2023 CLIMATE RISK DISCLOSURE SURVEY

American Health and Life Insurance Company

NAIC Number	**60518**
Line Of Business	**Life**
Group Filing	**Y**
Group Number	**5021**
Group Name	**OneMain Holdings, Inc.**

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.

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

Response to Governance:

The primary nature of the products offered by the insurance company are credit insurance products which are geographically dispersed and do not present significant climate-related risks to the company. The Board of Directors and senior management have established an appropriate governance structure and ERM Framework to manage all risks, including climate-related risks.

A. The insurance company Board of Directors and senior managers oversee management of all risks, including climate-related financial risks through its governance structure and ERM framework. The company's investment committee is responsible for the oversight of the investment strategies employed by a third-party investment advisor. The investment advisor incorporates opportunities and risks associated with climate change into the investment process. The company uses the advisor's tools and dashboards to assist in the climate risk oversight. The company relies on both proprietary and industry ESG ratings to assist in the monitoring of ESG risks within the portfolio.

B. On an on-going basis, management assesses and manages climate-related risks and opportunities through review of its investment portfolio and oversight of the investment advisor activities. Since the company's products are primarily credit insurance which are not materially impacted by climate-related events, management assesses operational and financial risks as events occur. Climate risk scenarios are identified and assessed by senior managers annually during the Own Risk and Solvency Assessment (ORSA).

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.

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.

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

Response to Strategy:

Due to the nature of the company's credit insurance products, the impact of climate-related risks is not material to the business. Environmentally, the company retrofits owned buildings with LED lighting and programmable thermostats. Metrics used to measure impact to the environment and monitor reduction efforts include trees preserved, water and energy saved, CO_2 emissions and landfill space conserved.

A. Climate-related risks and opportunities are identified primarily in the short term, as events or changes occur. When natural disasters or weather events occur, an analysis is performed to assess impact to policy holders and risk for increased claims and suspension of policy cancellation. Reserves are adjusted, as necessary. Operational risk, compliance risk and financial risk are increased as a byproduct of a disaster or climate-related event so these risks are monitored and managed, as appropriate. Climate-related risks may also be identified through investment portfolio management.

B. As mentioned above, an impact analysis is performed as climate-related events occur, but due to the nature of the company's products, the impact is not expected to be material. The company's products are not of the nature to support the transition to a low carbon economy.

In services and operations, transitions to a low carbon economy are measured in areas as described above.
The company does not have explicit target amounts of low carbon economy investments but uses an integrated

approach to analyzing individual investments. The investment advisor uses a fiduciary approach to analyze the risks and returns of an individual investment. This analysis includes a measure of the transition risks associated with individual corporate issuers.

C. Given the nature of credit insurance products which present low climate-related risk, resilience has not been assessed in different 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. *

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 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.

Response to Risk Management:

The primary nature of the products offered by the company are credit insurance products which are geographically dispersed. Consequently, physical risks are not significantly affected by climate-related events. The company's Enterprise Risk Management Framework, co-owned by the Chief Actuary, Chief Financial Officer, and Associate Director, Risk Management addresses how all types of risks, including climate-related risks, are identified, assessed, monitored, and managed. Climate-related risks are assessed on an on-going basis, as natural disaster or weather-related events occur as to the impact to customers, claims experience, operationally and financially. Annually, climate-related risks are assessed as part of the company's Own Risk and Solvency Assessment (ORSA). The impact of climate-related risks does not factor into the underwriting portfolio due to the nature of credit insurance products.

For our investment portfolio, environmental risks and opportunities are factored into the fundamental analysis of individual issuers. For corporate issuers this includes gauging exposure and preparedness of issuers in a transition to a lower carbon emissions environment.

A. As described above, climate-related risks are identified and assessed on-going on an individual basis, as events occur and/or are emerging, as part of the annual ORSA and factored into an analysis of individual issuers in the investment portfolio. Financial implications are considered in assessing climate-related risks in all three types of assessments.

B. Climate-related risks associated with specific disasters are managed based on information issued from State Departments of Insurance for the disaster declared and primarily an actuarial analysis of customers impacted. Operations, technology and financial areas are usually impacted and have to manage changes in order to comply with DOI's declarations and meet customers' needs during a time of disaster. The company's investment advisor utilizes ESG and climate-related data to assess and manage risks in the portfolio at the direction of the investment committee and management.

C. Climate-related risks are identified, assessed, and managed within the company's ERM Framework and investment guidelines and policies. During the annual ORSA, specific climate-related scenarios, i.e. natural disasters, weather-related events, etc. are identified from various sources and assessed. Due to the nature of the company's products being primarily credit insurance, no climate-related risk scenario has risen to the level to perform stress testing. Underwriting is not impacted by climate-related risks due to the nature of the products. As climate-related events occur, processes are in place to manage the compliance, actuarial, customer, operational, and financial impacts of the event. The company's investment advisor uses a climate analysis tool that measures the theoretical valuations of companies within the investment portfolio in order to support a particular climate goal. This includes temperature rise scenarios of 1.5/2/3 degrees Celsius.

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.

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.

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

Response to Metrics and Targets:

The company does not have metrics and targets to assess and manage collateralized risks and opportunities due to the nature of the company's products. Catastrophic modeling is not used to manage climate-related risks.

A. The company does not have metrics for assessing climate-related risks and opportunities.

B. The company does not have information as to Scope 1, 2 or 3.

C. Given the low climate-related risk nature of its products, the company does not have targets for managing climate-related risks.