

# Materiality analysis Storebrand ASA



2023

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# 1. Introduction

Defining material topics based on environmental, social and corporate governance factors have gained increased importance and has become a requirement for companies. Increased data availability and quality, stakeholder engagement and expectations, and stricter regulations are shaping the need to assess material topics to understand business impacts, risks and opportunities.

The materiality analysis guides the reporting of our impacts and will be connected to our company wide risk assessments and strategy work.

To ensure that we have a comprehensive and long-term approach to creating value for our shareholders, customers, employees and society at large, Storebrand has conducted several materiality analyses over the past years to understand which topics are most material for our business and for our stakeholders.

The first materiality analysis was conducted in 2017 with annual adjustments following stakeholder engagement. In 2020 we renewed our topics following a thorough analysis based on input from both internal and external sources. In 2023 we conducted a new materiality analysis line with the principles

of double materiality as stated in the Corporate Sustainability Reporting Directive (CSRD).<sup>1)</sup> The analysis was based on input from trends, policies, internal and external stakeholders, as well as input from the executive management. CSRD is still in development and the materiality assessment may be impacted by changes in the EU directive that is being implemented.<sup>2)</sup> Going forward we aim to review our material topics annually.

Below is an overview of the most material topics over the past years.

## 1.1 Double materiality

Our current materiality analysis is based on the principle of double materiality.<sup>3)</sup> Double materiality means that the analysis assessed two dimensions: impact materiality and financial materiality. A sustainability topic meets the criterion of double materiality if it is material from the impact perspective or the financial perspective or both.

Double materiality acknowledges that businesses should assess both the risk and opportunities linked to ESG topics that can influence enterprise value creation (“outside-in”) and the ESG impacts that a company can have on the planet and society (“inside-out”). Further, the concept of “dynamic materiality” recognizes that the financial materiality of an ESG impact can evolve over time.

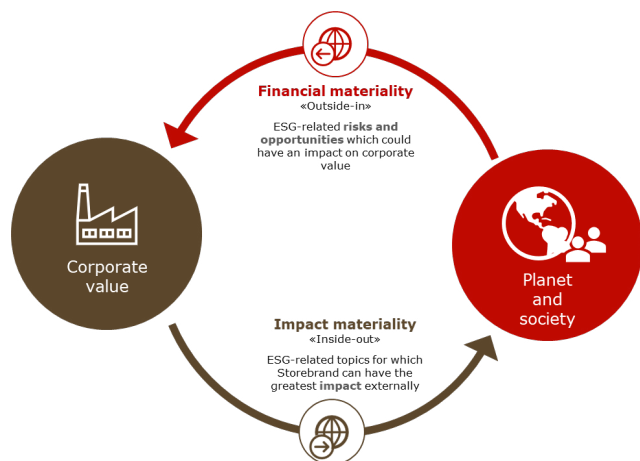


1) From 2017 to 2022, the material topics were largely the same encompassing only minor adjustments. In 2023 the materiality assessment included the principle of double materiality. The assessment is segmented into ESG in line with the European Sustainability Reporting Standards (ESRS) in which Climate Change and Sustainable Finance is within the E-category, Own Workforce and Consumers and End-users are within the S-category, and Business Conduct is within the G-category.

2) The EU Corporate Sustainability Reporting Directive (CSRD) aims to increase transparency about the company's results, objectives and action plans when it comes to sustainability. The CSRD is expected to affect almost 50,000 companies operating in the EU. CSRD introduces mandatory European sustainability reporting standards through the ESRS.

3) Double materiality is a basic principle in ESRS reporting and sets guidelines for what businesses must report on in order to report in accordance with CSRD. The definition is disclosed in the ESRS 1 draft: <https://www.efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2Fsiteassets%2F06%2520Draft%2520ESRS%25201%2520General%2520requirements%2520November%25202022.pdf>

Our analysis involves identifying the main impacts, risks and opportunities that Storebrand and our stakeholders perceive are the most important to consider within our long-term strategic goals to achieve financial growth and where we have the most significant impact on people and the environment.



Storebrand’s impact on people and the environment as well as the ESG-related risks and opportunities which could impact Storebrand’s corporate value were assessed by including input from important stakeholders. Stakeholders are those who can affect or be affected by our business. The stakeholders we considered most relevant for our materiality analysis were shareholders, customers, employees, authorities and NGOs / public opinion, suppliers and nature as a silent stakeholder.<sup>4)</sup>

Analysis of policies, annual reports, trends as well as interviews with each stakeholder group was conducted to understand Storebrand’s impact, risks and opportunities. Information collected throughout the year through interactions with stakeholders, such as The Annual General Meeting, customer surveys and meetings, and participation in committees and initiatives aimed at addressing a wide range of sustainability issues, have also been incorporated.

### 1.1.1 Impact materiality

A sustainability matter is material from an impact perspective when it relates to Storebrand’s material impacts on people or the environment.<sup>5)</sup> For Insurance, Banking and Asset Management we analysed each ESRS topic and identified which could potentially have the most impact or be most impacted by our business. We also assessed our own operations as an independent business area.

To assess and prioritise the topics we analysed the severity of the impact (scale, scope and remediability) and the likelihood or the probability of the impact to occur. Impacts include those caused or contributed to by our business or those which are directly linked to our own operations, products, or services through our business relationships.

### 1.1.2 Financial materiality

Financial materiality reflects the threshold at which information is expected to influence the decision of the users of the information. The financial materiality is a fundamental concept and plays a crucial role when assessing which ESG factors affect the Groups ability to create long-term value.

For each of the legal entities in the Group, the financial materiality is determined by using both professional judgement and quantitative thresholds. The quantitative thresholds are set by using specific percentages on financial statement elements in each legal entity, i.e. EBITDA and equity. When estimating material topics, each topic is assessed by estimating the monetary impact and likelihood of impact on short-, medium- and long-term.

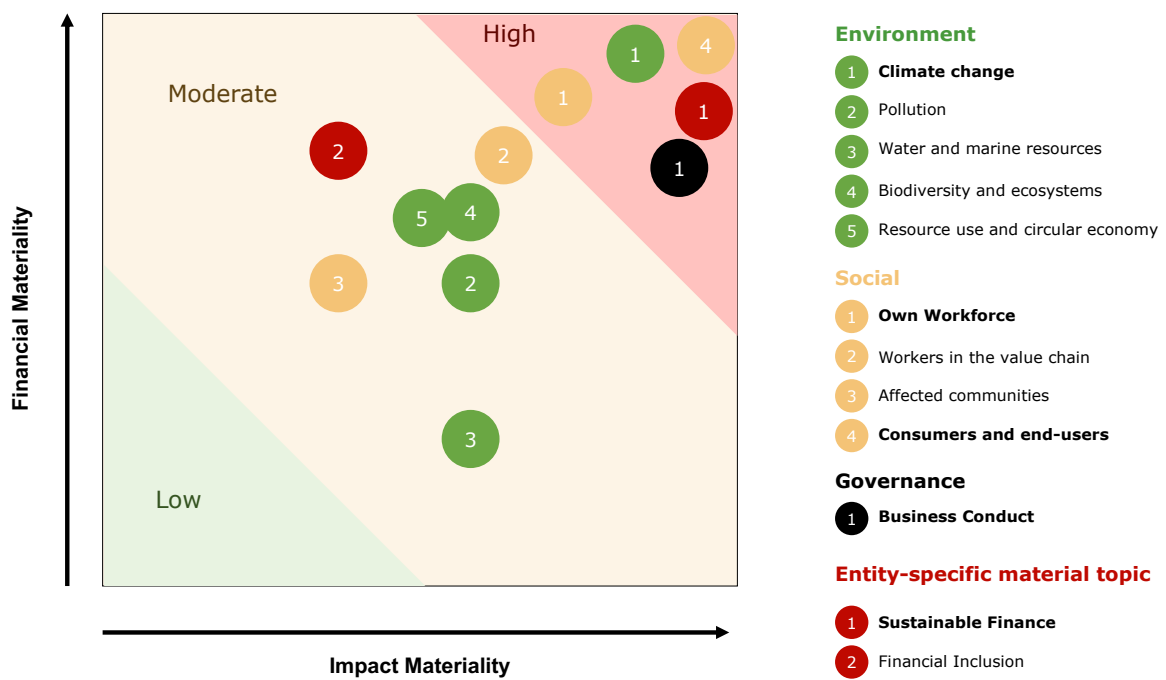
The financial impact is assessed on a scale from insignificant to critical financial impact and the likelihood is assessed on a scale from very unlikely (<10%) to very likely (>90%). When preparing the materiality assessment, the management is required to apply estimates, make discretionary assessments, and apply assumptions for uncertain amounts. The financial materiality assessment entails significant judgement and there is uncertainty related to the financial impact on material topics highlighted in the report.

4) Definitions and further explanations about our stakeholders are described in subchapter 5. Stakeholders.

5) The material impacts could be actual or potential impacts and/or positive or negative impacts. It is also assessed within a short- medium- and long-term time frame.

## 2. Materiality matrix

The material topics have been ranked based on significance of financial materiality and impact materiality. The ranking is based on quantitative scoring, qualitative interviews (internal and external), and input from management groups, Executive Management and the Audit Committee. The results are presented in the matrix below with the chosen topics marked in bold. The material topics are explained in the next chapter. The changes and adjustments compared to previous years are further outlined in appendix 6.2.



## 3. Material topics

### 3.1 Climate change

*Includes greenhouse gas emissions, energy use and the transition to a low-carbon society.*

Storebrand is considered to have a high score on impact materiality and a high score on financial materiality.

Impact materiality: Scope 3 emissions from financed emissions through investments are assessed as Storebrand's biggest impact under this topic.

- Asset management has a major impact on climate change through the emissions and energy use from the companies and the climate adaptation carried out by the companies we invest in. As a significant asset owner with global positions, we see climate change as one of the areas where we indirectly can contribute positively or negatively on society.
- In order to reduce the negative impact on climate change, Storebrand has set and had a Science-based target verified, which will help ensure that invested companies reduce their emissions.
- Influence from banks (e.g. Environmental Action Loan) and insurance (e.g. taxonomy, damage prevention, data) on our customers can also have a positive impact on climate change.
- Own office operations: Scope 1 & 2 are assessed as being impact material in own operations, as these also contribute to the same climate change, but on a smaller scale.

Financial materiality: Climate change can have a potential medium to high financial effect on Storebrand.

- Storebrand is exposed to physical risk and transition risk through our investments, as this can affect the fundamental value of the companies we are invested in. Through our Science-based targets, we can reduce this risk somewhat.
- Market risk linked to over- or under-investment relative to market expectations has been identified.
- In non-life insurance, Storebrand may be hit financially by having to make more and larger payments as a result of climate change. However, this consequence can be limited by adapting the insurance contracts over time, since such climate changes are more relevant on the long-term.
- In own office operations and the banking business, there is mainly reputational risk linked to this area.

### 3.2 Own workforce

*Includes working conditions, equality and other rights for people who are employed or otherwise work directly for Storebrand.*

Storebrand is considered to have a high score on impact materiality and a high score on financial materiality on this topic.

Impact materiality: The influence Storebrand has on our employees is assessed as high.

- Storebrand has a very large influence on employees' well-being, although the scope of the influence is largely limited to Storebrand internally. Storebrand's employees are our most important source of innovation, development, and growth. We need employees who are brave pioneers, who challenge and think creatively to create a brighter future for our customers.
- Overall, the impact is linked to skill development, in addition to potential weaknesses in the digital security of employees and a number of factors that fall under the category of equality: management training, salary adjustments, and recruitment.

Financial materiality: Own workers have a high potential financial effect on Storebrand.

- The financial materiality in this area is mainly about the potential opportunity that lies in skill development for the employees. By differentiating ourselves in terms of employee competence, beyond what is the situation today, Storebrand can achieve a competitive advantage that can lead to increased earnings.
- There is also an opportunity for indirect financial gain through equality as a result of increased external focus on this both from investors, customers and society. This contributes to a better reputation and potential financial opportunities.
- Thirdly, Storebrand's focus on sustainability is also part of its employer branding. Hence, we see an important benefit in attracting motivated talents dedicated to contributing to Storebrand's sustainability strategy.

### 3.3 Consumers and end-users

*Includes information flow to, security for, inclusion of and relationships with customers and end users as well as risks of human rights violations in service delivery.*

Storebrand is considered to have a high score on impact materiality and a high score on financial materiality on this topic.

Impact materiality: The impact Storebrand has on consumers is assessed as high.

- Storebrand is in a position where we play a decisive role for the safety of end users, especially through insurance. Good insurance schemes give customers the certainty that they will be given assistance and assurance if something were to happen to them. Storebrand delivers financial security and freedom and through this has a high positive impact on consumers and end users.
- An example is Storebrand's commitment to reducing number of people outside the job market due to disease and to return to work after sick leave. More information on this here: [Helse-tjenesten VEL - forebygg sykdom - Storebrand](#).
- Storebrand also has an inherent risk for cyber and data security through the service delivery, which is mitigated through company-wide processes and employee training.
- Storebrand depends on transparency in customer relations in order to give customers a better information base and full insight into, e.g., what is covered by the insurance and not. Not having this transparency could lead to consumers being affected by misunderstandings or making choices that are not favourable for themselves.
- The risk of human rights violations against customers / end consumers is low, but there is an inherent risk that certain groups (e.g., the elderly) find fully digital solutions challenging or that some customer groups find financial language and terminology difficult. This is mitigated through e.g., increased focus on clear and precise communication and the opportunity for oral communication to avoid misunderstandings.

Financial materiality: Consumers have a high potential financial effect on Storebrand.

- The financial materiality in this area is linked to reputational risk. Not being transparent can be a competitive disadvantage given that customers are looking for the greatest possible transparency in order to make decisions that are favourable to themselves. Storebrand's ability to deliver financial security and freedom is crucial to attracting customers.

### 3.4 Business conduct

*Includes business culture, supplier relations, anti-corruption, lobbying, notification mechanisms, animal welfare and payment practices in Storebrand.*

Storebrand is considered to have a moderate score on impact materiality and a moderate score on financial materiality on this topic.

Impact materiality: The influence Storebrand has through business conduct is assessed as moderate.

- There is a systematic risk in the financial industry to indirectly contributing to corruption, money laundering or other types of financial crime. Storebrand has implemented processes for mitigating this, e.g., anti-corruption training for all employees.

- There is also a risk of indirectly being part of misconduct through supplier relationships, e.g., sub-suppliers. Storebrand is committed to maintaining a close dialogue with suppliers on material sustainability topics for mitigating this risk. This is maintained in the procurement process, where relevant risks are considered, e.g., potential human rights issues. When engaging in new supplier relationships, new suppliers must commit to our Supplier declaration which e.g., commits to following UN Global Compact's 10 core principles<sup>6</sup>). This also includes sub-suppliers used in the relationship with Storebrand.

Financial materiality: Business conduct has a moderate potential financial effect on Storebrand.

- The financial materiality in this area is linked to reputational risk. As an example, corruption cases and whistle-blowing cases can result in a major loss of reputation for Storebrand.
- On the other hand, Storebrand can gain an improved reputation by only using suppliers who maintain a certain standard in this area.

### 3.5 Sustainable finance

*Includes ESG integration in the products Storebrand makes.*

Storebrand is considered to have a high score on impact materiality and a high score on financial materiality on this topic.

Impact materiality: The influence Storebrand has through sustainable finance is assessed as high.

- Storebrand has a positive impact and influences sustainable development in society indirectly through some of our products, for example solution funds, Environmental Action Loans, specific fund products and green bonds.
- We fundamentally believe that investing in companies well-positioned to deliver on the United Nations Sustainable Development goals (SDGs), will deliver better risk-adjusted long-term returns for our clients. We therefore put capital into action to fund socially beneficial, sustainable solutions aligned with the achievement of the SDGs. At the same time, we reduce exposure to activities that negatively impact society and the environment.

Financial materiality: Sustainable finance has a high potential financial effect on Storebrand.

- The financial materiality related to sustainable finance includes the ability to gain and maintain market share as a result of increased demand and interest from stakeholders.
- There are also risks associated with an increasingly regulated area, with reputational risk from greenwashing, as well as legal and financial consequences from deviant practices.

6) *The Ten Principles of the UN Global Compact*: <https://unglobalcompact.org/what-is-gc/mission/principles>

## 4. Targets and KPIs

In line with ESRS 2, our sustainability matters shall be considered over both short-, medium- and long-term time horizons. Below is a table summarizing current targets for the material

topics identified in the analysis. Storebrand is in the process of evaluating whether targets must be added or adjusted in terms of timeline, in accordance with ESRS.

Material topic	Short-term goals	Medium-term goals	Long-term goals
Climate change	<b>Asset management:</b> Relative emissions reduction in equity, bond and real estate by 32% in 2025 <sup>7)</sup>	<b>Asset management:</b> Science-Based Targets 42% by 2027 (equity and bonds).  Reduction in real estate emissions with 64% for residential buildings and 74% for commercial buildings by 2030 <sup>8)</sup>  <b>Own emissions:</b> Reduce absolute emissions by 52% by 2030 <sup>9)</sup>	Net zero by 2050 in investments
Own Workforce	Gender balance in all senior positions: 50% by 2023  Women's share of men's pay per job category: 100% by 2023  Engagement score >8/10 by 2023	Gender balance in all senior positions: 50% by 2025  Women's share of men's pay per job category: 100% by 2025  Engagement score >8/10 by 2025	Gender balance in all senior positions: 50%  Women's share of men's pay per job category: 100%
Consumers and end-users	Recognised for sustainable value creation: no. 1 (corporate market) and top 3 (retail market) in 2023	Recognised for sustainable value creation: no. 1 (corporate market) and no. 1 (retail market) in 2025	

7) Intensity based with baseline year 2018

8) Per square meter, baseline year 2019

9) From a 2018 base year



Material topic	Short-term goals	Medium-term goals	Long-term goals
Business conduct	<p>Number of information security incidents (no target, but reporting annually)</p> <p>Share of total expenditure from suppliers with certified environmental management system 55% in 2023</p> <p>Number of privacy incidents (no target, but reporting annually)</p> <p>Share of employees conducted E-learning<sup>10)</sup> in 2023: 100% (e.g., anti-corruption)</p> <p>Number of breaches of Code of conduct (no target, but reporting annually)</p> <p>Share of total assets invested screened against sustainability criteria 100% in 2023</p> <p>GRESB score direct real estate investments increase in 2023</p>	<p>Number of information security incidents (no target, but reporting annually)</p> <p>Share of total expenditure from suppliers with certified environmental management system 60% in 2025</p> <p>Number of privacy incidents (no target, but reporting annually)</p> <p>Share of employees conducted E-learning in 2025: 100% (e.g., anti-corruption)</p> <p>Number of breaches of Code of conduct (no target, but reporting annually)</p> <p>Share of total assets invested screened against sustainability criteria 100% in 2025</p> <p>GRESB score direct real estate investments increase in 2025</p>	<p>Number of information security incidents (no target, but reporting annually)</p> <p>Number of privacy incidents (no target, but reporting annually)</p> <p>Share of employees conducted E-learning: 100%</p> <p>Number of breaches of Code of conduct (no target, but reporting annually)</p>
Sustainable finance	<p>13% of total AUM invested in solutions by 2023<sup>11)</sup></p> <p>70% of real estate investments in certified green property by 2023</p>	<p>15% of total AUM invested in solutions by 2025</p> <p>78% of real estate investments in certified green property by 2025</p>	<p>Net zero by 2050 in investments</p>

10) Anti-corruption, money laundering, financial crime, privacy, information security.

11) This includes equity investments in solution companies, green bonds, certified green real estate and investments in green infrastructure.

## 5. Stakeholders

The stakeholder dialogue is an important part of the materiality analysis, and is used to identify and prioritise impacts, risks and opportunities. Our main stakeholders are our customers, shareholders, employees, authorities, public opinion / NGO, suppliers and nature as a silent stakeholder. Representatives from the stakeholder groups were consulted via interviews, and results of these interviews are summarized below.



**Customers:** We are dependent on customers purchasing our products and wanting us to manage their capital and savings.

**Shareholders:** Capital is necessary for our business, and it is important that our shareholders perceive us as a good investment that delivers competitive returns.

**Employees:** The competition for recruiting the best talents is high and potential employees evaluate more than salary before applying and accepting a job offering today. To continuously improve our business and stay competitive it is important to be an attractive employer where people want to begin and keep working for.

**Authorities:** We have regulatory requirements to follow and are continuously reviewed by the authorities, to ensure comp-

liance. It is important that we have the right procedures and transparency for authorities to allow us to continue our operations. We want to be a trusted referral body to authorities and be asked for input to e.g., improve current and future legislation.

**Public opinion / NGOs:** Media, NGOs and other organizations that affect the public opinion is important as it influences our trustworthiness and all other stakeholders' perception of us.

**Suppliers:** We are dependent on suppliers to deliver as agreed upon while living up to internationally recognized best practices, especially given the context of the Norwegian Transparency Act.

**Nature:** We see nature as our holding company. If it goes bankrupt, we will all go bankrupt.

### 5.1 Specific input per stakeholder group

Throughout the interviews, the focus areas and material topics were thoroughly discussed. In addition, key questions that have been discussed with Storebrand employees are:

- What ESG-topics were most commonly discussed with each stakeholder group during the year?
- What are the most important prioritizations for the stakeholder group in general?

- How do we track and follow up on our performance?
- Which topic were considered for Storebrand to have the largest impact on society and environment (inside-out perspective)?
- Which topic were considered to have the largest financial impact on Storebrand (outside-in perspective)?

The answers are summarized in the table below:

Stakeholder group	How we interact during the year	Most material topics	Follow-up / measurement
Customers	<ul style="list-style-type: none"> <li>- Customer dialogue / meetings</li> <li>- Webinars</li> <li>- Conferences</li> <li>- Customer surveys</li> </ul>	<p>Bank:</p> <ul style="list-style-type: none"> <li>- Climate change mitigation</li> <li>- Energy efficiency</li> <li>- Financial literacy</li> <li>- Money laundering</li> </ul> <p>Insurance:</p> <ul style="list-style-type: none"> <li>- Climate change mitigation</li> <li>- Responsible sourcing</li> <li>- Circularity</li> <li>- Well-being</li> </ul> <p>Capital management:</p> <ul style="list-style-type: none"> <li>- Climate</li> <li>- Biodiversity</li> <li>- Human rights</li> <li>- Change in land use</li> <li>- Salary level</li> <li>- Waste</li> <li>- Pollution</li> <li>- Financial independence</li> <li>- Active ownership</li> <li>- Influence</li> </ul>	<ul style="list-style-type: none"> <li>- Net loyalty score (customer survey measuring loyalty and collecting feedback)</li> <li>- Surveys</li> <li>- KPIs following up sales</li> <li>- Dialogues and meetings (qualitative feedback)</li> </ul>
Shareholders	<ul style="list-style-type: none"> <li>- Meetings and telephone conferences</li> <li>- Annual General meeting and Capital Markets Day</li> <li>- Quarterly reporting</li> <li>- Press releases</li> <li>- Email conversations</li> </ul>	<ul style="list-style-type: none"> <li>- Profit growth</li> <li>- Increased solvency</li> <li>- Increased dividend/buyback of shares</li> <li>- Green bonds</li> <li>- The market in general with a big focus on how money is allocated, especially for loans, corporate governance and remuneration</li> </ul>	<ul style="list-style-type: none"> <li>- In financial reporting, by group executive management and at board level</li> </ul>

Stakeholder group	How we interact during the year	Most material topics	Follow-up / measurement
Employees	<ul style="list-style-type: none"> <li>- Day to day interactions</li> <li>- Feedback and development conversations</li> <li>- Employee surveys</li> <li>- Interview processes</li> </ul>	<ul style="list-style-type: none"> <li>- Employee development</li> <li>- Competitive salaries</li> <li>- Health and well-being – psychological safety</li> <li>- Diversity and inclusion</li> <li>- Recruitment and onboarding</li> <li>- Learning culture based on employee engagement</li> <li>- Engagement with trade unions and activation of employees</li> </ul>	<ul style="list-style-type: none"> <li>- Peakon (platform for measuring and improving employee engagement<sup>12)</sup>)</li> <li>- Monthly employee surveys</li> <li>- Half-yearly HSE and diversity &amp; inclusion surveys</li> </ul>
Authorities	<ul style="list-style-type: none"> <li>- Direct dialogue on legal matters by phone</li> <li>- Conferences</li> <li>- Seminars</li> <li>- Receiving newsletters</li> <li>- Work with Finance Norway</li> <li>- Meetings with political parties and members of parliament</li> <li>- Meetings with relevant ministries and other authorities</li> </ul>	<ul style="list-style-type: none"> <li>- Transparency (No requirements for ESG behaviour yet).</li> <li>- A wave of incoming ESG regulation requires new expertise</li> <li>- Short-term costs to mitigate compliance risk</li> <li>- Life insurance and pension regulation</li> <li>- Capital requirements</li> </ul>	<ul style="list-style-type: none"> <li>- Monitoring development in legal frameworks concerning ESG</li> <li>- Monitoring ESG risk</li> <li>- Outcome of regulatory processes</li> </ul>
Public opinion / NGO	<ul style="list-style-type: none"> <li>- Frequent contact with NGOs, academics and journalists</li> <li>- Engagement with companies</li> <li>- Meetings and telephone conferences</li> <li>- Proactive and reactive interaction with media</li> <li>- Quarterly results</li> <li>- Collaborations</li> <li>- NGO reports</li> <li>- Collaborative projects</li> <li>- Social media</li> </ul>	<ul style="list-style-type: none"> <li>- How can the financial sector contribute to the green transition?</li> <li>- Transparency</li> <li>- Consequences of geopolitical changes and climate change</li> <li>- Climate and nature</li> <li>- Partnerships</li> <li>- Knowledge</li> <li>- Circular economy</li> <li>- Regulations</li> <li>- Value chain perspective</li> <li>- Human rights</li> </ul>	<ul style="list-style-type: none"> <li>- Media presence</li> <li>- Reports</li> <li>- Relations with relevant organizations and their understanding of Storebrand's POV</li> <li>- Monthly trackers on brand awareness</li> <li>- Analysis on marketing campaigns – attention, decoding of message and sender ID</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>- Annual supplier survey</li> <li>- Meetings and telephone conferences</li> </ul>	<ul style="list-style-type: none"> <li>- Climate neutrality</li> <li>- Diversity and inclusion</li> <li>- Compliance and risk</li> <li>- Sourcing</li> <li>- ESG weighting in tenders</li> </ul>	<ul style="list-style-type: none"> <li>- Annual survey</li> </ul>
Nature	<ul style="list-style-type: none"> <li>- Assessment of impacts</li> <li>- Active ownership</li> <li>- Exclusion of companies based on screening criteria</li> </ul>	<ul style="list-style-type: none"> <li>- Climate change</li> <li>- Biodiversity and ecosystems</li> <li>- Resource consumption</li> </ul>	<ul style="list-style-type: none"> <li>- Assessment of impacts</li> </ul>

12) Employee engagement surveys in Peakon are conducted on a bi-weekly basis to measure well-being, commitment to work tasks, perception of sustainability and the experience of self-determination, amongst others. The results are followed up by the group management regularly and are an important part of the manager evaluation processes

## 6. Appendix

### 6.1 Process

Storebrand's ESG reporting process starts with conducting a materiality analysis. This gives Storebrand a good starting point for identifying the most business-critical topics, and for defining and monitoring key performance indicators. Topics that Storebrand can influence through its direct or indirect business relationships are within the scope of the materiality assessment.

The materiality analysis described in this document has been conducted during spring 2023. The process has involved both qualitative and quantitative input from internal and external stakeholders. It has also included involvement of the executive management and board of directors.

Four different phases were required to conduct the updated materiality analysis:

- Phase 1: Identification of the main impacts, risks and opportunities
- Phase 2: Prioritisation of the most material impacts, risks and opportunities based on the ESRS
- Phase 3: Validation of the material topics by the management and audit committee
- Phase 4: Implementation of the material topics and the integration in annual report

The analysis has used the existing materiality analysis as a starting point, and during the process both the stakeholder dimension and the material themes and topics have been reviewed and adjusted more in line with the European Sustainability Reporting Standards (ESRS) as required in the incoming reporting regulations. The material topics will be reviewed annually.

#### 6.1.1 Phase 1: Identification of the main impacts, risks and opportunities

Qualitative interviews with Storebrand Group employees have been the main source of information in the materiality analysis. The employees are in contact with all our main stakeholders on

a regular basis. Therefore, they have a holistic view and relevant insights of the material topics for each of them. Through continuous dialogue with multiple parties within each stakeholder group, our employees are also able to aggregate the individual opinions from unique stakeholders into trends and general takeaways.

Qualitative interviews with 30 employees representing each of the stakeholder groups have been conducted in the process. The employees interviewed are working within B2B sales, B2C sales, institutional customers sales, investor relations, HR, risk, public relations, communications and asset management. They are working in both Norway and Sweden.

In addition to internal interviews, we have conducted two external interviews in order to verify insights and ensure an outside-in perspective on our material topics. The prioritized stakeholder groups interviewed externally have been NGOs representing a large group of business partners and/or customers. The other stakeholders are well covered through proxy insights and e.g. formalized surveys, public procurements, regulations etc. "Employees" has been covered in the interviews with current employees. The interviews with external parties were conducted after the internal interviews to be able to verify and discuss the results.

The input from the interviews was an important source of information used to assess and identify the main impacts, risks and opportunities (IRO) in Storebrand. The analysis of the IROs was based on the ESRS overview of ESG topics.<sup>13)</sup> The IROs were then identified by business areas; insurance, banking, asset management as well as own operations to consider the Group's diverse business activities and companies. An initial list of material topics was developed based on the interviews and a review of the following sources including:

- External sources: stakeholder dialogue, regulatory developments, megatrends, ESG-standards, ESG-ratings.
- Internal sources: Storebrand's corporate strategy, Storebrand's risk assessment, Pillar 3-reports, guidelines for sustainability.

13) Draft European Sustainability Reporting Standards. ESRS 1 General Requirements. Annex B: <https://www.efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2FSiteAssets%2F06%2520Draft%2520ESRS%25201%2520General%2520requirements%2520November%25202022.pdf>

### 6.1.2 Phase 2: Prioritisation of the most material impacts, risks and opportunities based on the ESRS

In order to determine and prioritise the most material topics, the initial list of topics was guided by the perspectives of double materiality and assessed along two dimensions: Financial materiality and Impact materiality. We also considered 'pre-financial' information (dynamic materiality), that are material to the society and environment and therefore may become financial material for the company in the future. A sustainability matter meets the criterion of double materiality if it is material from the impact perspective or the financial perspective or both.

In addition to the qualitative input gathered through the interviews, we collected quantitative input. The quantitative input was

used to map the material topics in a matrix based on impact materiality and financial materiality for the whole business. The identified impacts, risks and opportunities (IRO) were assessed based on criteria according to the ESRS. Which criteria are to be used per IRO depends on the classification, for example the likelihood of impact is only assessed if an impact is potential.

The identified impacts, risks and opportunities were evaluated according to the criteria on a scale of 0-5. Each criterion has descriptive texts to ensure consistent evaluation. See figure below.

All valuations have been done both from both the stakeholder perspective and the business perspective.

<b>Scale</b> How significant is the impact?	<b>Scope</b> How widespread is the impact?	<b>Remediability</b> How difficult is it to reverse the impact?	<b>Likelihood</b> How probable is the impact likely to occur?
<b>5</b> Absolute	<b>5</b> Global/total	<b>5</b> Not remediable/reversible	<b>5</b> Very likely (>50%)
<b>4</b> High	<b>4</b> Widespread (value chain)	<b>4</b> Very severe or long-term	<b>4</b> Likely (40%)
<b>3</b> Medium	<b>3</b> Medium	<b>3</b> Difficult or medium-term	<b>3</b> Rather unlikely (25%)
<b>2</b> Low	<b>2</b> Concentrated (Storebrand)	<b>2</b> With effort (time & cost)	<b>2</b> Unlikely (12,5%)
<b>1</b> Minimal	<b>1</b> Limited	<b>1</b> Relatively easy/short term	<b>1</b> Very unlikely (5%)
<b>0</b> None	<b>0</b> None	<b>0</b> Very easy to remedy	<b>0</b> None (<1%)

### 6.1.3 Phase 3: Validation of the material topics by the management and audit committee

Anchoring the process was important to ensure feedback, reviews and quality assurance of the priorities that have been set, and to include the various stakeholders in the Group who are responsible for Storebrand's impact, risks and opportunities. This included valuable input from Risk and Strategy units.

The results of the materiality analysis were presented to various management groups (B2B, B2C, CFO, Asset Management), Executive Management and the Audit Committee to get iterative feedback and validation of the process. Finally, the Audit Committee gave their final input and validated the chosen material topics.

### 6.1.4 Phase 4: Implementation of the material topics and the integration in annual report

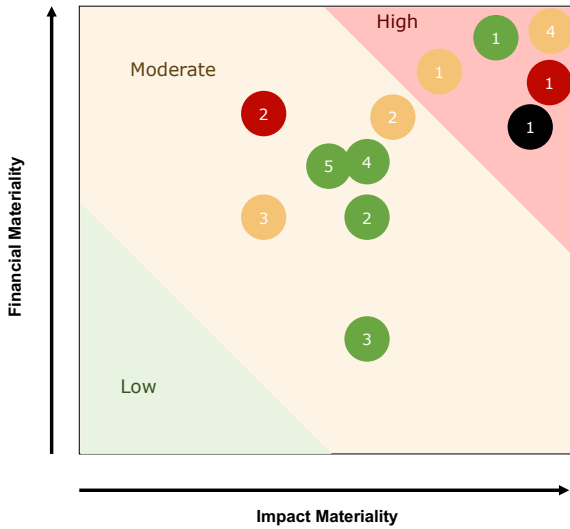
The final phase of implementing the material topics is to integrate the results into the next annual report. We manage and monitor material topics through the implementation of our strategy, risk and business plan. Progress is monitored regularly through business reviews and communicated in our and annual reports.

Storebrand's most material topics will shape the structure of the next annual reporting. The management report will need to include both financial and non-financial information as required by the CSRD. Every material topic will have to include information about IROs with additional qualitative descriptions along with KPIs with short, medium and long-term targets. The structure of the report will also be aligned with the chosen material topics, segmented after ESG.

The ESRS reporting requirements were dependent on the results of the materiality analysis and this will be used as the foundation for the structure of the report. Going forward we will continue to review any amendments to the regulation and map whether we have any gaps related to the standards associated with our material topics. This review will occur annually, and we will perform a gap-analysis whenever we choose new material topics. We will adjust and continue to improve our material topics. We will also delegate responsibility for complete and efficient reporting.

## 6.2 Overview of changes in material topics

### 6.2.1 Materiality matrix 2023



#### Environment

- 1 Climate change
- 2 Pollution
- 3 Water and marine resources
- 4 Biodiversity and ecosystems
- 5 Resource use and circular economy

#### Social

- 1 Own Workforce
- 2 Workers in the value chain
- 3 Affected communities
- 4 Consumers and end-users

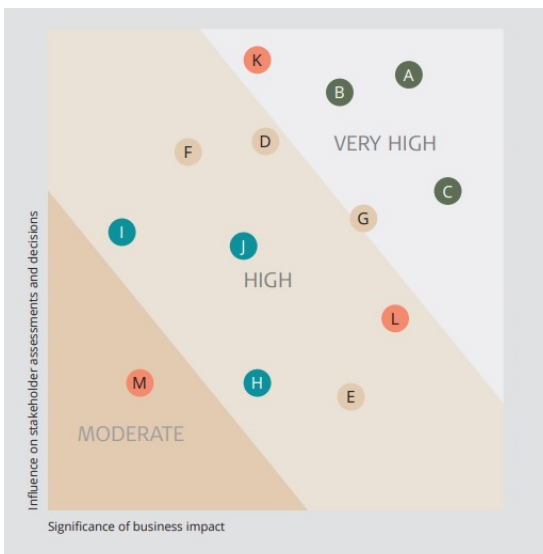
#### Governance

- 1 Business Conduct

#### Entity-specific material topic

- 1 Sustainable Finance
- 2 Financial Inclusion

### 6.2.2 Materiality matrix 2019



#### Financial capital and investment universe

- A Competitive returns to shareholders and customers
- B Driving force for sustainable investments
- C Active ownership

#### Customer and community relations

- D Financial freedom in all stages of life
- E Engaging, relevant and responsible advice
- F Digital trust
- G Simple and digital customer experiences

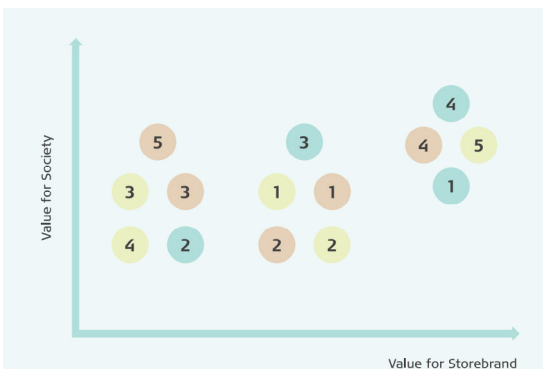
#### Our people

- H A culture for learning
- I Committed and courageous employees
- J Diversity and equal opportunities

#### Keeping our house in order

- K Working against corruption and financial crime
- L Sustainable practices throughout value chain
- M Corporate citizenship

### 6.2.3 Materiality matrix 2017



#### Financial capital and our investment universe

- 1 Deliver returns to owners
- 2 Driving force for sustainability and restructuring
- 3 Active ownership
- 4 Investing in the winners of tomorrow



#### Our people and systems

- 1 Good environmental standards and working conditions throughout the entire value chain
- 2 Exploit the opportunities presented by the digital transition
- 3 Diversity and equal opportunities
- 4 Purpose-driven culture and committed employees
- 5 Organisation with the ability to learn and adapt



#### Customers and community relations

- 1 Good money in a sustainable manner
- 2 Information security and digital trust from the customer
- 3 Appealing and simple customer experiences
- 4 Involvement in own pension and savings
- 5 Relevant and responsible customer advice

