

#### Sanlam

# 2024 CDP Corporate Questionnaire 2024

#### Word version

#### Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

Terms of disclosure for corporate questionnaire 2024 - CDP

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#### C1. Introduction

#### (1.1) In which language are you submitting your response?

Select from:

English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

✓ ZAR

(1.3) Provide an overview and introduction to your organization.

## (1.3.1) Type of financial institution

Select from:

✓ Other, please specify: Sanlam is a diversified non-banking financial services group, offering services in insurance, investment, financial planning and retirement advice/solutions.

#### (1.3.2) Organization type

Select from:

☑ Publicly traded organization

#### (1.3.3) Description of organization

Founded in 1918 as a life insurance company in South Africa, Sanlam Group has evolved over 106 years into a diversified financial services powerhouse with the largest non-banking financial services footprint on the African continent. Sanlam derives its revenue from insurance activities and investments, providing services across life insurance, general insurance, and micro-insurance. The group offers a broad range of financial solutions including retirement products, wealth management, investment management, corporate benefits, healthcare, credit solutions, and wills and estates. Sanlam's core operations are focused on the life and long-term insurance sector, personal finance, and asset management. The group operates through five key business clusters: Sanlam Life and Savings (SLS) Sanlam Emerging Markets (SEM) Sanlam Investment Group (SIG) Sanlam Fintech (SFT) Santam (SNT) Each cluster contains a set of entrepreneurial business units and operates with its own board of directors. Santam, Sanlam's subsidiary, extends the group's reach into the short-term insurance sector, where it holds a market

share exceeding 22%. Santam offers a wide range of general insurance products through six distinct business units: Santam Commercial and Personal, Santam Specialist, MiWay, Santam Re, Alternative Risk Transfer, and SEM Partner businesses. Sanlam operates in 31 Pan-African countries and selected international markets, including India, Malaysia, the Philippines, and the UK/Ireland. While its headquarters are located in Bellville, Cape Town, Sanlam's influence extends globally, making it a key player in the international financial services landscape. Sanlam Limited is listed on the Johannesburg Stock Exchange (JSE), has a secondary listing on the Namibian Stock Exchange (NSX), and is also available on A2X. Sustainability and Carbon Footprint Sanlam is committed to sustainability, with its carbon footprint encompassing 11 facilities across 9 operational sites in South Africa. These include offices such as Sanlam Head Office Campus, Sanlam Investments (SIM), Sanlynn, and Glacier Place, as well as Santam's offices, such as Auckland Park and Alice Lane. Santam's Role and Strategic Partnerships Santam operates as a key subsidiary, serving both individuals and businesses through its extensive network of intermediaries and direct channels. Additionally, Santam's SEM Partner businesses reflect its collaborative investments and strategic partnerships within Sanlam Emerging Markets (SEM), helping the group expand its economic participation and market share in diverse international markets, particularly across Africa. In conclusion, Sanlam Group is a dynamic, forward-thinking financial services provider, with a strong focus on life insurance, personal finance, and asset management. Through its diverse clusters and Santam subsidiary, the group offers comprehensive financial solutions that cater to a wide array of clients. With a commitment to sustainability and a global presence, Sanlam continues to empower its clients and remains a trusted partner in enabling them to live with confidence.

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

# (1.4.1) End date of reporting year

12/30/2023

## (1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

Yes

## (1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

✓ Yes

## (1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

✓ 5 years	
(1.4.5) Number of past reporting years you will be providing	Scope 2 emissions data for
Select from:  ✓ 5 years	
(1.4.6) Number of past reporting years you will be providing	Scope 3 emissions data for
Select from:  ✓ 5 years  [Fixed row]  (1.4.1) What is your organization's annual revenue for the re	eporting period?
12400000000	
(1.5) Provide details on your reporting boundary.	
	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from:  ✓ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?
Select from:
☑ No
ISIN code - equity
(1.6.1) Does your organization use this unique identifier?
Select from:
✓ Yes
(1.6.2) Provide your unique identifier
ZAE000070660
CUSIP number
(1.6.1) Does your organization use this unique identifier?
Select from:
☑ No
Ticker symbol
(1.6.1) Does your organization use this unique identifier?
Select from:
✓ Yes
(1.6.2) Provide your unique identifier
SLM-JSE and A2X SLA-NSX

SEDOL code

(1.6.1) Does your organization use this unique identifier?
Select from:  ☑ No
LEI number
(1.6.1) Does your organization use this unique identifier?
Select from:  ✓ Yes
(1.6.2) Provide your unique identifier
378900E10332DF012A23
D-U-N-S number
(1.6.1) Does your organization use this unique identifier?
Select from:  ✓ No
Other unique identifier
(1.6.1) Does your organization use this unique identifier?
Select from:  ✓ No [Add row]
(1.7) Select the countries/areas in which you operate.

Select all that apply

✓ Mali ✓ Togo Benin ✓ Egypt Gabon ✓ Malawi ✓ Rwanda Uganda ✓ Zambia **✓** Burundi ✓ Nigeria Senegal ✓ Botswana Cameroon Eswatini Mozambique ✓ Burkina Faso

- Ghana
- ✓ India
- Kenya
- ✓ Niger
- Angola
- Ireland
- Lebanon
- ✓ Lesotho
- ✓ Morocco
- ✓ Namibia
- ✓ Malaysia
- ✓ Zimbabwe
- ✓ Indonesia
- Mauritius
- ✓ Madagascar

- ✓ South Africa
- ☑ Côte d'Ivoire
- ☑ United Kingdom of Great Britain and Northern Ireland
- (1.9) What was the size of your organization based on total assets value at the end of the reporting period?

1170000000000

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

**Banking (Bank)** 

(1.10.1) Activity undertaken



#### **Investing (Asset manager)**

## (1.10.1) Activity undertaken

Select from:

Yes

### (1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

✓ Yes, the value of the portfolio based on total assets

#### (1.10.4) Portfolio value based on total assets

35909000

## (1.10.6) Type of clients

Select all that apply

- Asset owners
- ✓ Institutional investors
- ☑ Family offices / high network individuals
- ✓ Retail clients
- ✓ Corporate and institutional clients (companies)

#### (1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

Retail

Services

✓ Materials

✓ Power generation

▼ Food, beverage & agriculture

☑ Biotech, health care & pharma

- ✓ Fossil Fuels
- ✓ Infrastructure

## **Investing (Asset owner)**

## (1.10.1) Activity undertaken

Select from:

Yes

## (1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

✓ Yes, the value of the portfolio based on total assets

### (1.10.4) Portfolio value based on total assets

30205000

## (1.10.6) Type of clients

Select all that apply

- ✓ Asset owners
- ☑ Retail clients
- ✓ Institutional investors
- ☑ Family offices / high network individuals
- ☑ Corporate and institutional clients (companies)

☑ Government / sovereign / quasi-government / sovereign wealth funds

# (1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- Retail
- Services
- Materials

- ✓ Power generation
- ▼ Food, beverage & agriculture
- ☑ Biotech, health care & pharma

- Manufacturing
- ✓ Infrastructure

#### **Insurance underwriting (Insurance company)**

## (1.10.1) Activity undertaken

Select from:

Yes

## (1.10.2) Insurance types underwritten

Select all that apply

- ☑ General (non-life)
- ✓ Life and/or Health

## (1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

✓ Yes, the value of the portfolio based on total assets

## (1.10.4) Portfolio value based on total assets

96255000

## (1.10.6) Type of clients

Select all that apply

- ✓ Family offices / high network individuals
- ✓ Retail clients
- ☑ Corporate and institutional clients (companies)
- ☑ Business and private clients (banking)

## (1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

Retail

Services

Materials

Manufacturing

✓ Infrastructure

[Fixed row]

- ✓ Power generation
- ✓ Transportation services
- ▼ Food, beverage & agriculture
- ☑ Biotech, health care & pharma

#### (1.24) Has your organization mapped its value chain?

#### (1.24.1) Value chain mapped

Select from:

✓ No, but we plan to do so within the next two years

#### (1.24.4) Highest supplier tier known but not mapped

Select from:

☑ Tier 2 suppliers

## (1.24.8) Primary reason for not mapping your upstream value chain or any value chain stages

Select from:

✓ Not an immediate strategic priority

#### (1.24.9) Explain why your organization has not mapped its upstream value chain or any value chain stages

Sanlam has not yet fully mapped its value chain due to a combination of strategic priorities and structural challenges. One significant factor is that Sanlam is focused heavily on digital transformation and expansion into new markets, especially across Africa and India, which requires significant resources and attention. This expansion takes precedence over conducting a comprehensive value chain mapping, as their growth strategy aims to reinforce their presence in multiple markets rather than streamline their existing processes. Additionally, Sanlam's commitment to sustainability and financial inclusion involves complex multi-sector collaborations, which might complicate mapping the full value chain. Efforts like the Sanlam Transformation Gauge and the focus on partnerships to achieve equitable growth further show the focus on broader socioeconomic objectives rather than granular internal process mapping at this stage Finally, internal capacity challenges

related to restructuring and integration of new acquisitions, such as the recent merger with Allianz, might also contribute to delays in systematically addressing the value chain.
[Fixed row]

# (1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

Plastics mapping	Portfolios covered in mapping
Select from:  ✓ Yes, we have mapped or are currently in the process of mapping plastics in our value chain	Select all that apply  ✓ Investing (Asset manager)  ✓ Investing (Asset owner)  ✓ Insurance underwriting (Insurance company)

[Fixed row]

- C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities
- (2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

#### **Short-term**

# (2.1.1) From (years)

1

#### (2.1.3) To (years)

2

#### (2.1.4) How this time horizon is linked to strategic and/or financial planning

This is aligned with business plans, which focus on short term changes and actions. This also aligns with annual reduction targets and budgeting for CAPEX to implement projects.

#### **Medium-term**

## (2.1.1) From (years)

2

## (2.1.3) To (years)

10

#### (2.1.4) How this time horizon is linked to strategic and/or financial planning

This horizon is used in forward-looking business plans, which include a longer-term view of operations, reduction targets and project identification, design and approval.

#### Long-term

## (2.1.1) From (years)

11

## (2.1.2) Is your long-term time horizon open ended?

Select from:

Yes

## (2.1.4) How this time horizon is linked to strategic and/or financial planning

This 10-30-year horizon is used in forward looking business plans which include a longer-term view of operations, reduction targets and project design, including the allocation of capital for implementation. This aligns with more visionary strategic view of climate-related risks and opportunities. [Fixed row]

# (2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

Process in place	Dependencies and/or impacts evaluated in this process
Select from:  ✓ Yes	Select from:  ☑ Both dependencies and impacts

[Fixed row]

# (2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
Select from:  ✓ Yes	Select from:  ✓ Both risks and opportunities	Select from:  ✓ Yes

[Fixed row]

(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

#### Row 1

# (2.2.2.1) Environmental issue

Select all that apply

✓ Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

- ✓ Dependencies
- Impacts
- Risks
- Opportunities

## (2.2.2.3) Value chain stages covered

Select all that apply

✓ Direct operations

## (2.2.2.4) Coverage

Select from:

Partial

## (2.2.2.7) Type of assessment

Select from:

✓ Qualitative only

## (2.2.2.8) Frequency of assessment

Select from:

✓ Not defined

## (2.2.2.9) Time horizons covered

Select all that apply

✓ Short-term

# (2.2.2.10) Integration of risk management process

Select from:

☑ A specific environmental risk management process

# (2.2.2.11) Location-specificity used

Select all that apply

✓ Site-specific

# (2.2.2.12) Tools and methods used

#### Commercially/publicly available tools

✓ TNFD – Taskforce on Nature-related Financial Disclosures

#### **Enterprise Risk Management**

**☑** Enterprise Risk Management

#### Other

✓ Desk-based research

# (2.2.2.13) Risk types and criteria considered

#### **Acute physical**

- ✓ Cold wave/frost
- Drought
- ✓ Flood (coastal, fluvial, pluvial, ground water)
- ✓ Wildfires

#### **Chronic physical**

- ☑ Changing temperature (air, freshwater, marine water)
- ☑ Changing wind patterns

## (2.2.2.14) Partners and stakeholders considered

#### Select all that apply

- Customers
- Employees
- Investors
- ✓ Local communities
- ✓ Regulators

#### (2.2.2.15) Has this process changed since the previous reporting year?

Select from:

Yes

#### (2.2.2.16) Further details of process

Sanlam typically approaches the identification, assessment, and management of environmental risks and opportunities: 1. ESG Integration Sanlam integrates ESG considerations into its investment decisions across different asset classes. This includes the assessment of environmental risks such as climate change, resource depletion, pollution, and biodiversity loss. ESG integration ensures that the environmental impact of portfolio companies is evaluated alongside financial performance. 2. Risk Identification and Screening Sanlam uses ESG screening methods to identify companies and sectors with significant environmental risks. This process helps avoid or reduce investments in industries with high environmental impacts, such as fossil fuels, mining, or unsustainable agriculture. They may also use positive screening to invest in companies leading in sustainability. Tools for screening: External ESG data providers: Sanlam uses third-party ESG data sources and ratings to help identify environmental risks. Internal research: Sanlam's research teams analyze specific environmental factors relevant to the industries or regions in which they invest. 3. Engagement and Active Ownership As part of their responsible investment strategy, Sanlam engages with portfolio companies to encourage better environmental practices. Active ownership includes: Engaging with management to address environmental risks and opportunities. Voting on resolutions at shareholder meetings that promote environmental sustainability, such as climate change mitigation efforts. Collaborating with industry bodies: Sanlam may also participate in industry initiatives aimed at enhancing environmental practices, like the UN Principles for Responsible Investment (PRI). 4. Scenario Analysis and Stress Testing Sanlam conducts scenario analysis to understand how environmental risks, particularly climate change, could impact their portfolios. Stress testing is performed to see how their investments would perform under different environmental scenarios, such as a transition to a low-carbon economy. 5. Sustainability and Impact Investments Sanlam actively seeks out investment opportunities that deliver positive environmental outcomes. This includes investments in renewable energy, energy efficiency projects, and technologies that reduce environmental footprints. These investments align with global efforts like the Paris Agreement and the UN Sustainable Development Goals (SDGs). 6. Environmental Risk Monitoring Sanlam continuously monitors environmental risks throughout the life of the investment. This includes: Regular portfolio reviews that assess the ongoing exposure to environmental risks. Reporting frameworks: They report on the environmental performance of their portfolios, both to internal stakeholders and external bodies, ensuring transparency. 7. Climate Risk Management Framework Sanlam's climate risk management approach involves understanding how climate-related risks (both physical and transition risks) impact their investments. They align their strategies with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), helping them to manage and disclose climate-related financial risks effectively. 8. Partnerships and Collaborations Sanlam collaborates with various industry groups and initiatives to improve its environmental risk management. Being a signatory of the United Nations Principles for Responsible Investment (UNPRI).

#### Row 2

#### (2.2.2.1) Environmental issue

Select all that apply

✓ Plastics

# (2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

✓ Impacts

## (2.2.2.3) Value chain stages covered

Select all that apply

✓ Direct operations

#### (2.2.2.4) Coverage

Select from:

Partial

## (2.2.2.7) Type of assessment

Select from:

✓ Qualitative only

## (2.2.2.8) Frequency of assessment

Select from:

✓ Not defined

## (2.2.2.9) Time horizons covered

Select all that apply

✓ Short-term

# (2.2.2.11) Location-specificity used

Select all that apply

National

## (2.2.2.12) Tools and methods used

#### Other

✓ Desk-based research

#### (2.2.2.14) Partners and stakeholders considered

Select all that apply

Employees

## (2.2.2.15) Has this process changed since the previous reporting year?

Select from:

✓ No

## (2.2.2.16) Further details of process

Sanlam conducted a plactics assessment

#### Row 3

## (2.2.2.1) Environmental issue

Select all that apply

☑ Biodiversity

# (2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

Impacts

## (2.2.2.3) Value chain stages covered

Select all that apply

✓ Upstream value chain

## (2.2.2.4) Coverage

Select from:

Partial

## (2.2.2.7) Type of assessment

Select from:

✓ Qualitative only

## (2.2.2.8) Frequency of assessment

Select from:

✓ Not defined

#### (2.2.2.9) Time horizons covered

Select all that apply

✓ Short-term

# (2.2.2.11) Location-specificity used

Select all that apply

✓ Sub-national

# (2.2.2.12) Tools and methods used

#### Commercially/publicly available tools

✓ TNFD - Taskforce on Nature-related Financial Disclosures

### (2.2.2.14) Partners and stakeholders considered

Select all that apply

Customers

#### (2.2.2.15) Has this process changed since the previous reporting year?

Select from:

✓ No

### (2.2.2.16) Further details of process

In 2022, Sanlam became an African Natural Capital Alliance member and participated in the organisation's pilot to develop locally relevant guidelines based on the Taskforce on Nature related Financial Disclosures (TNFD) recommendations. While our focus has been on climate change, we believe that biodiversity risk demands greater attention. Sanlam, together with five leading financial institutions across the African continent, played a pivotal role in Africa's TNFD pilot programme last year, actively contributing to shaping the TNFD framework by providing insights and testing its applicability in the African context. Its objectives were to provide feedback on the TNFD pilot methodology and build nature-related risks and opportunities knowledge and capability.

[Add row]

# (2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

**Investing (Asset manager)** 

#### (2.2.4.1) Process in place covering this portfolio

Select from:

✓ No, but we plan to within the next two years

## (2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

☑ Other, please specify: Sanlam Investments is in a process to quantify the footprint and scenario analyses work in order to evaluate the dependencies.

# (2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

Sanlam Investments is in a process to quantify the footprint and scenario analyses work in order to evaluate the dependencies.

#### **Investing (Asset owner)**

#### (2.2.4.1) Process in place covering this portfolio

Select from:

✓ Yes

#### (2.2.4.2) Dependencies and/or impacts related to this portfolio evaluated in this process

Select from:

☑ Both dependencies and impacts

#### **Insurance underwriting (Insurance company)**

### (2.2.4.1) Process in place covering this portfolio

Select from:

Yes

#### (2.2.4.2) Dependencies and/or impacts related to this portfolio evaluated in this process

Select from:

☑ Both dependencies and impacts
[Fixed row]

# (2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

	Process in place covering this portfolio	Risks and/or opportunities related to this portfolio are evaluated in this process	Is this process informed by the dependencies and/or impacts process?
Investing (Asset manager)	Select from: ✓ Yes	Select from: ✓ Both risks and opportunities	Select from:
Investing (Asset owner)	Select from: ✓ Yes	Select from:  ☑ Both risks and opportunities	Select from: ✓ Yes
Insurance underwriting (Insurance company)	Select from: ✓ Yes	Select from: ✓ Both risks and opportunities	Select from: ✓ Yes

[Fixed row]

(2.2.6) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.

**Investing (Asset manager)** 

#### (2.2.6.1) Environmental issue

Select all that apply

✓ Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Risks
- Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

## (2.2.6.4) Type of assessment

Select from:

✓ Qualitative and quantitative

## (2.2.6.5) Industry sectors covered by the assessment

Select all that apply

Retail

Apparel

Materials

Hospitality

▼ Fossil Fuels

☑ Biotech, health care & pharma

Manufacturing

✓ Infrastructure

✓ Power generation

✓ Transportation services

✓ Food, beverage & agriculture

## (2.2.6.6) Frequency of assessment

Select from:

✓ As important matters arise

## (2.2.6.7) Time horizons covered

Select all that apply

✓ Short-term

✓ Medium-term

✓ Long-term

## (2.2.6.8) Integration of risk management process

Select from:

✓ Integrated into multi-disciplinary organization-wide risk assessment process

## (2.2.6.9) Location-specificity used

Select all that apply

✓ Not location specific

## (2.2.6.10) Tools and methods used

Select all that apply

✓ Internal tools/methods

#### (2.2.6.11) Risk type and criteria considered

#### **Acute physical**

☑ Other acute physical risk, please specify: Increased severity and frequency of extreme weather events such as cyclones and floods

## (2.2.6.12) Partners and stakeholders considered

Select all that apply

- Employees
- **✓** Investors
- ✓ Local communities

## (2.2.6.13) Further details of process

In 2023, Sanlam made significant strides in supporting climate change mitigation in emerging markets. This included building on our successful joint venture with the Dutch Development Bank, FMO, through the Climate Investor One (CI1) and Climate Investor Two (CI2) funds. The Risk and Compliance Committee integrated ESG (Environmental, Social, and Governance) principles, with a particular focus on climate change, into our risk management framework, thereby supporting responsible investing. As an insurance provider, Sanlam Group emphasises emerging risks, such as those posed by climate change, which fall outside the usual risk framework. The Social, Ethics, and Sustainability (SES) Committee monitors Sanlam's ESG activities and advises the Board on ESG matters, including climate-related risks and opportunities. The SES Committee's scope has expanded to include comprehensive oversight of ESG issues, with regular updates provided to the Board. The Risk Committee assists the Board with evaluating climate risks and responsible investment. Sustainability and climate-related concerns remain central to the Board's agenda, with all business units and subsidiaries required to include social, ethics, and sustainability issues in their board agendas. This ensures a coordinated approach to climate risk management across our organisation. Sanlam utilises several committees to manage climate-related risks and opportunities, including: •

Audit Committee: Oversees non-financial information and supports risk management. •

Actuarial Forum and Finance and Risk Forums: Assist with risk

control. • Chief Audit Executive: Ensures effective internal audit control and reports to the Audit Committee and Group Finance Director. • Risk and Compliance Committee: Advises on risk, ethics management, and compliance. • Finance Committee: Manages the Group's combined assurance approach. Sanlam Group is committed to sustainable insurance practices. Sustainable insurance is a strategic approach where all activities in the insurance value chain,

including interactions with stakeholders, are done in a responsible and forward looking way by identifying, assessing, managing and monitoring risk and opportunities associated with environment, social and governance issues.

#### **Investing (Asset owner)**

### (2.2.6.1) Environmental issue

Select all that apply

✓ Climate change

## (2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Risks
- Opportunities

## (2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

1

# (2.2.6.4) Type of assessment

Select from:

Quantitative only

## (2.2.6.5) Industry sectors covered by the assessment

Select all that apply

Services

### (2.2.6.6) Frequency of assessment

Select from:

✓ Not defined

#### (2.2.6.7) Time horizons covered

Select all that apply

✓ Long-term

#### (2.2.6.8) Integration of risk management process

Select from:

✓ Integrated into multi-disciplinary organization-wide risk assessment process

#### (2.2.6.9) Location-specificity used

Select all that apply

✓ Not location specific

### (2.2.6.10) Tools and methods used

Select all that apply

☑ CDP Disclosure Framework

## (2.2.6.11) Risk type and criteria considered

#### Reputation

✓ Other reputation, please specify: Shifts in consumer preferences

## (2.2.6.12) Partners and stakeholders considered

Select all that apply

Customers

### (2.2.6.13) Further details of process

Sanlam incorporates ESG risk assessment into our investment policy statement. In cases of multi-managed portfolios, external service providers are responsible for purchasing securities, and their policy frameworks may or may not include climate-related considerations. Hence, it is crucial for Sanlam to evaluate providers and

their ESG impact. The approach of asset owners to climate change can shape our relationships with stakeholders, including investors, clients, and communities. Stakeholders increasingly expect Sanlam, as an asset owner, to tackle climate-related risks, demonstrate sustainable practices, and provide relevant disclosures. Failure to meet these expectations can lead to reputational harm and loss of trust. As a listed company on the Johannesburg Stock Exchange, a signatory to the UN Global Compact, Sanlam is obligated to effectively address the challenges posed by climate change. Insufficient response to this challenge would significantly impact our reputation and brand. Difficulties in meeting customer preferences could result in a decline in revenues due to reduced demand for products and services.

#### **Insurance underwriting (Insurance company)**

#### (2.2.6.1) Environmental issue

Select all that apply

✓ Climate change

## (2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Impacts
- Risks
- Opportunities

## (2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

1

### (2.2.6.4) Type of assessment

Select from:

✓ Qualitative only

### (2.2.6.5) Industry sectors covered by the assessment

Select all that apply

✓ Infrastructure

#### (2.2.6.6) Frequency of assessment

#### Select from:

✓ Not defined

## (2.2.6.7) Time horizons covered

Select all that apply

- ✓ Short-term
- ✓ Medium-term
- ✓ Long-term

## (2.2.6.8) Integration of risk management process

Select from:

✓ Integrated into multi-disciplinary organization-wide risk assessment process

## (2.2.6.9) Location-specificity used

Select all that apply

✓ Not location specific

## (2.2.6.10) Tools and methods used

Select all that apply

☑ CDP Disclosure Framework

## (2.2.6.11) Risk type and criteria considered

#### **Acute physical**

☑ Other acute physical risk, please specify: Change is weather patterns

## (2.2.6.12) Partners and stakeholders considered

Select all that apply

✓ Local communities

# (2.2.6.13) Further details of process

Our subsidiary Santam, has a well-established and robust risk management and governance structure which offer a comprehensive and interconnected perspective on strategic and operational risks, including those related to ESG factors. From a governance perspective, the board of Santam Ltd has delegated oversight of and reporting on sustainability, climate and ESG matters to the Social, Ethics and Sustainability Committee (SESCO). In addition to the SESCO, the board is assisted by additional subcommittees in discharging it's duties of overseeing ESG performance including climate-related risks and opportunities. These include the Group investment and risk committees. The investment committee assists the Boards oversight of the Group's responsible investment practices promoting good governance and creating value. The Risk committee assists the Board in fulfilling its governance duties from a risk and control perspective and as such, is responsible for identifying, evaluating, ad effectively managing all significant risks (including enterprise risk – which incorporates climate risk). The committee ensures that ERM analyses the Group's top inherent risks which include climate-related extreme weather events. This approach also helps us identify potential opportunities arising from our risks. The assessment of portfolio exposure to climate-related risks and opportunities is integrated into a multi-disciplinary company-wide risk management process. Some of the additional internal initiatives that have been embarked on in the past financial year to assess and improve our understanding of our exposure to climate-related risks include conducting flood risk assessments which have been implemented with the intention of investigating current flood exposure. Geocoding our insurance book with the aim of better understanding and managing this exposure through underwriting and pricing actions has been an important and ongoing initiative. The outcomes of the process will assist in managing the accumulation of risk in exposed geographies. The third priority area feeding into the assessment of our portfolio's exposure to climate-related risk and opportunities is the process that is currently underway to conduct comprehensive climate risk assessment (climate scenarios) in line with the recommendation of the Task Force on Climate-related Financial Disclosures. The outcomes will of this process will guide our climate change response more holistically. [Add row]

# (2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed	Primary reason for not assessing interconnections between environmental dependencies, impacts, risks and/or opportunities	Explain why you do not assess the interconnections between environmental dependencies, impacts, risks and/or opportunities
Select from:	Select from:	We have began the in
✓ No	☑ Other, please specify: We have started the scenario analyses work and we will assess the interconnectedness in the upcoming financial year.	

[Fixed row]

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

	We consider environmental information
Investing (Asset manager)	Select from:  ✓ Yes
Investing (Asset owner)	Select from: ✓ Yes
Insurance underwriting (Insurance company)	Select from:  ✓ Yes

[Fixed row]

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.

**Investing (Asset manager)** 

## (2.2.9.1) Environmental issues covered

Select all that apply

✓ Climate change

#### (2.2.9.2) Type of environmental information considered

Select all that apply

- ☑ Emissions data
- ☑ Energy usage data

#### (2.2.9.3) Process through which information is obtained

Select all that apply

✓ Data provider

#### (2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

- ✓ Materials
- ✓ Transportation services

#### (2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

1

# (2.2.9.6) Total portfolio value covered by the process

359090

#### **Investing (Asset owner)**

#### (2.2.9.1) Environmental issues covered

Select all that apply

✓ Climate change

# (2.2.9.2) Type of environmental information considered

Select all that apply

- ☑ Emissions data
- ☑ Energy usage data

# (2.2.9.3) Process through which information is obtained

Data provider

# (2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

- Manufacturing
- Services
- ▼ Transportation services

### (2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

1

# (2.2.9.6) Total portfolio value covered by the process

302050

#### **Insurance underwriting (Insurance company)**

#### (2.2.9.1) Environmental issues covered

Select all that apply

✓ Climate change

# (2.2.9.2) Type of environmental information considered

Select all that apply

- ✓ Emissions data
- ☑ Energy usage data

# (2.2.9.3) Process through which information is obtained

✓ Data provider

# (2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

- Manufacturing
- Services
- ✓ Transportation services

# (2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

1

# (2.2.9.6) Total portfolio value covered by the process

962550 [Add row]

#### (2.4) How does your organization define substantive effects on your organization?

#### **Risks**

# (2.4.1) Type of definition

Select all that apply

- Qualitative
- Quantitative

# (2.4.2) Indicator used to define substantive effect

Select from:

Revenue

#### (2.4.3) Change to indicator

Select from:

✓ % increase

#### (2.4.4) % change to indicator

Select from:

**☑** 1-10

#### (2.4.6) Metrics considered in definition

Select all that apply

☑ Likelihood of effect occurring

### (2.4.7) Application of definition

The Group's ERM Framework clearly outlines the process in which Sanlam takes to determine the significance (impact) of a risk by considering quantitative and qualitative factors. The quantitative impact is defined as the potential loss, financial or otherwise, to the business should the risk materialise. The two primary metrics used by the Group are expected impact on the Group's reported annual normalised headline earnings and/or Group Equity Value. In terms of the Group's risk escalation policy risks where the potential financial impact on Earnings is higher than R45m or impact on Group GEV higher than R490m would be seen as significant from a group perspective which will be escalated and require Senior Management and Group Exco intervention. Qualitative factors to consider during the impact assessment include the following criteria: Any material breach or potential material breach of risk appetite at business unit / entity level. Adverse publicity in the financial and/or general press (e.g., leading to a drop in the Sanlam share price on the JSE) Regulatory censure involving a publicised fine, and/or the removal of a "trading/operating" license and/or an unfavourable regulatory report where there is a potential for a further regulatory inspection and or sanction. Customer defections/ Customer complaints and other stakeholder complaints measured by increased lapses / surrenders. Reduction in assets under management. A decline in staff morale measured by staff turnover. Fraud Transgressions of legislation Any publicity in the media or social media which negatively impacts on the Sanlam Group or Brand. Legal claims against any part of the Sanlam group. Loss of control over critical information – e.g., loss of data quality (i.e., integrity, availability, accuracy, timeliness, extent to which it is up-to-date, completeness, uniqueness of the data, etc). Cyber related incidents such as ransomware, hacking, data breaches, denial of service attacks, etc. should not only be considered from a quantifiable loss or fine / penalty perspective, but also from a qualitative perspective in terms of potential reputational damage to the group through the media or involvement from regulators. As such any cyber-event that has the possibility to cause reputational damage to the group or brand regardless of the guantum involved, should be escalated to the Group CRO with immediate effect. For all risks where guantitative analysis is difficult, appointed cluster/business CROs

#### **Opportunities**

### (2.4.1) Type of definition

Select all that apply

Qualitative

#### (2.4.6) Metrics considered in definition

Select all that apply

∠ Likelihood of effect occurring

# (2.4.7) Application of definition

Sanlam recognizes the significant global risk posed by climate change, which has the potential to impact society and its clients. However, Sanlam also sees opportunities within this changing landscape. One notable opportunity for lies in financing a just transition, where ESG investments actively reduce carbon emissions and improve social outcomes. As an asset manager, Sanlam believes that proactive investment can drive transformative change. The provision of funds that invest in companies that have positive environmental and climate credentials is therefore a substantive climate-related opportunity for Sanlam. The primary financial impact of these funds is increased access to capital, for the development of largescale climate mitigation and adaptation infrastructure projects. Sanlam continues to support the allocation of capital to combat climate change in emerging markets. Notable examples include the successful joint venture with Dutch Development Bank, FMO, which developed the blended finance Climate Investor One and Two funds, as well as the Sanlam Sustainable Infrastructure Fund. The Climate Investor One fund was the first such initiative by Climate Fund Managers, Sanlam's joint venture with the Dutch Development Bank, FMO. With the support of broad public and private sector commitment, the funds raised by Climate Investor One have been allocated to renewable energy infrastructure projects, for example, a river-run-off hydro project in Uganda, an offshore wind project in India and a near-shore wind project in Vietnam. Sanlam's opportunity relates to the profits made by the fund, which is aimed at the new and emerging markets arising from efforts to decarbonise the global economy.

[Add row]

#### C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

#### Climate change

#### (3.1.1) Environmental risks identified

Select from:

✓ Yes, only within our direct operations or upstream value chain

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

✓ Evaluation in progress

#### (3.1.3) Please explain

The Group's ERM Framework clearly outlines the process in which Sanlam takes to determine the significance (impact) of a risk by considering quantitative and qualitative factors. The quantitative impact is defined as the potential loss, financial or otherwise, to the business should the risk materialise. The two primary metrics used by the Group are expected impact on the Group's reported annual normalised headline earnings and/or Group Equity Value. In terms of the Group's risk escalation policy risks where the potential financial impact on Earnings is higher than R45m or impact on Group GEV higher than R490m would be seen as significant from a group perspective which will be escalated and require Senior Management and Group Exco intervention. Qualitative factors to consider during the impact assessment include the following criteria: Any material breach or potential material breach of risk appetite at business unit / entity level. Adverse publicity in the financial and/or general press (e.g., leading to a drop in the Sanlam share price on the JSE) Regulatory censure involving a publicised fine, and/or the removal of a "trading/operating" license and/or an unfavourable regulatory report where there is a potential for a further regulatory inspection and or sanction. Customer defections/ Customer complaints and other stakeholder complaints measured by increased lapses / surrenders. Reduction in assets under management. A decline in staff morale measured by staff turnover. Fraud Transgressions of legislation Any publicity in the media or social media which negatively impacts on the Sanlam Group or Brand. Legal claims against any part of the Sanlam group. Loss of control over critical information — e.g., loss of data quality (i.e., integrity, availability, accuracy, timeliness, extent to which it is up-todate, completeness, uniqueness of the data, etc). Cyber related incidents such as ransomware, hacking, data breaches, denial of service attacks, etc. should not only be considered from a quantifiable loss or fine

reputational damage to the group or brand regardless of the quantum involved, should be escalated to the Group CRO with immediate effect. • Occupational Health and Safety risks to staff -

#### **Plastics**

#### (3.1.1) Environmental risks identified

Select from:

✓ No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

✓ No standardized procedure

#### (3.1.3) Please explain

Sanlam is in a process to understand the impact of plastic on the organisation. In 2024 we initiated the elimiation of plastics project to within our operations and raising awareness.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

#### Climate change

# (3.1.1.1) Risk identifier

Select from:

✓ Risk1

### (3.1.1.3) Risk types and primary environmental risk driver

#### **Acute physical**

☑ Other acute physical risk, please specify: Increased severity and frequency of extreme weather events such as cyclones and floods

# (3.1.1.4) Value chain stage where the risk occurs

Select from:

✓ Insurance underwriting portfolio

# (3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

☑ Systemic risk

# (3.1.1.6) Country/area where the risk occurs

Select all	that apply	

✓ Mali

✓ Togo
✓ Kenya

✓ Benin
✓ Angola

✓ Egypt
✓ Malawi

☑ Gabon☑ Uganda☑ Burundi☑ Senegal

✓ Lesotho

- Lesottio

✓ Morocco
✓ Cameroon

✓ Namibia
✓ Eswatini

✓ Nigeria
✓ Malaysia

✓ Zimbabwe
✓ Burkina Faso

✓ Indonesia
✓ South Africa

✓ Mauritius
✓ Côte d'Ivoire

✓ Madagascar
✓ United Kingdom of Great Britain and Northern Ireland

Mozambique

# (3.1.1.9) Organization-specific description of risk

Devastating storms and floods pose severe financial risks to individuals, families, and insurers, threatening Sanlam's business. Even smaller events like hailstorms damage agriculture, infrastructure, housing, and production facilities, leading to increased insurance claims. While risk mitigation measures help, complete elimination is impossible. The insurance sector assumes this risk by providing coverage against such events. In society, insurance serves as a risk manager, investor, and carrier. General insurance protects consumers and businesses financially after incidents. Africa, especially the developing world, faces catastrophic climate change impacts. Water shortages hinder future development. Extreme weather events affect Sanlam's general insurance, leading to earnings declines, driven by adverse weather, rising claims, costs, and lower investment returns. Traditional approaches fail to meet customer needs. A significant protection gap exists between economic and insured losses. Accordingly, the risk of increased severity and frequency of extreme weather means that Sanlam's risks relate to increased liabilities on insurance claims which largely lie within Santam. Insurance lays the foundation for a sustainable society, encouraging sustainable practices. The UNEP FI's Principles for Sustainable Insurance (PSI) aim to bridge the gap and support a sustainable economy. Sanlam and Santam, as founding members, follow four sustainable insurance principles: 1. Embed relevant

### (3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

**☑** 1-10%

# (3.1.1.11) Primary financial effect of the risk

Select from:

✓ Increased insurance claims liability

# (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

✓ Short-term

# (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

✓ Very likely

#### (3.1.1.14) Magnitude

Select from:

#### ✓ Medium

# (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Increased acute weather risks, such as severe droughts, floods, and storms, present significant financial costs for both Santam and Sanlam. For Santam, heightened claims from natural disasters lead to increased payouts, driving up insurance liabilities and operational costs. For Sanlam, the risks of office closures, damage to assets, and disrupted customer services result in lost income and operational delays. These impacts, coupled with the cost of repairing damaged infrastructure, elevate financial pressures, potentially reducing profitability and straining resources for both companies as they navigate the increasing frequency of extreme weather events.

#### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

✓ No

#### (3.1.1.26) Primary response to risk

#### **Engagement**

☑ Engage with regulators/policy makers

# (3.1.1.27) Cost of response to risk

2000000

#### (3.1.1.28) Explanation of cost calculation

• Sanlam and Santam to work on a project plan to define by when Sanlam/Santam will finalise the quantification of the exposure. • Complete the scope 3 emissions report with Carbon Trust to help inform the project plan.

# (3.1.1.29) Description of response

Sanlam is currently working with consultants to understand scope 3 investments and perform scenario analyses.

#### Climate change

#### (3.1.1.1) Risk identifier

Select from:

✓ Risk2

## (3.1.1.3) Risk types and primary environmental risk driver

#### **Chronic physical**

☑ Other chronic physical risk, please specify: Water scarcity

# (3.1.1.4) Value chain stage where the risk occurs

Select from:

✓ Investing (Asset manager) portfolio

# (3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

✓ Systemic risk

#### (3.1.1.6) Country/area where the risk occurs

Select all that apply

✓ Mali

✓ Togo
✓ Kenya

✓ Benin
✓ Angola

✓ Egypt
 ✓ Malawi

✓ Ghana ✓ Uganda

✓ Burundi

✓ Lesotho ✓ Cameroon

✓ Morocco ✓ Eswatini

✓ Namibia
✓ Malaysia

- Nigeria
- ✓ Indonesia
- ✓ Mauritius
- Madagascar
- ✓ Mozambique
- ✓ Burkina Faso

- Zimbabwe
- ✓ South Africa
- ✓ Côte d'Ivoire
- ✓ United Kingdom of Great Britain and Northern Ireland

## (3.1.1.9) Organization-specific description of risk

Water scarcity is a critical risk to the global economy, and South Africa is particularly vulnerable. The country is once again entering an El Niño cycle, which is expected to intensify droughts and lead to erratic rainfall patterns. At the current rate of water consumption, South Africa's demand is projected to exceed supply by 2025, placing extreme strain on already fragile freshwater ecosystems. The Western Cape experienced its most severe drought in 2017, with dam levels hitting historic lows, nearly bringing Cape Town to "Day Zero," when the city would have run out of water. The impact on businesses, including Sanlam and Santam, whose head offices are based in Cape Town, would have been immense. More recently, Gqeberha is facing a similar crisis, with water supplies dwindling due to persistent drought conditions. Sanlam recognises the broad social and environmental consequences of its business activities, which affect various stakeholders, including policyholders, shareholders, and local communities. While Sanlam is not a water-intensive business, it acknowledges the systemic risks associated with water crises, which can disrupt economies where it operates. In response, the company is committed to preserving water and reducing its consumption. The ongoing water shortages across key regions where Sanlam operates could affect the business by reducing revenue due to potential operational disruptions. Offices may face temporary closures as drought conditions escalate.

#### (3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

**☑** 1-10%

# (3.1.1.11) Primary financial effect of the risk

Select from:

✓ Closure of operations

# (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

✓ Short-term

### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

Very likely

#### (3.1.1.14) Magnitude

Select from:

✓ Medium

# (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Temporary office closure due to water shortages or Day Zero will impact Sanlam's continued operations, employees, and customers, leading to a significant loss of income. Additional costs are expected for the repair of damaged equipment. A one-week shutdown of nationwide operations could result in a loss of profits of approximately R178.2 million, based on current normalized headline earnings.

# (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

Yes

# (3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

178241096

## (3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

178241096

#### (3.1.1.25) Explanation of financial effect figure

Temporary office closure due to water shortages or Day Zero will impact Sanlam's continued operations, employees, and customers, leading to a significant loss of income. Additional costs are expected for the repair of damaged equipment. A one-week shutdown of nationwide operations could result in a loss of profits of approximately R178.2 million, based on current normalized headline earnings.

#### (3.1.1.26) Primary response to risk

#### Compliance, monitoring and targets

✓ Improve monitoring of direct operations

## (3.1.1.27) Cost of response to risk

746000

# (3.1.1.28) Explanation of cost calculation

The cost of response to this risk includes the provision of capital or operational expenses to climate proof the Sanlam offices. In the reporting year, at Sanlam's Head Office, expansion of the rainwater harvest system occurred, together with the extended water use licence of the borehole. Such activities cost Sanlam a total of R746 000 in the reporting year. This expense forms part of an ongoing programme. Due to the risk of drought and water shortages in the future, Sanlam implemented an energy and water management programme towards the end of 2021. The programme is managed through the Group-wide Energy Forum monthly. The role of the Energy Forum is to ensure that Sanlamowned buildings are energy and water efficient by managing consumption and investigating opportunities to integrate renewable energy sources through the direct installation of green energy or power-wheeling agreements.

# (3.1.1.29) Description of response

In the reporting year, Sanlam did consider the installation of a grey water system at Head Office. However, such activity was not feasible as local government has not been able to connect water since 2021. Under investigation is the implementation of motion sensor taps. Such initiative has not been implemented but is under investigation. It is identified that such initiatives will have the potential to save 30%-50% of water.

#### Climate change

### (3.1.1.1) Risk identifier

Select from:

✓ Risk3

#### (3.1.1.3) Risk types and primary environmental risk driver

#### Market

✓ Inability to attract co-financiers and/or investors due to uncertain risks related to the environment

### (3.1.1.4) Value chain stage where the risk occurs

Select from:

✓ Investing (Asset manager) portfolio

# (3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

✓ Market risk

# (3.1.1.6) Country/area where the risk occurs

Select all that apply

✓ Mali

✓ Togo

✓ Benin
✓ Kenya

✓ Egypt
 ✓ Angola

✓ Gabon

✓ Malawi

✓ Uganda
✓ Nigeria

✓ Burundi
✓ Senegal

✓ Lesotho
✓ Botswana

✓ Morocco
✓ Cameroon

✓ Namibia
✓ Eswatini

✓ Malaysia
✓ Mozambique

✓ Zimbabwe

✓ Indonesia

✓ Mauritius ✓ Côte d'Ivoire

✓ Madagascar
✓ United Kingdom of Great Britain and Northern Ireland

## (3.1.1.9) Organization-specific description of risk

Sanlam is responsible for managing a substantial amount of investments on behalf of policyholders, shareholders, and third-party clients. We recognise that some assets are exposed to climate change risks which may be either physical or transitional in nature. Transitional risks are becoming increasingly prevalent as the world transitions towards a low-carbon economy. As an asset manager, Sanlam may face challenges related to shifts in regulations, carbon pricing, changes in consumer preferences, advancements in clean technologies, and evolving market dynamics. These transition risks can impact the value and performance of investments, particularly in carbonintensive industries. Ultimately, the driver of such risks includes the inability to attract co-financiers and /or investors due to uncertain risks related to climate change. The impacts of these risks encompass the possibility of holding stranded assets, which may result in unexpected write-downs, devaluations, or liabilities due to climate change, resource depletion, climate regulations, shifts in consumer behavior, and litigation. Climate-related factors can introduce additional volatility into financial markets. Changes in regulations, public sentiment, or physical impacts of climate change can lead to sudden shifts in market dynamics, asset prices, and investor behavior. This volatility can impact the overall performance of investment portfolios and increase market uncertainty.

### (3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

✓ 1-10%

#### (3.1.1.11) Primary financial effect of the risk

Select from:

☑ Reduced profitability of investment portfolios

### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

✓ Medium-term

# (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

✓ More likely than not

## (3.1.1.14) Magnitude

Select from:

Medium

# (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The inability of Sanlam's investments to secure co-financiers or attract investors due to uncertain environmental risks, such as water scarcity, climate change, or regulatory shifts, could lead to significant financial costs. These risks may increase project financing costs, delay implementation, or even result in project cancellations. As a result, Sanlam could face reduced returns on investment, missed growth opportunities, and potential reputational damage, all of which would negatively impact the company's overall profitability and shareholder value.

### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

✓ No

#### (3.1.1.26) Primary response to risk

#### **Diversification**

✓ Develop new products, services and/or markets

#### (3.1.1.27) Cost of response to risk

0

# (3.1.1.28) Explanation of cost calculation

Sanlam is in the process of investigating and quantifying the climate risks associated with the assets under management in the business. We will be able to report a potential financial impact figure, or range, once these investigations are finalised.

#### (3.1.1.29) Description of response

Sanlam is responding to these market risks related to our assets under management by increasing our focus on sustainable investing. We believe it will be a key driver of structural change in the countries, companies and the markets in which we operate. Accordingly, Sanlam Investments established an oversight and governance committee, the Sustainable Investments Committee, to drive our sustainable investment initiatives and monitor and evaluate the implementation and progress of the agreed priorities. This committee is made up of some of the most senior individuals within our business and reports into the executive committee and, ultimately, the board of directors. Sanlam is a founding member of the UNEP FI's Principles for Sustainable Insurance, and accordingly follow four sustainable insurance principles: 1. Embed relevant ESG issues in decision-making. 2. Collaborate with clients to raise awareness, manage risk, and find solutions. Sanlam is a

proponent of active ownership, which entails the use of the rights and position of ownership to influence the activities or behaviour of investee entities. Active ownership can be applied differently in each asset class. For example, for listed equities it would include engagement and voting activities. 3. Engage with governments and stakeholders to promote action on ESG issues. 4. Demonstrate transparency by publicly disclosing progress in implementing the Principles. Our sustainable investment strategy also includes negative screening, which excludes entire sectors or industries from the investable universe. In addition, we engage in impact investing, where funds target positive measurable social and/or environmental outcomes as well as financial returns. The costs of this response are borne internally and therefore not reported as standalone costs.

#### Climate change

## (3.1.1.1) Risk identifier

Select from:

✓ Risk4

### (3.1.1.3) Risk types and primary environmental risk driver

#### Reputation

☑ Other reputation risk, please specify: Shifts in customer preferences

# (3.1.1.4) Value chain stage where the risk occurs

Select from:

✓ Investing (Asset manager) portfolio

## (3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

☑ Reputational risk

# (3.1.1.6) Country/area where the risk occurs

Select all that apply

✓ Mali

✓ India

✓ Togo

Kenya

- Benin
- Egypt
- Gabon
- Burundi
- Lesotho
- ✓ Morocco
- Namibia
- Nigeria
- Zimbabwe
- ✓ Indonesia
- Mauritius
- Madagascar
- Mozambique

- Angola
- ✓ Malawi
- Uganda
- Senegal
- Botswana
- Cameroon
- Eswatini
- ✓ Malaysia
- Burkina Faso
- ✓ South Africa
- ✓ Côte d'Ivoire
- ✓ United Kingdom of Great Britain and Northern Ireland

#### (3.1.1.9) Organization-specific description of risk

Sanlam incorporates ESG risk assessment into our investment policy statement. In cases of multi-managed portfolios, external service providers are responsible for purchasing securities, and their policy frameworks may or may not include climate-related considerations. Hence, it is crucial for Sanlam to evaluate providers and their ESG impact. The approach of asset owners to climate change can shape our relationships with stakeholders, including investors, clients, and communities. Stakeholders increasingly expect Sanlam, as an asset owner, to tackle climate-related risks, demonstrate sustainable practices, and provide relevant disclosures. Failure to meet these expectations can lead to reputational harm and loss of trust. As a listed company on the Johannesburg Stock Exchange, a signatory to the UN Global Compact, Sanlam is obligated to effectively address the challenges posed by climate change. Insufficient response to this challenge would significantly impact our reputation and brand. Difficulties in meeting customer preferences could result in a decline in revenues due to reduced demand for products and services.

#### (3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

**☑** 1-10%

# (3.1.1.11) Primary financial effect of the risk

Select from:

✓ Decreased revenues due to reduced demand for products and services

# (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

✓ Medium-term

#### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

✓ More likely than not

#### (3.1.1.14) Magnitude

Select from:

Medium

# (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Reputational damage for Sanlam's asset management business could lead to significant financial costs, including loss of investor confidence and subsequent withdrawal of funds under management. This could result in a decrease in fee income, affecting the firm's profitability. Additionally, negative perceptions may increase the cost of capital, reduce future business opportunities, and necessitate increased spending on marketing and public relations to restore trust. In severe cases, reputational damage could impact long-term client relationships, leading to sustained revenue losses.

#### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

✓ No

# (3.1.1.26) Primary response to risk

#### **Diversification**

✓ Develop new products, services and/or markets

#### (3.1.1.27) Cost of response to risk

#### (3.1.1.28) Explanation of cost calculation

Sanlam is in the process of investigating and quantifying the climate risks associated with the assets under management in the business. We will be able to report a potential financial impact figure, or range, once these investigations are finalised.

#### (3.1.1.29) Description of response

Sanlam is responding to these market risks related to our owned assets by increasing our focus on sustainable investing. We believe it will be a key driver of structural change in the countries, companies and the markets in which we operate. Accordingly, Sanlam Investments established an oversight and governance committee, the Sustainable Investments Committee, to drive our sustainable investment initiatives and monitor and evaluate the implementation and progress of the agreed priorities. This committee is made up of some of the most senior individuals within our business and reports into the executive committee and, ultimately, the board of directors. Sanlam is a founding member of the UNEP Fl's Principles for Sustainable Insurance, and accordingly follow four sustainable insurance principles: 5. Embed relevant ESG issues in decision-making. 6. Collaborate with clients to raise awareness, manage risk, and find solutions. Sanlam is a proponent of active ownership, which entails the use of the rights and position of ownership to influence the activities or behaviour of investee entities. Active ownership can be applied differently in each asset class. For example, for listed equities it would include engagement and voting activities. 7. Engage with governments and stakeholders to promote action on ESG issues. 8. Demonstrate transparency by publicly disclosing progress in implementing the Principles. Our sustainable investment strategy also includes negative screening, which excludes entire sectors or industries from the investable universe. In addition, we engage in impact investing, where funds target positive measurable social and/or environmental outcomes as well as financial returns. The costs of this response are borne internally and therefore not reported as standalone costs.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

#### Climate change

#### (3.1.2.1) Financial metric

Select from:

✓ Revenue

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

Select from:

**✓** 1-10%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

1

# (3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

**✓** 1-10%

# (3.1.2.7) Explanation of financial figures

Sanlam still to quantify the amounts through scenario work that is currently underway. [Add row]

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

	Environmental opportunities identified
Climate change	Select from:  ✓ Yes, we have identified opportunities, and some/all are being realized

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

#### Climate change

### (3.6.1.1) Opportunity identifier

Select from:

✓ Opp2

### Climate change

#### (3.6.1.1) Opportunity identifier

Select from:

✓ Opp1

# (3.6.1.3) Opportunity type and primary environmental opportunity driver

#### Markets

☑ Other markets opportunity, please specify: Investing (Asset manager) portfolio

#### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

✓ Investing (Asset manager) portfolio

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

✓ South Africa

# (3.6.1.8) Organization specific description

Sanlam recognizes the significant global risk posed by climate change, which has the potential to impact society and its clients. However, Sanlam also sees opportunities within this changing landscape. One notable opportunity for lies in financing a just transition, where ESG investments actively reduce carbon emissions and improve social outcomes. As an asset manager, Sanlam believes that proactive investment can drive transformative change. The provision of funds that invest in companies that have positive environmental and climate credentials is therefore a substantive climate-related opportunity for Sanlam. The primary financial impact of these funds is increased access to capital, for the development of largescale climate mitigation and adaptation infrastructure projects. Sanlam continues to support the allocation of capital to combat climate change in emerging markets. Notable examples include the successful joint venture with Dutch Development Bank, FMO, which developed the blended finance Climate Investor One and Two funds, as well as the Sanlam Sustainable Infrastructure Fund. The Climate Investor One fund was the first such initiative by Climate Fund Managers, Sanlam's joint venture with the Dutch Development Bank, FMO. With the support of broad public and private sector commitment, the funds raised by Climate Investor One have been allocated to renewable energy infrastructure projects.

#### (3.6.1.9) Primary financial effect of the opportunity

Select from:

✓ Increased access to capital

#### (3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

✓ Medium-term

#### (3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

✓ Very likely (90–100%)

#### (3.6.1.12) Magnitude

Select from:

☑ High

# (3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Sanlam will still quantify the anticipated effect of the opportunity on the financial performance and cash flows of Sanlam in the selected future time zones.

#### (3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

✓ No

#### (3.6.1.24) Cost to realize opportunity

0

#### (3.6.1.25) Explanation of cost calculation

Sanlam's investment activities are largely done through the internal Sanlam Specialised Finance and Sanlam Investments Group, through the course of daily business operations. These are internal costs and the costs to realise these opportunities are reported as 0.

#### (3.6.1.26) Strategy to realize opportunity

Sanlam's strategy to realise the opportunities associated with increasing capital to develop large-scale climate-related infrastructure projects involves the employment of a sustainable investment approach. ESG is integrated into the decision-making processes to ensure that Sanlam creates positive impact alongside mandated financial returns. To further integrate ESG additionality into its investment decision-making, Sanlam has partnered with Business Day and Intellidex to launch the Sanlam ESG Barometer research project. In traditional investment decisions, ESG ratings based on external views of countries and companies play a significant role. Investors utilize these ratings in a passive screening process to direct capital towards strong performers and avoid those engaged in activities with adverse ESG impacts. These activities may include countries with high inequality, dependence on coal, a history of corruption, or companies involved in fracking and known for labour abuses, making it difficult for them to access ESGlinked investment. However, relying solely on historical data from rating agencies limits insights into entities' efforts to improve their ESG performance. This means that investors may miss opportunities to actively drive transformative and measurable ESG change. This concept is known as ESG additionality, which refers to achieving positive environmental or social outcomes that would not be possible without specific investments. By embracing ESG considerations and seeking opportunities to support sustainable practices, Sanlam aims to navigate the challenges posed by climate change while actively contributing to a more sustainable future.

#### Climate change

#### (3.6.1.1) Opportunity identifier

Select from:

✓ Opp3

## (3.6.1.3) Opportunity type and primary environmental opportunity driver

#### **Products and services**

✓ Other products and services opportunity, please specify: Insurance underwriting portfolio

#### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

✓ Insurance underwriting portfolio

#### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

South Africa

#### (3.6.1.8) Organization specific description

Sanlam and Santam generate revenue through our insurance activities and investments, serving clients in South Africa and selected emerging markets. In particular, Santam's comprehensive range of policies includes coverage for crop losses and catastrophe events. Our primary objective is to mitigate risk and safeguard our clients' financial well-being, ensuring that insured losses are covered by investment premiums. Santam Agriculture is the leading crop insurer in South Africa, specializing in named peril insurance and multi-peril crop insurance. Over the years, the demand for crop insurance has grown significantly, driven by factors such as increased commodity prices. However, increasingly, the agricultural sector is facing adverse impacts, including reduced crop yields and feedstocks, due to water scarcity caused by climate change. This could lead to financial hardships for farmers and agribusinesses, creating a greater need for crop insurance coverage. We are committed to supporting our customers in navigating these challenges and providing them with the necessary protection for their crops and livelihoods.

#### (3.6.1.9) Primary financial effect of the opportunity

Select from:

✓ Increased revenues resulting from increased demand for products and services

# (3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

✓ Short-term

#### (3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

✓ Very likely (90–100%)

# (3.6.1.12) Magnitude

Select from:

Medium

# (3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Sanlam will still quantify the anticipated effect of the opportunity on the financial performance and cash flows of Sanlam in the selected future time zones.

#### (3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

✓ No

## (3.6.1.24) Cost to realize opportunity

239000000

#### (3.6.1.25) Explanation of cost calculation

Index insurance operates by setting predetermined levels for specific parameters like rainfall or soil moisture. When these measures fall below or exceed the set level, the policy pays out without the need for manual assessment, providing immediate support to the insured. While index insurance products are not legislated in South Africa, Santam has conducted a pilot project in collaboration with various stakeholders, including government departments and regulatory authorities. A decision regarding the inclusion of this product is currently pending. However, similar index insurance products are available in other African countries, albeit dependent on government support and subsidies. If permitted in South Africa, index insurance could have a significant impact on the long-term economic performance of farms. Insurance provides stability to farm income through indemnity payments, enabling farmers to secure financial loans and make necessary investments for farm growth. Additionally, insurance allows farmers to adjust their production strategies and improve economic performance in situations where onfarm risk reduction measures may be insufficient or ineffective.

## (3.6.1.26) Strategy to realize opportunity

Santam Agriculture, in collaboration with the South African Insurance Association (SAIA) and relevant government departments, has successfully conducted a pilot project for Soil Moisture Index insurance. The primary goal of this initiative is to expand the market reach of Santam Agriculture by offering the product to small, medium, and micro enterprises (SMMEs) as well as smallholder farmers. Furthermore, Santam Agriculture aims to customize solutions for markets outside of South Africa. It's important to note that index insurance, such as the Soil Moisture Index product, is not currently regulated under the Insurance Act. The research and development cost of R239 million was considered for the cost to realize this opportunity.

[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

#### Climate change

# (3.6.2.1) Financial metric

Select from:

Assets

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

1

# (3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

**☑** 1-10%

#### (3.6.2.4) Explanation of financial figures

Sanlam will still quantify the anticipated effect of the opportunity on the financial performance and cash flows of Sanlam in the selected future time zones. [Add row]

#### C4. Governance

#### (4.1) Does your organization have a board of directors or an equivalent governing body?

# (4.1.1) Board of directors or equivalent governing body

Select from:

Yes

# (4.1.2) Frequency with which the board or equivalent meets

Select from:

Annually

## (4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

- ☑ Executive directors or equivalent
- ✓ Non-executive directors or equivalent
- ✓ Independent non-executive directors or equivalent

# (4.1.4) Board diversity and inclusion policy

Select from:

✓ Yes, and it is publicly available

#### (4.1.5) Briefly describe what the policy covers

The policy outlines the governance framework and regulatory requirements for the selection and re-appointment of directors at Sanlam Limited. It applies to the Board of Sanlam Limited and Sanlam Life Insurance Limited, with similar approaches for subsidiaries. It details the process for evaluating and appointing new directors, including skills assessment, diversity, background checks, and ensuring compliance with regulatory standards. Furthermore, it emphasizes the importance of board renewal, performance evaluation, and the non-automatic re-appointment of directors.

# (4.1.6) Attach the policy (optional)

Policy-for-the-Selection-Appointment-of-Directors (1).pdf [Fixed row]

#### (4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	Select from:  ✓ Yes
Biodiversity	Select from:  ✓ Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

#### Climate change

# (4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☑ Board-level committee

# (4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

✓ No

#### (4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

#### Select from:

☑ Scheduled agenda item in every board meeting (standing agenda item)

#### (4.1.2.5) Governance mechanisms into which this environmental issue is integrated

#### Select all that apply

- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ✓ Overseeing reporting, audit, and verification processes
- ☑ Approving corporate policies and/or commitments
- ✓ Monitoring progress towards corporate targets
- ✓ Overseeing and guiding the development of a business strategy

## (4.1.2.6) Scope of board-level oversight

#### Select all that apply

- ☑ Risks and opportunities to our own operations
- ☑ The impact of our own operations on the environment
- ☑ Risks and opportunities to our investment activities
- ☑ The impact of our banking activities on the environment
- ☑ The impact of our investing activities on the environment

- ☑ Risks and opportunities to our insurance underwriting activities
- ☑ The impact of our insurance underwriting activities on the environment

#### (4.1.2.7) Please explain

Sustainability, including climate-related issues, forms part of board agendas, and it is mandatory for all business units and subsidiaries to include social, ethics and sustainability issues onto the board agendas. The engagement and oversight at Board level facilitates the integration of multiple functions involved in climate risk, across the business. In FY2023, the use of the listed governance mechanisms contributed to the Board's overall oversight of climate related issues. The Social, Ethics and Sustainability (SES) Committee briefed the Board on the following items during the reporting year: - Oversaw the group's sustainability reporting and disclosure on material non-financial aspects. - Maintained a heightened approach to governance, ethics management, and compliance and risk management processes. The committee received regular reports on each of these items. - Reviewed the group's sustainability strategy, and recommended it to the board for approval. - Reviewed the group stakeholder management policy to ensure it remains relevant and appropriate. - Reviewed the stakeholder relations strategy to ensure alignment with the outcomes of the stakeholder perception survey. - Considered the risks and opportunities associated with the committee's mandate and key deliverables, including ongoing review of emerging risks. - Exercised oversight of the group's 'new ways of work' initiatives and its culture journey assessment. The

insights shared by stakeholders assist the group in shifting to a culture that enables and complements the group strategy. - Influenced the group's investment mandate and policy to ensure Sanlam practices responsible investment principles. Objectives include promoting good governance principles and decision-making, including creating value through the companies and initiatives in which Sanlam invests. - Oversight of ESG matters, specifically the implementation of the newly approved group sustainability strategy and setting key metrics with business clusters. - Identifying and reviewing the group's exposure and response to climate-related risks. - Presentations on a range of topical matters were considered, including global reporting trends and convergence relevant to ESG reporting and disclosure requirements with a view to adopting the double materiality principle in the group's reporting. - Review and approval of the annual Sanlam group sustainability report.

#### **Biodiversity**

#### (4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

▼ Board-level committee

# (4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

✓ No

#### (4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

✓ Scheduled agenda item in every board meeting (standing agenda item)

## (4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ✓ Overseeing reporting, audit, and verification processes
- ☑ Approving corporate policies and/or commitments
- ✓ Monitoring progress towards corporate targets
- ✓ Overseeing and guiding the development of a business strategy

### (4.1.2.6) Scope of board-level oversight

Select all that apply

- ☑ Risks and opportunities to our own operations
- ☑ The impact of our own operations on the environment
- ☑ Risks and opportunities to our investment activities
- ☑ The impact of our banking activities on the environment
- ☑ The impact of our investing activities on the environment

- ☑ Risks and opportunities to our insurance underwriting activities
- ☑ The impact of our insurance underwriting activities on the environment

#### (4.1.2.7) Please explain

The Social, Ethics and Sustainability Committee of the Board is specifically tasked with overseeing the response to environmental, social, and governance (ESG) risks, which includes climate-related risks. This committee ensures that climate change considerations are integrated into the company's overall strategy and operations
[Fixed row]

#### (4.2) Does your organization's board have competency on environmental issues?

#### Climate change

## (4.2.1) Board-level competency on this environmental issue

Select from:

✓ No, but we plan to within the next two years

## (4.2.4) Primary reason for no board-level competency on this environmental issue

Select from:

✓ No standardized procedure

#### (4.2.5) Explain why your organization does not have a board with competence on this environmental issue

The governance structure prioritises a broader oversight of ESG risks rather than isolating environmental issues as a separate competency. By integrating environmental considerations into a wider ESG framework, the board can address these issues in conjunction with social and governance factors. Sanlam's Board of Directors is the group's highest governing body and has an appropriate balance of relevant diversity in gender, culture, age, fields of knowledge, skills and experience

in areas appropriate to Sanlam's business. ESG matters, notably climate change and sustainability, are considered material matters for the group. During FY2022, the board was given training via a webinar on Climate Change matters. In 2024 Board received further training on climate-related matters. [Fixed row]

#### (4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Select from:  ☑ Yes
Biodiversity	Select from:  ☑ Yes

[Fixed row]

# (4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

# Climate change

#### (4.3.1.1) Position of individual or committee with responsibility

#### **Executive level**

☑ Chief Executive Officer (CEO)

#### (4.3.1.2) Environmental responsibilities of this position

#### Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

#### Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

#### Strategy and financial planning

- ✓ Developing a business strategy which considers environmental issues
- ✓ Implementing a climate transition plan

# (4.3.1.3) Coverage of responsibilities

Select all that apply

☑ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

#### (4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

#### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

Quarterly

# (4.3.1.6) Please explain

The Group Chief Executive Officer CEO is the highest management position responsible for climate-related matters at Sanlam. Although the board remains accountable, certain responsibilities are delegated to the group CEO, the CFO and, where applicable, the group executive committee (Group Exco). The group chief executive officer is an ex officio member of the board of directors of Santam. Due to the capacity in which he operates, he also serves as the chair of the Group executive committee. In addition, the group CEO has been appointed as a member of the risk and investment committees in 2022 and the SES committee with effect from 1 January 2023. The group CEO is accountable to the board for the successful execution of the group's strategy and the overall management of Sanlam's subsidiary Santam performance. Processes by which the CEO is informed of and monitors climate-related issues: Is by quarterly meetings that includes board members and reports received by the different Sanlam groups and subsidiaries. The CEO is informed by the CRO on risks and opportunities as well as implementation of climate strategy and programmes in order to adequately make decisions on climate related matters. The Group CEO also receives feedback and is reported directly to by the strategy unit team on reporting of ESG matters, monitoring of performance against ESG goals and targets including climate change. The

CEO is also informed by Social, Ethics and Sustainability (SES) committee, The SES committee is responsible for overseeing the group's response to ESG matters and climate-related risks and opportunities. Position

#### **Biodiversity**

#### (4.3.1.1) Position of individual or committee with responsibility

#### **Executive level**

☑ Chief Executive Officer (CEO)

# (4.3.1.2) Environmental responsibilities of this position

#### Dependencies, impacts, risks and opportunities

- ✓ Assessing environmental dependencies, impacts, risks, and opportunities
- ☑ Managing environmental dependencies, impacts, risks, and opportunities

#### Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

#### Strategy and financial planning

- ✓ Developing a business strategy which considers environmental issues
- ✓ Implementing a climate transition plan

# (4.3.1.3) Coverage of responsibilities

Select all that apply

☑ Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

# (4.3.1.4) Reporting line

Select from:

☑ Reports to the board directly

#### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

Quarterly

#### (4.3.1.6) Please explain

The Group Chief Executive Officer CEO is the highest management position responsible for climate-related matters at Sanlam. Although the board remains accountable, certain responsibilities are delegated to the group CEO, the CFO and, where applicable, the group executive committee (Group Exco). The group chief executive officer is an ex officio member of the board of directors of Santam. Due to the capacity in which he operates, he also serves as the chair of the Group executive committee. In addition, the group CEO has been appointed as a member of the risk and investment committees in 2022 and the SES committee with effect from 1 January 2023. The group CEO is accountable to the board for the successful execution of the group's strategy and the overall management of Sanlam's subsidiary Santam performance. Processes by which the CEO is informed of and monitors climate-related issues: Is by quarterly meetings that includes board members and reports received by the different Sanlam groups and subsidiaries. The CEO is informed by the CRO on risks and opportunities as well as implementation of climate strategy and programmes in order to adequately make decisions on climate related matters. The Group CEO also receives feedback and is reported directly to by the strategy unit team on reporting of ESG matters, monitoring of performance against ESG goals and targets including climate change. The CEO is also informed by Social, Ethics and Sustainability (SES) committee, The SES committee is responsible for overseeing the group's response to ESG matters and climate-related risks and opportunities. Position [Add row]

# (4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

#### Climate change

## (4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

Yes

# (4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

10

### (4.5.3) Please explain

In 2022, a decision was made to enhance the alignment of the Group Executive Committee's (Group Exco) performance contracts with Environmental, Social, and Governance (ESG) metrics. Beginning from the 2023 financial year, 10% of the key performance metrics for their annual contracts: 5% linked to ESG factors and 5% based on metrics related to people, culture, transformation, and people development. The Group Human Resources and Remuneration committee plays a crucial role in reviewing the value drivers within the Group. This ensures that incentives provided are directly aligned with strategic objectives and appropriately address the integration of acquired businesses. In making forward-looking policy decisions, the committee prioritizes principles of simplification and transparency to ensure clarity and effectiveness.

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

#### Climate change

[Fixed row]

## (4.5.1.1) Position entitled to monetary incentive

#### **Board or executive level**

☑ Board/Executive board

## (4.5.1.2) Incentives

Select all that apply

✓ Bonus – set figure

# (4.5.1.3) Performance metrics

#### **Targets**

- ✓ Progress towards environmental targets
- ☑ Achievement of environmental targets
- ☑ Reduction in absolute emissions in line with net-zero target

#### **Emission reduction**

☑ Implementation of an emissions reduction initiative

#### Resource use and efficiency

- ☑ Improvements in emissions data, reporting, and third-party verification
- ☑ Energy efficiency improvement
- ☑ Reduction in total energy consumption

#### **Pollution**

☑ Reduction/elimination of environmental incidents and/or environmental notices (notices of violation)

## (4.5.1.4) Incentive plan the incentives are linked to

Select from:

☑ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

# (4.5.1.5) Further details of incentives

Sanlam introduced ESG and culture Key Performance Indicators (KPIs) in 2023, linking 10% of Group Exco's short-term incentives to these metrics. Emission and water reduction targets were set, aiming for a 10% reduction against a 2019 baseline by 2025. The facilities management team diligently tracks consumption patterns related to electricity, water, diesel, petrol, aircon gas, and waste to manage environmental impact effectively. These initiatives reflect Sanlam's commitment to addressing climate-related risks and opportunities in a responsible and sustainable manner.

# (4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

By tying 10% of the Group Exco's short-term incentives to environmental, social, and governance (ESG) KPIs, Sanlam ensures that leadership prioritizes sustainability in decision-making. This alignment motivates executives to actively pursue climate-related objectives. By integrating sustainability goals into executive compensation, Sanlam reinforces the importance of climate considerations within its corporate governance framework. This alignment encourages leaders to focus on long-term sustainability rather than short-term financial gains. Furthermore, the linkage fosters a culture of continuous improvement and innovation, as executives are incentivized to explore new strategies and technologies that can enhance sustainability efforts. This commitment to innovation is crucial for addressing climate challenges effectively. By tying compensation to specific sustainability targets, Sanlam holds its executives accountable for their performance in achieving these goals. This accountability is essential for driving meaningful progress in the company's climate transition plans [Add row]

#### (4.6) Does your organization have an environmental policy that addresses environmental issues?

Does your organization have any environmental policies?
Select from: ✓ Yes

[Fixed row]

# (4.6.1) Provide details of your environmental policies.

#### Row 1

# (4.6.1.1) Environmental issues covered

Select all that apply

- ✓ Climate change
- ✓ Biodiversity

# (4.6.1.2) Level of coverage

Select from:

✓ Organization-wide

# (4.6.1.3) Value chain stages covered

Select all that apply

- ✓ Direct operations
- Upstream value chain
- ✓ Downstream value chain

# (4.6.1.4) Explain the coverage

The policy applies to the entire Sanlam Group, with oversight by the Sanlam Board of Directors, Executives, Group Sustainability, and Corporate Facilities departments. Regular updates and monitoring are part of the policy to ensure its effectiveness.

# (4.6.1.5) Environmental policy content

#### **Environmental commitments**

- ✓ Commitment to avoidance of negative impacts on threatened and protected species
- ☑ Commitment to comply with regulations and mandatory standards
- ☑ Commitment to take environmental action beyond regulatory compliance
- ☑ Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems
- ✓ Commitment to stakeholder engagement and capacity building on environmental issues

#### **Climate-specific commitments**

- ☑ Commitment to 100% renewable energy
- Commitment to net-zero emissions

#### Social commitments

- ☑ Adoption of the UN International Labour Organization principles
- ✓ Commitment to promote gender equality and women's empowerment
- ☑ Commitment to respect and protect the customary rights to land, resources, and territory of Indigenous Peoples and Local Communities
- ☑ Commitment to respect internationally recognized human rights

# (4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

✓ Yes, in line with the Paris Agreement

# (4.6.1.7) Public availability

Select from:

✓ Publicly available

#### (4.6.1.8) Attach the policy

# (4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies	Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio	Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion
Investing (Asset manager)	Select from:  ✓ Yes, our policies include environmental requirements that clients/investees need to meet	Select from:  ✓ Other, please specify:Not applicable	Not applicable.
Investing (Asset owner)	Select from:  ✓ Yes, our policies include environmental requirements that clients/investees need to meet	Select from:  ✓ Other, please specify:Not applicable	Not applicable.
Insurance (Insurance company)	Select from:  ✓ Yes, our policies include environmental requirements that clients/investees need to meet	Select from:  ✓ Other, please specify :Not applicable	Not applicable.

[Fixed row]

# (4.7.1) Provide details of the policies which include environmental requirements that clients/investees need to meet.

#### **Investing (Asset manager)**

# (4.7.1.1) Environmental issues covered

Select all that apply

- ✓ Climate change
- ☑ Biodiversity

# (4.7.1.2) Type of policy

Select all that apply

- ☑ Risk policy
- Credit policy
- ✓ Sustainable/Responsible Investment Policy
- ✓ Investment policy/strategy

# (4.7.1.3) Public availability

Select from:

✓ Publicly available

#### (4.7.1.4) Attach the policy

Sustainable Investment Policy.pdf

# (4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

☑ Direct operations and upstream/downstream value chain

#### (4.7.1.6) Industry sectors covered by the policy

Select all that apply

- Retail
- ✓ Materials
- ▼ Fossil Fuels
- Manufacturing
- ✓ Infrastructure

- ✓ Power generation
- ✓ Transportation services
- ☑ Biotech, health care & pharma

# (4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

## (4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

We recognise that taking action on climate change is crucial to limit global temperature increases to below 1,5C, in accordance with the goals of the Paris Agreement and the Intergovernmental Panel on Climate Change's Sixth Assessment's Shared Socioeconomic Pathway 1 (SSP-1) Recommendations, complemented by more ambitious Nationally Determined Contributions (NDCs). However, a strict exclusionary policy in responsible investment and insurance aimed at transitioning to a low-carbon economy could inadvertently lead to socioeconomic issues, potentially exacerbating energy insecurity and poverty among the most vulnerable in our society. Sanlam adopts a 'just and equitable energy transition' principle(1) in its approach to fossil fuel investments and insurance.

#### (4.7.1.12) Requirements for clients/investees

#### **Climate-specific commitments**

☑ Commitment to not invest in fossil-fuel expansion

#### (4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

☑ No, but we plan to measure this within the next two years

# (4.7.1.17) Explain why your organization does not measure the % of clients/investees compliant with the policy

Work in progress.

#### **Investing (Asset owner)**

#### (4.7.1.1) Environmental issues covered

Select all that apply

- ✓ Climate change
- ☑ Biodiversity

# (4.7.1.2) Type of policy

Select all that apply

✓ Risk policy

- ✓ Credit policy
- ✓ Sustainable/Responsible Investment Policy
- ✓ Investment policy/strategy

# (4.7.1.3) Public availability

Select from:

☑ Publicly available

## (4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

✓ Direct operations and upstream/downstream value chain

#### (4.7.1.6) Industry sectors covered by the policy

Select all that apply

✓ Retail
 ✓ Manufacturing

✓ Apparel
✓ Infrastructure

✓ Materials
✓ Power generation

✓ Hospitality
✓ Transportation services

☑ Biotech, health care & pharma

#### (4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

# (4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

Sustainable investing is strategically important to us and also lies at the heart of our DNA. Impact-first frameworks and environmental, social, and governance (ESG) metrics, aligned with the United Nations sustainable development goals (UN SDGs), are anchored into all our investment processes to ensure we accurately measure our sustainability. Sanlam Investments firmly believes that the evaluation of ESG factors enables asset managers to make more informed investment decisions, ultimately enhancing the sustainability of investment returns for our valued clients. Recognising this responsibility, mandated by regulatory and governance drivers,

we align our beliefs with these principles. To steer our ESG endeavours, we actively subscribe to the globally recognised United Nations-supported Principles for Responsible Investment (UNPRI). Additionally, we have embraced the Code for Responsible Investing in South Africa (CRISA) principles, aligning our practices with local standards. We also acknowledge the significance of the UN SDGs and our national development goals outlined in the National Development Plan 2030 (NDP). In our commitment to making a positive impact, we aspire to direct our investments toward these crucial goals. In line with Sanlam Investments' overarching perspective on sustainable investment, we have adopted the following beliefs, which serve as guiding principles in our decision-making processes: The focus on sustainability has become commonplace in investment markets and will increasingly be a key driver of structural change in countries, companies, and the markets in which we operate, as a result of the requirement for improvements in governance, environmental, and positive social impacts. An investee entity's attention (or lack thereof) to ESG factors can impact the value, performance, and reputation of the investments made on behalf of clients. Therefore, ESG considerations that are financially material must be included in our investment process and decision-making.

#### (4.7.1.12) Requirements for clients/investees

#### **Environmental commitments**

☑ Other environmental commitment, please specify: Commitment to acting urgently to ensure greenhouse gases are minimised.

### (4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

✓ No, but we plan to measure this within the next two years

# (4.7.1.17) Explain why your organization does not measure the % of clients/investees compliant with the policy

Work in progress.

#### **Insurance (Insurance company)**

# (4.7.1.1) Environmental issues covered

Select all that apply

✓ Climate change

#### (4.7.1.2) Type of policy

Select all that apply

☑ Risk policy

✓ Other insurance policy, please specify: Climate change position statement

## (4.7.1.3) Public availability

Select from:

✓ Publicly available

## (4.7.1.4) Attach the policy

santam\_cc-position-statement-final.pdf

## (4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

☑ Direct operations and upstream/downstream value chain

## (4.7.1.6) Industry sectors covered by the policy

Select all that apply

✓ Retail
✓ Infrastructure

✓ Apparel
✓ Power generation

✓ Materials
✓ Transportation services

✓ Fossil Fuels

✓ Food, beverage & agriculture

✓ Manufacturing
✓ Biotech, health care & pharma

#### (4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

# (4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

In the light of the increasing global trend of divesting from fossil fuels, the short term business acknowledges that it operates in a South African market that is still heavily reliant on coal for power generation. The Group supports the transition from divesting from coal to a low carbon economy but understands that this transition needs to be just and that it considers the impact on the economy. In practice, just transition involves the consideration of the needs of groups of workers, communities, consumers and citizens who are vulnerable to the effects of the low carbon transition. Santam will work with different stakeholders and clients to

understand and support a just transition from coal to a low carbon economy. The Group also supports the development of transition policies which are imperative to ensure that the low carbon development pathway does not exacerbate existing economic fragility but contributes to climate change mitigation and climate justice goals.

#### (4.7.1.12) Requirements for clients/investees

#### **Climate-specific commitments**

- ☑ Commitment to not invest in fossil-fuel expansion
- ☑ Other climate-related commitment, please specify :Santam will work with different stakeholders and clients to understand and support a just transition from coal to a low carbon economy

## (4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

✓ No, but we plan to measure this within the next two years

#### (4.7.1.17) Explain why your organization does not measure the % of clients/investees compliant with the policy

Work in progress.

[Add row]

# (4.9) Does your organization offer its employees a pension scheme that incorporates environmental criteria in its holdings?

#### **Climate change**

#### (4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

✓ Yes, as the default investment strategy for all plans

# (4.9.2) Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated

At Sanlam Investments, all equity and debt investments are guided by a Responsible Investment Policy. This policy ensures that investment processes integrate environmental, social, and governance (ESG) principles, including considerations related to climate change. Specifically, the Responsible Investment Policy applies to the management of retirement funds by Sanlam Investment Group (SIG), which includes employment-based retirement schemes. This means that ESG factors, including climate change risks and opportunities, are taken into account when making investment decisions for these funds. By incorporating ESG principles, Sanlam Investments demonstrates its commitment to responsible investing and aligning investment strategies with sustainable and long-term value creation. All equity and debt investments at Sanlam Investments are governed by a Responsible Investment Policy. As a result, investment processes incorporate ESG principles, including climate change, for retirement funds managed by SIG, including employment-based retirement schemes.

[Fixed row]

#### (4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

# (4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

Yes

## (4.10.2) Collaborative framework or initiative

Select all that apply

- UN Global Compact
- ✓ ClimateWise Principles
- ✓ Principles for Responsible Investment (PRI)
- ✓ UNEP FI Principles for Sustainable Insurance
- ☑ Global Reporting Initiative (GRI) Community Member

☑ Task Force on Climate-related Financial Disclosures (TCFD)

#### (4.10.3) Describe your organization's role within each framework or initiative

1. ClimateWise Principles As a signatory to the ClimateWise Principles, Sanlam commits to taking leadership in climate action within the insurance industry. This involves assessing and managing the risks and opportunities associated with climate change. Sanlam reports annually on its progress against these principles, demonstrating how it is integrating climate considerations into its business strategy, risk management, and client engagement. 2. Global Reporting Initiative (GRI) Community Member Sanlam utilizes the GRI Standards for its sustainability reporting, ensuring that its disclosures are comprehensive, comparable, and reliable. This membership helps Sanlam engage with stakeholders by providing transparent information on its economic, environmental, and social impacts, enhancing accountability and driving continuous improvement in its sustainability practices. 3. Principles for Responsible Investment (PRI) As a PRI signatory, Sanlam Investments Group (Sanlam's Asset Manager) incorporates ESG considerations into its investment processes, decisions, and active ownership practices. This commitment involves integrating ESG factors into financial analysis, engaging with investee companies on ESG issues, and promoting responsible investment

practices across the industry. Sanlam also reports on its progress in implementing the PRI principles, reflecting its dedication to generating sustainable, long-term returns. 4. Task Force on Climate-related Financial Disclosures (TCFD) Sanlam aligns with TCFD recommendations by systematically disclosing its climate-related financial risks and opportunities. This includes reporting on governance, strategy, risk management, and metrics and targets related to climate change. By adopting TCFD guidelines, Sanlam aims to provide stakeholders with insights into how climate change might impact its business and what steps it is taking to mitigate those risks. 5. UN Global Compact Sanlam is a participant in the UN Global Compact, committing to its ten principles in the areas of human rights, labor, environment, and anti-corruption. This involves integrating these principles into its strategies, policies, and procedures. Sanlam actively engages in initiatives that support broader UN goals, such as the Sustainable Development Goals (SDGs), and reports annually on its progress in upholding these principles. 6. UNEP FI Principles for Sustainable Insurance Santam (subsidiary of Sanlam) is a long-standing and founding member of the UNEP FI PSI, as part of its membership, Santam is committed to embedding ESG in decision-making as relevant to the insurance business, working with clients and business partners, governments and regulators to raise ESG awareness and manage ESG risk, and demonstrating accountability and transparency through regular public disclosure. [Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

- ✓ Yes, we engaged directly with policy makers
- ✓ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

✓ Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

✓ Paris Agreement

## (4.11.4) Attach commitment or position statement

Santam\_CC Position Statement Final (003).pdf

#### (4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

✓ Yes

## (4.11.6) Types of transparency register your organization is registered on

Select all that apply

- ✓ Mandatory government register
- ✓ Voluntary government register
- ✓ Non-government register

# (4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Sanlam manages the multiple engagement activities around climate change across business divisions and geographies to ensure that the group has a common approach that is also consistent with our strategy on climate change. The Sanlam Board is ultimately responsible for the governing and monitoring of the quality of stakeholder relationships and the effectiveness of our stakeholder engagements in the Group – in line with King IVTM Report on Corporate Governance. In addition, each business entity is given relative autonomy in their positioning and responses but must adhere to the principles outlined in the Group stakeholder management policy. For example, the Sanlam Sustainability Management Office has direct responsibility for Sanlam's partnership with WWF, which includes regular meetings and updates on all project aspects, including advocacy. If there are any differences in strategy, these would be shared with the Social, Ethics, and Sustainability Committee of the Sanlam Board for discussion and decision-making. In a similar vein, Sanlam Investments monitors the strategy direction of the Association for Savings and Investments (ASISA) and the South African Insurance Association (SAIA). If there are any divergences, they will be escalated to the Sanlam Investment Group Board level and subsequently reviewed by the Social, Ethics, and Sustainability Committee of the Sanlam Board. The Social Ethics and Sustainability Committee comprises individuals representing various business functions, many of which fall under the Group Office. The Group Compliance office engages with regulatory bodies, advocating for Sanlam's position on policy-related debates and forums. Key representatives from different business units, including the Company Secretariat, maintain regular engagement with regulators, shareholders, government entities, and business partners on significant policy issues affecting the company, including climate change where relevant.

# (4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

#### Row 1

### (4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

South Africa's Climate Change Bill

## (4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

✓ Climate change

#### (4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

#### Social issues

- ✓ Food security
- ✓ Public health
- ☑ Rights of Indigenous Peoples and local communities
- ✓ Other social issues, please specify: Job creation, and skills development

# (4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

National

# (4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

✓ South Africa

#### (4.11.1.6) Your organization's position on the policy, law, or regulation

#### Select from:

#### (4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

- ✓ Discussion in public forums
- ✓ Participation in working groups organized by policy makers
- ✓ Participation in voluntary government programs
- ✓ Provided funding or in-kind support

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

The South African Climate Change Bill is critical to Sanlam's environmental commitments and transition plans as it establishes a regulatory framework for reducing greenhouse gas emissions, enhancing climate resilience, and promoting a low-carbon economy. This aligns with Sanlam's goals to mitigate climate-related risks, invest in sustainable infrastructure, and support vulnerable communities in carbon-intensive sectors. The bill has informed Sanlam's engagement through collaboration with stakeholders, integrating climate considerations into its business strategy, and enhancing transparency in climate-related disclosures. Success in these engagements is measured by reductions in Sanlam's carbon footprint, growth in sustainable assets under management, effective integration of climate risk into decision-making, and compliance with the bill's reporting requirements. By aligning with the Climate Change Bill, Sanlam not only meets regulatory obligations but also reinforces its commitment to a just transition, balancing environmental imperatives with socio-economic realities, particularly in developing markets.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

✓ Yes, we have evaluated, and it is aligned

# (4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

✓ Paris Agreement [Add row]

(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.

#### Row 1

## (4.11.2.1) Type of indirect engagement

Select from:

✓ Indirect engagement via a trade association

#### (4.11.2.4) Trade association

#### Africa

☑ Other trade association in Africa, please specify: Association for Savings and Investments (ASISA)

(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

✓ Climate change

(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

Consistent

# (4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

✓ Yes, we publicly promoted their current position

# (4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

The South African Insurance Association (SAIA) represents the short-term insurance industry and recognizes its responsibility in addressing broader sustainability issues. These include risk management in a changing natural and built environment, encompassing climate change, disaster management, as well as economic and societal challenges like the energy and water crisis in South Africa. SAIA acknowledges that climate change presents significant financial challenges to insurers, posing threats to insurability and affordability. Failure to adequately address climate risks can impact the sector's sustainability. By redefining insurers' understanding, communication, and action on climate risks, clients and policymakers can be incentivized to reduce their exposure to these risks, contributing to mitigation efforts and the promotion of resilient economies. Santam actively participates in various SAIA committees, playing an active role in knowledge sharing. Through these committees, Santam shares insights gathered from environmental scanning processes that assess macro and micro factors affecting the general insurance operating environment. Santam holds positions on the boards of both the UN's Principles for Sustainable Insurance and ClimateWise, actively contributing to discussions and initiatives related to sustainable practices in the insurance industry. All relevant and valuable information collected through these engagements is shared with SAIA, either through the committees themselves or via the leadership channels, ensuring a comprehensive exchange of insights and expertise.

#### (4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

721147.8

# (4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

By paying the membership fees of the trade organization Sanlam aims to achieve a comprehensive understanding of the climate risks that its insurance businesses are exposed to. We aim to assist our clients and policymakers reduce their exposure to these risks, contributing to mitigation efforts and the promotion of resilient economies. In addition, Sanlam aims to promote a just and fair transition to a low carbon economy through membership in this industry association.

(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

✓ Yes, we have evaluated, and it is aligned

# (4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

✓ Paris Agreement [Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

#### Row 1

#### (4.12.1.1) Publication

Select from:

✓ In voluntary sustainability reports

#### (4.12.1.3) Environmental issues covered in publication

Select all that apply

- ✓ Climate change
- ✓ Water
- Biodiversity

## (4.12.1.4) Status of the publication

Select from:

Complete

#### (4.12.1.5) Content elements

Select all that apply

- ☑ Governance
- ☑ Risks & Opportunities
- Strategy

#### (4.12.1.6) Page/section reference

Sanlam Sustainability Approach Pg., 46-59 Governance and Risk Management Pg., 61-72 Environmental Wellness Pg., 128-135 Value Creation Pg., 41-42

## (4.12.1.7) Attach the relevant publication

sustainability-report-2023.pdf

## (4.12.1.8) Comment

Sanlam's 2023 Sustainability Report continues to address the challenges and risks posed by climate change to the sustainability of its business. The company emphasizes the importance of aligning actions to reduce greenhouse gas emissions and mitigate the impacts of climate change with the "Just Transition" principles, particularly in the developing world. Sanlam remains committed to supporting employees and communities in Africa's carbon-intensive sectors, focusing on enhancing resilience through initiatives such as investing in sustainable infrastructure and energy efficiency projects. By taking a systematic approach, Sanlam integrates considerations of human rights into business decisions, ensuring that its climate change mitigation and adaptation strategies contribute positively to societal well-being and economic stability across its operating regions

#### Row 2

## (4.12.1.1) Publication

Select from:

☑ In mainstream reports, in line with environmental disclosure standards or frameworks

# (4.12.1.2) Standard or framework the report is in line with

Select all that apply

✓ TCFD

# (4.12.1.3) Environmental issues covered in publication

Select all that apply

✓ Climate change

# (4.12.1.4) Status of the publication

Select from:

Complete

#### (4.12.1.5) Content elements

Select all that apply

- **☑** Governance
- ☑ Risks & Opportunities
- Strategy
- Emissions figures

# (4.12.1.6) Page/section reference

Governance section: page 5 Strategy section: page 7 Risk Management section (risks and opportunities): page 10 Metrics & Targets section: page 13

# (4.12.1.7) Attach the relevant publication

2023-Santam\_TCFD\_report.pdf

## (4.12.1.8) Comment

Santam (Sanlam subsidiary) (non-life business) published its second Taskforce on Climate-related Financial Disclosures (TCFD) Report outlining risks and opportunities identified as part of the scenario analysis exercise conducted in line with the Network for Greening the Financial System scenarios. [Add row]

#### C5. Business strategy

#### (5.1) Does your organization use scenario analysis to identify environmental outcomes?

#### Climate change

## (5.1.1) Use of scenario analysis

Select from:

✓ No, but we plan to within the next two years

## (5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

✓ Other, please specify :Sanlam Group has started the process to understand the climate change scenarios.

### (5.1.4) Explain why your organization has not used scenario analysis

We are actively performing climate scenarios aligned with TCFD recommendations, with the outcomes to be made public once they are complete. In 2024, Sanlam started the process to assess the climate scenarios to identify the environmental outcomes to transition to a sustainable economy. These efforts demonstrate our commitment to understanding and addressing climate-related challenges. By conducting climate scenarios, we gain valuable insights into potential impacts on our business. Sharing the outcomes enhances transparency and informs decision-making. The climate scenarios will shed light on different future climate scenarios and their implications. This proactive approach prepares us for risks and opportunities. We aim to build resilience and capitalize on emerging prospects, aligning with our responsible and sustainable practices. Through transparent reporting and TCFD adherence, we foster trust and accountability. Our climate position statement provides a comprehensive overview of our climate-related actions and commitment to addressing climate change. Sanlam's dedication to climate scenarios and disclosure reinforces our proactive management of climate risks and opportunities. Embracing the TCFD framework supports our long-term resilience and contributes to a sustainable future. Lastly, we are currently working towards implementing scenario analyses. After such work has been completed, we will work towards our scienced based targets. Santam our short-term insurance business has partnered with BSR to perform a climate scenario analysis as per TCFD recommendations. The objectives were 1) to build resilience and maximize the climate-related opportunities in Santam's strategy and risk management processes, 2) to provide Santam with clear disclosure to stakeholders on the implementation of the TCFD recommendation Strategy c) on scenario analysis. Santam will face physical and transition climate risks in all three scenarios, and these will impact the product portfolio, business continuity, infrastructure, workfo

[Fixed row]

#### (5.2) Does your organization's strategy include a climate transition plan?

Transition plan	Primary reason for not having a climate transition plan that	Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world
Select from: ✓ No, but we are developing a climate transition plan within the next two years	Select from:  ✓ Other, please specify: We have began the process developing the transition plan for Sanlam	Detail-

[Fixed row]

#### (5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

## (5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

✓ Yes, both strategy and financial planning

# (5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

Products and services

Operations

[Fixed row]

#### (5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

#### **Products and services**

## (5.3.1.1) Effect type

Select all that apply

- ✓ Risks
- Opportunities

### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

✓ Climate change

## (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

1. Risk Management and Climate Change as a Risk Factor: Sanlam recognizes climate change as a significant risk to both its business and its clients. The company has developed risk management strategies to mitigate the impact of extreme weather events, such as droughts and floods, which can affect the economic environment, particularly in agriculture, infrastructure, and insurance sectors. Insurance and Reinsurance Adjustments: To address climate-related risks, Sanlam has adapted its insurance offerings, particularly in agriculture and property insurance, to better reflect the increased likelihood of natural disasters. It also uses climate data to improve underwriting models and inform reinsurance policies. 2. Environmental, Social, and Governance (ESG) Integration Sustainable Investment: Sanlam integrates ESG factors into its investment decisions, promoting responsible investment practices. This means that environmental risks (such as the carbon footprint of a company or its exposure to climate risks) are factored into the evaluation process of investment opportunities. Green Bonds and Sustainable Finance: Sanlam has been involved in the issuance and investment in green bonds, which fund environmentally sustainable projects. The company is committed to increasing its allocation to assets and projects that contribute positively to the environment. 3. Opportunities in the Green Economy Investment in Renewable Energy: Sanlam sees opportunities in the transition to a low-carbon economy, especially in sectors like renewable energy, clean technology, and energy efficiency. By investing in these areas, Sanlam aims to capitalize on growth sectors driven by environmental regulations and shifting consumer preferences. Support for Sustainable Development Goals (SDGs): Sanlam's strategy aligns with the United Nations SDGs, particularly goals related to climate action, clean energy, and sustainable cities. This alignment drives the company's initiatives to support projects that have a positive environmental impact. 4. Operational Efficiency and Environmental Impact Reduction of Carbon Footprint: Internally, Sanlam has taken steps to reduce its carbon footprint by improving energy efficiency in its offices, reducing water consumption, and promoting recycling and waste reduction. These operational adjustments are part of the company's broader commitment to minimizing its environmental impact. Sustainability Reporting: Sanlam provides detailed sustainability reports as part of its annual reporting, demonstrating transparency about how environmental factors are integrated into its operations and strategy. 5. Stakeholder Engagement and Advocacy Client and Partner Awareness: Sanlam engages with clients, business partners, and stakeholders to raise awareness about environmental risks and opportunities.

#### **Operations**

#### (5.3.1.1) Effect type

Select all that apply

Risks

Opportunities

### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

Climate change

#### (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

1. Asset Owner: Sanlam recognizes its climate impact through its operations and has accordingly set a 10% reduction target in Scope 1 and 2 greenhouse gas (GHG) emissions for our South African operations. This commitment reflects our determination to minimize our environmental impact. Looking ahead to 2023, we plan to conduct a bottom-up analysis to expand the scope of emissions reduction efforts and include other jurisdictions where we operate. To address the broader scope of emissions, we will also conduct a feasibility study focused on Scope 3 GHG emissions, with a particular emphasis on our investments. Our business strategy is influenced by climate change, and we are dedicated to meeting environmental targets. When it comes to assessing operational climate change risks related to our day-to-day operations, we take a bottom-up approach. This ensures that we thoroughly understand and manage the potential risks associated with climate change. 2. Asset Manager: -Exposure to climate risk through investment portfolio of high-emitting companies. To mitigate against this, the investment business has a bespoke engagement management process in place that regularly keep investee companies accountable and provides oversight into their climate ambitions and climate response plans. 2. Short-term insurance: -Increased claim frequency due to heightened extreme weather events. -Reinsurance: The increase in the severity and frequency of extreme events has resulted in higher reinsurance prices and could in the long-term impact the availability of reinsurance. -Operational risk: Our business faces the potential risk of business interruption following a natural disaster as a result of possible system failure at a time of mass claims. -Reputational risk (potential): The pace at which our business responds to climate and innovates could impact our reputation and climate and social responsibility becomes more important to society.

[Add row]

#### (5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

#### Row 1

# (5.3.2.1) Financial planning elements that have been affected

Select all that apply

- Capital expenditures
- ✓ Claims reserves

# (5.3.2.2) Effect type

Select all that apply

Risks

# (5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

✓ Climate change

#### (5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Climate-related risks and opportunities have influenced our financial planning at Sanlam in various ways. As a company, we are committed to supporting and spearheading the just energy transition in Africa. With our extensive historical data and understanding of the social and economic complexities involved, we are well-equipped to drive sustainable change. One of the ways we have incorporated climate-related risks into our financial planning is through strategic partnerships and investments that have the potential to increase sustainable revenues. For instance, we have collaborated with the Dutch Development Bank, FMO, to establish the Climate Investor One and Two funds. These funds focus on financing renewable energy projects in emerging markets and water, sanitation, and ocean infrastructure projects. By investing in these initiatives, we not only contribute to addressing climate change but also create opportunities for sustainable development. [Add row]

#### (5.10) Does your organization use an internal price on environmental externalities?

# (5.10.1) Use of internal pricing of environmental externalities

Select from:

✓ No, but we plan to in the next two years

#### (5.10.3) Primary reason for not pricing environmental externalities

Select from:

✓ No standardized procedure

# (5.10.4) Explain why your organization does not price environmental externalities

We are in a process of concluding the climate scenario work for 2024-2025 and we will look at developing an internal carbon price in the following year. [Fixed row]

#### (5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Clients	Select from:  ✓ Yes	Select all that apply
Investees	Select from: ✓ Yes	Select all that apply
Suppliers	Select from: ✓ Yes	Select all that apply  ☑ Climate change
Investors and shareholders	Select from: ✓ Yes	Select all that apply ✓ Climate change
Other value chain stakeholders	Select from:  ✓ Yes	Select all that apply  ✓ Plastics

[Fixed row]

# (5.11.3) Provide details of your environmental engagement strategy with your clients.

#### Row 1

# (5.11.3.1) Type of clients

Select from:

✓ Clients of Insurers

# (5.11.3.2) Environmental issues covered by the engagement strategy

✓ Climate change

# (5.11.3.3) Type and details of engagement

#### **Capacity building**

☑ Support clients to set their own environmental commitments across their operations

### (5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

Select from:

Unknown

#### (5.11.3.5) % of portfolio covered in relation to total portfolio value

Select from:

Unknown

#### (5.11.3.6) Explain the rationale for the coverage of your engagement

In our interactions with clients, both in insurance and investment sectors, we actively encourage them to embrace the TCFD framework for reporting their climate-related risks and opportunities. As an increasing number of our clients adopt the TCFD guidelines, it enables us to align our understanding of climate risks, thereby enhancing collaborative efforts in our strategic response to these challenges.

#### (5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

We are committed to raising awareness among our employees and communities about the impacts of climate change and the significance of our group's response. Utilising various communication methods, we disseminate information, data, and narratives to highlight the urgency of the issue. Furthermore, we host online educational webinars and training sessions, equipping our employees with comprehensive knowledge about climate change, its implications for our business, and the essential roles they can play in our collective climate action efforts.

### (5.11.3.8) Attach your engagement strategy

SAMI Shareholder Engagement Policy (1).pdf

## (5.11.3.9) Staff in your organization carrying out the engagement

Select all that apply

✓ Senior-level roles

#### (5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

✓ Other, please specify: Not specific, depends on the applicant.

## (5.11.3.11) Effect of engagement, including measures of success

Clients are better informed about the potential risks that could impact the settlement of their claims and thus take proactive steps towards mitigating the risks.

#### (5.11.3.12) Escalation process for engagement when dialogue is failing

Select from:

✓ Yes, we have an escalation process

#### (5.11.3.13) Describe your escalation process

Where possible all identified risks should be quantified, including regular updating of risk information and control effectiveness, as required. Each appointed cluster/business CRO is responsible for immediately escalating any risks which meet the defined escalation rules as per Groups escalation policy. [Add row]

#### (5.11.4) Provide details of your environmental engagement strategy with your investees.

#### Row 1

# (5.11.4.1) Environmental issues covered by the engagement strategy

Select all that apply

✓ Climate change

## (5.11.4.2) Type and details of engagement

#### **Capacity building**

☑ Other capacity building activity, please specify: Sanlam Investments has a robust Active Ownership (Investee Engagement) process that in place that ensures direct engagement with clients across all asset classes. This also includes voting on all resolutions.

#### (5.11.4.3) % of scope 3 investees associated emissions as reported in 12.1.1/12.1.3

Select from:

Unknown

# (5.11.4.4) % of investing (Asset managers) portfolio covered in relation to total portfolio value

Select from:

Unknown

## (5.11.4.5) % of investing (Asset owners) portfolio covered in relation to total portfolio value

Select from:

Unknown

# (5.11.4.6) Explain the rationale for the coverage of your engagement

Our Active ownership/Stewardship activities which involve engagement and voting is integral to our business because it allows us to play and active and advocacy role to influence the direction of the business with respect to climate-response. In doing this, we are able to manage our own exposure to climate risk and fulfill our fiduciary duty towards our clients. The engagement approach employs both proactive and responsive strategies, fostering constructive dialogue with company boards and management. We choose engagement areas based on financial materiality and impact, leveraging our partnership with Robeco to scale engagement efforts and focus on strategic themes for positive change and improved practices.

#### (5.11.4.7) Describe how you communicate your engagement strategy to your investees and/or to the public

We leverage our ownership position in each of the investee companies to influence the activities and behavior of investee entities. The engagement and voting is applied differently across the asset classes. The engagement strategy is communicated through our publicly available reports and the investment business stewardship policy.

### (5.11.4.8) Attach your engagement strategy

Sustainable Investment Policy.pdf

## (5.11.4.9) Staff in your organization carrying out the engagement

Select all that apply

✓ Specialized in-house engagement teams

## (5.11.4.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

✓ Board members

✓ CEO

#### (5.11.4.11) Effect of engagement, including measures of success

All engagements are meticulously tracked against specific objectives and outcomes, and categorised as either positive, neutral or negative. The duration varies; proxy voting or AGM-related engagements may last up to six months, while deeper thematic and value-based engagements could extend to three years. In instances where engagements are not well-received or fail to achieve the targeted outcome, Sanlam Investments may cast votes against a board or management at their AGM, reduce stake or exit a holding. In severe cases, legal routes may be pursued to resolve issues with boards. We adhere to a set voting process and mandates, making our voting records and proxy voting guidelines publicly available.

## (5.11.4.12) Escalation process for engagement when dialogue is failing

Select from:

✓ Yes, we have an escalation process

#### (5.11.4.13) Describe your escalation process

Where engagements do not lead to the targeted results, Sanlam Investments may cast votes against the board and management at AGMs. Escalations may also contribute to a decision to decrease or exit a holding in severe situations. In addition, we may elect to pursue a legal route to resolve issues with boards. This would signal failure of any previous communication, escalation or dispute resolution methods.

[Add row]

#### (5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

#### Climate change

### (5.11.7.2) Action driven by supplier engagement

Select from:

☑ Waste and resource reduction and improved end-of-life management

### (5.11.7.3) Type and details of engagement

#### **Capacity building**

✓ Other capacity building activity, please specify: Supplier code of conduct and supplier charter outlines the need for all suppliers to conduct the business responsibly and adhere to the environmental regulations of the jurisdiction they are located in.

### (5.11.7.4) Upstream value chain coverage

Select all that apply

- ☑ Tier 1 suppliers
- ☑ Tier 2 suppliers
- ✓ Tier 3 suppliers
- ✓ Tier 4+ suppliers

#### (5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

Unknown

## (5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

Unknown

## (5.11.7.8) Number of tier 2+ suppliers engaged

0

#### (5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Indirect engagement through the supplier code of conduct and supplier charters which outlines the expectation of all suppliers to conduct their businesses responsibly and to adhere to environmental regulations of the jurisdictions that their operations are located in.

#### (5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

Unknown

[Add row]

#### (5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

#### Climate change

## (5.11.9.1) Type of stakeholder

Select from:

✓ Investors and shareholders

#### (5.11.9.2) Type and details of engagement

#### **Education/Information sharing**

✓ Share information on environmental initiatives, progress and achievements

## (5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

Unknown

## (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Shareholders and investors have an interest in the business and its overall long-term sustainability. The rationale behind the engagement is to provide an assurance to our investors that we are cognizant of the role that our organisation needs to play in responding to environmental and climate-related risk.

#### (5.11.9.6) Effect of engagement and measures of success

Through engagement with investors, we are able to get a sense of their expectations of our progress in responding to climate-related and nature-related risks. [Add row]

# (5.14) Do your external asset managers have to meet environmental requirements as part of your organization's selection process and engagement?

External asset managers have to meet specific environmental requirements as part of the selection process and engagement	Policy in place for addressing external asset manager non- compliance			
	Select from:  ✓ No, we do not have a policy in place for addressing non-compliance			

[Fixed row]

(5.14.1) Provide details of the environmental requirements that external asset managers have to meet as part of your organization's selection process and engagement.

#### Row 1

## (5.14.1.1) Environmental issues covered by the requirement

Select all that apply

✓ Climate change

#### (5.14.1.2) Coverage

Select from:

☑ Minority of assets managed externally

#### (5.14.1.3) Environmental requirement that external asset managers have to meet

Select from:

☑ Other, please specify: Investing responsibly as per the Code for Responsible Investing and Responsible Investing principles.

## (5.14.1.4) Mechanisms used to include environmental requirement in external asset manager selection

Select all that apply

☑ Other, please specify: Implied in the Responsible Investment Policies and Principles.

## (5.14.1.5) Response to external asset manager non-compliance with environmental requirement

Select from:

✓ Retain and engage

#### (5.14.1.6) % of non-compliant external asset managers engaged

Select from:

Unknown

[Add row]

#### (5.15) Does your organization exercise voting rights as a shareholder on environmental issues?

Exercise voting rights as a shareholder on environmental issues
Select from:  ☑ Yes

[Fixed row]

## (5.15.1) Provide details of your shareholder voting record on environmental issues.

#### Row 1

## (5.15.1.1) Method used to exercise your voting rights as a shareholder

Select from:

☑ Exercise voting rights directly

## (5.15.1.3) % of voting rights exercised

76.07

## (5.15.1.4) % of voting which is publicly available

100

## (5.15.1.5) Environmental issues covered in shareholder voting

Select all that apply

✓ Climate change

## (5.15.1.6) Global environmental commitments that your shareholder voting is aligned with

Select all that apply

✓ Not assessed

## (5.15.1.7) Issues supported in shareholder resolutions

Select all that apply

☑ Board oversight of environmental issues [Add row]

#### **C6. Environmental Performance - Consolidation Approach**

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

#### Climate change

## (6.1.1) Consolidation approach used

Select from:

Operational control

## (6.1.2) Provide the rationale for the choice of consolidation approach

The operational control approach is selected based on its ability to define the boundaries of the Groups GHG inventory and is useful because of its inclusion of emission sources from operations that the Group has authority to develop and implement policies as it excludes emissions from operations where Sanlam Group does not have operational control.

#### **Plastics**

#### (6.1.1) Consolidation approach used

Select from:

Operational control

## (6.1.2) Provide the rationale for the choice of consolidation approach

The current plastic audit at the canteen is a crucial first step in reducing single-use plastics in our buildings. As the canteen is a primary source of plastic waste, including packaging and products, this audit provides valuable data on the types and volumes of plastic entering our facilities. However, focusing solely on plastic products at the point of origin is insufficient for achieving a comprehensive reduction and ensuring accountability for recycling commitments.

#### **Biodiversity**

## (6.1.1) Consolidation approach used

Select from:

✓ Operational control [Fixed row]

C7. Environmental performance - 0	limate Change
(7.1) Is this your first year of reporti	ng emissions data to CDP?
Select from: ✓ No	
(7.1.1) Has your organization under changes being accounted for in this	gone any structural changes in the reporting year, or are any previous structural disclosure of emissions data?
	Has there been a structural change?
	Select all that apply ✓ No
<pre>[Fixed row] (7.1.2) Has your emissions account year?</pre>	ng methodology, boundary, and/or reporting year definition changed in the reportin
	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply  ☑ No

[Fixed row]

# (7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

- ☑ IPCC Guidelines for National Greenhouse Gas Inventories, 2006
- **☑** ISO 14064-1
- ☑ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- (7.3) Describe your organization's approach to reporting Scope 2 emissions.

#### (7.3.1) Scope 2, location-based

Select from:

☑ We are reporting a Scope 2, location-based figure

#### (7.3.2) Scope 2, market-based

Select from:

✓ We have no operations where we are able to access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2, market-based figure

#### (7.3.3) Comment

Sanlam operates in countries where regulated central electricity utilities operate and control the market. Since Sanlam gets all their purchased electricity from the national electricity grid, Sanlam's Scope 2 emission are location-based.

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

Yes

# (7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

#### Row 1

## (7.4.1.1) Source of excluded emissions

Smaller facilities within the South African scope of reporting are unable to provide data to report on GHG emissions at these facilities.

#### (7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

✓ Scope 1

✓ Scope 2 (location-based)

✓ Scope 3: Business travel

☑ Scope 3: Employee commuting

☑ Scope 3: Purchased goods and services

✓ Scope 3: Waste generated in operations

✓ Scope 3: Upstream transportation and distribution

✓ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

#### (7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

## (7.4.1.4) Relevance of location-based Scope 2 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

#### (7.4.1.6) Relevance of Scope 3 emissions from this source

Select from:

☑ Emissions are relevant but not yet calculated

#### (7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents

15

#### (7.4.1.9) Estimated percentage of total Scope 3 emissions this excluded source represents

15

## (7.4.1.10) Explain why this source is excluded

Data is unavailable for these smaller locations due to constrained resources, and lack of historical data for greenhouse gas emissions. Sanlam's GHG inventory was calculated according to the operational control approach. For the Reporting year this included 15 of the Group's South African facilities, and one office in the United Kingdom. These facilities account for 85% of the Group's directly held subsidiaries.

#### (7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Estimated percentage of 15% for both scope 1, 2 & 3 emissions is seen as 85% of the emissions of the South African facilities (and one location in the UK) have been determined by the limited assurance of the Group's GHG verification statement.

[Add row]

#### (7.5) Provide your base year and base year emissions.

#### Scope 1

#### (7.5.1) Base year end

12/31/2019

## (7.5.2) Base year emissions (metric tons CO2e)

2391

## (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### **Scope 2 (location-based)**

#### (7.5.1) Base year end

12/31/2019

#### (7.5.2) Base year emissions (metric tons CO2e)

41353

#### (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Scope 3 category 1: Purchased goods and services

#### (7.5.1) Base year end

12/31/2019

#### (7.5.2) Base year emissions (metric tons CO2e)

652.84

#### (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

#### (7.5.1) Base year end

#### (7.5.2) Base year emissions (metric tons CO2e)

4011.23

## (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Scope 3 category 4: Upstream transportation and distribution

#### (7.5.1) Base year end

12/31/2019

#### (7.5.2) Base year emissions (metric tons CO2e)

816.3

## (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Scope 3 category 5: Waste generated in operations

#### (7.5.1) Base year end

12/31/2019

#### (7.5.2) Base year emissions (metric tons CO2e)

509.2

### (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Scope 3 category 6: Business travel

#### (7.5.1) Base year end

12/31/2019

#### (7.5.2) Base year emissions (metric tons CO2e)

11332.12

## (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Scope 3 category 7: Employee commuting

#### (7.5.1) Base year end

12/31/2019

#### (7.5.2) Base year emissions (metric tons CO2e)

16949.31

#### (7.5.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Scope 3 category 13: Downstream leased assets

### (7.5.1) Base year end

12/31/2019

#### (7.5.2) Base year emissions (metric tons CO2e)

809.55 [Fixed row]

#### (7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

#### Reporting year

## (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

3169

## (7.6.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 1

## (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

2821

## (7.6.2) End date

12/30/2022

## (7.6.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 2

## (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1684

#### (7.6.2) End date

12/30/2021

#### (7.6.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 3

## (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

1644

## (7.6.2) End date

12/30/2020

## (7.6.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 4

#### (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

#### (7.6.2) End date

12/30/2019

## (7.6.3) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 5

## (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

163

## (7.6.2) End date

12/30/2018

## (7.6.3) Methodological details

Greenhouse Gas (GHG) Protocol for Carbon Footprint. [Fixed row]

#### (7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

#### Reporting year

## (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

32333

## (7.7.4) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 1

## (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

33605

#### (7.7.3) End date

12/30/2022

#### (7.7.4) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 2

## (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

35460

#### (7.7.3) End date

12/30/2021

#### (7.7.4) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 3

#### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

#### (7.7.3) End date

12/30/2020

## (7.7.4) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 4

## (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

41353

## (7.7.3) End date

12/30/2019

## (7.7.4) Methodological details

Sanlam Group's carbon footprint was calculated using the Greenhouse Gas Protocol's 'A Corporate Accounting and Reporting Standard (Revised Edition)' and the ISO 14064:2006 (first edition).

#### Past year 5

#### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

38022

#### (7.7.3) End date

12/30/2018

## (7.7.4) Methodological details

Greenhouse Gas (GHG) Protocol for Carbon Footprint. [Fixed row]

(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

#### **Purchased goods and services**

#### (7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

## (7.8.2) Emissions in reporting year (metric tons CO2e)

251

#### (7.8.3) Emissions calculation methodology

Select all that apply

Hybrid method

## (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

#### (7.8.5) Please explain

Purchased goods and services covers purchased paper products and water purchased by Sanlam in this reporting year. Boundary: the calculation covered all upstream emissions from these purchased goods and services (cradle to gate). The hybrid method was used to calculate the emissions associated with these goods. If supplier specific information was not available, then the mass of the purchased goods was multiplied by the average emission factor sourced from DEFRA. The emission factors for paper were sourced from the paper supplier Mondi in their Integrated Annual Report 2022. Water was sourced from Rand Water Annual Report 2017. Emissions were calculated according to the GHG Protocol using the respective emissions factors.

#### **Capital goods**

#### (7.8.1) Evaluation status

Select from:

☑ Relevant, not yet calculated

### (7.8.5) Please explain

Currently, data sets related to this specific category are not evaluated or analysed. However, there are plans to extend the reporting boundary in the near future to incorporate this particular Scope 3 category. This means that the data pertaining to this category will be considered and included in the assessment process in future.

#### Fuel-and-energy-related activities (not included in Scope 1 or 2)

#### (7.8.1) Evaluation status

Select from:

✓ Relevant, calculated

### (7.8.2) Emissions in reporting year (metric tons CO2e)

5060

## (7.8.3) Emissions calculation methodology

Select all that apply

✓ Average data method

## (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

#### (7.8.5) Please explain

This Scope 3 category covers Well-to-Tank emissions of diesel, petrol and LPG and transmission and distribution losses. The average data method was used to calculate the emissions related to fuel and energy activities. The emissions were calculated by multiplying the fuel consumption by the industry average emission factors sourced from DEFRA. Boundary: the cradle-to-gate emissions of purchased fuels were included in the calculation. The T&D losses emissions were calculated on a cradle-to-gate basis. There may be some inaccuracy in the emission factors relating to fuel production as the DEFRA emission factors are specific to the UK. Emission factors were sourced from DEFRA (UK Department of Environment Food and Rural Affairs) 2022 and Eskom Integrated Report 2022.

#### **Upstream transportation and distribution**

#### (7.8.1) Evaluation status

Select from:

✓ Relevant, calculated

#### (7.8.2) Emissions in reporting year (metric tons CO2e)

254

## (7.8.3) Emissions calculation methodology

Select all that apply

✓ Distance-based method

#### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

## (7.8.5) Please explain

The emissions in this category relate to the upstream transportation of goods by Sanlam in the reporting year. The goods reported covers the following transportation modes: heavy goods vehicle couriers, international freight airline couriers, domestic freight airline couriers and short haul freight airline couriers. The distance-based method was used to calculate emissions. The emissions were calculated by multiplying the total mass and distance travelled by the emission factor from DEFRA, with the freight airline emission factors consisting of radiative forcing. Boundary: The scope 1 emissions of transportation were included in the calculation.

#### Waste generated in operations

## (7.8.1) Evaluation status

Select from:

✓ Relevant, calculated

#### (7.8.2) Emissions in reporting year (metric tons CO2e)

176

## (7.8.3) Emissions calculation methodology

Select all that apply

Average data method

## (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

#### (7.8.5) Please explain

The emissions in this category relate to the disposal of waste, such as municipal waste, recycled municipal waste, recycled paper and food compost. The average data method was used to calculate the emissions related to waste disposal activities. Emission factors are sourced from DEFRA 2022 and Friedrich, E. and Trois, C., 2010. Greenhouse gases accounting and reporting for waste management— A South African perspective. Boundary: The Scope 1 and 2 emissions of the waste service providers were included.

#### **Business travel**

#### (7.8.1) Evaluation status

Select from:

✓ Relevant, calculated

#### (7.8.2) Emissions in reporting year (metric tons CO2e)

12023

## (7.8.3) Emissions calculation methodology

✓ Distance-based method

#### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

## (7.8.5) Please explain

The emissions in this category are related to business car hire, air travel and accommodation. The distance-based method was used to calculate the emissions related to car hire, air travel. The distance travelled was multiplied by emission factor associated with the mode of transport sourced from DEFRA 2022. As for accommodation, the total number of accommodation nights was multiplied by the DEFRA emission factor. Boundary: The Scope 1 and 2 emissions from the use of vehicles were included. Emissions are reported on a Tank to Wheel basis.

#### **Employee commuting**

#### (7.8.1) Evaluation status

Select from:

✓ Relevant, calculated

## (7.8.2) Emissions in reporting year (metric tons CO2e)

10370

#### (7.8.3) Emissions calculation methodology

Select all that apply

✓ Distance-based method

## (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

25

## (7.8.5) Please explain

The distance-based method was used to calculate both car hire and air travel emissions. The distance travelled was multiplied by emission factor associated with the mode of transport from DEFRA. Boundary: The Scope 1 and 2 emissions from the use of vehicles were included. Emissions are reported on a Tank to Wheel basis

#### **Upstream leased assets**

#### (7.8.1) Evaluation status

Select from:

☑ Relevant, not yet calculated

## (7.8.5) Please explain

Not applicable at this moment as no leased assets were reported in this boundary of Sanlam and Santam's GHG emissions. However, data for this activity has already been collected and will be provided in the future.

#### **Downstream transportation and distribution**

## (7.8.1) Evaluation status

Select from:

✓ Not relevant, explanation provided

#### (7.8.5) Please explain

Sanlam and Santam are financial services and insurance providers and hence, do not produce any goods requiring transportation and distribution. Courier services are accounted for under upstream transportation and distribution.

#### **Processing of sold products**

#### (7.8.1) Evaluation status

Select from:

✓ Not relevant, explanation provided

#### (7.8.5) Please explain

Not applicable as	Sanlam's	operations a	re relate	d to the	provision	of insurance	services	and fir	nance.
[Fixed row]									

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/30/2022

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

296

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

4671

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

211

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

142

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

## (7.8.1.8) Scope 3: Employee commuting (metric tons CO2e) 10213 (7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e) 0 (7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e) 0 (7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e) 0 (7.8.1.12) Scope 3: Use of sold products (metric tons CO2e) 0 (7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e) 0 (7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e) 0 (7.8.1.15) Scope 3: Franchises (metric tons CO2e) (7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e) 0

## (7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

#### (7.8.1.19) Comment

Sanlam is currently working with consultants to assess and quantify the extent of its Scope 3 emissions, particularly in relation to category 15 (investments). As a financial services provider, Sanlam's operations do not involve the sale or use of physical products, which typically contribute to Scope 3 emissions in other sectors. Instead, the majority of Sanlam's Scope 3 emissions are tied to its investments and the activities of its clients. Given the complex nature of tracking emissions from these sources, some Scope 3 categories are still being evaluated and have not yet been fully recorded.

#### Past year 2

#### (7.8.1.1) End date

12/30/2021

#### (7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

212

#### (7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

#### (7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

5133

## (7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

155

## (7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

## (7.8.1.7) Scope 3: Business travel (metric tons CO2e) 2391 (7.8.1.8) Scope 3: Employee commuting (metric tons CO2e) 6399 (7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e) 0 (7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e) 0 (7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e) 0 (7.8.1.12) Scope 3: Use of sold products (metric tons CO2e) 0 (7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e) 0 (7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e) (7.8.1.15) Scope 3: Franchises (metric tons CO2e) 0

### (7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

#### (7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

#### (7.8.1.19) Comment

Sanlam is currently working with consultants to assess and quantify the extent of its Scope 3 emissions, particularly in relation to category 15 (investments). As a financial services provider, Sanlam's operations do not involve the sale or use of physical products, which typically contribute to Scope 3 emissions in other sectors. Instead, the majority of Sanlam's Scope 3 emissions are tied to its investments and the activities of its clients. Given the complex nature of tracking emissions from these sources, some Scope 3 categories are still being evaluated and have not yet been fully recorded.

#### Past year 3

#### (7.8.1.1) End date

12/30/2020

#### (7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

338

#### (7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

## (7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

3281

## (7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)
234
(7.8.1.7) Scope 3: Business travel (metric tons CO2e)
3673
(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)
8384
(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)
o
(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)
0
(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)
o
(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)
o
(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)
o
(7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)
732

### (7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

#### (7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

## (7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

#### (7.8.1.19) Comment

Sanlam is currently working with consultants to assess and quantify the extent of its Scope 3 emissions, particularly in relation to category 15 (investments). As a financial services provider, Sanlam's operations do not involve the sale or use of physical products, which typically contribute to Scope 3 emissions in other sectors. Instead, the majority of Sanlam's Scope 3 emissions are tied to its investments and the activities of its clients. Given the complex nature of tracking emissions from these sources, some Scope 3 categories are still being evaluated and have not yet been fully recorded.

#### Past year 4

## (7.8.1.1) End date

12/30/2019

#### (7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

515

#### (7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

## (7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)
683
(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)
361
(7.8.1.7) Scope 3: Business travel (metric tons CO2e)
8378
(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)
11784
(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)
0
(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)
0
(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)
0
(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)
0
(7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)
0

#### (7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

810

#### (7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

## (7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

#### (7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

## (7.8.1.19) Comment

Sanlam is currently working with consultants to assess and quantify the extent of its Scope 3 emissions, particularly in relation to category 15 (investments). As a financial services provider, Sanlam's operations do not involve the sale or use of physical products, which typically contribute to Scope 3 emissions in other sectors. Instead, the majority of Sanlam's Scope 3 emissions are tied to its investments and the activities of its clients. Given the complex nature of tracking emissions from these sources, some Scope 3 categories are still being evaluated and have not yet been fully recorded.

#### Past year 5

#### (7.8.1.1) End date

12/30/2018

## (7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

515

## (7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)
3265
(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)
683
(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)
361
(7.8.1.7) Scope 3: Business travel (metric tons CO2e)
8378
(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)
11784
(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)
O
(7.8.1.10) Scope 3: Downstream transportation and distribution (metric tons CO2e)
0
(7.8.1.11) Scope 3: Processing of sold products (metric tons CO2e)
0
(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)
0

### (7.8.1.13) Scope 3: End of life treatment of sold products (metric tons CO2e)

0

## (7.8.1.14) Scope 3: Downstream leased assets (metric tons CO2e)

810

## (7.8.1.15) Scope 3: Franchises (metric tons CO2e)

0

#### (7.8.1.17) Scope 3: Other (upstream) (metric tons CO2e)

0

## (7.8.1.18) Scope 3: Other (downstream) (metric tons CO2e)

0

#### (7.8.1.19) Comment

Sanlam is currently working with consultants to assess and quantify the extent of its Scope 3 emissions, particularly in relation to category 15 (investments). As a financial services provider, Sanlam's operations do not involve the sale or use of physical products, which typically contribute to Scope 3 emissions in other sectors. Instead, the majority of Sanlam's Scope 3 emissions are tied to its investments and the activities of its clients. Given the complex nature of tracking emissions from these sources, some Scope 3 categories are still being evaluated and have not yet been fully recorded.

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from:  ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from:  ☑ Third-party verification or assurance process in place
Scope 3	Select from:  ☑ Third-party verification or assurance process in place

[Fixed row]

# (7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

#### Row 1

# (7.9.1.1) Verification or assurance cycle in place

Select from:

Annual process

# (7.9.1.2) Status in the current reporting year

Select from:

Complete

# (7.9.1.3) Type of verification or assurance

Select from:

✓ Limited assurance

### (7.9.1.4) Attach the statement

Sanlam-2023-GHG-Verification-Statement.pdf

### (7.9.1.5) Page/section reference

Pages 1-4

# (7.9.1.6) Relevant standard

Select from:

**☑** ISO14064-3

### (7.9.1.7) Proportion of reported emissions verified (%)

100 [Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

# (7.9.2.1) Scope 2 approach

Select from:

✓ Scope 2 location-based

# (7.9.2.2) Verification or assurance cycle in place

Select from:

✓ Annual process

# (7.9.2.3) Status in the current reporting year



Complete

# (7.9.2.4) Type of verification or assurance

Select from:

✓ Limited assurance

#### (7.9.2.5) Attach the statement

Sanlam-2023-GHG-Verification-Statement.pdf

# (7.9.2.6) Page/ section reference

Pages 1-4

# (7.9.2.7) Relevant standard

Select from:

**☑** ISO14064-3

# (7.9.2.8) Proportion of reported emissions verified (%)

100 [Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

# (7.9.3.1) Scope 3 category

Select all that apply

✓ Scope 3: Business travel

✓ Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

☑ Scope 3: Employee commuting

☑ Scope 3: Purchased goods and services

✓ Scope 3: Waste generated in operations

☑ Scope 3: Upstream transportation and distribution

# (7.9.3.2) Verification or assurance cycle in place

Select from:

✓ Annual process

### (7.9.3.3) Status in the current reporting year

Select from:

Complete

# (7.9.3.4) Type of verification or assurance

Select from:

✓ Limited assurance

# (7.9.3.5) Attach the statement

Sanlam-2023-GHG-Verification-Statement.pdf

# (7.9.3.6) Page/section reference

Pages 1-4

# (7.9.3.7) Relevant standard

Select from:

**☑** ISO14064-3

### (7.9.3.8) Proportion of reported emissions verified (%)

100 [Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

#### (7.10.1.1) Change in emissions (metric tons CO2e)

0

# (7.10.1.2) Direction of change in emissions

Select from:

✓ No change

#### (7.10.1.3) Emissions value (percentage)

0

# (7.10.1.4) Please explain calculation

Sanlam Head office installed a small solar PV system on its roof for the purpose of disaster recovery - to charge batteries and other equipment in the event of a power outage. It is not available to the building to use as an alternative to grid power. Furthermore, the Solar PV facility that is being commissioned on Sanlam Investments' building is still in progress and not yet commissioned.

#### Other emissions reduction activities

# (7.10.1.2) Direction of change in emissions

Select from:

✓ Increased

#### **Divestment**

# (7.10.1.1) Change in emissions (metric tons CO2e)

0

# (7.10.1.2) Direction of change in emissions

Select from:

✓ No change

#### **Acquisitions**

# (7.10.1.1) Change in emissions (metric tons CO2e)

1

# (7.10.1.2) Direction of change in emissions

Select from:

✓ No change

#### Mergers

# (7.10.1.2) Direction of change in emissions

Select from:

✓ No change

#### **Change in output**

# (7.10.1.2) Direction of change in emissions

Select from:

✓ No change

# Change in methodology

# (7.10.1.2) Direction of change in emissions

Select from:

✓ No change

#### Change in boundary

# (7.10.1.2) Direction of change in emissions

Select from:

✓ No change

#### **Change in physical operating conditions**

# (7.10.1.1) Change in emissions (metric tons CO2e)

1854.78

# (7.10.1.2) Direction of change in emissions

Select from:

✓ Decreased

# (7.10.1.4) Please explain calculation

n 2021, Scope 1 and 2 emissions increased mainly as employees returned to the office in a flexible working schedule which resulted in increased energy and electricity consumption. However, in 2022, emissions decreased as a result of reduced overall electricity usage and a lower emission factor for the South African grid, ultimately leading to a decline in Scope 2 emissions. The total combined Scope 1 and 2 emissions for 2021 amounted to 37,144.17 tCO2e. Furthermore, there was a decrease of 1,854.78 in electricity usage during 2023. By applying the calculation (1,854.78/37,144.17) \* 100, we derived a percentage of approximately 4.993%.

#### Unidentified

### (7.10.1.2) Direction of change in emissions

Select from:

Decreased

[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

✓ Location-based

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

Yes

(7.23.1) Break down your gross Scope 1 and Scope 2 emissions by subsidiary.

#### Row 1

# (7.23.1.1) Subsidiary name

Santam

# (7.23.1.2) Primary activity

Select from:  ☑ Insurance
(7.23.1.3) Select the unique identifier you are able to provide for this subsidiary
Select all that apply  ✓ ISIN code - equity  ✓ Ticker symbol  ✓ Other unique identifier, please specify
(7.23.1.5) ISIN code – equity
ZAE000093779
(7.23.1.7) Ticker symbol
SNT
(7.23.1.11) Other unique identifier
For NSX stock exchange the ticker symbol is SNM
(7.23.1.12) Scope 1 emissions (metric tons CO2e)
1633
(7.23.1.13) Scope 2 Jacation-based emissions (motric tons CO2a)

#### (7.23.1.13) Scope 2, location-based emissions (metric tons CO2e)

7496

# (7.23.1.14) Scope 2, market-based emissions (metric tons CO2e)

7496

# (7.23.1.15) Comment

Santam's emissions performance calculations are based on a location-based Scope 1 and Scope 2 emissions figures. The facilities included within the calculation are:1.Santam Head Office 2.Santam Auckland Park 3.Santam Alice Lane 4.Santam Glacier Furthermore, Santam GHG emissions are included within Sanlam's GHG inventory provided for within the 2023 sustainability report.

[Add row]

#### (7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

✓ Don't know

#### (7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year	
Consumption of fuel (excluding feedstocks)	Select from: ✓ Yes	
Consumption of purchased or acquired electricity	Select from:  ✓ Yes	
Consumption of purchased or acquired heat	Select from: ☑ No	
Consumption of purchased or acquired steam	Select from: ☑ No	
Consumption of purchased or acquired cooling	Select from: ☑ No	
Generation of electricity, heat, steam, or cooling	Select from: ☑ No	

[Fixed row]

### (7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

#### **Consumption of fuel (excluding feedstock)**

### (7.30.1.1) **Heating value**

Select from:

✓ HHV (higher heating value)

# (7.30.1.2) MWh from renewable sources

0

# (7.30.1.3) MWh from non-renewable sources

13608

# (7.30.1.4) Total (renewable and non-renewable) MWh

13608

#### Consumption of purchased or acquired electricity

# (7.30.1.1) Heating value

Select from:

✓ Unable to confirm heating value

# (7.30.1.2) MWh from renewable sources

0

# (7.30.1.3) MWh from non-renewable sources

32275

(7.30.1.4) Total (renewable and non-renewable) MWh				
32275				
Total energy consumption				
(7.30.1.1) Heating value				
Select from:  ☑ Unable to confirm heating value				
(7.30.1.2) MWh from renewable sources				
0				
(7.30.1.3) MWh from non-renewable sources				
45883				
(7.30.1.4) Total (renewable and non-renewable) MWh				
45883 [Fixed row]				
(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year				
	Total electricity/heat/steam/cooling energy consumption (MWh)			
Angola	0.00			
[Fixed row]				

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

#### Row 1

# (7.45.1) Intensity figure

4.51

### (7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

35502

#### (7.45.3) Metric denominator

Select from:

✓ full time equivalent (FTE) employee

#### (7.45.4) Metric denominator: Unit total

7870

### (7.45.5) Scope 2 figure used

Select from:

✓ Location-based

#### (7.45.6) % change from previous year

1.53

#### (7.45.7) Direction of change

Select from:

✓ Decreased

# (7.45.8) Reasons for change

Select all that apply

☑ Other emissions reduction activities

#### (7.45.9) Please explain

Sanlam has committed to reducing its environmental impact by fostering sustainable initiatives to lower the carbon footprint of the operations. With a hybrid working policy, as well as other measures to increase energy efficiency, lower carbon usage resulted across the operations.

[Add row]

### (7.52) Provide any additional climate-related metrics relevant to your business.

#### Row 1

#### (7.52.1) Description

Select from:

✓ Waste

# (7.52.2) Metric value

333.5

#### (7.52.3) Metric numerator

Tonnes

# (7.52.5) % change from previous year

16.16

# (7.52.6) Direction of change

Select from:

Decreased

# (7.52.7) Please explain

An increase in waste that was recycled was seen, and this ensured that there was a decrease in the amount of waste sent to the landfill.

#### Row 2

# (7.52.1) Description

Select from:

☑ Other, please specify: Annual paper consumption per full time employee

# (7.52.2) Metric value

6.17

# (7.52.3) Metric numerator

Total kg consumption

# (7.52.4) Metric denominator (intensity metric only)

Full time employees

# (7.52.5) % change from previous year

27.67

# (7.52.6) Direction of change

Select from:

✓ Decreased

#### (7.52.7) Please explain

Efforts to reduce paper usage within offices has resulted in decreased printing and/or other uses of paper.

#### Row 3

# (7.52.1) Description

Select from:

✓ Other, please specify :Annual water consumption across the reporting boundary

# (7.52.2) Metric value

107965

#### (7.52.3) Metric numerator

Total kilolitre consumption

### (7.52.4) Metric denominator (intensity metric only)

Square metres

# (7.52.5) % change from previous year

10.06

# (7.52.6) Direction of change

Select from:

Decreased

# (7.52.7) Please explain

Water usage across the reporting boundary decreased for the reporting year (FY: 2023).

#### Row 4

# (7.52.1) Description

Select from:

✓ Energy usage

### (7.52.2) Metric value

32275

### (7.52.3) Metric numerator

Total electricity usage

#### (7.52.5) % change from previous year

0.57

#### (7.52.6) Direction of change

Select from:

Decreased

# (7.52.7) Please explain

Energy saving and energy decreasing measures were taken to ensure a decrease in energy consumption for the FY 2023. [Add row]

#### (7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

✓ Absolute target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

#### Row 1

# (7.53.1.1) Target reference number

Select from:

✓ Abs 1

# (7.53.1.2) Is this a science-based target?

Select from:

✓ No, but we anticipate setting one in the next two years

# (7.53.1.5) Date target was set

12/30/2021

### (7.53.1.6) Target coverage

Select from:

✓ Organization-wide

# (7.53.1.7) Greenhouse gases covered by target

Select all that apply

✓ Carbon dioxide (CO2)

# (7.53.1.8) Scopes

Select all that apply

✓ Scope 1

# (7.53.1.11) End date of base year

12/30/2019

### (7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

2391

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

2391.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

# (7.53.1.54) End date of target

12/31/2024

(7.53.1.55) Targeted reduction from base year (%)

10

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

2151.900

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

3169

#### (7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

3169.000

### (7.53.1.78) Land-related emissions covered by target

Select from:

✓ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

-325.39

#### (7.53.1.80) Target status in reporting year

Select from:

Underway

### (7.53.1.82) Explain target coverage and identify any exclusions

This target covers Sanlam's Scope 1 emissions which includes Santam's Scope 1 emissions

#### (7.53.1.83) Target objective

The target objective is to decrease the amount of scope 1 emissions by 10% in the year 2025 based on the 2019 base year emissions. This target applies across the organisation and across the various facilities that are included in the scope of the reporting boundary.

#### (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Sanlam has taken several measures to reduce greenhouse gas (GHG) emissions, aligning with global sustainability goals. Sanlam has integrated energy-efficient systems across operations, focusing on reducing electricity consumption and investing in renewable energy sources. Sanlam has also implemented initiatives to optimise building management practices, such as installing energy-efficient lighting and heating systems. Additionally, Sanlam is committed to reducing emissions from business travel by encouraging virtual meetings and promoting sustainable transport options. Sanlam monitors and reports on their carbon footprint, ensuring transparency in their sustainability efforts while seeking ways to further minimise their environmental impact.

#### (7.53.1.85) Target derived using a sectoral decarbonization approach

Sel	lect	from:
001	-cc	II OIII.

✓ No

#### Row 3

# (7.53.1.1) Target reference number

Select from:

✓ Abs 2

# (7.53.1.2) Is this a science-based target?

Select from:

✓ No, but we anticipate setting one in the next two years

### (7.53.1.5) Date target was set

12/30/2021

# (7.53.1.6) Target coverage

Select from:

✓ Organization-wide

# (7.53.1.7) Greenhouse gases covered by target

Select all that apply

✓ Carbon dioxide (CO2)

# (7.53.1.8) Scopes

Select all that apply

✓ Scope 2

# (7.53.1.9) Scope 2 accounting method

Select from:

✓ Location-based

# (7.53.1.11) End date of base year

12/30/2019

### (7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

41353.0

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

41353.000

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100.0

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100.0

### (7.53.1.54) End date of target

12/31/2024

### (7.53.1.55) Targeted reduction from base year (%)

10

#### (7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

37217.700

### (7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

32333

#### (7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

32333.000

# (7.53.1.78) Land-related emissions covered by target

Select from:

✓ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

218.12

### (7.53.1.80) Target status in reporting year

Select from:

Underway

#### (7.53.1.82) Explain target coverage and identify any exclusions

This target covers Sanlam's Scope 2 emissions which includes Santam's Scope 2 emissions.

### (7.53.1.83) Target objective

The target objective is to decrease the amount of scope 2 emissions by 10% in the year 2025 based on the 2019 base year emissions. This target applies across the organisation and across the various facilities that are included in the scope of the reporting boundary.

# (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Sanlam has taken several measures to reduce greenhouse gas (GHG) emissions, aligning with global sustainability goals. Sanlam has integrated energy-efficient systems across operations, focusing on reducing electricity consumption and investing in renewable energy sources. Sanlam has also implemented initiatives to optimise building management practices, such as installing energy-efficient lighting and heating systems. Additionally, Sanlam is committed to reducing emissions from business travel by encouraging virtual meetings and promoting sustainable transport options. Sanlam monitors and reports on their carbon footprint, ensuring transparency in their sustainability efforts while seeking ways to further minimise their environmental impact.

### (7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

✓ No

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

✓ Other climate-related targets

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

#### Row 1

#### (7.54.2.1) Target reference number

Select from:

✓ Oth 1

#### (7.54.2.2) Date target was set

12/30/2021

#### (7.54.2.3) Target coverage

Select from:

✓ Organization-wide

# (7.54.2.4) Target type: absolute or intensity Select from: Absolute (7.54.2.5) Target type: category & Metric (target numerator if reporting an intensity target) **Energy consumption or efficiency √** kWh (7.54.2.7) End date of base year 12/30/2019 (7.54.2.8) Figure or percentage in base year 39760000 (7.54.2.9) **End date of target** 12/31/2024 (7.54.2.10) Figure or percentage at end of date of target 35784000 (7.54.2.11) Figure or percentage in reporting year

32280000

(7.54.2.12) % of target achieved relative to base year

188.1287726358

(7.54.2.13) Target status in reporting year

Select from:

Underway

### (7.54.2.15) Is this target part of an emissions target?

This target feeds into the Abs 2 target in question 7.53.1.

### (7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

✓ No, it's not part of an overarching initiative

# (7.54.2.18) Please explain target coverage and identify any exclusions

This target covers total electricity usage in kWh for Sanlam and Santam across the various facilities.

#### (7.54.2.19) Target objective

The Sanlam Group's commitment to sustainability is deeply embedded in its operational strategy. The specific target to reduce overall electricity usage across its facilities is a critical component of the Group's broader objective to minimize its environmental footprint. By actively managing and decreasing electricity consumption, Sanlam ensures that it not only reduces its carbon footprint but also contributes to a more sustainable future. This initiative is fully aligned with the Group's overarching strategy of responsible business practices, reflecting its dedication to long-term value creation and environmental stewardship.

#### (7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

The functionality of our facilities includes the thorough monitoring of data pertaining to the consumption patterns and fluctuations of our buildings. We gather data on various aspects such as electricity, water, diesel, petrol, liquefied petroleum gas, air conditioning gas, and waste (including landfill waste, recycled materials, food waste, and confidential shredding). Our commitment to reduce energy consumption and minimise the impact on the environment is embedded in the Group Environmental Policy. Towards the end of 2021, we implemented an energy and water management programme, which is managed through the Group-wide Energy Forum monthly. Such Energy Forum is to ensure that Sanlam-owned buildings are water and energy efficient by managing consumption and investigating opportunities to integrate renewable energy sources through the direct installation or power-wheeling agreements. Examples of metrics actively tracked were: •

Energy intensity per square meter; and • Baseload energy and performance in terms of SANS 10400 XA regulations. Furthermore, on 8th December 2020 it became mandatory for accounting officers and buildings owners to display and submit an Energy Performance Certificate (EPC) for their buildings, with an effective date of December 2022. EPCs for buildings serve as indicators of the energy usage required to operate a specific building. The evaluation of a building's energy performance is determined by analysing its actual energy consumption and comparing it to the maximum energy consumption allowed according to the guidelines outlined in SANS 10400 XA:2021. In 2022, a hybrid working environment was implemented, where employees may work from home. Such implementation has influenced the group's energy consumption in buildings. Over the course of 2023, the team successfully built an impressive collection of projects which will help achieve the target.

These are such as: 1. Renewable – projects focused on conversion to renewable energy, i.e., embedded solar PV 2. Resource efficiency – project focused on energy and water efficiency.

[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	27	`Numeric input
To be implemented	9	4872.61
Implementation commenced	2	6899.5
Implemented	2	2089.82
Not to be implemented	1	`Numeric input

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

#### Row 1

### (7.55.2.1) Initiative category & Initiative type

#### **Energy efficiency in buildings**

☑ Heating, Ventilation and Air Conditioning (HVAC)

# (7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

2080

# (7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

✓ Scope 2 (location-based)

# (7.55.2.4) Voluntary/Mandatory

Select from:

Mandatory

### (7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

3500000

# (7.55.2.6) Investment required (unit currency – as specified in C0.4)

45000000

# (7.55.2.7) Payback period

Select from:

# (7.55.2.8) Estimated lifetime of the initiative

Select from:

✓ 21-30 years

### (7.55.2.9) Comment

Upgrading the HVAC system. Such implementation is creating a reduction of 200 000 kWh per month.

#### Row 2

### (7.55.2.1) Initiative category & Initiative type

#### **Energy efficiency in buildings**

Lighting

### (7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

9.82

### (7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

✓ Scope 2 (location-based)

# (7.55.2.4) Voluntary/Mandatory

Select from:

✓ Voluntary

# (7.55.2.5) Annual monetary savings (unit currency – as specified in C0.4)

28600

# (7.55.2.6) Investment required (unit currency – as specified in C0.4)

100000

### (7.55.2.7) Payback period

Select from:

### (7.55.2.8) Estimated lifetime of the initiative

Select from:

✓ 21-30 years

#### (7.55.2.9) Comment

Implementing LED lighting and other light fixture savings for lights at various facilities. [Add row]

#### (7.55.3) What methods do you use to drive investment in emissions reduction activities?

#### Row 1

#### (7.55.3.1) Method

Select from:

✓ Dedicated budget for energy efficiency

### (7.55.3.2) Comment

Projects are considered against feasibility and ROI measures that in the first instance need to make financial and business sense. However, Sanlam's resource consumption and efficiency is managed primarily by Facilities Management who report to the Finance unit, but have a co-operative relationship with the Sustainability unit. This co-operation identified the need for a dedicated budget for energy efficiency to reduce energy consumption and associated carbon emissions.

#### Row 2

# (7.55.3.1) Method

Select from:

☑ Employee engagement

# (7.55.3.2) Comment

Sanlam and Santam continually encourage staff to reduce their footprint and consider the environment.

#### Row 3

# (7.55.3.1) Method

Select from:

✓ Partnering with governments on technology development

# (7.55.3.2) Comment

Sanlam and Santam make use of the Government's Section 12I tax allowance incentive as well as the Eskom Demand Side Management (DSM) subsidies and rebates where available to help defray the capital costs of equipment.

[Add row]

### (7.79) Has your organization canceled any project-based carbon credits within the reporting year?

Select from:

✓ No

#### C12. Environmental performance - Financial Services

#### (12.1) Does your organization measure the impact of your portfolio on the environment?

**Investing (Asset manager)** 

#### (12.1.1) We measure the impact of our portfolio on the climate

Select from:

Yes

# (12.1.2) Disclosure metric

Select all that apply

✓ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

### **Investing (Asset owner)**

#### (12.1.1) We measure the impact of our portfolio on the climate

Select from:

Yes

#### (12.1.2) Disclosure metric

Select all that apply

✓ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

### (12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

✓ No, but we plan to do so in the next two years

### (12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

✓ Lack of tools or methodologies available

#### (12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

Sanlam is piloting the Taskforce on Nature-related Financial Disclosures, as part of this the impact for certain areas of the business are yet to be measured. However, this tracking and measuring will take place after the TNFD has been piloted. At Sanlam Investments ("SI"), we continuously monitor the emissions exposure (Scope 1, Scope 2, and Scope 3) of our portfolio holdings through a range of internal tools and external service providers, including Bloomberg and MSCI. The impact on our portfolios, particularly within our Alternative funds, is also closely monitored through our internal models and systems. SI is currently in the process of calculating financed emissions for its portfolios in collaboration with Carbon Trust. This initiative will include the assessment of Sanlam Group's investment portfolios in its first year, with the second year extending the evaluation to other third-party clients. Our objective is to provide comprehensive reports on various aspects of SIG over the next 3 to 5 years.

### **Insurance underwriting (Insurance company)**

# (12.1.1) We measure the impact of our portfolio on the climate

Select from:

Yes

#### (12.1.2) Disclosure metric

Select all that apply

☑ Other carbon footprinting and/or exposure metrics (as defined by TCFD)

#### (12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

✓ Yes

[Fixed row]

#### (12.1.3) Provide details of the other metrics used to track the impact of your portfolio on the environment.

#### Climate change

# (12.1.3.1) Portfolio

Select from:

✓ Investing (Asset manager)

# (12.1.3.2) Portfolio metric

Select from:

✓ Avoided emissions financed (tCO2e)

#### (12.1.3.3) Metric value in the reporting year

0

### (12.1.3.4) % of portfolio covered in relation to total portfolio value

1

#### (12.1.3.5) Total value of assets included in the calculation

1

# (12.1.3.6) % of emissions calculated using data obtained from clients/investees

1

# (12.1.3.7) Please explain the details and key assumptions used in your assessment

Sanlam Group is in a process to quantify the Financed emissions for the Sanlam Investments business in preparation for the next year reporting cycle.

#### **Biodiversity**

# (12.1.3.1) Portfolio



✓ Insurance underwriting (Insurance company)

#### Climate change

#### (12.1.3.1) Portfolio

Select from:

✓ Investing (Asset owner)

#### (12.1.3.2) Portfolio metric

Select from:

✓ Other metric for impact on climate change please specify

### (12.1.3.3) Metric value in the reporting year

0

# (12.1.3.4) % of portfolio covered in relation to total portfolio value

0

# (12.1.3.5) Total value of assets included in the calculation

0

### (12.1.3.6) % of emissions calculated using data obtained from clients/investees

1

# (12.1.3.7) Please explain the details and key assumptions used in your assessment

Sanlam Group is in a process to quantify the Financed emissions for the Sanlam Investments business in preparation for the next year reporting cycle.

#### Climate change

# (12.1.3.1) Portfolio

Select from:

✓ Insurance underwriting (Insurance company)

# (12.1.3.2) Portfolio metric

Select from:

✓ Facilitated emissions (tCO2e)

# (12.1.3.3) Metric value in the reporting year

0

### (12.1.3.4) % of portfolio covered in relation to total portfolio value

0

#### (12.1.3.5) Total value of assets included in the calculation

0

# (12.1.3.6) % of emissions calculated using data obtained from clients/investees

1

# (12.1.3.7) Please explain the details and key assumptions used in your assessment

Sanlam Group is in a process to quantify the Financed emissions for the Sanlam Investments business in preparation for the next year reporting cycle. [Add row]

# (12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?

**Investing (Asset manager)** 

## (12.2.1) Portfolio breakdown

Select all that apply

✓ None of the above, but we plan to do this in the next two years

#### (12.2.2) Please explain why you do not provide a breakdown of your portfolio impact on the climate

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions associated with the portfolios we manage. This ongoing work aims to deepen our understanding of the carbon impact within our investment portfolio and aligns with our commitment to responsible and sustainable investment practices

#### Investing (Asset owner)

#### (12.2.1) Portfolio breakdown

Select all that apply

✓ None of the above, but we plan to do this in the next two years

## (12.2.2) Please explain why you do not provide a breakdown of your portfolio impact on the climate

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions associated with the portfolios we manage. This ongoing work aims to deepen our understanding of the carbon impact within our investment portfolio and aligns with our commitment to responsible and sustainable investment practices

#### **Insurance underwriting (Insurance company)**

#### (12.2.1) Portfolio breakdown

Select all that apply

✓ None of the above, but we plan to do this in the next two years

#### (12.2.2) Please explain why you do not provide a breakdown of your portfolio impact on the climate

Climate scenario work as well as work to determine the carbon footprint of the insurance book is also in the process of being completed. [Fixed row]

#### (12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Investing in all fossil fuel assets (Asset manager)

### (12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

#### (12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

✓ Other, please specify: Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### (12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### **Investing in thermal coal (Asset manager)**

#### (12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

✓ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

#### (12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

#### Select from:

☑ Other, please specify: Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### (12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### Investing in met coal (Asset manager)

#### (12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

#### Select from:

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

#### (12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

#### Select from:

☑ Other, please specify: Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### (12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### Investing in oil (Asset manager)

#### (12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

#### Select from:

✓ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

#### (12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

#### Select from:

✓ Other, please specify: Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### (12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### **Investing in gas (Asset manager)**

#### (12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

#### Select from:

☑ No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

#### (12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

#### Select from:

☑ Other, please specify: Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### (12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

[Fixed row]

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

#### **Investing (Asset manager)**

# (12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

✓ No, but we plan to report in the next two years

#### (12.5.35) Primary reason for not providing values of the financing and/or insurance

Select from:

✓ Other, please specify

#### (12.5.36) Explain why you are not providing values of the financing and/or insurance

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### **Investing (Asset owner)**

# (12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

✓ No, but we plan to report in the next two years

#### (12.5.35) Primary reason for not providing values of the financing and/or insurance

Select from:

✓ No standardized procedure

#### (12.5.36) Explain why you are not providing values of the financing and/or insurance

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

#### **Insurance underwriting (Insurance company)**

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

✓ No, but we plan to report in the next two years

#### (12.5.35) Primary reason for not providing values of the financing and/or insurance

Select from:

✓ No standardized procedure

#### (12.5.36) Explain why you are not providing values of the financing and/or insurance

Sanlam is currently engaged in consultations with the Carbon Trust to assess and measure the financed emissions. This ongoing work aims to deepen our understanding of the impact of our portfolio.

[Fixed row]

# (12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
Select from:
✓ Yes

[Fixed row]

(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.

#### Row 1

## (12.6.1.1) Environmental issue

Select all that apply

✓ Climate change

#### (12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

- Mitigation
- Adaptation

## (12.6.1.3) Portfolio

Select from:

✓ Insurance underwriting (Insurance company)

#### (12.6.1.4) Asset class

Select from:

✓ Other, please specify :Insurance

## (12.6.1.5) Type of product classification

Select all that apply

✓ Products that promote environmental and/or social characteristics

#### (12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

✓ Internally classified

#### (12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

☑ Other, please specify :Sustainable agriculture

#### (12.6.1.8) Description of product/service

As for the insurance line of business, Santam is a short-term insurer who offers insurance solutions and products to businesses, providing them with protection from climate-related impacts and helping them build resilience. Our key products include underwriting renewable energy projects and crop insurance through SantamAgri. These offerings enable our clients in various sectors to mitigate and adapt to the adverse effects of climate change.

#### (12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

0

## (12.6.1.10) % of asset value aligned with a taxonomy or methodology

0

#### (12.6.1.11) Product considers principal adverse impacts on environmental factors

Select from:

✓ No

#### Row 2

#### (12.6.1.1) Environmental issue

Select all that apply

✓ Climate change

## (12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

- Mitigation
- Adaptation

#### (12.6.1.3) Portfolio

Select from:

✓ Investing (Asset manager)

#### (12.6.1.4) Asset class

Select from:

✓ Project finance

## (12.6.1.5) Type of product classification

Select all that apply

✓ Products that have sustainable investment as their core objective

## (12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

✓ Internally classified

#### (12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

- ✓ Low-emission transport
- ✓ Renewable energy

## (12.6.1.8) Description of product/service

On 1 September 2021, Sanlam Investments launched a Sustainable Infrastructure Fund. The purpose of this fund is to finance projects and companies across broad spectrum of essential infrastructure sectors. The priority sectors include renewable energy, conventional energy, natural transport and logistics, ICT, water and waste. The fund currently has nearly R1 billion in new capital deploy, with a further R6 billion that Sanlam is expected to deploy in the next two to three years.

## (12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

85

## (12.6.1.10) % of asset value aligned with a taxonomy or methodology

85

# (12.6.1.11) Product considers principal adverse impacts on environmental factors

Select from:

✓ No

[Add row]

C13. Further information & sign o	1 & Sign ot	rmation	urtner	تا ئ. F∪	C
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(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

Other environmental information included in your CDP response is verified and/or assured by a third party
Select from:  ✓ Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

#### Row 1

#### (13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

✓ Climate change

## (13.1.1.2) Disclosure module and data verified and/or assured

#### Introduction

✓ All data points in module 1

#### (13.1.1.3) Verification/assurance standard

#### **General standards**

✓ AA1000AS

#### Climate change-related standards

✓ ISO 14064-3

#### (13.1.1.4) Further details of the third-party verification/assurance process

Sanlam Limited ('Sanlam' or the 'Group'), together with Santam and several other subsidiaries, is a diversified financial services company that was founded in South Africa. Core operations include life insurance, long- and short-term insurance, personal finance, and asset management. Globally Sanlam has a direct and indirect presence globally and is the largest insurance company in Africa. Sanlam engaged Verify CO2 to conduct an independent greenhouse gas ('GHG') emissions verification with the objective of providing assurance to a limited level that the company's 2023 GHG Statement is accurate and conforms with the stated criteria. This is the fifth consecutive Sanlam verification to be performed by Verify CO2. Verification activities performed to achieve a limited level of assurance are less extensive in nature, timing and extent than those for reasonable assurance. Furthermore, GHG quantification is subject to inherent uncertainty as methods to determine, calculate, sample and estimate GHG data rest upon incomplete scientific knowledge. The Verification Opinion is issued based on the scope of work detailed below which included an in-depth review of the underlying calculations and supporting information used to prepare Sanlam's 2023 GHG Statement. Sanlam enhances data quality for climate-related research and analytics through a combined assurance process, including third-party verification of our GHG emissions inventory by Verify CO2. This process ensures data accuracy and completeness. Collaboration with AQRate also verifies our broad-based black economic empowerment (B-BBEE) status, adding credibility to our sustainability efforts.

#### (13.1.1.5) Attach verification/assurance evidence/report (optional)

Sanlam-2023-GHG-Verification-Statement.pdf [Add row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

#### (13.2.1) Additional information

Sanlam's position on climate change recognises the severity of the crisis for developing countries and advocating for climate issues to be addressed in the context of development. We aim to balance climate change action with positive social impact in areas such as job creation, resilient infrastructure, food security, financial education, water security and environmental stewardship. Sanlam's impact framework for the "Just Transition" is executed globally through partnerships with FMO (the Dutch development bank) and Climate Fund Managers (CFM), as well as locally through the Sanlam Sustainable Infrastructure Fund and the Sanlam Foundation. The CFM philosophy focuses on innovative investment vehicles that contribute to climate change mitigation and adaptation in developing markets

worldwide. Sanlam's Sustainable Infrastructure Fund was established to finance essential infrastructure projects in South Africa to support the Just Transition ambition. Sanlam's "Just Transition" approach is characterised by practical and tangible outcomes, emphasising collaboration rather than punitive action against high carbon-intensive sectors.

## (13.2.2) Attachment (optional)

sustainability-report-2023.pdf [Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

## (13.3.1) Job title

Abel Sakhau

## (13.3.2) Corresponding job category

Select from:

☑ Chief Sustainability Officer (CSO)

[Fixed row]