The Northwestern Mutual Life Insurance Company
2021 TCFD Report

1 - GOVERNANCE

Disclosure	**1A) Describe the board's oversight of climate-related risks and opportunities**
Company Response	Northwestern Mutual's ESG-related vision and commitments includes focus on activities, initiatives, and policies related to climate risk governance and environmental stewardship. The Northwestern Mutual Board of Trustees, elected by our policyowners, carries the oversight responsibility and ultimate authority for all company matters (other than those matters reserved to the policyowners), including oversight of enterprise strategy and risk management efforts, both of which include climate-related considerations. The Board appoints the Chief Executive Officer (CEO) and senior executives who comprise the Senior Leadership Team (SLT). The SLT, described in further detail in section 1B, establishes the vision and strategies for the enterprise and recommends financial and business plans to the Board for approval. Each Board Committee is responsible for providing oversight for certain risk categories, with the following Committees specifically tasked with oversight of climate-related risks: – *Human Resources, Nominating, and Corporate Governance Committee* exercises primary oversight responsibility for the Company's activities, initiatives, and policies related to climate risk and environmental stewardship, including sustainability, corporate social responsibility, and corporate governance matters. The Committee reviews and assesses the mix of expertise and experience of the Board in the context of its current membership and seeks to ensure that the right combination of talents, skills, and characteristics needed to maintain an effective Board are possessed by members of the Board. Current Trustees serving on our Board have sustainability and ESG-related expertise, core competencies that we seek to maintain representation of going forward. – *Finance Committee* reviews and provides oversight of the Company's investment practices, including those related to environmental stewardship, including sustainability, social responsibility, and governance matters related to invested assets. – *Audit Committee* provides oversight of the Company's enterprise risk management framework, including approving on an annual basis the enterprise risk appetite framework which articulates the aggregate level and types of risk that the Company is willing to accept or wishes to avoid in order to achieve its business objectives. Along with its Committees, the Board receives periodic updates regarding the risks and actions management is taking to respond to those risks. An on-going risk identification process led by the Company's Enterprise Risk Management (ERM) department includes an annual formal written *Enterprise Risk Assessment* report to the Board which identifies the current and emerging risk themes that present the greatest concern to the Company and require oversight at the highest levels, giving consideration to the size of impact, likelihood and pervasiveness throughout the organization, and the Company's ability to control and influence the risk outcome. As described further in section 3, the prioritization process for climate risk also incorporates speed of onset, to account for unique characteristics of climate risk relative to other types of enterprise risk. The Company's Corporate Strategy department plays a key role in these discussions, providing yet another viewpoint, and accordingly prioritizing those risks that have the potential to adversely impact the successful execution of the Company's strategy. This assessment also includes a review of cross-cutting risks that impact multiple themes, or transversal risks, which includes climate risk. Ultimately, the *Enterprise Risk Assessment* serves as an input to the Company's planning process and directly feeds into the prospective solvency assessment. Consistent with its oversight responsibility for the Company's enterprise risk management program, the Audit Committee reviews, and the full Board receives, the Company's *Own Risk and Solvency Assessment (ORSA) Summary Report* on an annual basis, which includes a discussion of the Company's assessment of climate-related risk from a solvency perspective.
Disclosure	**1B) Describe management's role in assessing and managing climate-related risks and opportunities.**

Company Response	Northwestern Mutual has updated its governance framework and processes to include climate considerations. The Board appoints the Chief Executive Officer (CEO) and senior executives who comprise the Senior Leadership Team (SLT), which oversees the other Corporate Committees and has oversight responsibility for all enterprise risks, including climate risk. The SLT also establishes the vision and strategies for the enterprise and recommends financial and business plans to the Board for approval. Members of the SLT include the CFO/CRO (combined Chief Financial Officer & Chief Risk Officer) and CLO/CCO (combined Chief Legal Officer & Chief Compliance Officer) who also report directly to the CEO. Corporate Committees, composed of cross-functional senior leaders, have oversight accountability for risk management of enterprise level issues as well as for providing strategic guidance for these issues, including climate considerations. The cross-functional nature of our Corporate Committees facilitates not only the identification of enterprise-level risks, but also the appropriate evaluation and prioritization of risk management efforts. The Company's Enterprise Risk Executive Committee (EREC) chaired by the CFO/CRO, reports directly to the SLT. The EREC oversees the efficacy of risk governance structures and practices and evaluates and recommends improvements to risk management efforts for the enterprise, including Company subsidiaries. Because the CFO/CRO also participates as either a full or ad hoc member on many of the Corporate Committees that have oversight responsibility for a risk category, the EREC facilitates an integrated enterprise perspective on significant risks and drives appropriate prioritization, coordination of efforts, discipline, and accountability. The EREC oversees the Company's Climate Risk Stakeholder Group (CRSG), which is a cross-functional group of subject-matter experts tasked with performing physical and transition climate risk and opportunity identification and analysis, determining integration points for climate-related considerations into respective operations, strategic planning, and reporting, and evaluating how emerging climate risk practices, guidance, and standards may impact the Company. This group is led by the ESG department with representation from members of the following departments: Enterprise Risk, Law, Investment Risk, Managed Investments, Finance, Facilities Planning & Operations, Communications, Government Relations, Retail Investments, and Sourcing & Procurement, and Medical. Policy considerations are overseen by the Solvency Governance & Regulation Working Group, a subcommittee of the Public Policy Corporate Committee, while integration of climate considerations into the Company's *Own Risk & Solvency Assessment (ORSA)* are overseen by the *ORSA* Working Group, a subcommittee of the EREC. Additionally, the following groups contribute to the Company's assessment of climate-related risks: – The *ESG department* sets ESG strategy and is responsible for implementation of ESG initiatives across the enterprise, including goal setting, stakeholder engagement, key performance indicators (KPI) collection and monitoring, disclosure, and process improvement. This department is led by the Company's Vice President of Enterprise ESG who reports to the CLO/CCO. – The *ESG Leadership Council* is a cross-functional group of senior leaders led by the ESG function and sponsored by the Company's CLO/CCO. The ESG Leadership Council approves ESG strategy, goals and direction, and guides external ESG communications and commitments. – The *Infectious Disease and Environmental Risk Team (IDERT) Climate Change subgroup* is a cross-functional group of subject-matter experts tasked with assessing potential climate change impacts on insured mortality and morbidity. IDERT is part of the Company's Business Continuity Planning program, which identifies environmental and other threats to the operational capabilities of the Company and oversees the business continuity plan that informs the Company's response to such threats. – *Treasury, Risk, Investment Operations, Analytics and Data (TRIAD)* analyzes investment exposure to climate risk as well as other invested asset risks. TRIAD, which advises the Company's Investment Committee in its oversight of invested asset risk, is led by the Company's Vice President of Investment Risk & Operations, who reports to the CFO/CRO. - Departmental ESG focus groups analyze climate-risk considerations and regulatory requirements specific to their business function and escalate issues having broader

	enterprise impact to their respective representatives on the aforementioned cross-functional teams. These groups, in addition to the CRSG, provide a significant source of risk and opportunity information for the annual *Enterprise Risk Assessment* report and *ORSA Summary Report* to the Board via the EREC and the SLT.

2) Strategy

Disclosure	**2A). Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.**
Company Response	Northwestern Mutual's enterprise risk and opportunity identification and prioritization processes have been adapted to take into consideration the unique characteristics of climate-related issues, while still ensuring comparability of rankings relative to other risks identified at the enterprise level. Given these unique characteristics, short-, medium-, and long-term time horizons are defined in fewer and broader increments than the timeframes utilized more traditionally for enterprise-wide risk prioritization. For the purpose of climate analysis, the Company has elected to follow guidance promulgated by the New York Department of Financial Services which characterizes the short-term as 3-5 years, medium-term as 5-10 years, and long-term as 10-30 years and beyond.

Climate risk type	**Risk driver & description**		**Affected time horizon(s)**
Transition Risk	Policy & Legal	Regulation and supervision of climate-related risk is likely to increase, primarily from the Company's domestic insurance regulator.	Medium-term
		Enhanced emissions reporting obligations may be required for the Company's operations and potentially for investment portfolios.	Medium-term
		Retail investment ESG products are likely to face greater scrutiny around what can be included in such products and how those products can be labelled and/or marketed. These products could be subject to accusations of "greenwashing" given evolving climate-related guidance and taxonomies.	Short-term
		Perceptions of the Company's ability to manage climate-related risks and/or our potential short-falls in our responses to increasing regulatory and reporting requirements may result in increased exposure to regulatory scrutiny.	Short-, medium-, long-term
	Reputation	Increased stakeholder concern, negative stakeholder feedback, and/or negative press coverage around company behaviors or investment holdings have adverse implications for the Company's credit ratings and/or ability to attract and retain clients as well as talent.	Short- to medium-term
		The life insurance industry as a whole could potentially be stigmatized if common ESG values are not reflected in business practices.	Short-term
	Market	Changing consumer behaviors could result in demand for more ESG-related products.	Medium-term
		The Company could face higher operating costs as a result of increasing raw materials prices, such as energy and water.	Short-term
		The Company's investment portfolios could be negatively impacted by asset re-pricing, write-offs, and-or impairments due to both physical and transition climate-related risks.	Short-, medium-, and long-term
	Technology	The Company may incur costs to transition to lower-emissions technology.	Medium-term
Physical Risk	Acute	Extreme weather events could result in damage to the Company's facilities, disruption to operations within our supply chain, and business continuity, and/or outsized mortality and morbidity experience amongst policyowners and employees.	Short-, medium-, and long-term
	Chronic	Increasing ambient temperatures over time may result in increased mortality and morbidity experience. Potential loss of total addressable market and reduced impact of its field force, driven by consumers' loss of financial security and potentially less willingness and/or ability to purchase products.	Short-, medium-, and long-term

Climate opportunity	Opportunity driver & description	Affected time horizon(s)
Resource efficiency	Adoption of low-emission energy sources would likely reduce the Company's operational carbon footprint and operating costs.	Short-, medium-, long-term
Increased demand for products and services	Concern over potential or actual climate risks could lead to individuals facing mortality, which could increase the demand for life insurance and/or investment products and services designed to enhance financial security.	Short-, medium-, long-term
Access to new markets	Retail investment clients may be increasingly interested in ESG and climate-related investment products, creating a market for new offerings to attract new assets under management.	Short-, medium-, long-term
Improved resilience	Enhanced reporting of climate-related risks and opportunities, along with incorporating these considerations into company governance, risk management, and strategy will improve climate resiliency across our business.	Short-, medium-, long-term

Risk identification, evaluation, and response occur at both an enterprise level and within each functional area. Enterprise-level risks are described in the Company's *Enterprise Risk Assessment* report which informs management decision making, risk management activities, and the annual audit plan. The report includes specific risks that fall within the risk themes, identifies responsible leaders for those risks and includes a review of transversal risks that impact multiple themes. An enterprise-level risk register is maintained and updated based on the results of these ongoing risk identification efforts. The Company views climate change as a transversal risk that cuts across multiple risk themes, time horizons, scales, and scopes; as a result, the identification of climate-related risks and opportunities falls to the cross-functional Climate Risk Stakeholder Group (CRSG), introduced in section 1B, which is overseen by the ESG department and the Enterprise Risk Executive Committee EREC).

The Enterprise Risk Management (ERM) department maintains an enterprise risk prioritization framework which is adapted by business units across the enterprise to increase consistency and objectivity in evaluating risks. This framework provides a disciplined and objective approach to elevate and rate risks on a basis consistent with the ranking of enterprise-level risks and audit issues, while allowing for inclusion of qualitative factors and professional judgement. The ERM department performs an evaluation to make an initial determination of those residual risks that are most meaningful at the enterprise level, considering size of impact, likelihood, timeframe, environmental factors and risk-mitigating controls. ERM includes climate risk in this process, also taking into account factors such as speed of onset and vulnerability to accommodate the unique characteristics of climate risk. Focus is then given to those risks that have the potential to adversely impact the successful execution of the Company's strategy or impacts from a customer harm, employee or field harm, or third-party action perspective, or those that pose the greatest threat to surplus or income or to result in operational loss. These initial determinations are then validated through meetings with the appropriate Corporate Committees and members of senior leadership, EREC, and the Senior Leadership Team (SLT), to ensure that knowledge and insights from across the organization are appropriately incorporated into the *Enterprise Risk Assessment*.

The *Enterprise Risk Assessment* categorizes risk into two broad types: risks with potential immediate financial impact that may result in significant financial impact over a relatively short period of time, and risks with potential impact on long-term vitality that may result in an inability to execute on strategy and a gradual erosion of the Company's position over a more extended period. Risk categories that have the largest potential immediate financial impact on the business include insurance product risk and invested asset risk.

Investment Risk & Opportunity
Given the nature of the Company's insurance products, the most meaningful financial risk to the Company as a result of climate change will likely come from investment losses over the short-, medium-, or long-term, in reaction to, or in anticipation of, the transition away from carbon-intensive activities, as well as physical risk related to real estate and other investment assets resulting from climate change.

	The corresponding opportunities associated with climate change—resource efficiency, favorable policies, access to new markets, increased demand for products and services, and improved resiliency—could materially increase the value of certain investments that we hold over the short-, medium-, or long-term. Additionally, enhanced disclosure requirements would improve our ability to diligence climate-related issues that pertain to our investments, thereby reducing investment risk exposure to the extent data and methodologies allow. *Insurance Product Risk & Opportunity* Insurance product risks are risks associated with insurance and annuity products, including those related to mortality and morbidity. Mortality refers to the number of deaths during a particular period of time among a particular type or group of people, while morbidity refers to the frequency of which populations become sick, injured, or disabled. Northwestern Mutual's mortality exposure relates to core life insurance products. Much of that business is whole life or other permanent life insurance, and, simultaneously, any term life insurance business product generated is fully convertible to a whole-life product, emphasizing the importance of long-term potential impacts. The physical risks associated with mortality primarily encompass the chronic increase of global temperatures, resulting in more extreme environmental events, which will eventually be the cause of additional deaths within both the U.S. population. Most of Northwestern Mutual's morbidity risk relates to the stand-alone disability income product. Long-term care products also are morbidity-oriented products. Additionally, core life products have some morbidity risk given available riders such as waiver of premium and accelerated care benefit. Increasing frequency of acute physical risk such as natural disasters, combined with chronic physical risks stemming from changing weather patterns and extreme variability in weather patterns, could result in increased disability insurance claims. Physical risk related to morbidity for Northwestern Mutual's insured population should not be materially impacted in the short- and medium- terms and should be relatively low over the long-term. However, out of an abundance of caution, additional monitoring of occupational-specific claims experience is conducted to ensure the modest number of outdoor-oriented occupations the Company insures does not have unfavorable experience. Acute or chronic physical risk events or a sudden and dramatic transition to a low carbon economy could have the potential to impact financial markets in a manner that may trigger a severe economic downturn over the short-, medium-, or long-term. Prior experience shows that severe economic downturns can result in increased death claims and disability income insurance claims. As the effects of climate change are felt and understood more broadly in the United States, Northwestern Mutual may experience increased demand for its insurance products, which aim to provide financial security for consumers.
Disclosure	**2B). Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.**
Company Response	Northwestern Mutual recognizes the importance of holistic risk awareness in making business decisions. The evaluation of identified risks is a critical input to the Company's five-year Business Plan, which is developed as a collaborative effort among business units, financial teams, and senior management and is subject to extensive levels of review and validation. Ultimately, this strategic planning process serves as the basis for solvency assessments, which considers the prospect of operating in both normal and stressed environments. Scenarios are designed to reflect the most relevant and plausible stress scenarios from a solvency perspective over the five-year Plan time horizon. Management actions in response to these scenarios, validated by subject matter experts, reflect potential options that management could reasonably take under the circumstances. As part of the strategic planning process, the Company assesses how climate change may influence pre-existing risk exposures identified as having the largest potential immediate financial impact on the business: insurance product risk and invested asset risk. Potential

	climate-related impacts to mortality and morbidity and managed investments were assessed in 2021 and are regularly refined. Considering the available data, climate risk was deemed not material to the company's strategy, however, emerging trends and mega-trends, including climate, are reported on and used in multi-year strategy setting and in setting annual priorities and operating budgets. *Insurance Product Risk* As Northwestern Mutual only sells products domestically, physical risks within the United States are most relevant to the Company's insured population. Based on leading models for the United States, the Company's Actuarial and Medical departments view climate change as having an immaterial impact on company mortality and morbidity, and ultimately solvency. Still, this is an area that will be continuously monitored as scientific understanding advances. In addition to the regular monitoring of environmental-related claims by the Actuarial Department, the Climate Change subgroup of the Company's Infectious Disease and Environmental Risk Team (IDERT) performed an assessment in 2021 of the potential climate change impact on insured mortality and morbidity. The cross-functional group of subject matter experts concluded that there is not substantial evidence to support any significant short-term risk of worsening life, disability income, or long-term care experience for the Company as a result of climate change. Individuals who purchase or maintain coverage from insurance products are likely to have access to necessary protections should climate change worsen their physical environment. While not specific to climate change, general underwriting practices already consider many medical impairments which could be the result of climate change or could exacerbate should climate change progress. Yet, various scenarios do exist for the pace at which climate change could advance, and its potential impact on mortality and morbidity for the medium- to long-term timelines is less certain. Thus, the impact of climate risk to mortality and morbidity will be evaluated as evolving circumstances dictate, and regular monitoring to-date has not materially changed the opinion formed during the 2021 assessment. *Investment Risk* In 2021 the Treasury, Risk, Investment Operations, Analytics and Data (TRIAD) department performed an analysis of the Company's investment exposure to climate risk. This analysis considered the size of investments in the sectors anticipated to be the most vulnerable to climate risk (energy, utilities, and transportation), real estate holdings in areas that could be impacted by sea-level rise, and aggregate portfolio vulnerability exposure as measured by climate change preparedness of foreign countries and domestic states and cities. This assessment showed the Company's portfolio to be well-diversified across asset classes and geographic concentration with significant guardrails against exposure concentration to reduce the impact of climate risk on any individual asset class, sector, or geographical location of the portfolio. TRIAD also employs methodologies introduced by the International Association of Insurance Supervisors (IAIS) Global Insurance Market Report (GIMAR) to build scenario analysis and gain further insights into the general account portfolio's Public Investments holdings performance, utilizing climate scenarios as defined by the Network of Central Banks and Supervisors for Greening the Financial System (NGFS). These scenarios describe how insurers' public asset classes may be impacted by physical and/or transition risks caused by climate change. To gain another perspective and improve understanding of the extent to which the general account portfolio may be exposed to transition risks and how it compares to a market benchmark, TRIAD used the open-source Paris Agreement Capital Transition Assessment (PACTA) model. While limitations such as sector and exposure coverage exist, the model was a useful tool to assess the exposure to certain carbon intensive sectors relative to the benchmark. These climate risk scenarios, when applied to the Company's general account portfolio's Public Investments holdings, indicated that potential incurred losses are manageable, within historical ranges, and estimated to be in-line with other North American insurers. The Company continues to explore different approaches, services, and assessment capabilities related to portfolio scenario analysis as well as to expand assessments to other owned asset classes.

	Geographic Concentration of Risk To ensure adequate levels of diversification, Northwestern Mutual conducts an annual assessment on the Company's geographic concentration of insurance exposures as well as concentration of investments across all portfolios. This information can be used to highlight areas of high concentration risks for use in real estate investment decision-making and evaluating catastrophic mortality risk relative to financial tolerances. Concentration may either take the form of a high-level exposure to individual companies or as a high level of geographic exposure to individual countries, metropolitan areas, or regions. Geographic concentration is measured by country and within broad metropolitan statistical areas (MSAs) and submarkets within these broad MSAs. Limits are determined based on pre-determined parameters of potential loss within these regions, focusing specifically on the United States Geological Survey's (USGS) catalog of hundreds of potential scenarios involving earthquakes and tsunamis. Across the spectrum of scenarios covering both insurance product risk and investment risk, Northwestern Mutual's prudent capital management and financial flexibility demonstrate that the Company has the resources necessary to execute the multi-year Business Plan in accordance with risk appetite. In light of emerging climate risk practices, guidance, and standards, and recognizing the uncertainty surrounding the timing, scale, and scope of climate-related risks, the Company has taken further measures to strengthen the Company's climate-related risk management capabilities and resiliency. Examples of these measures include: 1. New Environmental, Social, and Governance (ESG) accountability and leadership to set enterprise ESG strategy and enable close monitoring of and compliance with climate and other regulatory initiatives. 2. Refined processes to continually refresh analysis of the impact of climate change on insured mortality and morbidity; conducted by the Climate Change subgroup of IDERT, the following research pillars inform business practices and risk assessment: – Academic Research: IDERT medical subject matter experts will stay abreast of current medical and public health literature as part of normal literature review duties, with the IDERT medical chair performing a systematic deep dive of relevant literature on an annual basis using academic search engines and leveraging outside consultants in the hears of public health, climatology, and medical subspecialties; – Industry Research: in addition to various IDERT members attending industry conferences and staying abreast of actuarial publications relevant to climate change implications on mortality and morbidity, the Company's re-insurance partners will be consulted regularly to glean insight into their experiences and learnings from the broader industry; – Internal Research: the Company's existing Geographic Concentration of Insurance Exposure and Catastrophic analysis will continue to be leveraged to provide insights into various geographic risks related to climate change, in particular, severe weather events. Death claims with climate-related causes of death will be tracked and reported. 3. Engaging key constituencies on sustainability and environmental preservation, including encouraging employees to reduce their personal carbon footprint in several ways, directly and by serving as an example, including: – implementing energy-saving building systems (LED lighting, daylight controls, CFDs, high efficiency boilers, etc.); – providing electronic pay statements to employees; – encouraging the use of electric vehicles by installing electric charging stations in the Company-owned parking structures; – Providing technology and tools that enable employees to be resilient in response to processes and procedures necessitated by climate-related events; – Encouraging employees to increase efficiency by identifying opportunities to digitize internal processes and client communication;

- Reducing facility energy use when the facility is not in use.

4. Implementation of an energy management plan that aims to minimize environmental impact by assessing and closely monitoring the energy usage of infrastructure, incorporating environmentally sustainable business practices when building physical facilities and strategically reducing campus emissions over time. Key facilities enhancements and achievements include LEED certification of owned home office campuses, indoor air quality improvements, and expansion of electric vehicle charging for cars, motorcycles, and e-bikes in the downtown Milwaukee parking structure, In 2017, the Company completed construction of the Northwestern Mutual Tower and Commons at its downtown campus which incorporates numerous sustainability features including a 4+ acre public green space park, extensive use of natural lighting and lighting sensors, and a 36,000 square foot green roof, which will prevent more than 500,000 gallons of storm water run-off annually from being diverted into sanitary-storm sewers.

5. Establishing foundational carbon foot printing capabilities:
   - In 2022, the Company engaged consulting and engineering firms to assist with documentation of scope 1 and 2 GHG emissions and energy usage intensity of Home Office operations. In addition to establishing a baseline carbon footprint, this process resulted in Northwestern Mutual's first GHG Inventory Management Plan (IMP) which documents the organizational boundary, operational boundary, data sources and collection processes, quantification methods, and quality assurance processes used to determine the Company's Scope 1 and 2 GHG emissions. All the process steps undertaken are in alignment with the World Resources Institute (WRI) / World Business Council for Sustainable Development (WBSCD) Greenhouse Gas Protocol.
   - The Company's Facilities Planning & Operations team also worked with an engineering firm to assess future pathways for improved building efficiency and is in the process of evaluating future recommendations.

6. Continued expansion of the range of climate and ESG-related factors as appropriate in the Company's general account portfolio with the aim of identifying future investment risks and opportunities that affect invested assets. The Company believes material ESG factors impact investment performance, and that proactively integrating ESG-related considerations enhances the ability to deliver significant, long-term value for policyowners while effectively managing risk in the general account portfolio. New initiatives include:
   - Targeting at least 5% of general account portfolio assets invested in environmentally and/or socioeconomically responsible assets;
   - Implementing auditable ESG practices for an increasing percentage of general account portfolio assets, including integration of climate and ESG-related metrics into proprietary research tools;
   - Pursuing analyst training on ESG and sustainable investing topics; and
   - Establishing an ESG Investment Task Force with representatives from the Company's Managed Investments departments to address relevant climate and ESG issues relevant to investment portfolios.

7. Collaboration between the ESG and Sourcing & Procurement functions to develop supplier sustainability surveys, conducted at the beginning of new supplier relationships and annually by existing suppliers. To better gauge the environmental impact of the Company's value chain, primary climate-related questions will focus on GHG emissions profiles and energy efficiency, in addition to a focus on natural capital to improve the quality of all living things. Additionally, the Company's Enterprise Third Party Risk Management (TPRM) Program ensures that Northwestern Mutual as an enterprise is identifying, monitoring, and managing risks associated with third parties.

	8. Introduction of ESG retail investment products by Northwestern Mutual Wealth Management Company's (NMWMC), the Company's wealth management subsidiary, , in response to, and anticipation of, growing client demand to invest their personal assets in a manner consistent with their values. For example, NMWMC's ESG Large Cap Core Equity Portfolio is structured to find opportunities that the research team expects to outperform the MSCI USA Extended ESG Focus Index along with maintaining a positive ESG rating over the S&P 500's ESG rating. Managers consider ratings from two ESG research providers, MSCI and Morningstar Sustainalytics, while constructing the portfolio. Portfolio performance is measured relative to its benchmark; as market or ESG ratings change, managers may adjust allocations to ensure risk exposures are well-diversified yet still align with ESG objectives.
Disclosure	**2C). Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios including a 2ºC or lower scenario.**
Company Response	Northwestern Mutual recognizes the symbiotic relationship between risk management and company strategy and the importance of holistic risk awareness in making business decisions. The Company's enterprise risk management (ERM) framework is designed such that components of strategy provide definition to the Company's approach to risk, while at the same time ensuring that the execution of strategy must not violate the risk tolerances and other considerations articulated in the risk appetite. The evaluation of identified risks is linked to relevant outcomes in the Company's strategy map and is an input to the five-year Business Plan which serves as the basis for solvency assessments. In managing the overall risk profile of the company, adherence to quantitative risk capacity and financial tolerances is critical. These tolerances, however, are generally most directly applicable to investment, product, and operational risks that result in quantifiable financial impacts. The management of risk must reflect and recognize potential threats to all components of the company's strategy and appropriately consider both those risks that are more easily quantified along with the equally important strategic risks that while difficult to quantify, could impact the long-term vitality, financial strength, and marketplace relevance of Northwestern Mutual. Both the Corporate Strategy and Investment Strategy departments are represented on the cross-functional Climate Risk Stakeholders Group (CRSG) as both contributors to the climate-related risk and opportunity identification, prioritization, and assessment processes, as well as receivers of the CRSG's risk identification, evaluation, and prioritization output in order to incorporate the Company's views on emerging trends and risks into the strategic planning process and better inform scenario analysis practices and operating budgets. As previously mentioned, scenario analyses were conducted on both underwriting and investment activities. These exercises will be further refined over time and as data and methodologies allow. *Underwriting Activities Scenario Analysis* As global temperatures increase, there is an expectation that more extreme environmental events, including heat waves, will eventually result in additional deaths within both the U.S. population and the Northwestern Mutual insured population. These incremental deaths will be somewhat offset by reductions in deaths from reduced exposure to extreme cold weather. Northwestern Mutual does not have sufficient data to assess, on its insured population, what impact climate change will have on mortality. To provide a reasonable basis for analysis, we looked at external literature of the mortality implications of climate change. Even then the available literature is limited. In the 2017 paper *Projected Temperature-Related Deaths in Ten Large U.S. Metropolitan Areas Under Difference Climate Change Scenarios* by Kate R. Weinberger, et al., the authors projected the additional annual expected deaths in the combined general population of ten large U.S. metropolitan areas (fixed in size at their 1997 populations) that may result from climate change by 2050 and 2090 under moderate and high greenhouse gas scenarios. We chose to first focus on the high greenhouse gas scenario (RCP 8.5) rather than a two-degree scenario (RCP 2.6) to evaluate worst-case outcomes. We chose

	the higher carbon, and thus higher ambient temperature scenario, as our group's preference was to examine the worst-case scenario first. In this analysis we assumed that the more affluent insured population would have better-than-average access to protective measures as the global temperature increases. We also assumed that the extra deaths would not be spread uniformly across all ages, but rather be distributed mainly among the elderly, whose life insurance policies tend to be older and smaller. Such policies typically have low net amounts at risk (i.e. death benefit less reserves released upon death), which is a proxy for the financial impact to the company's operating gain before dividends and taxes. The projected excess deaths from a high carbon scenario were determined to be an immaterial threat to the Company's overall mortality results and surplus testing, especially relative to the pandemic testing that is conducted as part of our ORSA process; hence, we can assume that the lower-carbon scenario represents a lesser threat. Finally, while the above study cites an estimate for temperature-related deaths in the general population in 1997, Northwestern Mutual claim experience aggregated from 2000-2020 had minimal claim activity with environmental-related cause of death. *Investment Risk Scenario Analysis* In 2021 the Treasury, Risk, Investment Operations, Analytics and Data (TRIAD) department performed an analysis of the Company's investment exposure to climate risk. This analysis considered the size of investments in the sectors anticipated to be the most vulnerable to climate risk (energy, utilities, and transportation), real estate holdings in areas that could be impacted by sea-level rise, and aggregate portfolio vulnerability exposure as measured by climate change preparedness of foreign countries and domestic states and cities. This assessment showed the Company's portfolio to be well-diversified across asset classes and geographic concentration with significant guardrails against exposure concentration to reduce the impact of climate risk on any individual asset class, sector, or geographical location of the portfolio. TRIAD also employs methodologies introduced by the International Association of Insurance Supervisors (IAIS) Global Insurance Market Report (GIMAR) to build scenario analysis and gain further insights into the general account portfolio's Public Investments holdings, utilizing climate scenarios as defined by the Network of Central Banks and Supervisors for Greening the Financial System (NGFS). These scenarios describe how insurers' public asset classes may be impacted by physical and/or transition risks caused by climate change. To gain another perspective and improve understanding of the extent to which the investment portfolio may be exposed to transition risks and how it compares to a market benchmark, TRIAD used the open-source Paris Agreement Capital Transition Assessment (PACTA) model. While limitations such as sector and exposure coverage exist, the model was a useful tool to assess the exposure to certain carbon intensive sectors relative to the benchmark. These climate risk scenarios, when applied to the Company's general account portfolio Public Investments holdings, indicated that potential incurred losses are manageable, within historical ranges, and estimated to be in-line with other North American insurers. The Company continues to explore different approaches, services, and assessment capabilities related to portfolio scenario analysis.

3) Risk Management

Disclosure	**3A). Describe the organization's process for identifying and assessing climate-related risks.**
Company Response	Consistent with the Company's strong risk management culture, existing risk management frameworks and processes have been updated to include climate factors.

	Risk identification, evaluation, and mitigation occur at both an enterprise level and within each functional area, resulting in the Company's *Enterprise Risk Assessment* report which informs management decision making, risk management activities, and the annual audit plan. This report is a significant component of the Company's *Own Risk and Solvency Assessment (ORSA)* process. In the course of conducting the *Enterprise Risk Assessment*, the Enterprise Risk Management (ERM) department seeks information about current and emerging risk themes that present the greatest concern to the Company and require oversight at the highest levels. The Corporate Strategy department and ERM partner to perform a scan of external emerging risk information and conduct emerging trend and risk workshops with leaders from across the Company; this information contributes to development of risk themes. The Company maintains a comprehensive risk taxonomy, which assigns ownership of oversight risk categories across Board committees and corporate committees; climate risk, being a transversal risk, has been recognized as a risk type under multiple risk categories. An enterprise-level risk register is maintained and updated based on the results of these ongoing risk identification efforts. Significant sources of risk information for the assessment include: - Cross-functional Corporate Committees tasked with risk identification and evaluation of their assigned categories; - Discussion with a wide variety of focus groups composed of Company leadership and subject matter experts throughout the organization, including both departmental leadership teams and cross-functional teams addressing specific risk categories; - Formalized risk identification and assessment processes developed by certain subsidiaries and departments; - Corporate Strategy-facilitated forums that bring together representatives from formal and ad hoc groups throughout the organization to discuss emerging risks and trends with a cross-functional, enterprise viewpoint; - Participation in various external groups such as the North American Chief Risk Officer Council and other external expertise; - Climate Risk Stakeholder Group (CRSG), which is a cross-functional group of subject-matter experts tasked with performing physical and transition climate risk and opportunity identification and analysis, determining integration points for climate-related considerations into respective operations, strategic planning, and reporting, and identifying emerging climate risk practices, guidance, and standards and evaluating how they may impact the Company. As previously mentioned, the Company views climate change as a transversal risk that cuts across multiple risk themes, time horizons, scales, and scopes. Because climate is not viewed in isolation, the primary responsibility for identification of climate-related risks and opportunities falls to the cross-functional Climate Risk Stakeholder Group. ERM maintains an enterprise risk prioritization framework which is adapted by business units across the enterprise to increase consistency and objectivity in evaluating risks. This framework provides a disciplined and objective approach to elevate and rate risks on a basis consistent with the ranking of enterprise-level risks and audit issues, while allowing for inclusion of qualitative factors and professional judgement. The Company's ERM department performs an evaluation to make an initial determination of those residual risks that are most meaningful at the enterprise level, considering size of impact, likelihood, timeframe, environmental factors and risk-mitigating controls. This risk prioritization process is modified slightly to take into account the unique characteristics of climate risk, adding dimensions such as speed of onset and vulnerability. Focus is then given to those risks that have the potential to adversely impact the successful execution of the Company's strategy or those that pose the greatest impacts from a customer harm, employee or field harm, or third-party action perspective, or that pose the greatest threats to surplus or income, or to result in operational loss. These initial determinations are then validated through meetings with the appropriate Corporate Committees and members of senior leadership, Enterprise Risk Examining Committee (EREC), and the Senior Leadership Team (SLT), to ensure that knowledge and insights from across the organization are appropriately incorporated into the *Enterprise Risk Assessment*.

	An example of risk identification and assessment is the Concentration of Risk report, which is an annual assessment of the Company's geographic concentration of insurance exposures and concentration of investments across all portfolios. This process was designed to ensure adequate levels of diversification; the output can be used to highlight areas of high concentration risks for use in real estate investment decision-making and evaluating catastrophic mortality risk relative to financial tolerances. Concentration may either take the form of a high-level exposure to individual companies or as a high level of geographic exposure to individual countries, metropolitan areas, or regions. Geographic concentration is measured by country and within broad metropolitan statistical areas (MSAs) and submarkets within these broad MSAs. Limits are determined based on pre-determined parameters of potential loss within these regions, focusing specifically on the United States Geological Survey's (USGS) catalog of hundreds of potential scenarios involving earthquakes and tsunamis. Within the general account portfolio, investment teams regularly engage with counterparties, to the extent possible, to extract information that improves the ability to assess material risks to the investee. Teams rely on primary research, credit rating agency publications, and third-party research to inform assessments of various forms of risk. At the portfolio level, the Treasury, Risk, Investment Operations, Analytics and Data (TRIAD) department performs analyses that consider the size of investments in the sectors anticipated to be the most vulnerable to climate risk, real estate holdings in areas that could be most impacted by sea-level risk, and has analyzed the Company's investment exposure to climate risk. This analysis considered the size of investments in the sectors anticipated to be the most vulnerable to climate risk (energy, utilities, and transportation), real estate holdings in areas that could be impacted by sea-level rise, and aggregate portfolio vulnerability exposure as measured by climate change preparedness of foreign countries and domestic states and cities. TRIAD also employs methodologies introduced by the International Association of Insurance Supervisors (IAIS) Global Insurance Market Report (GIMAR) to build scenario analysis and gain further insights into the general account portfolio's Public Investments holdings performance, utilizing climate scenarios as defined by the Network of Central Banks and Supervisors for Greening the Financial System (NGFS). These scenarios describe how insurers' public asset classes may be impacted by physical and/or transition risks caused by climate change. To gain another perspective and improve understanding of the extent to which the investment portfolio may be exposed to transition risks and how it compares to a market benchmark, TRIAD used the open-source Paris Agreement Capital Transition Assessment (PACTA) model. Over time the Company expects to enhance systems to enable better understanding of climate risk exposure and scenario analysis practices across invested asset classes, as well as for broader operations.
Disclosure	**3B). Describe the organization's process for managing climate-related risks.**
Company Response	In managing the overall risk profile of the company, adherence to quantitative risk capacity and financial tolerances is critical. These tolerances are generally most directly applicable to investment, product, and operational risks that result in quantifiable financial impacts. The management of risk must reflect and recognize potential threats to all components of the company's strategy and appropriately consider both those risks that are more easily quantified along with the equally important strategic risks that while difficult to quantify, could impact the long-term vitality, financial strength, and marketplace relevance of Northwestern Mutual. The Company has updated its existing risk management framework and processes to include consideration of climate factors, while maintaining its core long-term investment principles to protect the Company's long-term financial strength and assure its ability to deliver on the promises made to policyholders. *Risk Management – Three Lines of Defense* Northwestern Mutual employs a risk management philosophy consistent with the "three lines" model. Accordingly, the responsibility for day-to-day management of risks, including response and monitoring, resides within the various business areas. Oversight of these efforts for significant risks is provided by the appropriate Corporate Committee.

	The first line is composed of the business areas; the Company strongly believe in a decentralized risk management model that leverages the in-depth knowledge of the individuals running the business. Business units must own and manage the risks inherent in their conduct of business. As such, the management of these units is responsible for maintaining effective internal controls and executing risk and control procedures on a day-to-day basis, consistent with applicable defined risk appetite, tolerances, and/or limits, as well as implementation of risk management processes and procedures consistent with the enterprise-level risk management framework. The Company's Enterprise Risk Management (ERM) group serves as the central component of the second line for overall risk management. This group is chaired by the Chief Risk Officer (CRO), who also serves as the Chief Financial Officer (CFO) and reports directly to the Chief Executive Officer (CEO). The primary roles of the ERM group are to establish appropriate ERM practices and procedures across the Company, to provide effective challenge as to the adequacy of first line efforts to execute on the risk management framework, and to aggregate and evaluate risks at an enterprise level. In addition to the ERM group, other groups perform second line duties for specific risk categories or business units. The Climate Risk Stakeholder Group (CRSG) supports ERM in the coordination of assessments and response to climate-related risks and opportunities across the enterprise, facilitating incorporation of climate risk in the Company's ERM framework and risk assessment processes. A key component of the ERM framework at Northwestern Mutual is the identification, evaluation, mitigation, and communication of the Company's most significant current and emerging risk themes. The *Enterprise Risk Assessment*, as previously described, is the output of this process that is used to inform management decision-making, risk management activities and the annual audit plan. It is a significant component of the *Own Risk and Solvency Assessment (ORSA)* process. The third line is represented by Corporate Audit, an independent internal audit function providing assurance services that include the design and execution of risk management practices and procedures, including those associated with climate risk and ESG. *Risk Appetite* The Company's vision of freeing Americans from financial anxiety guides the types of risks the Company is willing to accept. Northwestern Mutual's Risk Appetite Framework articulates the aggregate level and types of risk willing to be accepted or avoided in order to achieve business objectives. Key components of this framework include, but are not limited to: – Risk philosophy, including how the Company's risk appetite is informed by and contributes to the Company's vision and strategy; – Quantitative risk capacity and financial tolerances, risk limits developed to operationalize the overall risk appetite, and influence factors that can impact the Company's resilience to risk events; and – Qualitative risk considerations including reputation and trust, compliance and ethics, financial strength ratings, and regulatory environment. The Risk Appetite Framework is established by the Enterprise Risk Executive Committee (EREC) and subject to approval by the Senior Leadership Team (SLT) and the Audit Committee of the Board of Trustees. Review and approval occur at least annually. *Risk Response & Monitoring* Risk response and monitoring are accomplished through a combination of functional areas and the Corporate Committee structure. To aid in decision making and monitoring regarding risks, risk tolerances and guidelines have been developed, and a variety of investment, product, and operational limits have been established. Additionally, risk monitors have been established for certain risks in order to anticipate instances where a risk may go beyond an established limit. Given observations of a steady increase in atmospheric carbon dioxide concentrations over recent years, the Company has conducted analysis on the potential impact of climate-related risks from these trends on mortality and morbidity. The Infectious Disease and Environmental

	Risk (IDERT's) Climate Change sub-group has concluded that there is not substantial evidence to support any significant short-term risk of worsening life, disability income, or long-term care experience for the Company as a result of climate change. Yet, various scenarios do exist for the pace at which climate change could advance, and its potential impact on mortality and morbidity for the medium- to long-term timelines is less certain. Thus, the impact of climate risk to mortality and morbidity will be evaluated as evolving circumstances dictate, with the group currently in the process of updating its 2021 assessment. Additionally, the Company assesses the potential impact of climate change on mortality and morbidity within a group of insured lives, focusing on the review of life insurance claims classified in the "environmental" category, review of literature and analysis to gauge how changes in ambient temperature could impact mortality, and, review of occupational classes to further define how Northwestern Mutual's insured population may be impacted by physical and transition risk. Furthermore, the Company's investment strategy and risk management processes address climate-related transition and physical risks, as well as other risks, and analyzes portfolio-wide investment exposure to climate-related risk by conducting various analyses on potential physical and transition risks that may arise. Given its investment time horizons, the Company's attention to climate risk, and the active management of its investment portfolio, the Company has the ability to prudently adjust its portfolio as appropriate. The Company anticipates that as climate risk-related systems and data capabilities advance, this will enable the Company to build out enhanced reporting for products, operations, and investments.
Disclosure	**3C). Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.**
Company Response	Northwestern Mutual has updated its existing risk management (ERM) framework and processes to include climate factors. As previously mentioned, the Company has taken steps to formalize its approach to climate risk management by refining and expanding the charter of its Climate Risk Stakeholder Group (CRSG) which is overseen by the Enterprise Risk Executive Committee (EREC). The CRSG, utilizing its cross-functional subject-matter experts spanning the Enterprise Risk, Law, Investment Risk, Managed Investments, Finance, Facilities Planning & Operations, Communications, Government Relations, Retail Investments, and Sourcing & Procurement, and Medical departments, has taken on the following accountabilities to coordinate climate risk and opportunity assessments across the enterprise: 1. Perform climate-related risk and opportunity identification across functions, describing physical and transition risks and opportunities across varying time horizons; 2. Assist in determining integration points for climate-related considerations into respective operations, strategic planning, and reporting; 3. Identify existing data sources for climate-related disclosures, provide context around existing controls, and identify gaps; 4. Assist in defining climate-related use cases for data and technology across the enterprise; 5. Provide insights and input into anticipation and shaping of regulatory and other external expectations. Additionally, the following groups contribute to the Company's assessment of climate-related risks across the enterprise: - *The ESG department* sets ESG strategy and is responsible for implementation of ESG initiatives across the enterprise, including goal setting, stakeholder engagement, KPI collection, monitoring, disclosure, and process improvement, and internal and external reporting. The ESG function oversees the CRSG and is tasked with climate risk and opportunity education of key constituents across the enterprise. This group is led by the Company's Vice President of Enterprise ESG who reports to the Chief Legal & Compliance Officer. - *The ESG Leadership Council* is a cross-functional group of senior leaders led by the ESG function and sponsored by the Company's Chief Legal & Compliance Officer. The

	ESG Leadership Council approves ESG strategy, goals and direction, and guides external ESG communications and commitments. - The *Infectious Disease and Environmental Risk Team (IDERT) Climate Change subgroup* – cross-functional group of subject-matter experts assessing potential climate change impacts on insured mortality and morbidity. IDERT is part of the Enterprise Business Continuity Planning group, which identifies environmental and other threats to the operational capabilities of the Company and oversees the business continuity plan that informs the Company's response to such threats. - *Treasury, Risk, Investment Operations, Analytics and Data (TRIAD)* – analyzes investment exposure to climate risk. TRIAD, which advises the Company's Investment Committee in its oversight of invested asset risk, is led by the Company's Vice President of Investment Risk & Operations, who reports to the Chief Financial & Risk Officer. - Departmental ESG focus groups analyze climate-risk considerations and regulatory requirements specific to their business function and escalate issues having broader enterprise impact to their respective representatives on the aforementioned cross-functional teams. Northwestern Mutual determines materiality of climate-related issues consistent with how materiality of other information included in financial and regulatory filings is determined. Identified climate-related risks are subject to the Company's risk prioritization framework, a tool that enables evaluation and ranking of risks on a basis consistent with the ranking of enterprise-level risks and audit issues. This framework has been modified to account for the unique characteristics of climate risk, in particular different effects based on geography and activities, longer time horizons and long-lived effects, changing magnitude and non-linear dynamics, and novel and uncertain nature. As previously mentioned, the Company views physical and transition risk as transversal, assessing how these risks may impact pre-existing categories within the risk taxonomy. These risks are managed within the boundaries of the Company's ERM framework. Additionally, the Company engages key constituencies on sustainability and environmental preservation, including encouraging employees to reduce their personal carbon footprint in several ways, directly and by serving as an example, as described in section 2B. The company continues to seek appropriate and meaningful opportunities to engage in constructive discussions on these topics both internally and externally.

4). Metrics & Targets

Disclosure	**4A). Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.**
Company Response	Strategic efforts to minimize impact on the environment align closely with the Company's ongoing efforts to promote the efficient use of resources. Accordingly, the Company will continue to seek appropriate opportunities throughout the organization to lessen its impact upon the environment. Further development of climate risk-related systems, data and methodologies will enable the Company to enhance climate-related reporting metrics for products, operations, and investments, such as tracking the effects that a changing climate have on mortality and morbidity, on resiliency, and on investment portfolio transition and physical risk. *Operations* As a financial services company, Northwestern Mutual is not a significant source of direct emissions. Still, the Company has implemented an energy management plan that aims to minimize environmental impact by assessing and closely monitoring the energy usage of infrastructure, incorporating environmentally sustainable business practices when building physical facilities and strategically reducing campus emissions over time.

	In 2022, the Company engaged consulting and engineering firms to assist with documentation of scope 1 and 2 GHG emissions and energy usage intensity of Home Office operations. In addition to establishing a baseline carbon footprint, this process resulted in Northwestern Mutual's first GHG Inventory Management Plan (IMP) which documents the organizational boundary, operational boundary, data sources and collection processes, quantification methods, and quality assurance processes used to determine the Company's Scope 1 and 2 GHG emissions. All the process steps undertaken are in alignment with the World Resources Institute (WRI) / World Business Council for Sustainable Development (WBSCD) Greenhouse Gas Protocol. Additionally, the Facilities Planning & Operations team closely monitors water usage and waste management metrics and seeks opportunities to best utilize the land on which Home Office facilities are built to the benefit of the community. Notably In 2017, the Company completed construction of the Northwestern Mutual Tower and Commons at its downtown Milwaukee campus which incorporates numerous sustainability features including a 4+ acre public green space park, extensive use of natural lighting and lighting sensors, and a 36,000 square foot green roof, which will prevent more than 500,000 gallons of storm water run-off annually from being diverted into sanitary-storm sewers. LEED-NC v3 Gold Certification was awarded to the Tower and Commons in August 2018. *Mortality & Morbidity* Metrics are tracked to highlight and monitor areas of high policyholder concentration risk that could result in catastrophic mortality events which exceed established financial risk tolerances. Specifically, the Company looks at life insurance concentration of risk by region, state, and metropolitan statistical area (MSA), and zip code, measuring the total number of lives insured, the net amount at risk in absolute dollar terms, the net amount at risk as a percentage of the Company's total net amount at risk, and the longer-term growth rate of the net amount at risk. Similar metrics are tracked for the Disability Income products issued by the Company. *Invested Assets* Northwestern Mutual Investment Management Company (NMIMC), the Company's primary asset manager for its $300 billion general account portfolio, has begun integrating climate and ESG-related metrics into its proprietary investment research tools. Within the Public Investments department, the Investment Grade Corporates team tracks the absolute scope 1 and 2 emissions profile of companies within analysts' coverage universe and seek to develop a broader ESG dashboard to compare entities' progress over time and absolute position and progress relative to peers and across sectors. As previously mentioned, the Company continues to explore different approaches, services, and assessment capabilities related to portfolio scenario analysis. The Company tracks investments in the general account portfolio that are supportive of or sensitive to the environment. Qualifying investments include: – Public and private corporate and sovereign green, social, sustainable and sustainability linked- bonds and loans; – Renewable energy projects including alternative energy investments ; – Projects qualifying for Commercial Property Assessed Clean Energy (C-PACE) financing; – Real estate investments that meet specific nationally recognized sustainable building and occupant wellness (sometimes referred to as "green building") standards, such as Leadership in Energy and Environmental Design USGBC, Energy Star DOE, Green Globes Building Certification GBI, Earthcraft, National Green Building Standard NAHB, Florida Green Homes, CalGreen, BREEM, Living Building Challenge, and WELL Building Standard IWBI;

	– Projects that invest in cleaning up State and Federal environmentally contaminated sites, such as Brownfield programs, CERCLA Superfund designations and Land revitalization projects. –
Disclosure	**4B). Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks.**
Company Response	In 2022, the Company engaged consulting and engineering firms to assist with documentation of scope 1 and 2 GHG emissions and energy usage intensity of Home Office operations. In addition to establishing a baseline carbon footprint, this process resulted in Northwestern Mutual's first GHG Inventory Management Plan (IMP) which documents the organizational boundary, operational boundary, data sources and collection processes, quantification methods, and quality assurance processes used to determine the Company's Scope 1 and 2 GHG emissions. All the process steps undertaken are in alignment with the World Resources Institute (WRI) / World Business Council for Sustainable Development (WBSCD) Greenhouse Gas Protocol. These third parties also worked with the Company's Facilities Planning & Operations team to assess future pathways for improved building efficiency; the Company is in the process of evaluating these recommendations. The Company continues to explore with different approaches, services, and assessment capabilities related to portfolio scenario analysis.
Disclosure	**4C). Describe the targets used by the organization to manage climate-related risks and opportunities against performance targets.**
Company Response	Northwestern Mutual aims to use our best efforts to allocate at least 5% of its general account investment portfolio to socially responsible investments, which are defined as investments meeting certain internally established socioeconomic, green, or impact objectives. As of September 30, 2022, the Company is meeting this goal. Investments which are considered that are supportive of or sensitive to the environment, or "green" include the following: – Public and private corporate and sovereign green, social, sustainable and sustainability linked- bonds and loans; – Renewable energy projects, including alternative energy investments – Projects qualifying for Commercial Property Assessed Clean Energy (C-PACE) financing; – Real estate investments that meet specific nationally recognized sustainable building and occupant wellness (sometimes referred to as "green building") standards, such as Leadership in Energy and Environmental Design USGBC, Energy Star DOE, Green Globes Building Certification GBI, Earthcraft, National Green Building Standard NAHB, Florida Green Homes, CalGreen, BREEM, Living Building Challenge, and WELL Building Standard IWBI; – Projects that invest in cleaning up State and Federal environmentally contaminated sites, such as Brownfield programs, CERCLA Superfund designations and Land revitalization projects. The Company's Environmental, Social, and Governance (ESG) group and ESG Leadership Council, described in more detail in disclosure 1B, are working to establish ESG and climate-risk goal setting processes and opportunities for ultimate approval by the Senior Leadership Team (SLT) and Board of Trustees.