

**Task Force on Climate-
related Financial
Disclosures (TCFD)
Report**

For the year ended
31 December 2025

About this report

This report has been prepared in line with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations in accordance with the requirements of the Bermuda Monetary Authority (BMA). Our emissions have been calculated using the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (revised edition). The emissions in our investment portfolio have been calculated using the Partnership for Carbon Accounting Financials (PCAF) Global GHG Accounting & Reporting Standard for the Financial Industry.

This report covers Resolution Life Group Holdings Ltd. (RLGH) and its subsidiaries, including Resolution Re Ltd. (RRL) and Resolution Life U.S. Holdings Ltd. (RLUSH). This is the scope of reporting for our financial statements. RLGH holds a minority interest in Acenda Group (which includes Nippon Life Insurance Australia and New Zealand Limited (formerly MLC Life Insurance), Resolution Life Australasia Limited (RLA) and Asteron Life New Zealand Limited), which is not in the scope of this report (due to not being consolidated in the RLGH financial statements).

This report should be read alongside our [2025 Annual Report](#), which contains more information about our overall governance, strategy, and risk management processes.



To read more about Resolution Life, see our [2025 Annual Report](#)

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Letter from our Chief People, Partnerships and Legal Officer



The life insurance industry has an important role to play in addressing climate change given its focus on managing long-term financial risk, and the ability to invest in long-term, sustainable assets. At Resolution Life we are committed to playing our part in addressing climate change in line with our purpose of protecting the financial futures entrusted to us. We do this by working to decarbonise our own operations and embedding a philosophy of responsible investing into our investment portfolio.

Our TCFD report reflects our desire for transparency and is an acknowledgement that robust data and standardisation of disclosure requirements will enable more informed decisions and better outcomes for our company and our industry.

In line with this, our focus this year was to improve data quality and coverage, and also to reflect the changes in our structure that resulted from our acquisition by Nippon Life on 30 October 2025. We also updated our sector-level scenario analysis to better highlight our investment portfolio's potential exposure to transition risks and opportunities.

This year we reduced our operational Scope 1 and Scope 2 (market-based) greenhouse gas (GHG) emissions, marking a complete reduction in both from the baseline year in 2022. We accomplished this through our efforts over the past few years, including more accurate data, using more renewable energy, implementing energy efficiency initiatives in our offices where we can, and, this year, offsetting our remaining Scope 2 emissions. Our operational Scope 3 emissions, excluding our investment portfolio, increased this year due to higher emissions related to professional services. However, we have made progress by nearly doubling the number of carbon-neutral suppliers in our global network during the year and will continue to focus on this area.

Our investment portfolio's Scope 3 financed emissions increased this year, reflecting improvements in data coverage, the effect of including in-scope structured real estate, and adding previously unmapped high-emitting issuers. On a per-dollar-invested basis, our financed emissions decreased.

We still have work to do on data quality and will be working closely with Nippon Life in the coming year to ensure our approach and reporting are aligned. Our aims will remain the same: to reduce our own emissions, and to refine and improve how we manage climate risks and opportunities in our operations and investments.

Claire Singleton

Chief People, Partnerships and Legal Officer

Introduction

Resolution Life is a global life insurance group focusing on reinsurance and the acquisition and management of portfolios of life insurance policies.

We believe that life insurance is a societal good. We are proud to provide security to our policyholders in their time of need, and to support the long-term growth of the global primary life insurance industry so that more people can benefit from financial protection. We are also conscious of our broader responsibilities to the world, especially on environmental matters and in the communities in which we work. We want to do what's right for the world today – and for future generations.

Resolution Life at a glance

Resolution Life serves as a long-term custodian of the portfolios that we acquire or reinsure for the primary market – managing them responsibly, fairly and with a commitment to policyholders. This stewardship removes stranded costs and reduces long-term risk, allowing insurers to release capital and reinvest in innovation, growth and the future needs of policyholders globally.

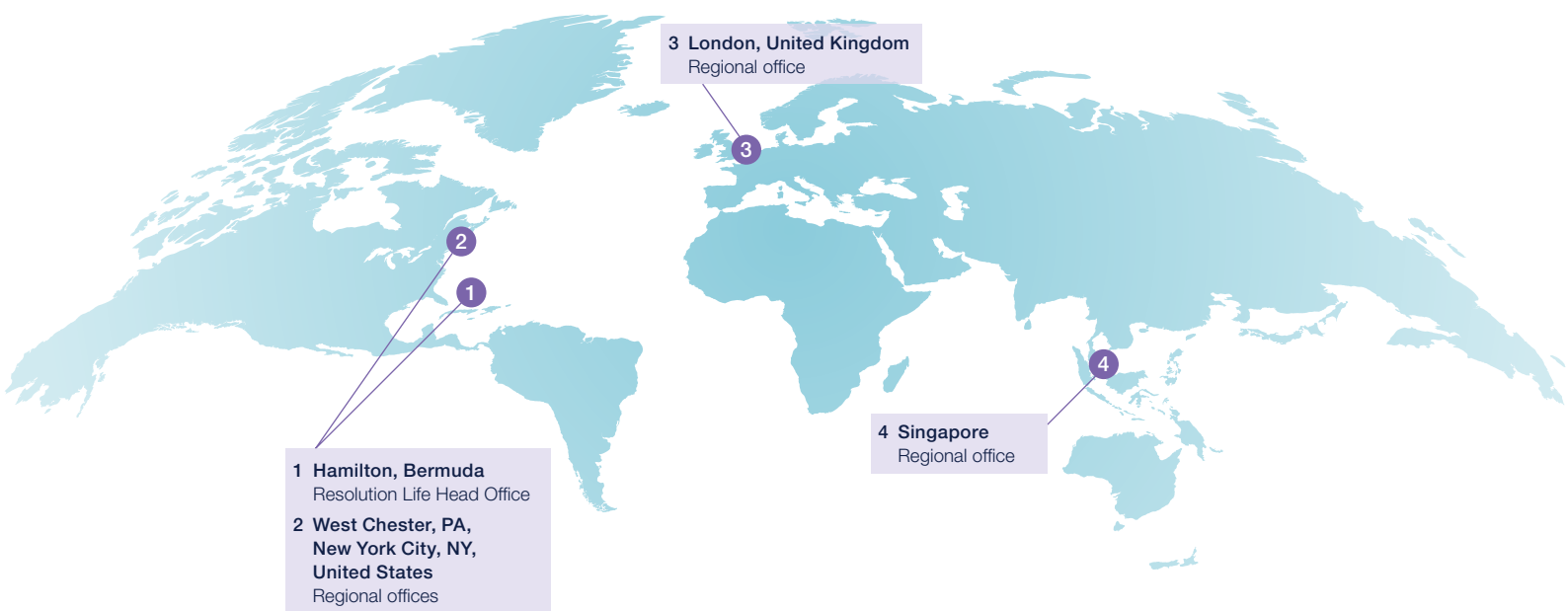
Through our innovative model, we enable the primary market to grow while ensuring promises are honoured and financial security is protected for generations to come.

Our main customers are primary life insurers in mature markets, including the US, Asia, Europe, and the UK. We serve them through our teams in the US, Singapore, the UK and Bermuda, providing bespoke solutions including:

- in-force reinsurance,
- legal entity acquisition,
- flow reinsurance, and
- transfer of operations.

We invest the assets and pay the claims and, in certain instances, administer the policies.

As part of our acquisition by Nippon Life, we established Acenda Group, a joint venture between Nippon Life (51%) and Resolution Life (49%). A new primary life insurer open to new business, Acenda Group includes the former MLC Life Insurance business, Resolution Life Australasia, and Asteron Life New Zealand.



c.\$80bn
assets under management

c.\$9.9bn
capital deployed

c.3.8m
policies

c.600
employees

Introduction

Our approach to managing climate risk

Our mission is to protect the financial futures entrusted to us and we do this by carefully managing risks. Those risks include climate change, which is widely acknowledged as a systemic risk globally, for all businesses. In recognition of this, we embed climate-related matters into our strategic decision-making, which focuses on: delivering on our promises, growing our business purposely, and building lasting value. We do this through transparent and fair reporting, responsible investment, and by using climate scenario analysis to stress-test our business strategy under different climate pathways. We also invest in building climate expertise across our business through internal and external training, to make sure that decisions reflect the latest expectations of climate realities. Our sustainability strategy, with its three themes of people, communities and environment, guides our decisions across our operations and for our investments.

As a life insurer, climate-related risks and opportunities affect our business primarily through our investments and our operations. By incorporating sustainability considerations, including climate change, within our investment decision-making processes, we aim to reduce risk, strengthen the resilience of our portfolio, and ultimately contribute to driving positive change in the companies we invest in. We became a signatory to the United Nations-supported Principles for Responsible Investment (PRI) in 2022, demonstrating our commitment to responsible investment practices. In our own operations, we are committed to reducing our carbon footprint, which we measure in carbon dioxide equivalents (CO₂e), and playing a positive role in the global response to climate change.

0tCO₂e

Scopes 1 and 2 (market-based)
operational emissions (100% decrease
from 2022 baseline year)

22,779tCO₂e

Scope 3 operational emissions
(73.2% decrease from 2022 baseline year)

16.5MtCO₂e

Scope 3 financed emissions
(9.6% increase from 2024 baseline year)

408tCO₂e per \$m invested

Portfolio carbon footprint
(17.4% decrease from 2024 baseline year)

Governance

Strong governance is fundamental to all our activities, including the implementation, enhancement, and monitoring of climate-related risks and opportunities within our business. Resolution Life has established a clear governance structure, which includes oversight of sustainability matters (including climate-related risks and opportunities).

Our governance processes include Board and Management oversight, a robust risk management framework to address climate-related risks, a Responsible Investment Policy, and a Sustainability Policy.

This section describes our climate governance framework, how the Board and Management oversee and manage climate-related issues and how we ensure there is sufficient expertise within the organisation for them to be able to do so.

Our climate governance framework

The RLGH Board, through its Board Committees, and the Management Committees, led by the Company Steering Committee (SteerCo) and Executive Leadership Team (ELT), have a company-wide mandate that includes the oversight and management of climate-related matters.

Resolution Life's governance framework for climate-related matters

RLGH Board Chair: Clive Cowdery		
Board Committees		
Investments Chair: Steve Goulart	Risk Chair: Weldon Wilson	
Company Steering Committee and Executive Leadership Team		
Management Committees		
Investment & Credit Chair: Ruth Farrugia	Risk & Compliance Chair: Peter Grewal	Sustainability Chair: Claire Singleton

Significant developments during the year

In 2025, we strengthened our climate risk governance by developing a qualitative climate risk appetite statement, updating the Board Risk Committee's charter to recognise the complex and long-term nature of climate risk and to include sustainability (including climate risk) as a recurring agenda item (twice per year). We refreshed our Responsible

Investment Policy, Sustainability Policy and Risk Strategy & Risk Management Framework Policy. We also developed a comprehensive company-wide Risk Appetite Statement and Risk Limits document, both of which were approved by the RLGH Board. In March 2026, we held a sustainability-focused session with the RLGH Board to build on their annual climate and sustainability training and ensure consistent level of understanding across all members. The session focused on Resolution Life's strategic direction, key initiatives underway and our alignment with Nippon Life's sustainability priorities.

Board's oversight of climate-related issues

The Investments Committee and Risk Committees of the RLGH Board oversee Resolution Life's identification of and response to climate-related issues relevant to their specific roles, as described below.

Resolution Life Group Holdings Ltd. Board

Frequency: Quarterly

The Board's role

The RLGH Board sets the tone for Resolution Life's culture of integrity, accountability, and transparency. It is responsible for providing oversight, guidance, and stewardship of the company's business, strategy, performance, governance, and risk management framework.

How the Board oversees climate-related risks and opportunities

The Board plays a crucial role in approving our sustainability strategy and goals, ensuring these are adopted across all our geographies. Additionally, the Board is responsible for reinforcing our commitment to sustainable and responsible business practices. The Board receives updates on climate-related matters from the Board Committees as described below. In addition, there is a standing update on sustainability-related matters as part of the People, Partnerships & Legal report at each Board meeting.

Board Investments Committee

Frequency: Quarterly

The Committee's role

The Board Investments Committee oversees investment portfolio transactions and develops and maintains our investment strategy and investment risk management policies. Additionally, the Committee reviews investment management performance and oversees the activities of investment managers.

Governance

How the Committee oversees climate-related risks and opportunities

The Committee reviews our Responsible Investment Policy and makes recommendations for its approval by the Board. This ensures alignment with our commitment to responsible and sustainable investing.

Board Risk Committee

Frequency: Quarterly

The Committee's role

The Board Risk Committee oversees the development and implementation of risk management systems and processes designed to identify, manage, and mitigate material risks, including climate risk. It provides recommendations to the Board on matters such as the Company's risk appetites, risk budget and effectiveness of the risk management framework (RMF). In addition, the Committee ensures a robust risk culture is embedded across the organisation.

The Committee also reviews the annual Group Statutory Supervisory Assessment (GSSA) that is submitted to the BMA. The submission includes information about Resolution Life's assessment of and approach to addressing material climate change risks.

How the Committee oversees climate-related risks and opportunities

The Committee updates the Board on key risks, including those related to climate change, through the Chief Risk Officer (CRO) reports and through ad-hoc reports and analyses. The CRO's report is a standing item on the Board Risk Committee's agenda. It includes a sustainability section with an overview of the sustainability-related activities undertaken in the previous quarter. The sustainability-related activities covered during 2025 included an overview of our first TCFD report with recommendations for enhancing our reporting capabilities and our climate risk governance, an updated qualitative climate risk appetite statement, and updates to our carbon reduction initiatives.

The Management Sustainability Committee provides input to the Board Risk Committee, with items such as the Sustainability Policy being reviewed and recommended by the Management Committee prior to submission to the Board Risk Committee. More information about the Management Sustainability Committee is in the next section.

Management's action on climate-related issues

The SteerCo and ELT are responsible for the oversight of climate-related issues. They do this through the work of Management Committees, including the Investment & Credit Committee, the Risk & Compliance Committee, and the Sustainability Committee. The role of the SteerCo, the ELT and each Management Committee is described below.

Company Steering Committee

Frequency: Weekly

The Committee's role

The Company Steering Committee is a forum for senior executives to meet, discuss, and develop advice and provide recommendations to members of the Group and their officers, including in relation to governance, strategy, financial and business performance matters. The purpose of the SteerCo is to provide advice and recommendations to the RLGH Board and other members of the Group, and to contribute to information sharing throughout the Group, as well as advising on ways to help the Group meet shareholder and regulatory expectations.

How the Committee assesses and manages climate-related risks and opportunities

The SteerCo provides advice relating to sustainability themes, sustainability strategy and climate risk and also on our ambition and direction. This includes reviewing and making recommendations for all climate-related material presented to the Board. In 2025, the SteerCo provided guidance on adapting our strategy given the evolving geopolitical landscape and for alignment with our new parent company, Nippon Life.

Executive Leadership Team

Frequency: Bi-Weekly

The Executive Leadership Team's role

The Executive Leadership Team is a forum for senior executives to meet and discuss matters of material significance to the Group as a whole, and is responsible for successfully overseeing the delivery of the Group's mission. The ELT seeks to form a common view of the matters within its remit – which includes strategy, financial and business performance, people and culture matters – for the benefit of the SteerCo and other members of the Group.

How the Executive Leadership Team assesses and manages climate-related risks and opportunities

The ELT provides advice on our ambition and direction relating to sustainability themes and our sustainability strategy, including climate-related goals and targets. It also reviews our annual Sustainability Report and TCFD Report.

Management Investment & Credit Committee

Frequency: Quarterly

The Committee's role

The Management Investment & Credit Committee recommends investment strategies and managers, monitors performance of our managers and the performance of our portfolio against Objectives and Key Results (OKRs). It also monitors credit- and market-related risks.

Governance

How the Committee assesses and manages climate-related risks and opportunities

The Committee receives updates on the progress and outcomes of our sustainability-related activities, and reviews the Responsible Investment Policy before it goes to the Board Investments Committee and is ultimately adopted by the Board.

Management Risk & Compliance Committee

Frequency: Monthly

The Committee's role

The Management Risk & Compliance Committee oversees the Group's risk profile, exposures, and trends, ensuring a comprehensive understanding of the risk landscape, including for climate-related matters. It is also responsible for overseeing the evolution of our Group Risk Management Framework, continuously enhancing risk capabilities, policies, tools and processes to effectively manage and mitigate potential risks.

How the Committee assesses and manages climate-related risks and opportunities

This year, the Committee recommended our qualitative climate risk appetite statement, and discussed metrics and limits informed by the stress and scenario testing results. It also reviews the TCFD report annually.

Management Sustainability Committee

Frequency: Quarterly¹

The Committee's role

The Management Sustainability Committee provides oversight of Resolution Life's sustainability activities, ensuring they are conducted in accordance with established policies and standards, and that associated risks are effectively managed.

How the Committee assesses and manages climate-related risks and opportunities

The Committee is responsible for responding to sustainability and climate-related regulatory requirements, as well as for developing and implementing the sustainability strategy and action plan to drive progress on our commitments. The Committee identifies and develops mitigation plans for climate-related risks and opportunities across the Group.

There are a number of underlying working groups, including a Climate Risk & Investments Working Group and a Sustainability Operations Working Group, that report into the Management Sustainability Committee.

The Climate Risk & Investments Working Group ensures company-wide alignment on sustainability-related risks and investment activities. The working group provides a forum to discuss and drive forward items including our reporting requirements, horizon scanning outputs, policy updates, and asset manager engagement activities.

The Sustainability Operations Working Group focuses on operational efforts across our jurisdictions, including the coordination of global greenhouse gas (GHG) emissions measurement and reduction initiatives. The working group seeks to ensure all activities undertaken are aligned across the company and with our overarching sustainability themes.

Ensuring we have sufficient expertise on climate-related matters

Our ability to effectively identify, manage and oversee climate-related matters that affect Resolution Life's business, including in our investment portfolio, depends on the expertise and skillset of the Board, the Management Team and our employees involved in sustainability and climate-related activities. We therefore ensure that they have access to training programmes relevant to their roles.

Board training

The RLGH Board comprises individuals who bring a wealth of knowledge and expertise, enabling them to perform their duties effectively. Continuous learning is important, because knowledge about climate change and its implications is an evolving area, scientific knowledge is improving, and the implications for our business are complex. Therefore, we ensure adequate training is available to the Board so they can make informed decisions for the business in the short, medium and long term.

In 2025, the RLGH, RRL and RLUSH Boards and the ELT received externally led climate and sustainability training on topics including regulatory expectations, macro trends, industry responses and roles and responsibilities. This was an expansion of the 2024 training programme, which was solely for the RLGH Board and the ELT.

Management and employee training

Delivering on our sustainability commitments, including with regard to climate change, requires having the right expertise within the business, at all levels. We therefore provide access to training to develop and maintain their knowledge and understanding of these complex areas so they can fulfil their day-to-day responsibilities. In 2025, 30 employees signed up for PRI Academy courses to further their understanding of responsible investing. This included all employees in the portfolio management team, as well as others in Risk, Legal, Compliance and other relevant roles.

¹ During 2025, the Management Sustainability Committee met three times.

At Resolution Life, our mission is to protect the financial futures entrusted to us. We do this by carefully managing risks, including those related to climate change. We embed climate into our strategic decision-making, which focuses on delivering on our promises, growing our business purposely, and building lasting value.

Climate change is widely acknowledged to be a systemic risk globally, for all businesses. As a life insurer, we are not immune to this, and this is why 'environment' is one of the three themes in our Sustainability Strategy. Climate-related risks and opportunities have the potential to affect insurance claims, investment performance and our business operations.

Our primary focus, as a business and in this report, is on how climate-related risks and opportunities may affect our investments and our operations and how we can make decisions that assist the energy transition and reduce our carbon footprint. Because we operate across a wide range of geographies and demographics, and climate change is not a significant factor in determining life expectancy, our exposure to climate-related risks through our insurance products is limited.

By incorporating sustainability considerations, including climate change, into our investment decision-making processes, we aim to reduce risk, strengthen the resilience of our portfolio, and ultimately contribute to driving positive change in the companies we invest in.

When it comes to our business operations, we measure our operational global GHG emissions and offset our Scopes 1 and 2 and Scope 3 business travel where we can. During 2024, we updated our supplier code of conduct and due diligence process to prioritise suppliers that are either carbon neutral or have carbon reduction initiatives in place. In 2025, we continued our efforts to increase the proportion of our suppliers globally who are carbon neutral. To support this goal, we held initiatives such as 'lunch & learn' events for all employees and a training session with those who hold relationships with our suppliers to communicate our ambition and share documentation on how to prioritise carbon-neutral suppliers. We also updated our travel standard to reflect our commitment to reduce air travel and promoting the use of electric vehicles where possible. More information about these initiatives and the progress we've made is in the Metrics & Targets section below.

This section sets out our climate-related risks and opportunities, the results of our scenario analysis and the climate-related implications for our business.

Our climate-related risks and opportunities

We've identified the climate-related risks and opportunities that are relevant to Resolution Life's business. Our assessment encompasses both transition risks – arising from shifts to a low carbon economy, including policy and regulatory changes, technological advancement, market shifts and reputational risks – and physical risks, including acute risks, such as extreme weather events, and chronic risks, like rising sea levels and temperature increases. We have also highlighted the opportunities that may arise. More information about our risk management process is in the Risk Management section of this report.

In our assessment, we considered how climate-related risks and opportunities may affect Resolution Life over the following time horizons:

- **Short-term: under 3 years**
- **Medium-term: 3-10 years**
- **Long-term: over 10 years**

We also considered the effect these risks and opportunities could have on Resolution Life's assets, both within the investment portfolio and in our operations, if left unmitigated or not realised, as described in the tables below.

Strategy

Resolution Life's climate-related risks

Description	Category	Impact, if not mitigated	Our response
Short- to medium-term			
Changes in supervisory regulation rendering individual assets as non-compliant	Transition – policy	Increased transaction costs and loss of income when replacing certain assets	We regularly conduct a horizon scanning exercise to monitor potential upcoming changes in regulation
A sudden change in investor sentiment for carbon-intensive sectors (e.g. energy)	Transition – market	Large impact on asset liquidity and valuation leading to higher unrealised losses in the investment portfolio	The Management Investment & Credit Committee monitors geopolitical and macroeconomic developments, we seek to have a diverse investment portfolio across a wide range of sectors, and we monitor (and adjust when necessary) our concentration in specific sectors
Extreme weather events and natural disasters such as hurricanes, floods and wildfires	Physical – acute	Reduction in value and income from certain asset classes linked to infrastructure and real estate. This can extend to companies we have invested in or have provided financing to, should their business operations be negatively impacted by these climate events Any outsourced business operations in areas with higher levels of physical risk and substandard infrastructure may be at risk	We aim to hold a diverse portfolio across multiple asset classes to mitigate the risk arising from climate-related events. This diversification extends across not only asset types but also geographical regions to reduce concentration risk, particularly where it may be more pronounced in specific locations We have business continuity plans (BCP) in place and update them regularly
Increased mortality due to extreme weather events and natural disasters	Physical – acute	Short-term liquidity risk to meet liability payments	We have a robust liquidity framework in place
Medium- to long-term			
A decline in the value and quality of all assets if issuers struggle to adapt or mitigate the impacts of transitioning to a low carbon economy	Transition – market & technology	Risk of holding 'stranded' assets in carbon-intensive sectors over the long term if the companies we support via our investment portfolios are significantly impacted by these transition risks Risk that issuers may be unsuccessful in adopting new technologies and may underestimate the associated transition costs	We monitor holdings and engage with asset managers on issuers most at risk
Long-term general disruption to the life insurance market resulting from extreme weather events and natural disasters	Physical – chronic	Additional asset sales (and therefore loss of income and increased transaction costs) to support increased liability payments	Our portfolio is diversified across risk types and liquidity is managed to our risk limits to ensure that we can meet policyholder needs across a range of scenarios
Concentration of investments in companies/issuers with business operations concentrated in areas with higher levels of physical risk	Physical – chronic	Decline in equity or debt valuation over the long term	Geographical considerations are part of the investment underwriting process undertaken by asset managers. Nevertheless, we maintain geographical diversification of our assets

Strategy

Resolution Life's climate-related opportunities

Description	Category	Impact, if realised	Our response
Short- to medium-term			
Maintain transparency and trust with stakeholders through positive reputation with rating agencies, policyholders and investors	Transition – reputation	Greater access to financing, increase attractiveness to investors and potential talent	We have strong governance processes in place, uphold our values in how we work and how we engage with external stakeholders, and we report transparently
Having well-positioned assets in our investment portfolios	Transition – market	Higher risk-adjusted return expectations	Our renewable energy holdings demonstrate higher risk-adjusted return projections
Having investment portfolios that are managed to incorporate climate effects	Physical – chronic	Higher risk-adjusted return expectations	We engage with our asset managers on how they incorporate climate effects into their investment processes
Medium- to long-term			
Investing in technology providers that create/advance solutions to manage transition risk in our industry	Transition – market	Higher risk-adjusted return expectations	Our renewable energy holdings demonstrate higher risk-adjusted return projections
Investing in companies/issuers that have proactively built resilience and align closely with low-carbon goals	Transition – market	Valuable investment opportunities over the long term	We engage with our asset managers on how they assess resilience to climate risk in their investment processes
Investing in infrastructure projects or real estate that help manage physical risks (e.g. forestry and other carbon capture projects)	Physical – chronic	Potential increased risk-adjusted returns	We engage with our asset managers on how they incorporate climate effects into their investment processes, in particular in the real estate and infrastructure asset classes
Investing in companies/issuers that have proactively built resilience against physical risks and align closely with low-carbon goals	Physical – chronic	Valuable investment opportunities over the long term	We engage with our asset managers on how they consider resilience and the transition to a low-carbon economy in their investment processes

How climate change could affect our insurance portfolio

Although climate change may influence life expectancy, it does not necessarily adversely affect the business we write. This is because climate change is only one of many contributing factors, and we mitigate risk by maintaining a diverse portfolio of different types of insurance products, across multiple geographies. In addition, our business is written in developed economies with strong healthcare systems, which helps to mitigate the effect on our business resulting from health risks that may be associated with climate change.

We derive our assumptions using accepted industry approaches based on observed experience and quantitative analysis. Attempting to directly quantify the inherent uncertainty associated with climate change would introduce spurious inaccuracies. Therefore, climate-related considerations remain indirect and secondary, with investment performance representing our most significant exposure.

Climate scenario analysis

In 2025, we performed a qualitative, sector-level climate scenario analysis heat-mapping exercise to support us in identifying risks and opportunities across short-, medium- and long-term time horizons, and to help us understand how climate transition pathways may affect the industries in which we invest. The analysis is designed to test severe but plausible scenarios to assess Resolution Life’s business strategy and resilience. It provides a sector-level overview of the implications of transition risks and opportunities. It does not capture physical risks and opportunities.

Our portfolio was first mapped to 33 International Energy Agency (IEA) sectors, and each sector was assessed under two climate scenarios:

- **Net Zero Emissions by 2050 (NZE)** – shows a narrow but achievable path for the global energy sector to achieve net zero CO₂ emissions by 2050, with advanced economies reaching net zero in advance of others. It is consistent with limiting global temperature rise to 1.5°C
- **Announced Pledges Scenario (APS)** – takes into account all recent government commitments relating to climate change, including Nationally Determined Contributions (NDCs), and assumes they will be met in full and on time. It is consistent with limiting global temperature rise to 1.7°C

These two scenarios were chosen because they are widely used across the finance and energy industries, and provide highly granular information on policy and technology shifts across a wide range of sectors.

We evaluated the sector outcomes across four TCFD-aligned transition risk lenses – Policy, Technology, Reputation and Market – and over the IEA recommended time horizons of 2025 (current), 2030, 2040 and 2050. We assigned each sector a risk or opportunity score from 1 (low) to 4 (very high) based on these sector outcomes, reflecting the degree of expected disruption or opportunity. The diagram below describes the risk and opportunity scores used.

Descriptions of scores for low, medium, high, and very high risks and opportunities

Risk score scale

Low	-1	The change is limited by nature and is unlikely to materialise over the time horizon for the sector
Med	-2	The change has the potential to impact the sector, but is not material enough over the time horizon for the sector
High	-3	The change is significant to the sector leading to a decline, resulting in a material impact over the time horizon
Very high	-4	The change represents a prolonged threat to the profitability of the sector, likely leading to the collapse of some players

Opportunity score scale

Low	1	The change is limited by nature and is unlikely to create demand and/or growth/investment over the time horizon for the sector
Med	2	The change provides examples of potential demand and/or growth/investment for the sector. However, they are unlikely to be transformational over the time horizon for the sector
High	3	The change provides compelling demand and/or growth/investment for the sector. The examples demonstrate a clear transformational path for the sector over the time horizon
Very high	4	The change sees the whole sector experience rapid expansion and/or transformation over the time horizon

We then mapped the sector scores to our investment portfolio to identify concentrations and to highlight where transition-related risks and opportunities may be most material. This provides a sector-level overview of the key findings from our transition-related risk and opportunity assessment. The results for the most material sectors in our portfolio are shown in the heatmap diagram below.

Because our investments span multiple sectors, we have highlighted specific industries in the heatmap that could face higher transition-related risks and opportunities based on our qualitative scenario analysis methodology. This approach ensures that we have a comprehensive understanding of sectors we may invest in, to allow us to make informed decisions.

Strategy

The scenario analysis highlights where our portfolio is most exposed to transition-related risks and opportunities, with notable concentrations in Real Estate, Finance and Insurance, Electricity Supply, and Oil & Gas. Although only a small portion of our investments are in sectors assessed as high transition risk (such as Oil & Gas and Power Production: Fossil Fuels Segment), we remain focused on gradually reducing exposure, particularly where longer-term risks remain elevated. For example, transition pressures in Oil & Gas persist through 2050, driven largely by expected shifts in consumer demand towards renewables and alternative fuels.

At the same time, the analysis identifies meaningful opportunity exposure in sectors such as Real Estate, where transition-driven enhancements and regulatory shifts are expected to create increasing opportunities from the 2030s onwards.

Although the scenario analysis provides a useful indication of our investment portfolio's relative risk or opportunity exposure, and it can support our climate risk stress-testing, the assessment has limitations: it is qualitative, sector-level, excludes physical risks, and depends on the availability and quality of underlying sector and asset-level data.

The methodology will continue to evolve as our data quality, coverage, and analytical capabilities improve, including as we work towards developing a bottom-up quantitative climate scenario analysis approach.

Material sector heatmap

Sector	Risk score		Opportunity score	
	APS	NZE	APS	NZE
Electricity Supply	-0.9	-1.3	1.7	2.4
Finance & Insurance	-1.3	-1.6	1.2	1.4
Food, Beverage & Food Retailing	-1.2	-1.3	0.7	0.7
Gas Supply & Transport	-1.6	-2.2	1.5	1.4
Health & Community	-0.6	-0.6	0.4	0.4
Industrial Machinery & Equipment	-1.4	-1.5	1.3	1.4
Media & Communication Services	-0.6	-0.6	0.6	0.6
Oil & Gas	-1.9	-2.4	1.2	1.3
Power Production: Fossil Fuels Segment	-2.2	-2.6	1.0	0.9
Power Production: Low Carbon	-0.8	-1.0	2.1	2.6
Real Estate	-1.6	-1.9	1.9	2.5
Software, Technology, Hardware & Equipment	-0.5	-0.6	1.0	1.1

Our investment approach

At Resolution Life we are dedicated to responsible investment because it aligns with our purpose of 'protecting financial futures', our first guiding principle of 'do the right thing', and our longer-term objectives as an insurance provider.

By incorporating sustainability considerations, including climate change, within our investment decision-making processes, we aim to reduce risk, strengthen the resilience of our portfolio, and ultimately contribute to driving positive change in the companies we invest in.

Underlying principles of our approach

Our approach to responsible investment is guided by:

- **Risk mitigation:** By considering sustainability factors in the management of our assets, we believe that we can better identify and mitigate risks that could affect the long-term performance of our investments, helping to ensure that policyholders' funds are protected. Climate change introduces asset-liability management risks by potentially reducing the value of assets in portfolios that do not account for climate factors, while also creating uncertainty around the timing and magnitude of future claims that those assets must cover.
- **Long-term sustainability:** Life insurance is a long-term financial commitment. Engaging in responsible investment aligns with our interest in ensuring the sustainability of our investments over many decades. We believe that investing sustainably over the long term will provide resilience in the face of economic and market fluctuations.
- **Reputation and trust:** Responsible investment practices enhance our company's reputation, building trust among policyholders and investors. Clients, partners, investors, employees and other stakeholders are increasingly conscious of Environmental, Social and Governance (ESG) issues, and they value knowing that their insurer is making environmentally and socially responsible investment choices while providing the necessary risk-adjusted returns.
- **Regulatory compliance:** Many of the jurisdictions that we or our partners operate in have introduced, or are considering introducing, regulations that encourage or require financial institutions (including life insurance companies) to consider sustainability factors in their investment decisions. Engaging in responsible investment practices helps us remain ready to comply with evolving regulations.
- **Social and environmental impact:** As a life insurance company we recognise our role as a responsible corporate citizen. By investing in companies that demonstrate responsible and sustainable practices, we can contribute to positive social and environmental outcomes, aligning with our corporate values and mission.

Understanding our portfolio's carbon footprint

We measure the portfolio-level carbon intensity as part of our climate scenario analysis to assess how exposed our investment portfolios are to climate-related risk. This generates areas of focus to consider more broadly as part of our sustainability strategy and overall business strategy. More information on carbon intensity is in the Metrics & Targets section of this report.

Being a socially responsible organisation

We acknowledge our responsibility in responding to climate change and are committed to fulfilling our duties as a socially responsible organisation. By investing in companies that exhibit responsible and sustainable practices, we can contribute to positive social and environmental outcomes, aligning with our corporate values and mission.

In 2022, we established our Responsible Investment Policy, which laid out the principles and minimum standards for responsible investment within our organisation. As part of that, we developed the framework and controls for managing any associated risks. Consistent with our fiduciary duties to our policyholders, cedants and investors, our Responsible Investment Policy is designed to protect and enhance the value of our investments over the long term. As a long-term investor, we believe that our investee companies should aim to generate and deliver sustainable financial value, supported by long-term owners who are clear about their expectations and to whom the investee company is accountable.

Our expectations of third-party asset managers

To gain the investment capabilities necessary and access a broad range of asset classes, we have outsourced the management of our investment portfolio to third-party asset managers. They are responsible for the execution of our investment strategy and incorporating our position on climate and sustainability. For example, our asset managers apply our exclusionary screens to avoid investments in industries or companies that are incompatible with our responsible investment principles. Currently we have restricted controversial weapons and tobacco.

However, our preferred investment approach is engagement rather than exclusion. Our investment teams across Resolution Life frequently engage with our asset managers to understand how sustainability issues are being integrated into the investment process. These teams also expect managers to engage with their portfolio companies on sustainability matters.

Managers are mandated to provide us with specific reporting on sustainability, including environmental factors relevant to their asset class. We formally review their approach and progress annually. We seek the presence of responsible investment policies for the majority of our mandates. This includes ensuring that their Responsible Investment Policies align with the investment mandate. We also evaluate resourcing and incentives, such as team structures, operating models and remuneration structures. Additionally, we assess staff competencies and experience in responsible investment.

Risk management

Risk management is central to everything we do. It informs how we grow and manage the business, how we give comfort to our policyholders, investors and other stakeholders that we are a safe, responsible insurer that honours promises, and how we deliver stable returns over the long term.

Our conservative approach to risk differentiates us from many of our competitors. We manage risk through a clearly defined risk strategy – the choices we make when dealing with risk – and our risk appetite – the level of risk we are prepared to accept in the business.

According to our risk strategy, we will only make acquisitions and do reinsurance deals that are aligned with our business strategy and where the risk and potential returns are within our risk appetite; and we will manage the businesses we acquire according to those same standards of risk and potential returns.

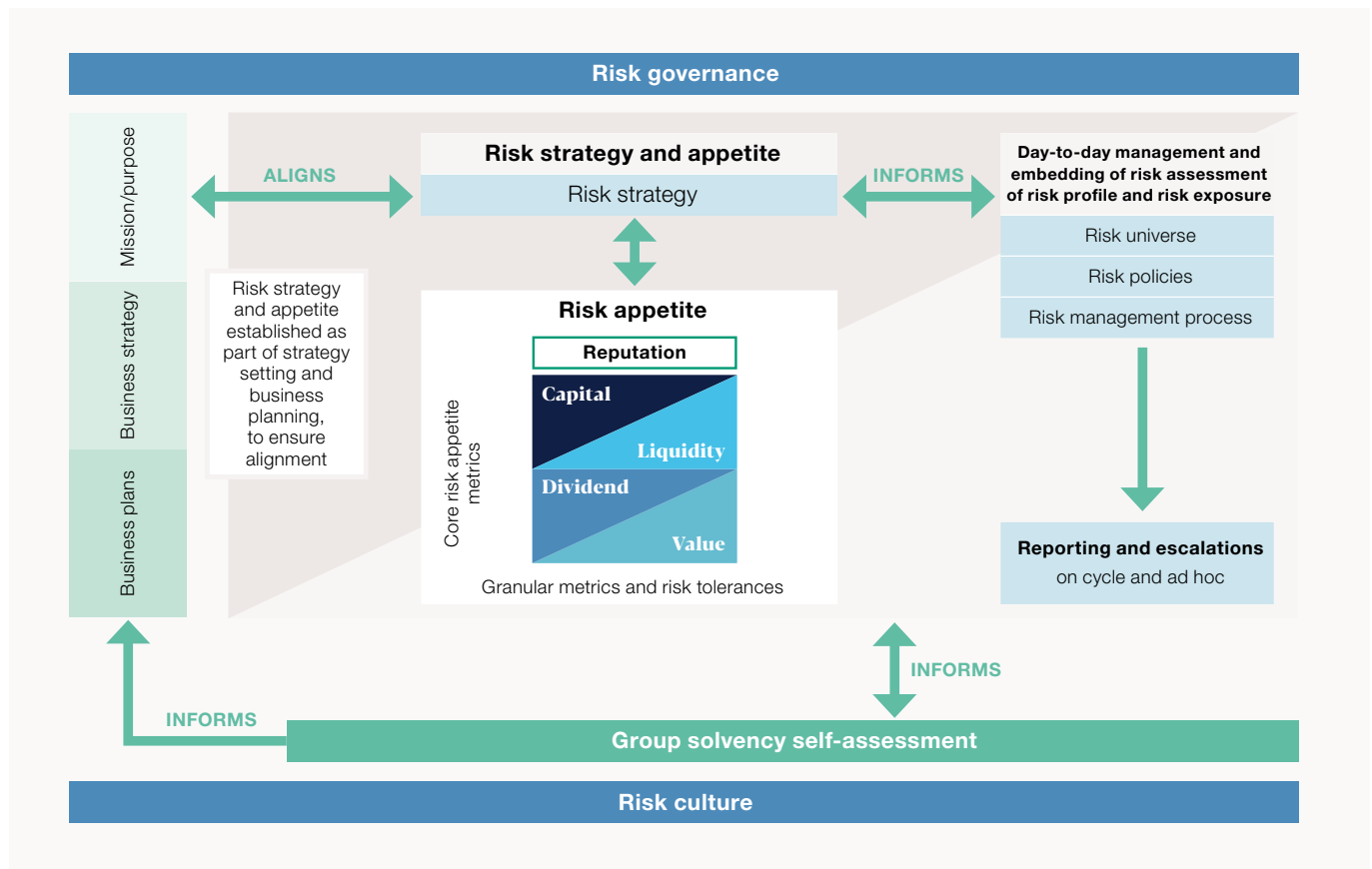
We maintain a moderate climate risk appetite, embedding environmental considerations into strategic and operational decisions. We identify, assess, and manage climate-related financial and operational risks and opportunities using scenario analysis, while continuously improving data quality to support informed decision-making.

This section explains how we manage risk in general and how climate-related risks fit into that process. It includes our risk management framework and processes, as well as our risk appetite, universe and policies.

Our Risk Management Framework and risk management processes

Our Risk Management Framework (RMF) provides a holistic and consistent way in which to identify, measure, manage, monitor and report on all types of risks within our organisation, including climate-related risks. Each regulated insurance entity of the company adopts this framework, allowing for materiality and proportionality, considering the nature, scale and complexity inherent in all our entities.

Resolution Life's Risk Management Framework



Risk management

The RMF sets out the minimum requirements in our risk management processes. We manage climate-related risk within our RMF in the same manner as other risks. In line with our Sustainability Policy, climate-related risks are subject to the same identification, measurement, management, monitoring and reporting requirements as the other risks that we manage. All our insurance entities record climate-related risks in a consistent manner, which enables us to consider and mitigate them globally, using our global risk system. This system facilitates a global view of all the climate change risks we are exposed to.

As part of an Internationally Active Insurance Group, we continue to invest in strengthening our approach to risk management through a risk transformation programme that aims to strengthen our overall Risk Management function, including investment risk capability. As a result, we will be in a stronger position to oversee climate-related risks.

Alignment with our business strategy

Strong risk management is at the heart of our strategy and our risk strategy and risk preferences are aligned with our business strategy. The risk strategy sets out the Group's risk philosophy, desired risk outcomes and risk preferences. It sets out qualitative statements and provides visibility on how risk management is incorporated consistently across all levels of the business. The risk strategy (which includes climate-related risk) is reviewed and approved annually by the Board as part of the strategy review and strategic planning process. More information about our governance processes is in the Governance section of this report.

We maintain a catalogue identifying all reasonably foreseeable and relevant risks facing the business. This process includes regularly evaluating the potential impact and materiality of all the identified risk types, including risks related to climate change. We use the TCFD guidance to support our definition of climate risks which are categorised into transition and physical risks, as described in the Strategy section of this report.

Our three lines of defence model

To support the execution of our risk management processes, we have adopted a 'three lines of defence' model:

- The **first line** is the manager of the business area, who owns and takes responsibility for identifying, assessing and reporting on the different risks within their business area. The business manager is also responsible for designing and maintaining effective processes and controls. Their role is essential in integrating climate-related considerations into business strategies and operations.
- The **second line**, consisting of the Risk and Compliance teams, plays a crucial role in climate risk management by developing risk management frameworks, policies, and procedures, and ensuring compliance with regulatory requirements and internal standards. Those teams design and implement the RMF and recommend the company's risk appetite to the Board. They also monitor and challenge

the actual risk profile of the company and each entity against the preferred level of risk given our risk appetite. Furthermore, they assess the effectiveness of the control environment and report their findings to the Management Risk & Compliance Committee.

- The **third line** is performed by internal audit, which provides independent assurance of the effectiveness of governance, risk management practices and the control environment, including how climate-related risks are being managed across the first and second lines of defence.

Risk monitoring

We monitor risk exposures on an ongoing basis. Where appropriate, control points are established for heightened monitoring, and limits are established that should not be breached. The RMF includes early warnings or triggers that allow timely consideration of, and adequate response to, material risks. Key risk indicators are used to monitor risk on a day-to-day basis allowing for the proactive management of risks.

Risk monitoring and reporting is carried out by the responsible managers in the first line of defence, with appropriate oversight and assurance from the second and third lines of defence.

Climate-related risk management for our investment portfolio

When considering climate-related risks within our investment portfolios, our first line of defence (the Investment Management team) requires our third-party asset managers to consider all factors that may affect our investment in an investee company (e.g. its ability to pay the relevant coupons and principal over the lifetime of a debt instrument). Those factors include implications stemming from the long-term nature of climate risk relative to the weighted average life of the asset portfolio under review. That approach requires our asset managers to consider climate-related risks in a holistic way, incorporating it into their investment decision-making. The first line of defence engages with our asset managers to understand their investment processes and frequently incorporates questions about climate-related considerations, where relevant, when discussing transactions.

We also evaluate our asset managers' processes for integrating and reporting climate-related issues for their respective portfolios as part of our annual sustainability review. The sustainability review aims to understand the processes employed by our third-party asset managers, including their responsible investment and stewardship practices and how they consider climate-related issues and decarbonisation activities in their investment processes. The review takes into account the nuances of the specific asset classes they manage for Resolution Life.

Risk management

Risk measurement and assessment

We have processes to evaluate and measure all identified risks regularly throughout the year, both qualitatively and, where appropriate, quantitatively. The measurement process includes an evaluation or comparison of the risk exposure to the stated risk appetite tolerances and considers mitigants currently in place. Resolution Life's climate risk appetite considers the long-term nature of climate risk.

The RMF was updated in 2022 to include environmental and sustainability risk within the overall company risk taxonomy and was further refined in 2025. In addition, we have defined high-level principles to guide our Sustainability Strategy within our Sustainability Policy (see 'Our risk policies and reporting', below). As such, climate-related risks are assessed in the same way as all our other types of risks.

We acknowledge the need to consider our own external impact on climate change and how it in turn impacts our own financial performance, reputation and operations. This is an evolving concept, and going forward we will enhance our risk management and strategy capabilities to consider this in line with the latest industry standards and practices.

Risk universe

We maintain a catalogue identifying all reasonably foreseeable and relevant risks facing the business, including climate-related risks. The potential impact and materiality of these risks are regularly assessed throughout the year in accordance with a risk matrix that considers both financial and non-financial risk impacts. The measurement process includes an evaluation or comparison of the risk exposure to the stated risk appetite tolerances, as well as mitigating factors that may bring a risk within tolerance.

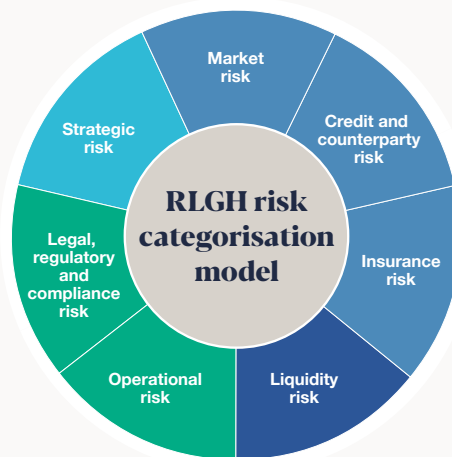
In 2024, we assessed the climate-related risk profile of our investment portfolios for the first time. Using the outputs and conclusions of that analysis, in 2025 we developed a qualitative climate risk appetite statement and we maintain a moderate climate risk appetite. As part of the process of strengthening our climate risk governance, we plan to develop a quantitative climate risk appetite and related limits in the future.

The risk wheel below sets out how we measure and manage our material risks. Each year we measure and report on risk exposures with relevant metrics, relative to limits, to the Management Risk & Compliance Committee. In addition, each appointed CRO provides a report to their respective Boards across the Group: the RLGH Board, the US Board, and the RRL Board. This process provides a sound basis for monitoring our risk profile in relation to our risk appetite. Trends and the absolute risk level both are important indicators.

Climate-related risks sit within the strategic risk category in our risk universe at Resolution Life. Climate risk is classified as a strategic risk due to its potential long-term effect on our sustainability, regulatory compliance, and financial stability, but is also recognised to be a transverse risk that can manifest across multiple risk categories. The potential combination of effects makes it important enough to be a standalone category within our risk taxonomy, resulting in dedicated management and accountability. Climate-related scenario analysis is performed annually, as described in the Strategy section of this report.

Risk categorisation at Resolution Life

- **Risk exposure largely not quantifiable, but risks actively managed.** Risk policies set out minimum requirements for management of each risk. Business and risk metrics are projected over the business planning period under a range of scenarios, which provides insights into these risk types.
- **Risk policies set out minimum requirements for management of each risk in addition to holding capital.** Quantitative risk assessment through capital at risk and value at risk metrics and individual risk stresses at a range of severities.



- **Risk policies set out minimum requirements for management of each risk.** The main risk mitigation for regulatory, compliance and operational risk is an appropriate risk and control culture. Operational risk is assessed quantitatively as part of the capital at risk and value at risk metrics. Resolution Life risks are determined by bottom-up and top-down risk assessment.
- **Risk policies set out minimum requirements for management of liquidity risk.** Risk exposure captured via quantitative risk metrics. Stressed cash balances are considered as part of stress and scenario testing. Liquidity buffers are held at RLGH and entity level.

Risk management

Our risk policies and reporting

We have a number of global business policies across the Group. A subset of policies are owned by the risk function, including the Risk Strategy and RMF policy, the Operational Risk policy and the Insurance Risk policy. We also have several external reporting requirements.

The Sustainability Policy is a component of the company's governance framework. In developing the policy, we considered a range of international standards to guide our approach and have committed to continuously monitor the evolving risk and regulatory landscape from both a global and local perspective to ensure our business operations are in line with current standards, including compliance with PRI's requirements. The policy sets out controls and minimum standards including ensuring the various functions within Resolution Life understand where their sustainability practices can be improved, both in terms of design and implementation. It was updated in 2025 to explicitly recognise that climate risk is a transverse risk that can manifest across multiple risk categories in the risk taxonomy.

The Sustainability Policy also ensures that we comply with PRI disclosure requirements and demonstrate to external stakeholders that we meet our sustainability exposure reporting requirements, including the TCFD recommendations.

In addition, we submit an annual GSSA report to meet our Group regulatory requirements. It reflects the culmination of the annual risk assessment and documents in detail the risk strategy, RMF and the key risks the company is exposed to. The GSSA is required to evidence that the regulatory capital held by the company under stress scenarios is sufficient to cover all key risks and includes the consideration of the impact of climate change risks on the investment portfolio. RLUSH prepares an Own Risk and Solvency Assessment (ORSA) and RRL prepares a Commercial Insurer's Solvency Self-Assessment (CISSA).

Metrics and targets

As an insurance company, our effect on the environment stems both directly from our operations and indirectly through the investments we make. We have a duty to consider the impact we have, to reduce our emissions and to ensure that we invest in a responsible way.

Our metrics cover the carbon footprint¹ of our operations and our investment portfolio (financed emissions). Within our own operations, we analyse trends in our emissions data and take proactive measures with an aim to continuously improve our sustainability practices and reduce our overall emissions.

By far the largest component of our carbon footprint comes from our investment activities. Therefore, it is important to measure and monitor our financed emissions and use this information to identify and assess climate-related risks and opportunities and develop a response to addressing them.

This section explains the GHG emissions from our operations, the financed emissions in our investment portfolio and our plans for setting targets.

Our total carbon footprint

Our carbon footprint comprises Scopes 1, 2 and 3 GHG emissions. We assess our operational emissions separately from the financed emissions associated with our investment portfolio. This helps us to see where we can make changes within our business to reduce our carbon footprint, as well as to identify where we need to seek to influence the asset managers and investee companies associated with our investment portfolio.

We will continue to evolve our approach to reducing our GHG emissions, actively working to lower our footprint while also investigating the appropriate role of offsets as part of a balanced strategy. As the quality of our underlying data improves, we will use these insights to focus our efforts where they can have the greatest impact and to further refine the metrics and KPIs that support our long-term climate ambitions. A key priority will be working closely with Nippon Life to develop a relevant and pragmatic roadmap that reflects the integration of our businesses and takes into account the uncertainties presented by the broader geopolitical landscape.

Our GHG emissions, in carbon dioxide equivalents (CO₂e), are set out in the table below.

Resolution Life's GHG emissions

Emissions source	2025 tCO ₂ e	2024 tCO ₂ e	2023 tCO ₂ e	2022 tCO ₂ e	2025 % change from baseline year
Total Scope 1	0.0	2.8	2.8	7.1	-100.0
Total Scope 2 (location-based)	305.0	380.7	440.3	540.5	-43.6
Total Scope 2 (market-based)	0.0	350.9	435.0	540.5	-100.0
Total Scope 3 (operational)	22,779.1	17,646.9	59,363.0	85,091.7	-73.2
Total Scopes 1, 2 (location-based) and 3 (operational)	23,084.1	18,030.4	59,806.1	85,639.3	-73.0
Total Scopes 1, 2 (market-based) and 3 (operational)	22,779.1	18,000.6	59,800.8	85,639.3	-73.4
Scope 3 category 15: Investments (financed emissions)	16,523,151.0	15,079,277.0	not avail.	not avail.	9.6
Total Scope 3	16,545,930.1	15,096,923.9	59,363.0	85,091.7	9.6
Total Scopes 1, 2 (location-based) and 3	16,546,235.1	15,097,307.4	59,806.1	85,639.3	9.6
Total Scopes 1, 2 (market-based) and 3	16,545,930.1	15,097,277.6	59,800.8	85,639.3	9.6

Notes: The baseline year for Scope 1, Scope 2, and operational Scope 3 emissions is 2022. The baseline year for Scope 3 financed emissions is 2024. Following the acquisition by Nippon Life, RLA is now part of Acenda, a joint venture between Nippon Life and Resolution Life. The 2025 metrics therefore do not include RLA's operational emissions. All prior years' metrics have been restated to exclude RLA. Numbers may not add up due to rounding.

¹ Our carbon footprint comprises our GHG emissions, which are reported in carbon dioxide equivalents. Therefore, in this report we use the terms 'GHG emissions' and 'carbon emissions' interchangeably. Our financed emissions reflect the GHG emissions (or carbon emissions) within our investment portfolio.

Metrics and targets

Our operational emissions include Scope 1 (GHG emissions we are directly responsible for within our organisational boundary), Scope 2 (GHG emissions associated with purchased electricity, heat and cooling) and Scope 3 (indirect GHG emissions generated outside our control but used within the company, excluding financed emissions in category 15 (investments)).

Going forward, we will continue to strengthen the quality, completeness, and usefulness of our climate-related metrics, including working to improve the data quality and coverage of our financed emissions reporting. As methodologies and market best practices evolve, we expect that our approaches will necessarily change, which may require certain aspects of these values to be restated in the future.

See Appendix 2 for information about the methodologies and data sources used to calculate our emissions metrics.

Emissions in our business operations

Our operational emissions comprise Scope 1, Scope 2 and all categories of Scope 3 except category 15 (investments). We calculate and report Scope 2 emissions on a location-based and market-based basis. The location-based method reflects the average emissions intensity of grids on which our energy consumption occurs. The market-based method reflects emissions from electricity that we have purposely chosen. Our Scope 3 operational emissions comprise categories 1 (purchased goods and services), 5 (waste generated in operations), 6 (business travel), 7 (employee commuting), and 8 (leased assets).

In 2025, our operational emissions, using the market-based approach, increased slightly to 22,779.1tCO₂e from 18,000.6tCO₂e in 2024. Both our Scopes 1 and 2 GHG emissions decreased to nil, a 100% reduction since 2022, our baseline year for operational emissions. We saw an increase in our Scope 3 operational emissions in 2025, primarily due to our spend on professional services. However, this represents a 73.2% reduction since 2022.

During 2025 we have taken steps to reduce our Scope 3 operational emissions by optimising the way we use technology, resulting in a 20.2% decrease in the emissions associated with information and communication technology (ICT). Our reduction in ICT-related emissions reflects a deliberate focus on optimising how technology is consumed across Resolution Life. This included retiring legacy systems, consolidating platforms, and increasing reliance on energy-efficient cloud-based solutions. We also reduced Scope 3 emissions in other areas as each of our entities worked to minimise their own carbon footprints where possible through activities such as reducing waste, lowering the footprint of office services and equipment, and seeking to reduce spend in areas where it was appropriate to do so.

Our greatest focus area over the past few years has been to reduce the emissions from our professional services, which is the largest source of our Scope 3 category 1 emissions. As mentioned in the Strategy section above, we have updated our supplier code of conduct and standards to emphasise prioritising suppliers that are carbon neutral or have credible carbon reduction initiatives in place. We also strengthened our due diligence process by integrating questions on suppliers' emissions reduction plans. In addition, we delivered 'lunch & learn' events and targeted training sessions for colleagues managing supplier relationships, ensuring our expectations and guidance on prioritising lower carbon suppliers were clearly communicated. With this work, we nearly doubled the number of carbon neutral suppliers in our global network during the reporting year. However, despite this the distribution of our spend ultimately resulted in an increase in emissions, which was compounded by a small number of our largest suppliers who shifted their strategies from offsets to a focus on direct emissions reductions. We will continue to focus on this area as it remains our largest source of Scope 3 GHG emissions.

To further mitigate our environmental impact in 2025, we worked with Climate Impact Partners to offset all our remaining Scope 2 (market-based) emissions and our Scope 3 business travel emissions. For our Scope 2 emissions, we purchased Renewable Energy Certificates (REC) to offset our use of non-renewable energy, and so in 2025 we used 100% renewable energy. For our Scope 3 business travel emissions, we invested in nature-based solutions across the geographies where our emissions have the greatest intensity.

Metrics and targets

Financed emissions in our investment portfolio

Our investment portfolio holds assets across multiple asset classes and sectors that produce emissions. These are our indirect Scope 3 category 15 financed emissions. By incorporating sustainability considerations, including climate change, into our investment decision-making processes, we aim to reduce risk, strengthen the resilience of our portfolio, and ultimately contribute to driving positive change in the companies we invest in. Appendix 2 contains information about the methodologies and data sources used to calculate our financed emissions metrics.

Our total financed emissions

The total emissions in our investment portfolio increased in 2025, reflecting improvements in data coverage, the effect of including in-scope structured real estate, and adding previously unmapped high-emitting issuers. This increased the amount of our assets under management (AUM) covered in our financed emissions calculations. This year, the Corporates asset class remained the primary source of financed emissions.

Total financed emissions, by scope

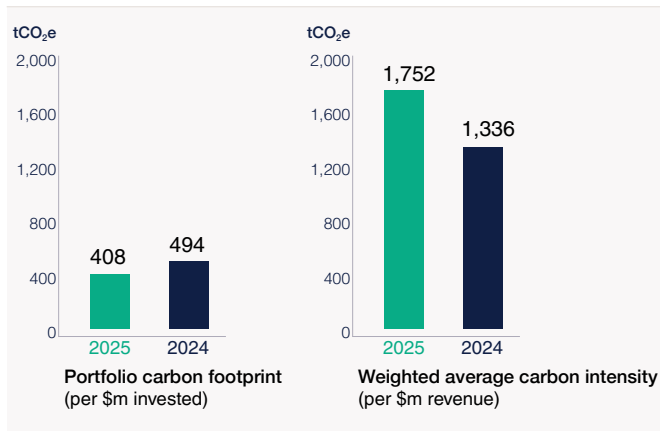
Emissions source	2025 tCO ₂ e	2024 tCO ₂ e	2025 % change from baseline year
Scope 1 and Scope 2 emissions	3,808,383	2,616,320	45.6
Scope 3 emissions	12,714,768	12,462,957	2.0
Total Scope 3 category 15: Investments (financed emissions)	16,523,151	15,079,277	9.6

Notes: The baseline year for Scope 3 financed emissions is 2024. Following the acquisition by Nippon Life, RLA is now part of Acenda, a joint venture between Nippon Life and Resolution Life. The 2025 metrics therefore do not include RLA's operational emissions. All prior years' metrics have been restated to exclude RLA. Numbers may not add up due to rounding.

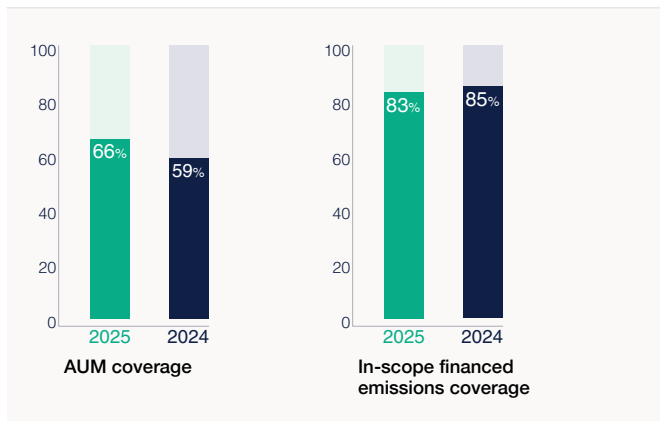
The weighted average carbon intensity (WACI) of the portfolio increased due to changes in portfolio composition, indicating that it has become more exposed to companies that generate higher emissions relative to their revenue. However, the portfolio's carbon footprint decreased because, relative to its size, the companies we invest in emitted less on an absolute, per-dollar-invested basis.

Financed emissions intensity and coverage

Intensity



Coverage



Notes: Following the acquisition by Nippon Life, RLA is now part of Acenda, a joint venture between Nippon Life and Resolution Life. The 2025 metrics therefore do not include RLA's operational emissions. All prior years' metrics have been restated to exclude RLA.

Our asset classes

Our investment portfolio comprises a number of asset classes. Our financed emissions metrics cover corporate equity and debt securities, sovereign debt, and real estate mortgages and equity. Our other asset classes are excluded from our financed emissions calculations due to a lack of data availability and PCAF methodology guidance. The table below sets out our financed emissions by asset class.

Metrics and targets

Financed emissions by asset class

Asset class	Scope	AUM (\$bn)		Financed emissions (MtCO ₂ e)		PCAF data quality score		Portfolio carbon footprint (tCO ₂ e/\$m invested)	
		2025	2024	2025	2024	2025	2024	2025	2024
Corporates	Scopes 1 & 2	29.1	23.1	3.0	1.9	2.9	3.2	103	84
	Scope 3			12.7	12.5	3.1	3.8	437	539
Sovereign	Scope 1 incl. LULUCF	3.3	2.2	0.5	0.4	1.2	1.2	161	192
	Scope 1 excl. LULUCF			0.6	0.5	1.2	1.2	172	208
Real estate	Scopes 1 & 2	8.1	5.2	0.3	0.3	4.6	4.4	33	49

Note: Following the acquisition by Nippon Life, RLA is now part of Acenda, a joint venture between Nippon Life and Resolution Life. The 2024 and 2025 metrics therefore include only the RLUSH and RRL portfolios. The 2024 metrics have been restated to exclude RLA. The metrics for real estate in 2025 include securitised assets.

Corporates

This year, changes in our Corporates asset class financed emissions were driven by increasing AUM but typically to lower-emitting sectors such as Real Estate and Finance & Insurance.

This calculation of financed emissions includes all sectors within the asset class (including public and private equities, corporate bonds, municipals), in line with PCAF requirements. Those sectors are shown in the Strategy section above.

PCAF data quality improved for this year because a larger share of the portfolio was covered by high quality reported issuer emissions (32% in 2025, up from 26% last year), rather than sector-level proxies.

Also in line with PCAF requirements, we include issuers' Scope 3 GHG emissions for all sectors. However, the data quality for Scope 3 tends to be poorer than an issuer's Scopes 1 and 2 emissions data. This is primarily due to the difficulty of calculating Scope 3 downstream emissions, which necessitates a greater use of proxies.

Sovereigns

Our Sovereigns asset class financed emissions increased this year because of growth in the portfolio. However, intensity fell as the portfolio shifted towards lower-emitting countries. We are predominantly exposed to sovereigns in developed countries, including the US, France, and Japan. As a result, data quality is high given emissions are sourced and verified directly from the United Nations Framework Convention on Climate Change (UNFCCC).

For sovereign bonds, emissions cover Scope 1 domestic GHG emissions from sources located within the country territory, aligning with the UNFCCC definition of domestic territorial emissions. Emissions are also shown both inclusive and exclusive of land use, land use change and forestry (LULUCF), as per the PCAF recommendation to report both values given there is no agreed consensus on their inclusion or exclusion.

Real estate

Our Real estate asset class financed emissions showed mixed movements this year: non-structured assets decarbonised because there were reductions across several higher-emitting building types, while the inclusion of in-scope structured real estate added additional exposure and slightly raised absolute emissions.

The calculation of Real estate financed emissions includes both commercial and residential real estate mortgages and equity. Data quality is poorer for real estate than for other asset classes because of limitations in being able to source building emissions data. These emissions are typically calculated using floor areas and emission intensities sourced from the Carbon Risk Real Estate Monitor tool, which covers different property types and regions.

Our work to establish targets

Our focus so far has been on measuring our global operational emissions, improving our data quality, and focusing on responsible investment. This year we expanded our offsets from just business travel to also include Scopes 1 and 2 of our operational emissions.

We have measured our global operational GHG emissions since 2022, with parts of our business measuring them for many years prior. In 2024, we began to measure our financed emissions and we have improved on that in 2025.

Although we are yet to set specific emissions reduction targets, we continue to seek to minimise our global carbon emissions. We want to proceed in a thoughtful manner, using our data to focus our attention on ensuring our efforts are as effective as possible. When considering setting targets, we will need to ensure our baseline is set, and we will work alongside Nippon Life to develop a relevant and pragmatic roadmap, which factors in the uncertainty that comes from a changing geopolitical landscape.

Appendices

Appendix 1: TCFD disclosure index

Recommendation	Response	Disclosure reference
Governance		
a) Describe the board's oversight of climate-related risks and opportunities	Climate governance framework, Board's oversight of climate-related issues, ensuring we have sufficient expertise on climate-related matters	Pages 6-8
b) Describe management's role in assessing and managing climate-related risks and opportunities	Climate governance framework, Management's action on climate-related issues, ensuring we have sufficient expertise on climate-related matters	Pages 6-8
Strategy		
a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium and long term	Time-bound risks and opportunities, scenario analysis	Pages 9-11
b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	Overall strategy, scenario analysis	Pages 12-13
c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario	Investment approach, scenario analysis	Pages 12-14
Risk Management		
a) Describe the organisation's processes for identifying and assessing climate-related risks	Risk Management Framework and risk management processes	Pages 15-18
b) Describe the organisation's processes for managing climate-related risks	Risk Management Framework and risk management processes	Pages 15-18
c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management	Risk Management Framework and risk management processes	Pages 15-18
Metrics & Targets		
a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	Our total carbon footprint, emissions in our business operations, financed emissions in our investment portfolio	Pages 19-22
b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 GHG emissions, and the related risks	Scopes 1 and 2 emissions, Scope 3 emissions for own operations and our investment portfolio	Pages 19-22
c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets	Targets	Page 22

Appendices

Appendix 2: Methodologies and data sources

We calculate our emissions using the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (revised edition). The emissions in our investment portfolio were calculated using the PCAF Global GHG Accounting & Reporting Standard for the Financial Industry. PCAF was developed by a global partnership of financial institutions as a response to demand for a standardised approach to measure and report financed emissions (category 15 of Scope 3). Scopes 1, 2 and 3 GHG emissions are used for issuers and are sourced from a third-party data provider.

This section describes the methodologies and data sources used, including the assumptions made in our calculations, and their limitations.

Our 2025 metrics reflect the acquisition by Nippon Life in October. Because RLA is now part of Acenda, a joint venture between Nippon Life and Resolution Life, the 2025 metrics therefore include only the RLUSH and RRL portfolios, and the 2024 metrics have been restated to exclude RLA.

Emissions in our own operations

We partner with Green Moves, an Australian sustainability consultant, to collate our global environmental operational data in a consistent and consolidated way. Our emissions are calculated using industry-accepted emission factors from government sources. Country-specific emission factors are used where available.

Initially we defined our baseline global carbon footprint using 2021 emissions data. However, in 2021 our business activities were significantly affected by COVID-19, meaning that data from 2021 was not a reasonable base for measuring future progress. Therefore, in 2023 we decided to change our baseline year to 2022, allowing for a more realistic and consistent comparison over time.

Emissions in our investment portfolio

Our financed emissions data guides us in defining thoughtful and meaningful emissions reductions targets over time. We partner with Baringa Partners LLP, a management consultancy firm, to calculate our financed emissions and to conduct a climate scenario analysis. We initiated this in 2024 as an important step in our efforts to have robust processes and information about sustainability. 2024 is therefore our baseline year for calculating financed emissions progress.

We use the following methodologies to calculate the metrics we use for assessing the climate-related risks and opportunities in our investment portfolio, in line with guidance from the BMA, the TCFD recommendations and PCAF.

Financed emissions calculation methodologies

Definition	Methodology	Strengths	Weaknesses
Total carbon emissions			
Total GHG emissions of the investment portfolio	$\sum_n^i \frac{\text{current value of investment}_i}{\text{issuer's market capitalisation}_i} \star \text{issuer's Scope 1, 2 and 3 GHG emissions}_i$	Commonly accepted measure of a portfolio's total level of emissions	Difficulty to compare relative to peers
Portfolio carbon footprint			
The total carbon emissions of the investment portfolio normalised by the market value of the portfolio	$\frac{\sum_n^i \frac{\text{current value of investment}_i}{\text{issuer's market capitalisation}_i} \star \text{issuer's Scope 1, 2 and 3 GHG emissions}_i}{\text{current portfolio value (\$m)}}$	Simple and allows for comparison with peers' portfolios	Volatility from non-climate factors and sensitive to outliers
Weighted Average Carbon Intensity (WACI)			
The investment portfolio's exposure to carbon-intensive issuers as a percentage of the issuer's revenue	$\sum_n^i \frac{\text{current value of investment}_i}{\text{current portfolio value (\$m)}} \star \frac{\text{issuer's Scope 1, 2 and 3 GHG emissions}_i}{\text{issuer's \$M revenue}_i}$	Simple and allows for comparison with peers' portfolios	Only for corporates, volatility from non-climate factors and sensitive to outliers

(where i = investee company or asset)

Appendices

Limitations on our calculations

Emissions calculations, whether in our own operations or in our investment portfolio, require modelling and estimation. As such, they are inherently subjective and require the use of judgement. The metrics presented have been prepared on a best-efforts basis, and it is important to be transparent with the limitations with the data. Those limitations, both in our own operations and in our investment portfolio, include the challenges with using estimates and proxy information for calculating the metrics, the time lag between financial reporting and emissions reporting, and Scope 3 emission double counting that occurs when aggregating emissions at a portfolio level in our financed emissions.

Those limitations are acknowledged as part of PCAF for measuring the emissions of assets under management.

PCAF requires firms to disclose information on their data quality across asset classes for the purposes of transparency and limitations on data availability. Data quality is specific to each asset class, and is assessed using a 1-5 score, with 1 being the highest data quality and 5 the lowest. As emissions measurement and reporting matures, we expect to be able to improve data quality and coverage over time.

Although we aim to maximise the coverage of our financed emissions reporting, some assets are excluded due to methodology or data constraints. We report our data coverage of financed emissions against total AUM and in-scope financed emissions. Cash and derivatives are not in-scope for financed emissions because no PCAF methodology guidance exists to address those product types. In addition, because of data limitations we are unable to include all assets in the portfolio in our financed emissions calculations.

Appendix 3: Glossary of acronyms

APS	Announced pledges scenario
AUM	Assets under management
BCP	Resolution Life's business continuity plans
BMA	Bermuda Monetary Authority
CISSA	Commercial Insurer's Solvency Self-Assessment
CO ₂ e	Carbon dioxide equivalent
CRO	Resolution Life's Chief Risk Officer
ELT	Resolution Life's Executive Leadership Team
ESG	Environmental, social, and governance
GHG	Greenhouse gas
GSSA	Group Solvency Self-Assessment
ICT	Information and Communication Technology
IEA	International Energy Agency
LULUCF	Land use, land use change and forestry
NZE	Net zero emissions by 2050 scenario
OKR	Objectives and key results
ORSA	Own Risk and Solvency Assessment
PCAF	Partnership for Carbon Accounting Financials
PRI	Principles for Responsible Investment
REC	Renewable energy certificate
RRL	Resolution Re Ltd.
RLA	Resolution Life Australasia Ltd.
RLGH	Resolution Life Group Holdings Ltd.
RLUSH	Resolution Life U.S. Holdings Ltd.
RMF	Resolution Life's Risk Management Framework
RRL	Resolution Re Ltd.
SteerCo	Resolution Life's Company Steering Committee
TCFD	Task Force on Climate-related Financial Disclosures
UNFCCC	United Nations Framework Convention on Climate Change
WACI	Weighted average carbon intensity

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