

# INSURER CLIMATE RISK DISCLOSURE SURVEY REPORTING YEAR 2023

## Filed By

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Related to the following insurance companies (the "Insurance Companies"), each of which is a wholly owned subsidiary of Voya Financial, Inc.

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## **Table of Contents**

GOVERNANCE	
STRATEGY	6
RISK MANAGEMENT	11
METRICS AND TARGETS	
SUPPLEMENTAL NOTES	_



#### **GOVERNANCE**

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

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.

Consider including the following

- Describe the position on the board and/or committee responsible for the oversight of managing the climate-related financial risks.
- B. Describe management's role in assessing and managing climate-related risks and opportunities.

Each of the Insurance Companies filing this survey is a subsidiary of Voya Financial, Inc. ("Voya Financial") (NYSE: VOYA).

Voya Financial and its subsidiaries (collectively, "Voya") is a leading provider of workplace benefits and savings solutions and technologies to U.S. employers, enabling better financial outcomes for their employees and for those who depend on their employees through our retirement solutions, retail wealth services, and a comprehensive portfolio of benefits products. Voya is also a leading international asset manager, built on a foundation of institutional-quality fixed income and private asset strategies, with a well-established presence in U.S. markets and a large and growing business managing retail and institutional equity, fixed income, and blended strategies for clients in Europe and Asia. Voya provides products and services principally through three segments: Wealth Solutions, Health Solutions and Investment Management. We refer to Voya's Wealth Solutions and Health Solutions segments collectively as our Workplace Solutions business.

Voya takes actions designed to mitigate the environmental impact of our business operations to help create a more sustainable future for our clients, colleagues, and communities. We continue to review our activities and explore ways in which we can address climate change through actionable environmental stewardship initiatives as well as through customer solutions that promote a more responsible future.

Voya has a corporate responsibility strategy to create shared value for our company and the community by conducting business in a way that is ethically, economically, socially, and environmentally responsible. Voya's Environmental Commitment Statement ("ECS") formalizes our commitment to doing our part





toward protecting the environment. The ECS can be found at <a href="https://www.voya.com/page/statements-and-policies">https://www.voya.com/page/statements-and-policies</a>.

As outlined in the ECS, Voya fosters environmentally responsible behavior by encouraging the embedding of sustainable practices across the enterprise, managing, measuring, and reporting on our performance, raising awareness among employees, and highlighting success stories. Voya continually works to improve the systems that monitor our environmental performance and is committed to internal and external stakeholder engagement regarding our environmental impacts (see the "Strategy" section of this survey for additional information regarding stakeholder engagement).

Since 2015, Voya has been a member of RE100, a global initiative of leading companies committed to sourcing 100% of their electricity from renewable energy sources. This pledge aims to reduce carbon dioxide emissions and promote environmentally responsible business practices. Additionally, we have been annually disclosing our environmental sustainability performance to CDP (formerly known as the Carbon Disclosure Project), a global disclosure system that allows companies, cities, states, and regions to share their environmental impacts with investors, asset owners, and other stakeholders.

Voya Financial became a signatory supporter of the Task Force on Climate-related Financial Disclosures ("TCFD") recommendations in 2018. Since 2008, we have also been a member of the Environmental Protection Agency Green Power Partnership, a voluntary program that encourages organizations to use green power to reduce their environmental impacts. In 2022, Voya joined the United Nations Global Compact (UNGC), a voluntary leadership platform for the development, implementation, and disclosure of responsible business practices. Additional information about Voya's engagement on environmental, social, and governance ("ESG") matters can be found throughout these survey responses and in Voya Financial's most recent Impact Report (<a href="https://www.voya.com/page/esg-environmental-social-and-governance-reporting">https://www.voya.com/page/esg-environmental-social-and-governance-reporting</a>).

The board of directors of Voya Financial (the "**Voya Board**") is responsible for the oversight of the management of ESG matters of significance to Voya.

- At the Voya Board level:
  - The Nominating, Governance and Social Responsibility Committee of the Voya Board assists the Voya Board in overseeing and reviewing information regarding ESG matters of significance to Voya, including, without limitation, significant policies, procedures and practices.
  - The Risk Committee of the Voya Board assists the Voya Board in overseeing and reviewing
    information regarding Voya's Enterprise Risk Management, including significant policies,
    procedures and practices used to manage all the risks identified in our risk taxonomy.
  - The Audit Committee of the Voya Board reviews the quality of internal controls to ensure the accuracy of disclosures and quality of operating procedures.



- At the Insurance Company board level:
  - Each Insurance Company's board has a designated Climate Risk Officer who is responsible for assisting the Insurance Company's board and management in meeting the Insurance Company's duties to manage climate risk.

Climate-related risks are identified, assessed, and managed in alignment with Voya's broader ERM framework. This framework requires the regular identification of current and emerging threats and risks, conducting risk and business impact assessments, and implementing mitigation measures when risk levels are deemed unacceptable. These activities are overseen by the Voya Management Risk Committee. To further advance Voya's ESG (including climate-related) strategy and better integrate and manage identified priorities, in 2023 Voya established a new ESG governance structure, which includes a cross-functional ESG Steering Committee that oversees multiple workstreams. The ESG Steering Committee, which reports to the Voya CEO, oversees the overall ESG strategy, execution, and reporting.

Voya's ESG risk management framework is comprehensive, encompassing a broad spectrum of Voya's activities. This includes managing relationships with business partners and communities, reflecting our commitment to responsible business conduct that is socially, environmentally, economically, and ethically sound, resonating with our corporate values. We regularly review our ESG risk management approach, along with the associated processes, to manage inherent risks. Climate-related risks are generally managed in conjunction with the broader risk assessment process as further addressed in the "Risk Management" section.



### **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.

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.

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

Consider including the following

- Discuss if and how the insurer provides products or services to support the transition to a low carbon economy or help customers adapt to climate-related 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 a 2 degree Celsius or lower scenario.

Risks associated with climate change, some of which are described further below, also provide opportunities to engage with key constituencies to explore ways in which we can address climate change through actionable environmental stewardship initiatives as well as through customer solutions that promote a more responsible future. Our engagement efforts include:

- Employees: Our employee-led Environmental Stewardship Council promotes positive behaviors both
  in our offices and at the homes and in the communities where our employees live and work, and
  empowers employees to play a role in helping to define and follow through on Voya's environmental
  efforts.
- Suppliers: Voya recognizes the importance of managing our supply chain and real estate in an environmentally conscious manner. We have an Environmental Procurement Policy and conduct



related internal training. We also have a Supplier Code of Conduct policy to ensure our suppliers' values, including environmental considerations, align with ours. This policy and code of conduct can be found at <a href="https://www.voya.com/page/statements-and-policies">https://www.voya.com/page/statements-and-policies</a>.

- Investors, Analysts, Clients and Prospective Clients, and the Public Generally: Voya communicates
  information on ESG matters, including our environmental sustainability efforts and accomplishments,
  in part by publishing an annual corporate responsibility Impact Report which can be found at
  <a href="https://www.voya.com/page/esg-environmental-social-and-governance-reporting">https://www.voya.com/page/esg-environmental-social-and-governance-reporting</a>. We invite feedback by clearly outlining in the report how to contact us with input. We review all feedback we receive
  and consider suggestions, as appropriate.
- Portfolio Companies (Investments): The majority of the Insurance Companies' proprietary investments
  are managed by our affiliated investment manager, Voya Investment Management ("Voya IM"). Voya
  IM leverages a range of ESG data to inform its materiality determinations and identify ESG issues
  (which may include climate-related risks and opportunities, carbon emissions, water, waste, etc.), on
  which it may engage directly with selected issuers of these investments.

To advance Voya's ESG (including climate-related) strategy and better integrate and manage identified priorities, in 2022 Voya established an Enterprise ESG Practice Center of Excellence ("ESG COE") designed to further embed ESG considerations, including those related to climate, throughout the organization and our businesses. The ESG COE is expected to drive future strategy, best practices and performance while fostering innovation and is responsible for ESG performance monitoring, assessment, continuous improvement, and reporting. As noted in the "Governance" section above, in 2023 Voya established a new ESG governance structure that oversees the overall ESG strategy, execution, and reporting.

As part of our corporate responsibility activities, Voya follows a three-fold strategy towards reducing our carbon footprint – measure, reduce, and compensate. This process begins with measuring our electricity use, and business air and car travel to determine the greenhouse gas ("GHG") emissions from operations. We utilize the EPA Simplified GHG Emissions Calculator (SGEC) to calculate and report on our emissions (see our further response under "Metrics and Targets" below). The year 2023 was the seventh consecutive year that Voya was carbon neutral for scope 1 and 2 GHG emissions, as defined by the Greenhouse Gas Protocol. For 2023, Voya used renewable energy certificates (RECs) purchased from NextEra for indirect emissions equal to at least 100% of our electricity use and carbon offsets from NextEra to compensate for direct emissions from natural gas, steam, and fleet car use.

We work to reduce emissions in a range of different ways, including programs such as green electricity purchases, implementing day lighting systems where lights automatically adjust based on natural lighting, video conferencing programs to avoid travel-related emissions, and an enterprise-wide strategy to reduce printing related impacts. Flexible work policies also support our emission reduction programs. We purchase products that enable our operations to have a low impact on the environment.

Following the COVID-19 pandemic, we saw that our employees thrive with flexible work opportunities. As a result, we have shifted to a hybrid work model - a Voya-wide effort to transform the way we work





together and interact with customers in a new world. We have eliminated certain offices in Arizona and lowa, and reduced square footage use in Connecticut, Georgia, Massachusetts, Minneapolis and New York. Over the next several years, Voya intends to continue to reduce office space with the potential for further operating and energy reductions. For the sites in which we operate, we incorporate, where possible, requirements for sustainable cleaning and maintenance practices and the maintenance of current LEED and Energy Star certifications.

Since introducing our strategy in 2007, Voya has reduced our environmental footprint by decreasing electricity use, reducing paper and water consumption, and producing less landfill and e-waste. Total energy consumption decreased 81% since the benchmark year of 2007. Total electric consumption was down 50K MWh from the benchmark year of 2007. Paper use decreased by 95% in 2023 compared to our 2007 baseline. Waste to landfills was reduced by 95% compared to our 2007 baseline. Although 2023 saw an overall GHG emissions increase, we are below our pre-COVID numbers — a 12,834 CO2e decrease in total business emissions from 2019 to 2023.

Our reported Scope 3 emissions include business travel, personal and rental car miles and waste. Higher demand for business air and rail travel in 2023 was the main driver of increased reported Scope 3 emissions compared to 2022 (4,058 vs. 2,626 metric tons CO2e). We plan to look for new tools that will help our teams calculate additional Scope 3 GHG emission categories in accordance with new legislation and regulations.

We recognize that the responsible procurement of the goods and services we purchase has direct and indirect environmental impacts. Voya's Environmental Procurement Policy details the environmental considerations of our purchasing decisions. In 2023, Voya received the EPEAT Purchaser Award recognized by the Global Electronics Council (GEC) in the Computers and Displays category. This award highlights our cross-functional collaboration, involving team members from Strategic Procurement Services and Technology, to select technologies and suppliers that incorporate responsible practices throughout the product lifecycle. These practices include sourcing materials, manufacturing or upcycling, shipping and distribution, and disposal or recycling. Through our sustainable technology procurement practices, we reduced 171,000 kilograms of CO<sub>2</sub> equivalents in 2023 and 1.4 million kilograms of CO<sub>2</sub> equivalents since 2019.

We face a variety of risks that are substantial and inherent in our business, including market, liquidity, credit, operational, legal, regulatory and reputational risks. Voya's view of climate-related risks is aligned with the TCFD view and is defined as the risks attributable to the physical and transition risks of climate change. Climate change can be a driver of a number of risks in our risk taxonomy.

Transition risks relate to the transition to a lower-carbon economy and may include, for example, risks to our investment portfolio and increased operating or compliance costs as a result of changing regulations, and liabilities associated with the operation of real estate sites if the properties do not meet existing or changing environmental regulatory standards.



In terms of physical risks, we are exposed to various risks arising from natural disasters, including hurricanes, climate change, floods, earthquakes, tornadoes and pandemic disease, as well as man-made disasters and core infrastructure failures, including acts of terrorism, military actions, power grid and telephone/internet infrastructure failures. As described further in the most recent Voya Financial Annual Report on Form 10-K for the year ended December 31, 2023 (filed on Feb. 23, 2024) ("our 10-K"), the occurrence of natural or man-made disasters may adversely affect our results of operations and financial condition by causing, among other things, adverse impacts on our investment portfolios, reduced sales, increased claims, withdrawals, lapses and surrenders, declines in sales and revenues, extraordinary assessments to support insurance guaranty associations, material harm to the financial condition of our reinsurers, and disruption to our normal business operations.

A number of these risks materialized in connection with the COVID-19 pandemic, which created material economic disruption worldwide and had significant effects on our business operations, including our operations in India and the operations of our third-party outsourcing providers.

In the event of any future disaster or disruption, there can be no assurance that our business continuation and crisis management plan or insurance coverages would be effective in mitigating any negative effects on operations or profitability, nor can we provide assurance that the business continuation and crisis management plans of the independent distributors and outside vendors on which we rely for certain services and products would be effective in mitigating any negative effects on the provision of such services and products.

Voya may consider climate-related risks and opportunities when performing budgeting, forecasting, and financial analysis. We recognize the occurrence of natural disasters may adversely affect our results of operations and financial condition, and that climate change may increase the probability of these harmful events. Climate-related risks and opportunities may be among the factors considered when evaluating opportunities to make acquisitions or divestments.

Although the likelihood of any climate-related risks occurring increases over time, as a general matter we have not formally designated climate-related risks as being short, medium, or long term in nature. The risks identified in this survey response are not an exhaustive list of risks we face that may be climate related.

To help assess climate-related risks and opportunities, Voya has several data subscriptions that include climate-related information, and has developed our own proprietary models and technology to better understand how climate risk presents in our investment portfolio holdings and assist in forming ideas to construct resilient portfolios. Voya IM has implemented an ESG governance structure, has been a signatory of Principles for Responsible Investment (PRI) since 2018, has dedicated ESG resources, and maintains ongoing education and dialogue to inform the impact of ESG factors on investment analyses. Voya continues to support the efforts to integrate ESG factors within the investment process, including those relating to climate-change, as further described in the "Risk Management" section below.





Voya has been proactive in incorporating climate-related risk analysis within its risk management framework as also further described in the "Risk Management" section below. In 2021, a qualitative assessment was undertaken to identify and document climate-related risks pertinent to Voya's business and operational spheres. This assessment focused on the potential impact of both physical and transition risks on our established risk taxonomy categories. Notable risk drivers identified included regulatory changes, disclosure mandates, extreme weather events, and evolving investor and consumer preferences. Voya has since dedicated additional efforts towards sourcing tools and methodologies that facilitate both qualitative and quantitative analysis of climate risk scenarios and their potential effects on our business. In 2024, Voya engaged an external consultant to perform a qualitative scenario analysis (e.g., a 2°C or lower scenario) which is underway.

Given the changing landscape in energy-related investments, the Insurance Companies continue to increase investments in renewables that support the transition to a low-carbon economy, including private credit investments. This includes alternative generating plants powered by wind, solar, hydro, and geothermal, as well as transmission infrastructure linking like projects to the grid. The Insurance Companies have maintained exposure to investment grade bonds of regulated utilities, and note that the utility industry itself has moved toward deriving a higher percentage of power from alternative sources. We believe that the highly regulated nature of utilities and provisions for rates of return that include cost recovery, minimizes the risk of "stranded assets" as power generation mixes continue to evolve. Our utility investments are focused in jurisdictions where the utility regulators properly recognize the need for utilities to maintain access to the capital cost recovery aspect of rate setting and note that stranded costs are avoidable in such properly functioning regulatory contexts.



### **RISK MANAGEMENT**

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

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.

Consider including the following:

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

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.

Voya recognizes that the occurrence of natural disasters may adversely affect our results of operations and financial condition, and that climate change may increase the probability of these harmful events. We have robust risk management programs and processes in place to identify and assess significant risks impacting the business, regardless of the source. The Risk Committee of the Voya Board assists the Voya Board in overseeing and reviewing information regarding Voya's Enterprise Risk Management, including policies,



procedures and practices used to manage all of the risks in our risk taxonomy that might be impacted by climate-related risks.

As detailed in the "Governance" section, climate-related risks are managed as part of our broader Enterprise Risk Management program. Our framework for assessing and managing climate-related risks leverages subject matter experts across the enterprise, with key functions represented on the Voya ESG Steering Committee workstreams. For example:

- The qualitative assessment of climate-related risks is included in Voya's emerging risk framework and
  is reviewed by Voya's cross-functional Emerging Risk Forum and the Voya Management Risk
  Committee annually and reported to the Voya Board's Risk Committee.
- We proactively identify, monitor, and manage various risks and threats to our operations through an
  operational risk framework aimed at improving business resilience and preventing disruption and
  loss. The operational framework is used to identify a broad range of risks and their financial and nonfinancial impact to operations. Our Continuity Risk Policy covers Crisis Management, Business
  Continuity, and Disaster Recovery. Voya updates emergency response plans annually for all major
  sites/facilities throughout the U.S. to mitigate business disruption risk.
- As a life insurer, we do not currently underwrite risks with direct exposure to climate. However, we
  are assessing the impact of increased morbidity/mortality due to extreme climate changes on our
  Health Solutions business. Claims frequency and severity is managed through the product
  development/pricing process in setting assumptions for mortality, morbidity, and other factors.
- Emerging ESG regulations, including climate-related regulations, are assessed as changes in laws and
  regulations may materially increase the cost of compliance and other expenses of doing business as
  emerging regulations may be unclear, subject to interpretation, or conflict with existing regulations.
  For example, Voya is assessing and preparing for both the California Climate Rules and the SEC final
  rule on climate disclosure so that the organization is ready to meet new reporting guidelines in the
  proposed time frame should the various rules go into effect.
- Voya may consider climate-related risk factors and potential impacts when making decisions to
  purchase real estate or adopt leases. However, direct physical risk is limited as Voya leases much of
  the office space it utilizes and the buildings that are owned are not in areas we view as at high risk of
  becoming impaired due to a climate-related natural disaster. Furthermore, Voya maintains insurance
  to protect against financial loss and employs business continuity plans to mitigate operational risks
  associated with such events.

As part of the implementation of Voya's ESG risk management framework, on a quarterly basis the Voya IM Investment Policy Committee analyzes data procured from a specialized ESG data vendor to outline restrictions in certain investments and business activities that do not meet Voya's values on selected ESG factors including toxic emissions. It reviews and takes into account both the investment and reputational risks that may result from our investing in companies that do not meet our threshold criteria. Material





violations will prompt further reviews on a case-by-case basis, potentially influencing the viability of a business relationship.

From a life insurer's perspective, investment risk is a major area of focus when it comes to climate-related risk, including both physical and transition risks. Voya recognizes that ESG factors including climate change can impact the investment risk and return profiles of our investments. The Insurance Companies manage investment risks in part by maintaining a diversified portfolio that takes into account a variety of risk factors and avoids over-concentration in specific sectors. General account investment guidelines include asset class and sector limitations, individual issuer credit limits, and geographical concentration limits. The Voya IM Investment Policy Committee considers the potential impact of certain risks that may be associated with climate change such as natural disasters, as well as changes in regulatory environments that may impact the risk-return profile of energy-related and other investments.

We believe that the incorporation of ESG information, including climate-related information, alongside traditional financial investment factors, leads to better-informed investment decision-making and a more holistic assessment of long-term investment risks and opportunities. Voya IM employs ESG integration, defined as the systematic consideration of ESG factors, when relevant and material, alongside traditional factors, into investment decisions and engages with issuers as part of our commitment to active ownership. Voya continues to support the efforts to integrate ESG factors within the investment process, with several examples described below and in the "Strategy" section above.

Voya IM's Active Ownership ("AO") Team aspires to improve the long-term sustainability of portfolio companies by promoting ESG best practices through proxy voting and engagement activities as well as collaborative discussions with other institutional shareholders. The AO Team's engagement notes are made available to Voya IM's investment teams. The AO Team will escalate an issue to the applicable research analyst and/or portfolio manager if the AO Team believes that the company's actions or inactions could negatively impact the value of the securities in which the Insurance Companies invest. The investment teams may also engage directly with the portfolio companies, and are able to escalate any concerns they may have with a portfolio company to the AO Team and to Voya IM's ESG Research teams.

For our portfolio companies and potential new investments, our expectation is that they recognize and plan for the increasing risk of future physical damage caused by climate-related disasters. We expect that they have strategies that consider the effects of the inevitable transition to a low-carbon global economy and, as material and applicable, Voya IM typically assesses the following investee climate information: carbon emissions; product carbon footprint; financing environmental impact; climate change vulnerability, carbon target and policy; and exposure to climate regulation. Voya IM collects this data and research related to these factors through a variety of sources including third party data vendors, sell-side and specialty research providers, and directly from company reports and filings.

The Insurance Companies have real estate investment-related exposure to climate-related risk through direct investments in commercial mortgages ("CMLs"), as well as investments in commercial and residential mortgage-backed securities. Voya IM has a team of professionals that underwrites each direct





commercial mortgage investment, taking into account factors such as current and anticipated property values and P&C insurance. For new CML investments, Voya IM completes an ESG questionnaire during the initial physical property inspection in conjunction with the applicable borrower, and uses an ESG scorecard system that combines the results of a third-party carbon emissions report with the ESG questionnaire to give each deal an ESG score. Voya IM uses this information as part of the risk assessment of the potential investment. Voya IM also uses third-party carbon emissions reports to assess climate-related risks for existing CML investments.

Separate teams manage commercial and residential mortgage-backed exposures, and take into account the geographical diversity of both the mortgage pools underlying each individual security and the overall collateral pool backing the Insurance Companies' investments in mortgage-backed securities. Diversification further alleviates the impact of asset price fluctuation that may result from climate-related risk impacting commercial mortgage, real estate, and fixed income assets. Diversification may also mitigate any climate change risks associated with sectors such as industrials, utilities, transportation, and other sectors that may be impacted by regulatory developments, governmental policies, or other climate change risks.

As noted in the "Strategy" section above, in 2024, Voya engaged an external consultant to perform a qualitative scenario analysis as contemplated by the TCFD (e.g., a 2°C or lower scenario) which is underway.



### **METRICS AND TARGETS**

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

We test our emergency response plans for design and effectiveness using various scenarios that may include weather events. Voya actively monitors pending weather and environmental conditions or occurrences, such as winter storms, earthquakes, hurricanes, flooding, drought, wildfires, etc., and their potential impacts, such as facility loss or damage, utility interruptions, critical infrastructure or technology failures, staff shortages, criminal actions, third-party failures, etc.

With 99% of our employees working fully remotely or splitting their time between home and in-office, Voya has been reducing office space to operate more sustainably and efficiently. We utilize the EPA Simplified GHG Emissions Calculator (SGEC) to calculate and report on our emissions. Our scope 1, 2, and 3 emissions (measured in metric tons CO2e) measured for the calendar year 2023 were:

Scope 1: 1,359 Scope 2: 4,909

Scope 3: 4,058 (reporting is currently limited to waste generated in operations and business travel)



#### SUPPLEMENTAL NOTES

#### NOTE CONCERNING FORWARD-LOOKING STATEMENTS

The responses to this survey may contain forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. Forward-looking statements include statements relating to future developments in our business or expectations for our future financial performance and any statement not involving a historical fact. Forward-looking statements use words such as "anticipate," "believe," "estimate," "expect," "intend," "plan," and other words and terms of similar meaning in connection with a discussion of future operating or financial performance. Actual results, performance or events may differ materially from those projected in any forward-looking statement due to, among other things, (i) global market risks, including general economic conditions, our ability to manage such risks and interest rates; (ii) liquidity and credit risks, including financial strength or credit ratings downgrades, requirements to post collateral, and availability of funds through dividends from our subsidiaries or lending programs; (iii) strategic and business risks, including our ability to maintain market share, achieve desired results from our acquisitions and dispositions, or otherwise manage our third-party relationships; (iv) investment risks, including the ability to achieve desired returns or liquidate certain assets; (v) operational risks, including cybersecurity and privacy failures and our dependence on third parties; (vi) tax, regulatory and legal risks, including limits on our ability to use deferred tax assets, changes in law, regulation or accounting standards, and our ability to comply with regulations, and (vii) other factors described under "Risk Factors" in our 10-K and "Risk Factors" in our Quarterly Report on Form 10-Q for the quarter ended June 30, 2024.

The risks included here are not exhaustive. Current reports on Form 8-K and other documents filed with the Securities and Exchange Commission ("SEC") include additional factors that could affect our businesses and financial performance. Moreover, we operate in a rapidly changing and competitive environment. New risk factors emerge from time to time, and it is not possible for management to predict all of them.

#### **NOTE REGARDING MATERIALTY**

As provided in the instructions accompanying the survey, there is no requirement to provide information in response to the survey that that is immaterial to an assessment of financial soundness. Insurers may choose to disclose such information voluntarily, with no implication that such information is in fact material. The disclosure of information in response to this survey does not necessarily imply that such information is material to an assessment of financial soundness of Voya Financial, Inc., or its subsidiaries, including the Companies.