Survey Question

Governance - narrative

- 1. Disclose the insurer's governance around climate-related risks and opportunities.
 - 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.

A. Describe the board and/or committee responsible for the oversight of climate-related risks and opportunities.

 Describe the position on the board and/or committee responsible for the oversight of managing the climate-related financial risks. The response to this Survey is provided on behalf of the following companies American National Insurance Company; American National Life Insurance Company of New York; American National Property And Casualty Company; American National General Insurance Company; Farm Family Casualty Insurance Company; and United Farm Family Insurance Company, collectively referred to herein as the "Company" or the "Companies."

The Board of Directors of American National Group Inc. (ANGI) (the "Board") holds the ultimate responsibility for the oversight of the formal enterprise risk management (ERM) program and investment activities of the Companies as part of its enterprise oversight activities. Climaterelated risks and opportunities are addressed through the framework of those programs and activities.

Risk management oversight by the Board includes an annual review of the Company's strategic, business, and financial plans. The Board is assisted by the ANGI Chief Risk Officer, the enterprise Chief Risk Officer, and two board-appointed committees, the Board Audit Committee and the Enterprise Risk Management Committee. The enterprise Chief Risk Officer ensures consistent application of the enterprise risk management process across all business segments.

The Board Audit Committee is apprised by the ANGI Chief Risk Officer of all significant enterprise risks, by review and discussion, no less than quarterly, of reports and assessments from the enterprise Chief Risk Officer.

The Enterprise Risk Management Committee, which meets quarterly, assists the Board in providing oversight of the Company's ERM activities and advises the Board with respect to the effectiveness of the Company's ERM framework. The Enterprise Risk Management Committee is further supported by two segment-level Management Risk Committees (MRCs), one focusing on life, annuity, and PRT business risks and one focusing on property and casualty business risks. The MRCs include risk officers for the business segments, committee members, and other Company employees with relevant expertise. In addition, several other senior management committees support the discussion and enforcement of risk management.

The Enterprise Risk Management Committee and Management Risk Committee structure strengthens and promotes the discussion of ERM at multiple levels and allows a feedback loop between operating areas, senior management, and the Board. The CROs meet frequently to collaborate on ERM projects, processes, and methods as well as share status updates on the organization's risk profile.

At the entity level, Farm Family Casualty Insurance Company and United Farm Family Insurance Company have approved and adopted a Climate Change Risk Policy (Risk Policy) and have directed management to integrate the consideration, assessment, and management of climate risks into risk management structures, processes, and functions in accordance with such Risk Policy, with the goal of compliance with the expectations set forth in the Guidance for New York Domestic Insurers on Managing the Financial Risks from Climate Change.

The Companies' ERM program identifies and analyzes risks and mitigation strategies. As part of the risk quantification aspect of this program, the Companies use commercially available catastrophe models to model hurricanes, severe convective storms, earthquakes (with fire following), winter storms, and wildfires. These models use data updated to reflect insights obtained from observations made during recent natural catastrophic events. The Companies continue to work with reinsurers and

organizations such as the Insurance Institute for Business and Home Safety (IBHS) in understanding climate change, its potential impact, and potential mitigation actions.

Investment activities, including setting investment policies and defining acceptable risk levels, are subject to oversight by the Board, which is assisted by the Investment Committee, the Asset-Liability Management (ALM) Committee, and Enterprise Risk Management Committee. Climate change risk has not been identified as a discrete risk among the significant investment market risk factors for the Companies. The potential for climate change risk impacting the Companies' portfolios is addressed holistically and not isolated to a particular investment type. Accordingly, the Companies' risk monitoring, beginning with asset allocation through individual asset purchase limits, assists with monitoring each individual risk.

When considering individual investments as well as the aggregate amount of investment categories, the Companies consider risks beyond the traditional investing frameworks of credit worthiness and growth potential. A holistic approach to investment risk considers political, macroeconomic, environmental, and potential correlations with other risks the Companies accept. For example, for the property and casualty Companies, climate risk is often associated with underwriting risks that the Company manages with geographic concentration analysis and reinsurance. A large loss may impact the Company's underwriting results, reinsurance collectability, and the credit quality of the reinsurance panel. Reinsurance capacity may also be affected. Similarly, societal initiatives to reduce carbon emissions may impact private or municipally owned electric utilities as well as global demand for fossil fuels, which may impact asset values of investments held by the Companies.

The Companies also believe that the Efficient Markets Hypothesis, which holds that all known risks are discounted in the current price of an investment asset, adequately discounts risks such as climate change by the pricing mechanism inherent within capital markets. Risks such as climate change are discounted within the price of an individual asset.

Governance – voluntary closed ended questions answered in addition to the narrative

Does the insurer have publicly stated goals on climate-related risks and opportunities? No

Does your board have a member, members, a committee, or committees responsible for the oversight of managing the climate-related financial risk? No for ANICO, ANICONY, ANPAC, and ANGIC; Yes for FFCIC and UFFIC

Does management have a role in assessing climate-related risks and opportunities? Yes

Does management have a role in managing climate-related risks and opportunities? Yes

Strategy - narrative

- 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.
 - Describe the steps the insurer has taken to engage key

Climate-related risks may adversely impact operational results. There are concerns that the increased frequency and severity of weather-related catastrophes and other losses, such as hurricanes, tornadoes, wildfires, droughts, earthquakes, snow, hail, and windstorms incurred by the industry in recent years is indicative of changing weather patterns, whether as a result of global climate change caused by human activities or otherwise, which could cause such events to persist. Increased weather-related catastrophes would lead to higher overall losses, which may be difficult to adequately price for, particularly in a highly regulated and competitive environment, and higher reinsurance costs. Certain catastrophe models assume an increase in frequency and severity of

constituencies on the topic of climate risk and resiliency.

- Describe the insurer's plan to assess, reduce, or mitigate its greenhouse gas emissions in its operations or organizations.
- A. Describe the climate-related risks and opportunities the insurer has identified over the short, medium, and long term.
- 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.
- B. Describe the impact of climaterelated risks and opportunities on the insurer's business, strategy, and financial planning.
- Discuss if and how the insurer provides products or services to support the transition to a low carbon economy or helps customers adapt to climaterelated risk.
- Discuss if and how the insurer makes investments to support the transition to a low carbon economy.
- C. Describe the resilience of the insurer's strategy, taking into consideration different climaterelated scenarios, including a2 degree Celsius or lower scenario.

certain weather or other events, which could result in a disproportionate impact on insurers with certain geographic concentrations of risk. This would also likely increase the risks of writing property insurance in coastal areas or areas susceptible to wildfires or flooding, particularly in jurisdictions that restrict pricing and underwriting flexibility. The threat of rising seas or other catastrophe losses as a result of climate change may also cause property values in coastal or such other communities to decrease, reducing the total amount of insurance coverage that is required.

In addition, climate change could have an impact on invested assets, resulting in realized and unrealized losses in future periods that could have a material adverse impact on operational results and/or the Company's financial position. It is not possible to foresee which, if any, assets, industries, or markets will be materially and adversely affected, nor is it possible to foresee the timing and magnitude of such effect. Moreover, we cannot predict how legal, regulatory, and social responses to concerns about global climate change will impact our business or the value of our investments.

The Company continues its efforts to address its climate-related impact. As an office-based organization, the Companies' carbon emissions are generally limited to the energy needed to power and equip their offices and for travel related to their operations. The Companies have undertaken an energy efficiency project in their home office buildings and have implemented measures to reduce the amount of electricity and natural gas used to power and equip their home office buildings. Energy management systems are in place in all locations, which provide a scheduled set-back of office temperatures when unoccupied. Energy saving/carbon reducing measures are considered in all renovation projects. A major lighting replacement project was completed to replace fluorescent light fixtures with LED lighting in offices and sodium vapor lights in parking lots were upgraded to LED fixtures. Motion sensor light controls have been installed in many offices and conference rooms. As aging HVAC equipment is replaced, efficiency is gained with newer, energy saving equipment. All restrooms were renovated with water saving "low-flow" fixtures, as well as LED lighting. Only Energy Star rated appliances are purchased. Additional spray-in insulation has been used in home office buildings. Insulation R-value was increased with roof replacement projects at some home office buildings. Elevators have been upgraded (or are scheduled to be upgraded) with higher-efficiency controls. Carpet used for replacement is made from recycled material. In addition, company employees travel on commercial airlines instead of private aircraft, reducing the carbon footprint of the Companies, and video conferencing is encouraged to further reduce the environmental impact of business travel. Paperless delivery is available to many property and casualty clients, reducing the amount of paper that is printed and mailed. Home Office recycling programs are in place to gather and recycle paper, plastics, glass, and metals and water bottle filling stations help to reduce waste and plastic water bottle consumption. The Company also primarily invests in Class A and B real estate which tend to have the latest environmentally friendly features.

Strategy – voluntary closed ended questions answered in addition to the narrative

Has the insurer taken steps to engage key constituencies on the topic of climate risk and resiliency? Yes

Does the insurer provide products or services to support the transition to a low carbon economy or help customers adapt to climate risk?

Yes, all Companies provide paperless delivery for property and casualty clients.

Does the insurer make investments to support the transition to a low carbon economy? No

Does the insurer have a plan to assess, reduce or mitigate its greenhouse gas emissions in its operations or organizations? Yes

Risk Management – narrative

- Disclose how the insurer identifies, assesses, and manages climaterelated risks.
 - 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.
 - Describe the insurers' processes for identifying and assessing climate-related risks.
 - Discuss whether the process includes an assessment of financial implications and how frequently the process is completed.

Climate-related risks are identified, assessed, and managed through the Companies' Enterprise Risk Management (ERM) program. Since our Companies adhere to a conservative operating philosophy, risks are managed by employing controls throughout our business operations. These controls are designed to both place limits on activities and provide internal reporting information that helps us monitor our businesses and shape decisions and actions.

As described in the Governance section of the response, the Company's Board of Directors oversees the formal ERM program to coordinate risk management efforts and to provide reasonable assurance that risk taking activities are aligned with the Company's strategic objectives. The Board is assisted by the ANGI Chief Risk Officer, the enterprise Chief Risk Officer, and two board-appointed committees, the Board Audit Committee and the Enterprise Risk Management Committee. The Board Audit Committee assists the Board in its risk management oversight. The Board Audit Committee is apprised by the ANGI Chief Risk Officer of all significant enterprise risks, by review and discussion, no less than quarterly, of reports and assessments from the enterprise Chief Risk Officer. The enterprise Chief Risk Officer ensures there is consistent application of the ERM process across all business segments. The Enterprise Risk Management Committee is further supported by two segment-level Management Risk Committees (MRCs), one focusing on life, annuity, and PRT business risks and one focusing on property and casualty business risks. In addition, several other senior management committees support the discussion and enforcement of risk controls in the management of the Company.

Underwriting-related climate risk is most relevant to the Organization's property and casualty insurance companies, which use commercially available catastrophe models to model hurricanes, severe convective storms, earthquakes (with fire following), winter storms, and wildfires to estimate the possible impact of catastrophic events on their business. These models use data updated to reflect insights obtained from recent severe weather observations. The Company monitors catastrophe risk and exposure as part of a Board reviewed P&C Risk Policy that includes various measures with limits. At the entity level, Farm Family Casualty Insurance Company and United Farm Family Insurance Company have approved and adopted a Climate Change Risk Policy (Risk Policy) and have directed management to integrate the consideration, assessment, and management of climate risks into risk management structures, processes, and functions in accordance with such Risk Policy, with the goal of compliance with the expectations set forth in the Guidance for New York Domestic Insurers on Managing the Financial Risks from Climate Change.

- 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.
- 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.

In addition, the property and casualty insurance companies manage climate related risks through diligent underwriting in catastrophe prone areas including brushfire exposure restrictions (using point of sale wildfire scoring), coastal exposure restrictions, the use of hurricane and wind/hail deductible requirements (where appropriate), the ability to proactively adjust rates to meet emerging risk and exposure changes, business writing restrictions, and product offerings with third parties. We also manage risk by purchasing reinsurance to limit exposure in our life and property and casualty segments. In our property and casualty segment, our reinsurance program provides coverage for individual risks with large exposure and coverage for catastrophes including hurricanes, tornadoes, wind and hail events, earthquakes, fires following earthquakes, winter storms, and wildfires. The Company continues to work with reinsurers and organizations, such as the Insurance Institute for Business and Home Safety (IBHS), in understanding climate change, its potential impact, and potential mitigation actions.

The Company is also participating in the newly created Center for Innovation in Risk-analysis for Climate Adaptation and Decision-making (CIRCAD), an NSF-supported research collaboration among Duke, UGA, and other industry, government, nonprofit, and academic participants.

The property and casualty insurance companies have taken steps to encourage policyholders to take certain actions with the goal of helping to reduce potential losses caused by weather events in general. These include encouraging the use of storm shutters and more weather resistant building materials in certain geographic areas and supporting Firewise USA® guidelines for mitigation of wildfire exposure and losses for individuals and municipalities. The property and casualty insurance companies are longstanding members of IBHS. IBHS is dedicated to research and promotion of building standards and mitigation techniques that reduce losses from weather-related catastrophic events.

The Companies have considered the impact of climate change on their investment portfolios; however, climate change risk has not been identified as a discrete risk among the significant investment market risk factors for the Companies.

When considering individual investments as well as the aggregate amount of investment categories, the Companies consider risks beyond the traditional investing frameworks of credit worthiness and growth potential. A holistic approach to investment risk considers political, macroeconomic, environmental, and potential correlations with other risks the Companies accept. For example, climate risk is often associated with underwriting risks that the Companies manage with geographic concentration analysis and reinsurance. A large loss may impact the Companies' underwriting results, reinsurance collectability, and the credit quality of the reinsurance panel. Reinsurance capacity may also be affected. Similarly, societal initiatives to reduce carbon emissions may impact private or municipally owned electric utilities as well as global demand for fossil fuels, which may impact asset values.

The potential for climate change risk to impact the portfolio is addressed holistically and not isolated to a particular investment type. Accordingly, all of the Companies' risk monitoring, beginning with asset allocation through individual asset purchase limits, assists with monitoring each individual risk.

The Companies also believe that the Efficient Markets Hypothesis, which holds that all known risks are discounted in the current price of an asset, adequately discounts risks such as climate change by the pricing mechanism inherent within capital markets.

The Company's ERM program includes various processes for identifying and assessing risks, including climate-related risks. In particular, the

Company conducts a risk assessment across the enterprise. Each identified risk in the inventory has a risk owner responsible for specifying mitigating actions as well as assessing the likelihood, severity, and velocity of each risk both gross and net of mitigation. An inventory of emerging risks is also maintained and reviewed on a regular basis with the risk committees. An inventory of Key Risk Indicators (KRIs) is also maintained to monitor risks from various sources. The Own Risk and Solvency Assessment ("ORSA") is conducted annually along with the filing of the ORSA Summary report. The ORSA laws require the Company to maintain a framework for annually identifying, assessing, monitoring, managing, and reporting on "material and relevant risks" associated with current and future business plans.

The Company's annual Own Risk and Solvency Assessment includes stress testing via realistic disaster scenarios. One of the scenarios utilizes an internally developed hurricane wind-field model to measure the net impact of a severe hurricane.

The Company also manages climate-related risks through its business continuity and disaster recovery plans. The Company has five primary office locations in Texas, Missouri, and New York, and most employees are able to work from their homes. This workforce distribution helps the Company to manage the risk that any one office location or region is impacted by a climate-related event.

Risk Management – voluntary closed ended questions answered in addition to the narrative

Does the insurer have a process for identifying climate-related risks? Yes

If yes, are climate-related risks addressed through the insurer's general enterprise-risk management process? Yes

Does the insurer have a process for assessing climate-related risks? Yes

If yes, does the process include an assessment of financial implications? Yes

Does the insurer have a process for managing climate-related risks? Yes

Has the insurer considered the impact of climate-related risks on its underwriting portfolio? Yes

Has the insurer taken steps to encourage policyholders to manage their potential climate-related risks? No for ANICO and ANICONY; Yes for ANPAC, ANGIC, FFCIC, and UFFIC

Has the insurer considered the impact of climate-related risks on its investment portfolio? Yes

Has the insurer utilized climate scenarios to analyze their underwriting risk? No

Has the insurer utilized climate scenarios to analyze their investment risk? No

Metrics and Targes – narrative

The Company's Enterprise Risk Management program identifies and analyzes risks and mitigation strategies. As part of this program, the property and casualty insurance companies use commercially available

- 4. Disclose the metrics and targets used to assess and manage relevant collateralized risks and opportunities where such information is material.
 - Discuss how the insurer uses catastrophe modeling to manage the climate-related risks to your business. Please specify for which climaterelated risks the insurer uses catastrophe models to assess, if any.
 - A. Disclose the metrics used by the insurer to assess climaterelated risks and opportunities in line with its strategy and risk management process.
 - 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.
 - 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 climaterelated risks and opportunities and performance against targets.

catastrophe models to model hurricanes, severe storms, earthquakes (with fire following), winter storms, and wildfires to estimate the possible impact of catastrophic events on their business.

The Company monitors catastrophe risk and exposure as part of a Board reviewed P&C Risk Policy that includes various measures with limits on: -capital requirements measured by the NAIC RBC and P&C BCAR, each of which directly incorporate catastrophe Probable Maximum Loss (PML) measures

- -gross aggregate hurricane PMLs relative to Policyholder Surplus (PS) limited at 65% for the 1-in-500 year TVaR excess Average Annual Loss (AAL), 35% for the 1-in-250 year VaR excess AAL, and 22.5% for the 1-in-100 year VaR excess AAL
- -gross aggregate severe convective storm 1-in-250 year VaR excess AAL relative to PS limited at 20%
- -gross aggregate wildfire 1-in-250 year VaR excess AAL relative to PS limited at 22.5%
- -net 250 aggregate All Peril combined VaR excess of AAL relative to PS limited at 25% $\,$
- -net occurrence/single event basis All Peril combined VaR relative to PS limited at 15%

Additional measures are defined with limits to manage catastrophe exposure concentrations. At the entity level, Farm Family Casualty Insurance Company and United Farm Family Insurance Company have specific, similar limits in place as part of the Climate Change Risk Policy. A separate P&C liquidity framework is also in place to manage stressed liquidity risk, including catastrophe risk.

Metrics and Targets – voluntary closed ended questions answered in addition to the narrative

Does the insurer use catastrophe modeling to manage your climate-related risks? No for ANICO and ANICONY; Yes for ANPAC, ANGIC, FFCIC, and UFFIC

Does the insurer use metrics to assess and monitor climate-related risks? No for ANICO and ANICONY; Yes for ANPAC, ANGIC, FFCIC, and UFFIC

Does the insurer have targets to manage climate-related risks and opportunities?
No for ANICO and ANICONY; Yes for ANPAC, ANGIC, FFCIC, and UFFIC
Does the insurer have targets to manage climate-related performance? No for ANICO and ANICONY; Yes for ANPAC, ANGIC, FFCIC, and UFFIC