected GHG Disclosures included within the Group's Climate Statements for the year ended 31 December 2024 included on the Group's website. The Directors are responsible for the maintenance and integrity of the Group's website. We have not been engaged to report on the integrity of the Group's website. We accept no responsibility for any changes that may have occurred to the GHG Inventory Report since it was initially presented on the website.

The limited assurance report refers only to the Selected GHG Disclosures included within the Climate Statements named above. It does not provide an opinion on any other information which may have been hyperlinked to/from these disclosures. If readers of this report are concerned with the inherent risks arising from electronic data communication, they should refer to the published hard copy of the Climate Statements that include these Selected GHG Disclosures and related limited assurance report dated 30 April 2025 to confirm the information presented on this website.



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