

NAIC CLIMATE RISK DISCLOSURE SURVEY

TCFD-ALIGNED QUESTIONS

UPDATED 2022

GOVERNANCE

1. Disclose the insurer's governance around 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.

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

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.

Company Response: Climate change and sustainability are part of the overall risk management program for the Company. The Board was briefed by the Chief Compliance Officer on the efforts being taken by management to ensure that the Company is taking appropriate steps to mitigate the risks posed by these phenomena. Working groups at the executive and management levels of the Company have been charged with providing the Company's sustainability goals, the detailed plan to reach them, and efforts to monitor the results of the initiatives designed to achieve them.

B. Describe management's role in assessing and managing climate-related risks and opportunities.

Company Response: Oceanview's management and executive teams are focused on reducing the Company's carbon footprint and minimizing its overall impact on the environment. To this end, a hybrid schedule has been introduced for all its employees at its largest office in Denver, and a fully remote schedule for all other employees. Improvement in electronic versus paper applications was observed in 2024, with electronic applications reaching more than 40% of the company's total. The goal for 2025 is to have the majority of applications submitted electronically, and to include an electronic policy document delivery process by YE 2025. The Company also switched to electronic agent commission statements, and more than 80% of all communications to agents are now electronic only.

STRATEGY

2. 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.

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. *
- 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.

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 1-5 years as short term, 5-10 years as medium term, and 10-30 years as long term.

Company Response: The Company is committed to taking steps to reduce its impact on global environmental issues. Given the overall nature of the Company's business (fixed annuities only), climate change is likely not to have a significant direct impact on the Company's day-to-day business in the short or medium term. The Company is monitoring any potential impact, and is considering this risk in its audit, compliance, and risk committee meetings at the executive and management levels.

B. Describe the impact of climate-related risks and opportunities on the insurer's business, strategy, and financial planning.

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.

Company Response: The Company is committed to being a good corporate partner in all aspects, including in its efforts to reduce environmental impact. As mentioned previously, the Company has taken steps to reduce carbon footprint, and to limit the use of paper in its application, agent correspondence, and as planned for 2025, policy document exchange with clients.

C. Describe the resilience of the insurer's strategy, taking into consideration different climate-related scenarios, including a 2 degree Celsius or lower scenario.

Company Response: The Company does not anticipate a significant direct impact on its business regardless of the climate-related scenarios.

RISK MANAGEMENT

3. Disclose how the insurer identifies, assesses, and manages climate-related risks.

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. *

A. Describe the insurers' processes for identifying and assessing climate-related risks.

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. *

Company Response: The Company conducts formal risk evaluations on a quarterly basis, and interim bi-weekly operational meetings to determine and address variances noticed in the overall risk profile, including those that are climate-related.

B. Describe the insurer's processes for managing climate-related risks.

Company Response: The Chief Compliance Officer has been charged with monitoring and managing all climate-related risks the Company has and reporting those risks and mitigation efforts to the executive risk committee.

C. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the insurer's overall risk management.

Company Response: The Chief Compliance Officer and his/her designees are responsible for evaluating the risks associated with climate change. To date, most of the focus of the Company has been on mitigating the Company's impact on the environment, not on any financial impact climate change may have on its overall business.

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.

METRICS AND TARGETS

- 4. Disclose the metrics and targets used to assess and manage relevant collateralized risks and opportunities where such information is material.*

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.

A. Disclose the metrics used by the insurer to assess climate-related risks and opportunities in line with its strategy and risk management process.

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.

Company Response: The Company is committed to continuing its remote/hybrid employment practices to reduce its direct carbon footprint. It is also targeting a 50% improvement in electronic versus paper communications with clients and agents by YE 2026.

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.

Company Response: The current targets for managing climate-related risks have been covered earlier in this document.

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