

REDESIGNED STATE CLIMATE RISK DISCLOSURE SURVEY

INTENT AND PURPOSE

The Climate Risk Disclosure Survey is a voluntary risk management tool for state insurance regulators to request from insurers on an annual basis a non-confidential disclosure of the insurers' assessment and management of their climate-related risks.

The purpose of the Climate Risk Disclosure Survey is to:

- Enhance transparency about how insurers manage climate-related risks and opportunities.
- Identify good practices and vulnerabilities.
- Provide a baseline supervisory tool to assess how climate-related risks may affect the insurance industry.
- Promote insurer strategic management and encourage shared learning for continual improvement.
- Enable better-informed collaboration and engagement on climate-related issues among regulators and interested parties.
- Align with international climate risk disclosure frameworks to reduce redundancy in reporting requirements.

SURVEY QUESTIONS

To provide clear direction for achieving a robust, insurance-sector specific TCFD report, narrative and closed ended questions follow, grouped into the TCFD's four topics: governance, strategy, risk management and metrics and targets.

The statements listed next to numbers and letters are directly taken from the TCFD Framework and should be fully addressed in the insurer's response. As discussed in detail above, insurers should consider including the bulleted items in their response to the TCFD statement above it. For additional guidance on sector specific content to consider including, refer to the [Implementation Recommendation Report](#).

Governance

- *Disclose the insurer's governance around climate-related risks and opportunities.*
 - A. *Describe the board and/or committee responsible for the oversight of climate-related risks and opportunities.*
 - B. *Describe management's role in assessing and managing climate-related risks and opportunities.*

[In disclosing the insurer's governance around climate-related risks and opportunities, insurers should consider including the following:

- Identify and include any publicly stated goals on climate-related risks and opportunities.
- Describe where climate-related disclosure is handled within the insurer's structure, e.g., at a group level, entity level, or a combination. If handled at the group level, describe what activities are undertaken at the company level.]

[In describing the position on the board and/or committee responsible for the oversight of managing the climate-related financial risks, insurers should consider including the following:

- Describe the position on the board and/or committee responsible for the oversight of managing the climate-related financial risks.]

ANSWER:

I. Resolution Life U.S. Holding Company System

Resolution Life U.S. Holdings Inc., NAIC Group Code #4992, is the U.S. holding company ("RLUS") of Resolution Life Group, a Bermuda-based company and the parent of RLUS ("Resolution Life Group" or "RLGH"). RLUS initiated operations on January 4, 2021, with its acquisition of the legacy individual life and annuity business of Voya Financial, Inc. The acquisition was accomplished through the purchase of certain legal entities, including Security Life of Denver Life Insurance Company, and the reinsurance of blocks of life and annuity business from other Voya entities.

The Enterprise Risk Management framework that was established at RLUS is a mature framework which has evolved from the one in place at Voya at the time of the transaction. As such, risks such as climate-related risks are managed within that framework. In June 2024, RLUS filed its latest Own Risk and Solvency Assessment ("ORSA") Report with its lead regulator, the Colorado Division of Insurance. The ORSA fully describes the RLUS Risk Framework. A brief summary of that framework, including how climate-related risks are managed, is set forth below.

II. RLUS Risk Governance

- Board Oversight
 - The RLUS Board of Directors (the “RLUS Board”) has the authority and responsibility to establish the Risk Framework within the RLUS holding company system.
 - In furtherance of the Risk Framework, the RLUS Board has approved (i) a Risk Taxonomy; (ii) an accompanying set of Risk Policies; and (iii) a Risk Appetite statement and associated risk limits.
 - The Risk Taxonomy explicitly includes Sustainability Risk as a key risk within Strategic Risk.
 - Among the Risk Policies is the Environmental, Social and Governance (“ESG”) Risk Policy. Climate-related risks are covered by this Policy.
 - The Investment and Risk Committee (the “IRC”) of the RLUS Board has been delegated authority to oversee Risk-related matters.
- Management Risk Committee
 - In addition to the oversight role of the IRC, the RLUS Board has delegated day-to-day risk management to the RLUS Chief Risk Officer (the “CRO”) and the RLUS Management Risk Committee (the “Management Risk Committee”).
 - The Management Risk Committee charter provides that the committee’s primary responsibility is to monitor and provide oversight of all risks in RLUS and to ensure compliance with the Risk Framework, including the Risk Policies and the approved Risk Operating Guidance of RLUS and Resolution Life Group. This includes monitoring and exercising oversight over climate-related risks.
- Management Sustainability Committee
 - The RLUS Management Sustainability Committee (the “Management Sustainability Committee”) derives its authority from the RLUS Board. The primary responsibility of the Management Sustainability Committee is to monitor and provide oversight of all activities related to RLUS’s ESG goals (also more broadly referred to as Sustainability goals), as determined by the Board and consistent with those goals and objectives established by Resolution Life Group.
 - In furtherance of this responsibility, the Management Sustainability Committee monitors all Sustainability-related statutory and regulatory requirements, including this survey. Additionally, the Management Sustainability Committee may set goals and objectives within the Board-approved Risk Appetite and Limits framework or recommend that the Board amend such framework to include appropriate Sustainability elements.
 - Over the past year, work by the Management Sustainability Committee includes: implementing and monitoring the quarterly Sustainability Scorecard; developing an RLUS ESG Risk Policy; reviewing expected climate-related disclosure requirements from the Bermuda Monetary Authority (“BMA”) as described in their September 2023 discussion paper; supporting RLGH in the development of Sustainability themes to

integrate into RLUS's framework; supporting RLGH with the completion of their external 2023 Sustainability Update report; and reviewing this survey.

III. Application of Risk Framework to Climate-Related Matters

- Risk Metrics and Targets have been developed to show adherence to the Risk Appetite.
- Stress tests have been developed to show performance under a range of adverse scenarios.
 - Work is underway to produce climate-related stress testing, which will leverage our licensed S&P Sustainability tool and require input from RLUS's asset managers.
- A series of reports have been established that are regularly presented to the RLUS Management Risk Committee, the RLUS Management Sustainability Committee, and the IRC to provide a view of RLUS's current risk profile, including climate risk. For example:
 - The quarterly Chief Risk Officer Report provides an update on activities related to Sustainability in the just-completed quarter.
 - The quarterly Emerging Risk Report identifies emerging risks to RLUS, including climate related risk specifically. The Management Risk Committee tracks the potential impact of these risks on an ongoing basis as they continue to develop.
 - The quarterly Sustainability Scorecard provides data across the Environmental, Social, and Governance pillars to determine progress quarter-over-quarter. This scorecard is also provided to RLGH and is used to support the annual RLGH Sustainability Update report.
- Climate-related goals are set by RLGH and implemented within RLUS by the Board, the RLUS Management Risk Committee, and the RLUS Management Sustainability Committee. The following has been accomplished in support of the RLGH goals:
 - Produced the second annual RLGH Sustainability Update report for public view.
 - Provided carbon offsets for greenhouse gas ("GHG") consumption for global business travel using an organization called Trees4Travel.
 - Approved an ESG/Sustainability Policy for each division of Resolution Life, including RLUS.
 - Administered the Responsible Investing Policy intended to protect and enhance the value of our investments in the long term. As such, the incorporation of Sustainability factors in the investment process and in improving the companies in which we invest is part of RLUS's strategic priorities.
 - Refined the 'scorecards' completed quarterly by RLUS (and the other companies/platforms of RLGH) to better focus on our key Sustainability priorities. These include items that indicate performance in several climate-related areas.
 - Continue to integrate software from industry-leading vendors (e.g., S&P) to help assess the Sustainability program of our business partners and general account investments.
 - Resolution Life became a signatory to the United Nations-supported Principles for Responsible Investment ("PRI") in 2022. In 2023, we submitted our first private PRI report and filed our first public PRI report in 2024.

Adopted by the Climate Risk Disclosure Workstream March 11, 2022
Adopted by the Climate and Resiliency (EX) Task Force March 21, 2022
Adopted by the Executive (EX) Committee April 6, 2022

Strategy

- *Disclose the actual and potential impacts of climate-related risks and opportunities on the insurer's businesses, strategy, and financial planning where such information is material.*
 - A. *Describe the climate-related risks and opportunities the insurer has identified over the short, medium, and long term.*
 - B. *Describe the impact of climate-related risks and opportunities on the insurer's business, strategy, and financial planning.*
 - C. *Describe the resilience of the insurer's strategy, taking into consideration different climate-related scenarios, including a 2 degree Celsius or lower scenario.*

[In disclosing the actual and potential impacts of climate-related risks and opportunities on the insurer's businesses, strategy and financial planning, insurers should consider including the following:

- Describe the steps the insurer has taken to engage key constituencies on the topic of climate risk and resiliency.*ⁱ
- Describe the insurer's plan to assess, reduce, or mitigate its greenhouse gas emissions in its operations or organizations.*]

[In describing the climate-related risks and opportunities the insurer has identified over the short, medium, and longer term, insurers should consider including the following:

- Define short, medium, and long-term, if different than 1-5years as short term, 5-10years as medium term, and 10-30years as long term.]

[In describing the impact of climate-related risks and opportunities on the insurer's business, strategy, and financial planning, insurers should consider including the following:

- Discuss if and how the insurer provides products or services to support the transition to a low carbon economy or helps customers adapt to climate-related risk.
- Discuss if and how the insurer makes investments to support the transition to a low carbon economy.]

ANSWER:

As stated under #1 (Governance), Resolution Life Group is the parent company of RLUS. Resolution Life Group has established goals and objectives for inclusion in the RLUS Sustainability program.

One such objective from RLGH is the implementation of a Responsible Investing Policy. This Policy was approved by the RLGH Board of Directors in 1Q 2023. To help implement this policy, the RLUS Investment Risk team has developed a live dashboard that shows up-to-date portfolio information with breakdowns for certain Sustainability categories. This assists in monitoring areas where we want less or more exposure.

Another developing area that will help identify climate-related risks and opportunities is the data that the RLUS Investment Managers provide on the Sustainability profile of our General Account investments. All of our investments are administered by external asset managers. Discussions with our asset managers regarding this data are ongoing, specifically regarding climate risk metrics and stress testing.

At this time, RLUS does not offer products or services to our policyholders to support the transition to a low carbon economy or to help policyholders adapt to climate-related risk.

Across our portfolios, we provide financing to companies with clear goals to support the energy transition both in the public and private markets, and through our partnership with asset manager Blackstone, we have deployed capital (\$1.8B) to support businesses focused on renewable energy and operating in various capacities within the sector. In 2023, two specific businesses supported in the US included Altus Power (a solar company delivering clean energy and storage solutions), and a fintech company focused on sustainable solutions (which provides financing options for people looking to install sustainable solutions in their homes).

In assessing the impact of our climate-related risks, note that our Scope 1 and 2 GHG footprint is primarily caused by the operation of office space, which includes emissions from purchased electricity, heating, and cooling. Mitigation efforts include improved energy efficiency in spaces where we have operational control. In 1Q 2024, RLGH partnered with an external firm to complete a 2023 Report of GHG Emissions. Based on this data, RLGH has decided to purchase carbon offsets for GHG produced in 2022 and 2023 related to business (see more under the 'Metrics and Targets' section).

Risk Management

- *Disclose how the insurer identifies, assesses, and manages climate-related risks.*
 - A. *Describe the insurers' processes for identifying and assessing climate-related risks.*
 - B. *Describe the insurer's processes for managing climate-related risks.*
 - C. *Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the insurer's overall risk management.*

[In disclosing how the insurer identifies, assesses, and manages climate-related risks, insurers should consider including the following:

- Describe how the insurer considers the impact of climate related risks on its underwriting portfolio, and how the company is managing its underwriting exposure with respect to physical, transition and liability risk.*
- Describe any steps the insurer has taken to encourage policyholders to manage their potential physical and transition climate related risks, if applicable.*
- Describe how the insurer has considered the impact of climate-related risks on its investment portfolio, including what investment classes have been considered.*]

[In describing the insurers' processes for identifying and assessing climate-related risks, insurers should consider including the following:

- Discuss whether the process includes an assessment of financial implications and how frequently the process is completed.*]

[In describing how processes for identifying, assessing, and managing climate-related risks are integrated into the insurer's overall risk management, insurers should consider including the following:

- Discuss whether climate-related risks are addressed through the insurer's general enterprise-risk management process or a separate process and how frequently the process is completed.
- Discuss the climate scenarios utilized by the insurer to analyze its underwriting risks, including which risk factors the scenarios consider, what types of scenarios are used, and what timeframes are considered.
- Discuss the climate scenarios utilized by the insurer to analyze risks on its investments, including which risk factors are utilized, what types of scenarios are used, and what timeframes are considered.]

ANSWER:

As described under the 'Governance Section' above, climate risk is managed under the Risk Framework in a manner consistent with other risks. The company has identified climate risk as part of its Business and Strategic Risk category, and there is a Board-level Business and Strategic Risk Policy to guide the identification, reporting, and management of these risks. As part of the overall Risk Framework, issues related to climate risk and other Sustainability-related risks are first identified in the quarterly Emerging Risk Report. This report is provided to the Management

Risk Committee and the RLUS Board of Directors. If an issue within the Emerging Risk Report is material and if it materializes, mitigating actions will be taken. These actions may include setting appropriate limits to manage the risk within the RLUS risk appetite. Additionally, as noted above, each quarter, the Chief Risk Officer Report is provided to the RLUS Board of Directors and the Management Risk Committee, which contains a section on Sustainability-related activity for the just-completed quarter. Finally, if a Sustainability-related risk is identified within the Emerging Risk Report as material, it will also appear in the RLUS Top Risk Report, which is provided to RLGH.

Additionally, as noted above, a Management Sustainability Committee coordinates and oversees Sustainability-related activities at RLUS. Thus far, the Committee has approved an initial Vendor Sustainability framework and an ESG Policy, which aligns with the Group Sustainability Policy. The Committee has also supported the development of the annual RLGH Sustainability Update report, continued quarterly Sustainability Scorecard reporting, and 2023 GHG Survey reporting. In addition, the Committee has provided the opportunity for multiple resources to go through Sustainability training offered by Cambridge University as well as the UN PRI. This training has proved to be enriching, informative, and pertinent, and serves to further embed the Sustainability framework in all areas of the company.

As described under the ‘Strategy Section’ above, RLUS manages closed blocks of life insurance business and small amounts of closed-block annuity business.

As described under the ‘Strategy Section’ above, the RLUS Investment Team is beginning to receive reports from its external asset managers to better understand the Sustainability risks that reside within our investment portfolio. Some of this effort is being formulated at the Resolution Life Group level as it develops goals and objectives that will be implemented at RLUS. Additionally, as mentioned above, the climate risk stress tests we are reviewing and discussing will provide us with an understanding of the risks within our general account.

RLUS’s main asset managers are signatories of UN PRI. Our asset managers are actively involved in initiatives such as: Climate Action 100+, Global Sustainability Benchmark for Real Asset and Global Impact Investing Network. All of our asset managers have processes in place to assess material Sustainability factors (including the use of scorecards and qualitative metrics), which are integrated into the management of assets.

Metrics and Targets

4. *Disclose the metrics and targets used to assess and manage relevant collateralized risks and opportunities where such information is material.*
 - A. *Disclose the metrics used by the insurer to assess climate-related risks and opportunities in line with its strategy and risk management process.*
 - B. *Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.*
 - C. *Describe the targets used by the insurer to manage climate-related risks and opportunities and performance against targets.*

[In disclosing the metrics and targets used to assess and manage relevant collateralized risks and opportunities where such information is material, insurers should consider including the following:

- Discuss how the insurer uses catastrophe modeling to manage the climate-related risks to your business. Please specify for which climate-related risks the insurer uses catastrophe models to assess, if any.]

[In disclosing the metrics used by the insurer to assess climate-related risks and opportunities in line with its strategy and risk management process, insurers should consider including the following:

- In describing the metrics used by the insurer to assess and monitor climate risks, consider the amount of exposure to business lines, sectors, and geographies vulnerable to climate-related physical risks [answer in absolute amounts and percentages if possible], alignment with climate scenarios, [1 in 100 years probable maximum loss, Climate VaR, carbon intensity], and the amount of financed or underwritten carbon emissions]

ANSWER:

Resolution Life Group is in the process of establishing benchmark data which will influence target determinations.

One of the sources of information will be our asset managers. As we gather Sustainability and climate-related data from them regarding our General Account, we will be in a better position to understand our risks and set any targets or limits that might be deemed appropriate.

In 1Q2024, Green Moves Australia (an independent carbon emissions consulting organization) was engaged to calculate the carbon emissions for all companies within Resolution Life Group, including RLUS operations, for the calendar year 2023. Green Moves has produced a carbon report that measured carbon emissions for RLUS for CY2021, CY2022, and CY2023. The report has been compiled in accordance with The GHG Protocol: A Corporate Accounting and Reporting Standard and the International Standards Organization ISO 14064-1:2018. The GHG assessment has been calculated using the operational control boundary for organizations. It covers scope 1,

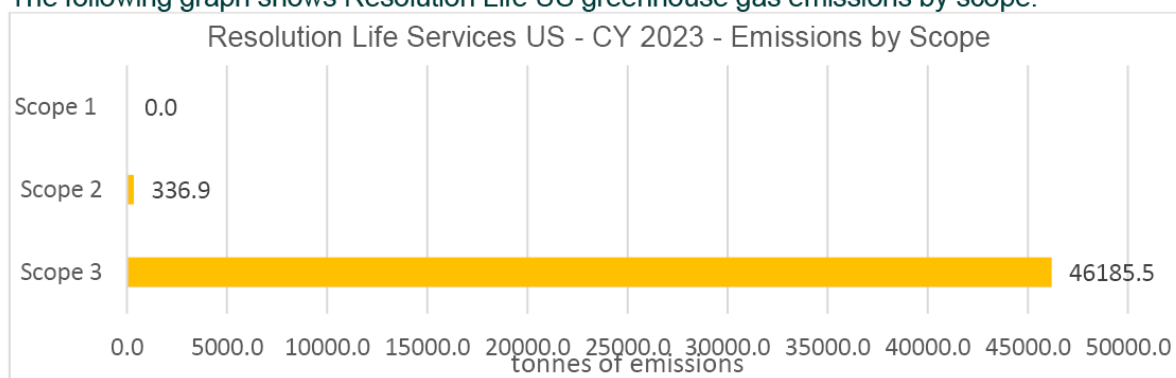
scope 2, and scope 3 emission sources that sit within its operational control and where data is available. This information provides a baseline to measure ongoing improvements. RLGH purchased carbon offsets to negate 2022 and 2023 GHG production from business travel using the organization Trees4Travel (for 2022, we offset 1,208.01 tCO₂e; for 2023, we offset 4,299.06 tCO₂e).

Key findings from the RLUS 2023 Carbon Report are shown below:

- Emissions Scope 1 – Direct emissions are 0.00 % None
- Emissions Scope 2 – Purchased electricity makes up 0.72% of emissions
- Emissions Scope 3 – Indirect emissions form over 99.28 % of the operation's emissions
- Primary emission sources are Professional Services, and Information and Communication Technology (“ICT”) expenses are responsible for 97.7%.

Emissions by scope

The following graph shows Resolution Life US greenhouse gas emissions by scope.



Since RLUS’s primary emissions are from Scope 3 and this is also true for the other companies in the Resolution Life Group, RLGH has begun to engage with our biggest suppliers, who make up 80% of our spending, to determine where they are on their carbon reduction journey and how we can work together to reduce our emissions.

In 1Q2023, RLGH purchased the S&P Sustainability tool Trucost. Several training sessions have been held to effectively utilize the tool. The RLUS Investment Team will use this tool to monitor/review the General Account Investments relative to Sustainability scoring, as well as the Risk Management team for use in climate risk metrics and stress testing.

In addition to the narrative Climate Risk Disclosure Survey, we ask companies to consider responding to the following voluntary survey at [SurveyMonkey link](#). The voluntary questions align with the NAIC Climate Risk Disclosure Survey.

Governance

- Does the insurer have publicly stated goals on climate-related risks and opportunities? (Y/N) – No
- Does your board have a member, members, a committee, or committees responsible for the oversight of managing the climate-related financial risk? (Y/N) - Yes
- Does management have a role in assessing climate-related risks and opportunities? (Y/N) - Yes
- Does management have a role in managing climate-related risks and opportunities? (Y/N) - Yes

Strategy

- Has the insurer taken steps to engage key constituencies on the topic of climate risk and resiliency? (Y/N) * - Yes
- Does the insurer provide products or services to support the transition to a low carbon economy or help customers adapt to climate risk? (Y/N) - No
- Does the insurer make investments to support the transition to a low carbon economy? (Y/N) - Yes
- Does the insurer have a plan to assess, reduce or mitigate its greenhouse gas emissions in its operations or organizations? (Y/N)* - In development

Risk Management

- Does the insurer have a process for identifying climate-related risks? (Y/N) - Yes
 - If yes, are climate-related risks addressed through the insurer's general enterprise-risk management process? (Y/N) - Yes
- Does the insurer have a process for assessing climate-related risks? (Y/N) - Yes
 - If yes, does the process include an assessment of financial implications? (Y/N) - No
- Does the insurer have a process for managing climate-related risks? (Y/N) – Yes, in general; No, specifically
- Has the insurer considered the impact of climate-related risks on its underwriting portfolio? (Y/N/Not Applicable)* - No
- Has the insurer taken steps to encourage policyholders to manage their potential climate-related risks? (Y/N)* - No
- Has the insurer considered the impact of climate-related risks on its investment portfolio? (Y/N)* - Yes
- Has the insurer utilized climate scenarios to analyze their underwriting risk? (Y/N) - No
- Has the insurer utilized climate scenarios to analyze their investment risk? (Y/N) - No

Metrics and Targets

- Does the insurer use catastrophe modeling to manage your climate-related risks? (Y/N) - No
- Does the insurer use metrics to assess and monitor climate-related risks? (Y/N) - No
- Does the insurer have targets to manage climate-related risks and opportunities? (Y/N) - No
- Does the insurer have targets to manage climate-related performance? (Y/N) - No

 [2022ProposedClimateRiskSurvey](#)

i * Asterisks represent questions derived from the original Climate Risk Disclosure Survey.