

2018

CORPORATE RESPONSIBILITY
REPORT





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in Sampo Group



Corporate Responsibility Report 2018

Introduction

About the Report

This is Sampo plc's Corporate Responsibility Report for the year 2018, published on 8 May 2019. The report has been prepared to meet the regulatory requirements on non-financial information in accordance with Chapter 3a, Section 5 of the Finnish Accounting Act and EU Directive 2014/95/EU. The purpose of the report is to be transparent and disclose Sampo Group companies' business and its impact on environmental, social, and governance issues. Sampo publishes its corporate responsibility report on an annual basis, as soon as possible after the publication of the Board of Director's Report and Financial Statements, but no later than 30 June. The report is only available in digital format.

The Scope of the Report

The report refers to the period from 1 January to 31 December 2018, unless otherwise stated. The reporting scope covers Sampo plc and its subsidiaries If P&C Insurance Holding Ltd (publ) (If), Mandatum Life Insurance Company Ltd (Mandatum Life),

and Topdanmark A/S (Topdanmark). Reporting on Topdanmark differs slightly from that on If and Mandatum Life, because it is listed on the Nasdaq Copenhagen and not fully owned by Sampo. Sampo's associated companies Nordea Bank AB (publ) (Nordea) and NDX Intressenter AB (NDX) are outside the scope of the report. Information on corporate responsibility at Nordea is available at www.nordea.com/en/sustainability.

The report provides group-level information, with some exceptions depending on the accessibility of the data due to a lack of comparable information between subsidiaries or the nature of the Group and the Group companies. The report follows the same structure as Sampo's previous corporate responsibility report for the year 2017, published on 7 June 2018. The amount of information has increased slightly this year, for example due to increased data availability, and the goal is to develop the report year-on-year. However, there are no significant changes to material topics or topic boundaries. Further information on the scope and the calculation methods is available in the appendix **Calculation Principles (page 86)**.

Reporting Framework and Assurance

Sampo has used the GRI Standards as guidance for the report and as basis for the reported indicators. Sampo references the GRI Standards framework when possible. Indicators have been calculated in compliance with GRI Standards as far as Sampo and the Group companies have been able to generate data according to the Standards' requirements and as far as the requirements are reasonable for the Group. Significant exceptions are mentioned in connection with each indicator. The GRI index is available at the end of this report.

The report has not been verified by an auditor or any other external party. Acquiring third-party verification has been discussed internally, and it was concluded that verification of the corporate responsibility report is part of Sampo's future development plans. However, there is no timeframe yet set for acquiring verification.



Preface

The year 2018 was a year of decisions for Sampo in terms of corporate responsibility. The most important decision that we made was the decision to strengthen Sampo's group level focus on corporate responsibility going forward. We identified areas that we want to develop further, and we made plans that aim to drive corporate responsibility within Sampo Group. This is in the interests of and expected by the Group's various stakeholders. It also supports our business.

To begin with, we decided to restructure Sampo plc's corporate responsibility organization. As a result, the corporate responsibility unit now operates under the Group CFO as of January 1, 2019. In addition, we appointed a Head of Corporate Responsibility, to be responsible for the development and coordination of corporate responsibility on a group level. In each subsidiary, various business areas, operational departments, and units continue to be actively involved in the Group's corporate responsibility endeavors.

In 2018, a decision was also made to establish a group level Corporate Responsibility Steering Group and a Corporate Responsibility Program for Sampo Group. The idea of the cross-functional executive-level steering group is, among other things, to provide a management perspective regarding corporate responsibility, to act as a platform for information exchange between the Group companies, to set a direction for corporate responsibility





work, and to make decisions on future development areas. The aim of the Corporate Responsibility Program is to direct the corporate responsibility activities of the Group toward the most material topics in a structured manner. It will provide a group-level approach, KPIs, and targets for corporate responsibility. Developments regarding the steering group and the program can be expected during 2019, once we get both up and running.

The year 2018 was centered around decisions, but there were concrete corporate responsibility-related actions, as well, which I would like to highlight. One example is our work regarding investments. We believe that ESG issues have an impact on the long-term performance, risks, and value of all companies. During the year, we supplemented the investment policies of the Group companies to strengthen the role of ESG considerations in investment analysis and decision-making. The investment policies were updated to include instructions on how to take ESG issues into account in the context of direct investments by using ESG risk ratings and an internal traffic light model. This is a great example of the developments, which we will continue in the coming years. Another concrete step was increasing board level focus on corporate responsibility by adding questions related to the matter to the self-evaluation of Sampo plc's Board of Directors.

At Sampo Group, we believe that success is driven by a motivated and driven workforce. This is built upon the assumption that employees who are encouraged in their professional development and supported to maintain a

healthy work-life balance perform better. The good results of the employee satisfaction surveys of 2018 show that Sampo Group companies have succeeded well in inspiring and engaging their employees.

The process of developing corporate responsibility is ongoing. In the future, we want to further increase transparency and develop group level disclosure on the most material environmental, social, and governance-related topics. Another aim is to really kick off the group level corporate responsibility work. At the same time, If, Topdanmark, and Mandatum Life will continue to work on their own corporate responsibility endeavors, simultaneously supporting the work of the Group. During 2019, we will also review closely initiatives and signatories, such as, the UN PRI and UN Global Compact, and study potential group level involvement.

I hope again that you find Sampo Group's Corporate Responsibility Report helpful in describing how Sampo views corporate responsibility and closely related matters. I would also like to invite you to read the corporate responsibility reports of our subsidiaries at www.sampo.com/year2018.

Kari Stadigh

Group CEO and President



Sampo Group in Brief

Sampo Group consists of the parent company Sampo plc and its subsidiaries If, Mandatum Life, and Topdanmark. Nordea, the Nordic banking group, and NDX, which was established for the takeover of Nordax Group AB, are Sampo plc's associated companies. As at 31 December 2018, Sampo plc held 21.2 per cent of the shares in Nordea and 36.25 per cent of the shares in NDX.

Sampo plc

Sampo plc is the parent company of the Group, and it administers the insurance subsidiaries. Sampo plc also coordinates Sampo Group's investment operations, capital allocation, risk management, group accounts, investor relations, and corporate responsibility, as well as legal and fiscal matters. Sampo's office is located in Helsinki, and it employs approximately 60 people.

If

If is the largest property and casualty insurer in the Nordic region. If's headquarters is located in Sweden, and the company operates through branch offices in Norway, Finland, and Denmark. In addition, If operates in all the Baltic countries and has offices in Germany, France, the Netherlands, and the UK. If's operations are divided into four business areas: Private, Commercial, Industrial, and Baltic. If's market share amounts to approximately one fifth of the Nordic market. If has approximately 6,600 employees, and it is a fully owned subsidiary of Sampo plc.

Topdanmark

Topdanmark is the second largest non-life insurance company and the fifth largest life insurance company in Denmark. The company focuses on the private, agricultural, and SME markets. Topdanmark's headquarters is located in Ballerup and the company has approximately 2,300 employees. Topdanmark's shares are listed on the Nasdaq Copenhagen. As at 31 December 2018, Sampo plc owned 46.7 per cent of the company.

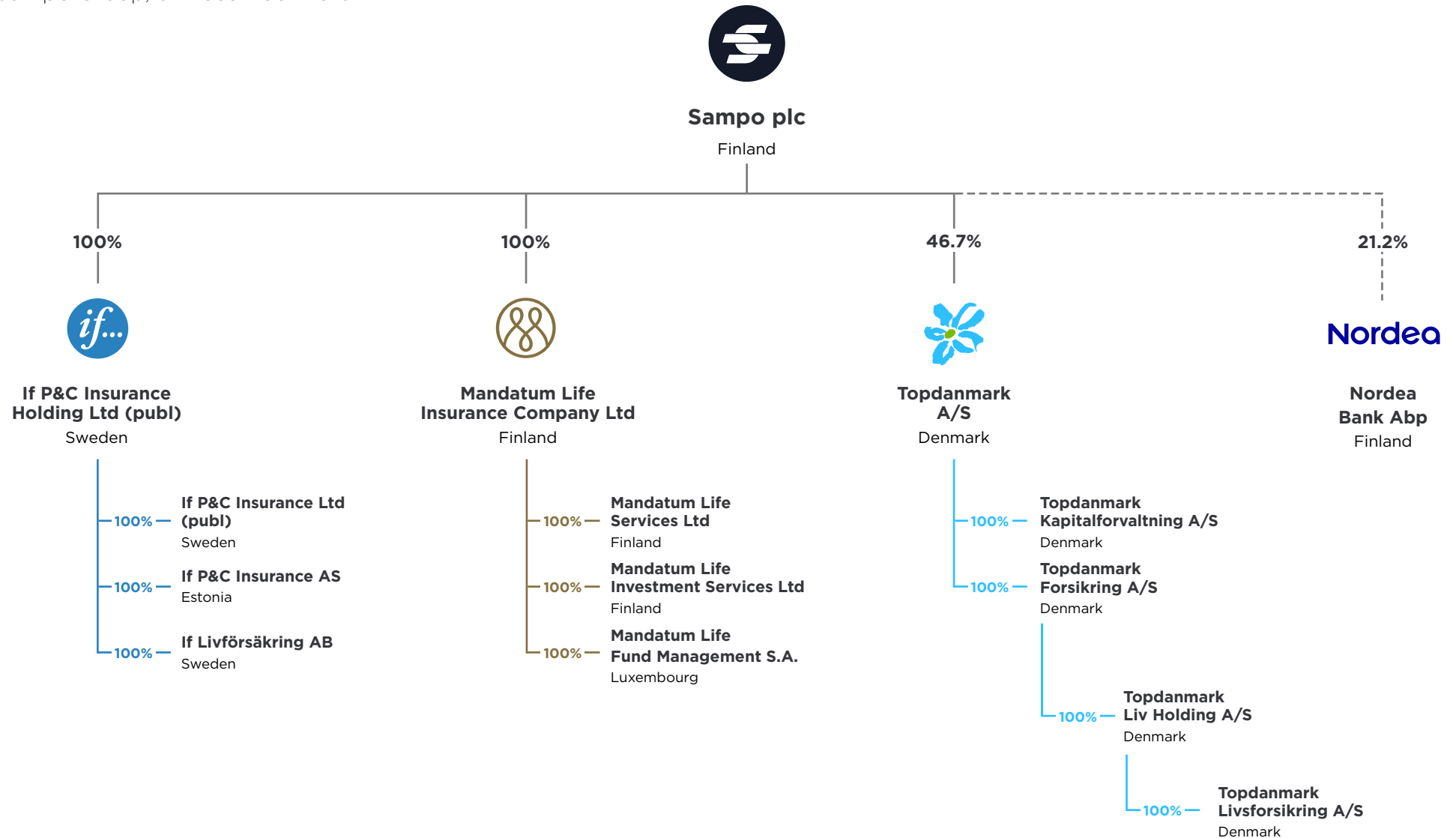
Mandatum Life

Mandatum Life offers services in wealth management, rewards, and personal risk insurance. The company has an estimated 300,000 private and 20,000 corporate customers. Mandatum Life's headquarters is located in Helsinki, Finland. In addition to Finland, Mandatum Life operates in all the Baltic countries. Mandatum Life has approximately 530 employees, and it is a fully owned subsidiary of Sampo plc.



Legal Structure

Sampo Group, 31 December 2018





Group Structure and Business Model

Sampo as a parent company manages its subsidiaries and associated companies independently of each other. The independent sub-groups have their own infrastructures and management, as well as operative processes. In instances where the subsidiaries and the associated companies cooperate, cooperation is conducted in a similar way to that with any third-party.

The parent company's main management tool is the work conducted on the companies' boards of directors. The boards of If and Mandatum Life consist of Sampo plc management. With regard to wholly owned subsidiaries, Sampo gives more exact guidance on how activities should be organized in terms of group-wide principles, and there is a frequent dialogue between Sampo and the subsidiaries in major operative issues. In addition, Sampo monitors performance, risks, and capitalization at detailed levels.

In Topdanmark, the chairman and two other board members are from Sampo Group's management and they constitute three of the total six board members elected by the annual general meeting. Topdanmark has also adopted Sampo's main group-wide principles and policies. The dialogue between Sampo and Topdanmark focuses primarily on performance, risk, and capitalization reporting, and is not as detailed as between Sampo and its wholly owned subsidiaries.

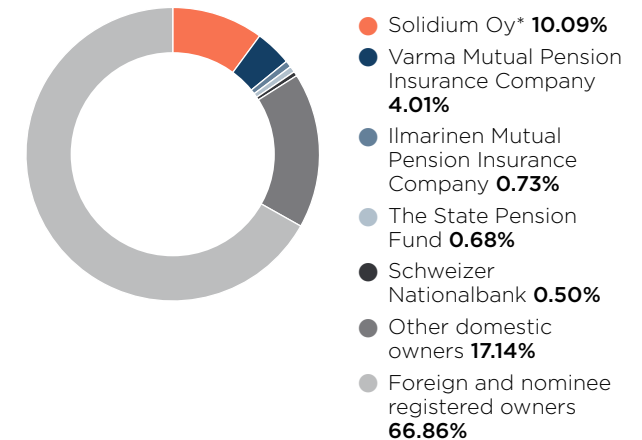
Nordea and NDX are associated companies and not controlled by Sampo. Therefore, their corporate responsibility is not covered in Sampo Group's Corporate Responsibility Report. More information on Sampo Group's structure and business model is available in the **Risk Management Report 2018** (www.sampo.com/year2018).

Shareholder Structure

Sampo has a diversified shareholder base and the major shareholders have owned their holdings for many years. Foreign and nominee registered owners make up the largest segment. The majority of these owners are from the United States and the UK, at approximately 20 per cent each. Otherwise, the foreign and nominee registered owners are spread globally. Further information on Sampo's shareholders can be found on Sampo's website www.sampo.com/investors/shareholders.

Shareholder Structure

Sampo plc, 31 December 2018



* Solidium Oy is entirely owned by the Finnish state.

Key Figures

Sampo Group

	2018	2017
Profit before taxes (EURm)	2,094	2,482*
Profit for the period (EURm)	1,778	2,239
Solvency ratio (%)	147	154
Return on equity (%)	7.5	17.1
Earnings per share (EUR)	3.04	3.96
Net asset value per share (EUR)	20.60	25.37
Average number of employees (FTE)	9,509	9,364

*Includes a non-recurring item of EUR 706 million related to the change in Topdanmark's accounting treatment in Sampo Group's accounts.



Risk Management in Sampo Group

Sampo Group publishes annually an extensive report on risk management, in which Sampo Group's risks, risk management process, and risk governance are explained in detail. The **Risk Management Report 2018** is available at www.sampo.com/year2018.

Sampo Group's Risks

Sampo Group companies operate in business areas in which the pricing of risks, the active management of risk portfolios, and sound customer service are specific features of value creation. Hence, common risk definitions are needed as a basis for business activities. In Sampo Group, the risks associated with business activities fall into three main categories: business risks, reputational risk, and risks inherent in business operations.

A business risk is the risk of losses due to changes in the competitive environment and/or a lack of internal operational flexibility. Unexpected abrupt changes, or already identified but internally neglected trends, can cause larger than expected fluctuations in profitability when volumes, margins, costs, and capital charges change. In the long run, they may also endanger the existence of Sampo Group's business models. External drivers behind such changes are varied and include, for instance, general economic development, changes in commonly shared values, developments in the institutional and physical

environment, and technological innovations. Because external drivers are inter-connected, customer preferences and demand can change unpredictably, and there may be a need to change regulations as well. Currently, the themes of sustainable business practices in general and especially the issues related to the environment, society, and governance are changing the preferences and values of different stakeholders. As a result, the competitive environment is also changing in different ways and forcing Sampo's risk management to acknowledge these topics. If a company's internal understanding of necessary changes, or its willingness and ability to act accordingly, is inadequate and competitors are more able to meet the altered expectations of customers and regulations, the company is highly exposed to business risk.

Reputational risk is often a consequence of a materialized operational or compliance risk and often manifests as a deterioration of reputation among customers and other stakeholders. As the roots of reputational risk are varied, the tools to prevent it must be diverse and embedded within the corporate culture. These core values are reflected in how Sampo deals with corporate responsibility issues and its core stakeholders, and how Sampo Group has organized its corporate governance system.

In its investment operations and underwriting, Sampo Group is consciously taking certain risks in order to

generate earnings. These earnings risks are carefully selected and actively managed. Underwriting risks are priced to reflect their inherent risk levels, and the expected return on investments is compared to the related risks. Successful management of underwriting risks and investment portfolio market risks is the main source of earnings for Sampo Group companies.

In general, from the viewpoint of corporate responsibility, risks to Sampo Group may arise, for instance, as a consequence of internal or external misconduct, insufficient human resources management, defects in operating processes, or insufficiencies in operating policies related to customers, products, or business activities. During Q1/2019, Sampo plc initiated a group level project regarding TCFD (Task Force on Climate-related Financial Disclosures). The aim is to define the prerequisites for applying the TCFD recommendations at Sampo Group.

Risk Governance

The Board of Directors of Sampo plc is responsible for ensuring that the Group's risks, including the environmental, social, and governance-related risks, are properly managed and controlled. The Board of Directors defines financial and capitalization targets for the subsidiaries and approves group-level principles, which steer the subsidiaries' activities. The Audit Committee is responsible, on behalf of the Board of Directors, for the preparation of Sampo Group's Risk Management Principles and other



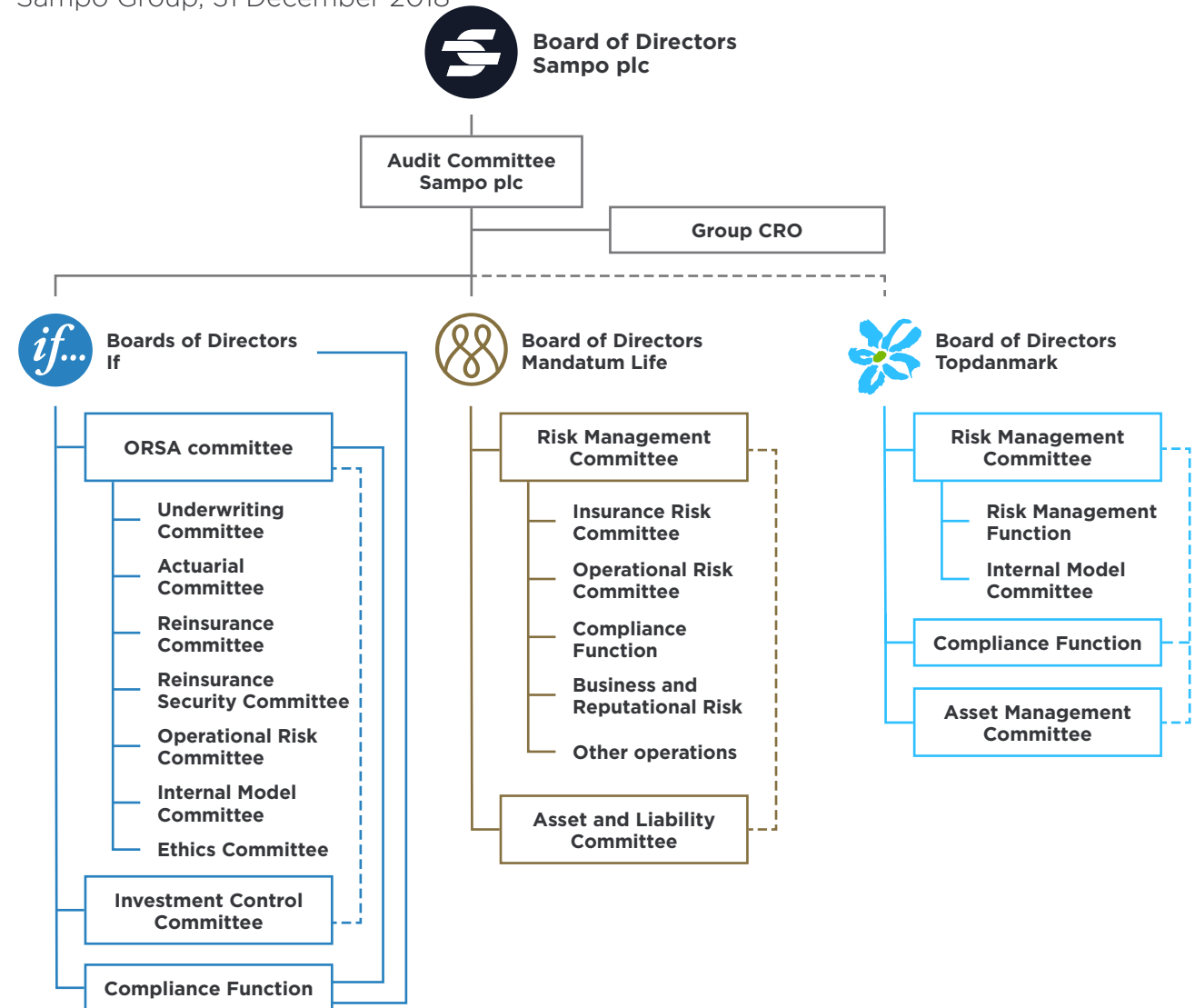
related guidelines. The Audit Committee shall ensure that the operations are in compliance with these guidelines, control Sampo Group's risks and risk concentrations, and control the quality and scope of risk management in the Group companies. The Group Chief Risk Officer (CRO) is responsible for appropriate risk management at group level. The boards of directors of If, Topdanmark, and Mandatum Life are the ultimate decision-making bodies of the respective companies and have overall responsibility for the risk management processes at If, Topdanmark, and Mandatum Life, respectively.

CASE EXAMPLE: ANALYSIS OF CORPORATE RESPONSIBILITY RELATED RISKS AT IF

In 2018, If organized an internal workshop, during which risks linked to climate, supply chain, material usage, work environment, diversity, gender equality, and responsible business practices were specifically analyzed. The results from the workshop were integrated into If's risk management system through, for example, development of relevant risk assessment processes. During 2019, the work to further improve the integration of sustainability risks into the company's general risk management system continues.

Risk Management Organization and Reporting Structure

Sampo Group, 31 December 2018





Compliance in Sampo Group

Adherence to applicable laws, regulations, rules, industry standards, and internal guidelines, or in other words, compliance, is an established principle of Sampo Group's corporate culture, manifested in the Group's Compliance Principles and Code of Conduct, approved by Sampo plc's Board of Directors. The Compliance Principles ensure that compliance activities are properly organized in all Group companies and that the business organization is capable of responding to the changing requirements of the business environment. Since the different Group companies operate in different business lines in various national jurisdictions, the Compliance Principles have been defined to facilitate the deployment of a set of tools and procedures to best serve the specific needs of each company and local operating environment, and to ensure full compliance without jeopardizing operational efficiency.

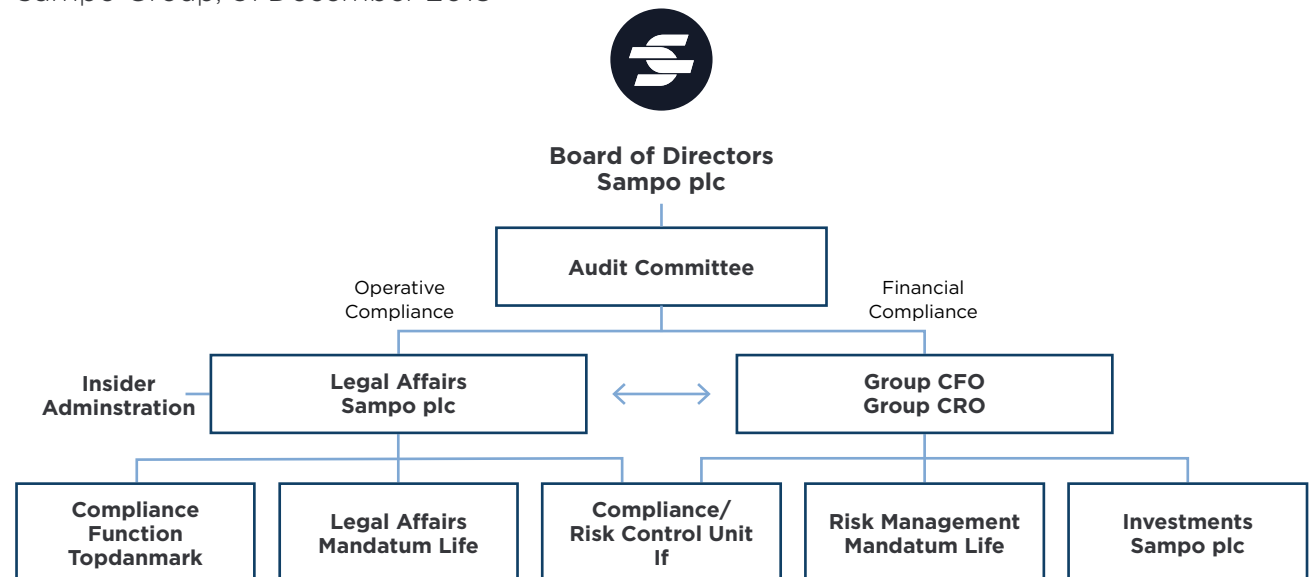
According to the principles, the subsidiary companies are permitted to organize their compliance activities operationally and organizationally as deemed pertinent and effective. All Sampo Group companies must have resources, systems, and processes in place to ensure that

they are complying with all applicable laws, regulations, codes of conduct, and standards of good practice, as well as broader company values, in order to reduce the risk of legal or regulatory sanctions, financial losses, or loss of reputation. In order to be compliant, it is essential that company-specific compliance programs contain a clear

plan of how applicable rules and standards are communicated to personnel. Furthermore, all training is matched with and tailored to the tasks of the audience. Compliance issues are also regularly reported to the Board of Directors of Sampo plc and its Audit Committee.

Compliance Organization and Reporting Structure

Sampo Group, 31 December 2018





Corporate Responsibility in Sampo Group

Sampo plc and the whole Sampo Group is aware of its corporate responsibility, and all Group companies are dedicated to being responsible corporate citizens. Sampo is committed to developing the corporate responsibility activities and targets of the Group's operations, as well as the related measurements and reporting. This is in the interests of and expected by the Group's various internal and external stakeholders. Through its products and services, Sampo Group, for its part, aims to contribute to the well-being and safety of society.

Corporate responsibility in the context of this report refers to the voluntary and involuntary obligations that Sampo and the Group companies have toward not only their shareholders, but also all their stakeholders. Commitment to corporate responsibility entails that Sampo takes responsibility for the social and environmental impacts of its business operations.

Approach to Corporate Responsibility

Sampo Group's general governance rests on the idea that Sampo plc, as the parent company of the Group, provides subsidiaries with a framework of general principles within which the parent company expects the subsidiaries to organize and carry out their businesses. These principles are Sampo Group's Code of Conduct, Risk Management Principles, Remuneration Principles, and Compliance Principles, which form the core of

Sampo Group's internal governance framework. These group-level guiding principles also set the general tone for corporate responsibility within Sampo Group.

During 2018, to strengthen the focus on corporate responsibility on a group-level, a decision was made to establish a Corporate Responsibility Steering Group and a Corporate Responsibility Program for Sampo. As corporate responsibility covers a wide range of topics relevant for key business operations, it was decided that a cross-functional executive-level steering group would best support the work. The steering group would provide a management perspective, set a direction for corporate responsibility work, and make decisions on future development areas. It would also act as a platform for information exchange between the Group companies, as it is planned to include members from all the subsidiaries.

The aim of the Corporate Responsibility Program, on the other hand, is to direct the corporate responsibility activities of the Group toward the most material topics in a structured manner. It should provide a group-level approach, KPIs, and targets for corporate responsibility. The program would apply to the entire Sampo Group, including the subsidiaries If, Topdanmark, and Mandatum Life. In addition to the program, the subsidiaries would continue to have the right to engage in their own corporate responsibility activities to match their business purposes. Further developments regarding the steering group and the program can be expected during 2019.

Corporate Responsibility Governance Structure

The Board of Directors of Sampo plc is responsible for and has the ultimate oversight of group level corporate responsibility issues. The board also validates the corporate responsibility report annually. The board has assigned its Audit Committee to monitor Sampo Group's corporate responsibility reporting and activities. During 2018, a couple of corporate responsibility related questions were added to the performance evaluation of Sampo's Board of Directors, to increase the board-level focus on these matters. The self-assessment is independent and completed annually. The results received from the 2018 self-assessment showed that the Board considers corporate responsibility important and, therefore, the work on the topic has further intensified at a group level. To develop and enhance the Board of Directors and its Audit Committee's knowledge of corporate responsibility at Sampo, to create discussion, and to receive feedback to support the work, corporate responsibility was also on the agenda of the Audit Committee meetings during the year.

At the end of 2018, a decision was made to strengthen Sampo's focus on corporate responsibility further. As a result, Sampo restructured its corporate responsibility organization. The Corporate Responsibility function operates under the Group Chief Financial Officer (CFO) as of January 1, 2019. In addition, Sampo appointed a Head of Corporate Responsibility, who reports to the Group CFO. The Head of Corporate Responsibility is responsible



for the development and coordination of corporate responsibility on a group level.

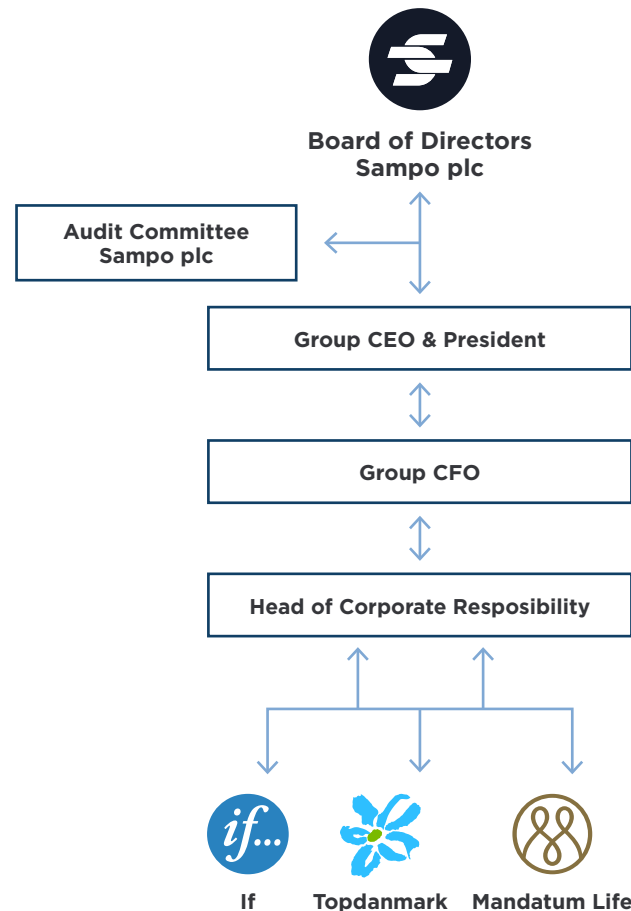
At each subsidiary, various business areas, operational departments, and units are actively involved in the Group's corporate responsibility endeavors. Group-level corporate responsibility reporting is largely based on information provided by the subsidiary companies according to formats and schedules defined by the Group's Corporate Responsibility function. In addition to group-level corporate responsibility governance, it is important to note that each Group company has its own internal governance structures. Information on If and Topdanmark's corporate responsibility governance structures can be found in their respective reports, **If Sustainability Report 2018** and **Topdanmark CSR Report 2018** (www.sampo.com/year2018).

Materiality Assessment

Sampo conducted a materiality assessment process with an external advisor in 2016. In the assessment process, Sampo took into account regulatory requirements regarding non-financial reporting, industry best practices, relevant reporting frameworks such as the GRI Standards, and the views of some of Sampo plc's largest investors and various sustainability rating agencies. Insights gathered from external sources were reviewed and prioritized internally.

Corporate Responsibility Organization and Reporting Structure

Sampo Group, 1 January 2019



The plan was to identify the most material aspects of corporate responsibility for Sampo. The materiality assessment helped Sampo to focus efforts on the most material topics for the Group. Based on the materiality assessment process, five corporate responsibility themes were formulated for the Group: Governance & Business Operations, Employees, Customers, Investments, and Communities. Under each of these themes, the most material corporate responsibility topics were identified. All the themes and topics are covered in more detail in this report.

It is important to note that the materiality assessment was made from Sampo plc's point of view. A materiality assessment from the subsidiaries' perspective could present and prioritize topics differently, as key stakeholder groups may vary and the relation to business can be different. Key stakeholder groups considered for this report include Sampo plc's shareholders, investors, Group personnel, analysts, media, authorities, and ESG rating agencies. Information on If's materiality assessment can be found in the **If Sustainability Report 2018** (www.sampo.com/year2018).



It has been almost three years since the first materiality assessment was completed. As the field of corporate responsibility is moving forward rapidly, and since Sampo has now progressed with the corporate responsibility work on group level, a review of the materiality analysis might become relevant. Some developments on this can be expected during 2019.

Sampo Group's Corporate Responsibility Themes and the Most Material Topics Based on the Materiality Analysis





RESPONSIBILITY IN GOVERNANCE AND BUSINESS OPERATIONS

17

Code of Conduct

19

Anti-Corruption
and Bribery

20

Anti-Money
Laundering and
Counter-Terrorism
Financing

22

Data Privacy

24

Information
Security

26

Human Rights

28

Environmental
Impacts of
Group Operations



Responsibility in Governance and Business Operations

Sampo considers good governance to be one of the preconditions for ensuring corporate responsibility throughout the Group's activities and essential to maintaining relationships with the company's stakeholders. Sampo Group's parent company, Sampo plc, as a publicly listed company, complies fully with the Finnish Corporate Governance Code, the rules of the Nasdaq Helsinki, applicable securities market legislation, and authority regulations based on such legislation.

In 2018, Sampo complied in full with the Finnish Corporate Governance Code issued on October 1, 2015 by the Securities Market Association, effective from January 1, 2016. Acting in compliance with the Corporate Governance Code, Sampo published a separate **Corporate Governance Statement** on its website www.sampo.com/statement in fulfillment of the requirement referred to in the Finnish Securities Markets Act. For further information on governance at Sampo Group, please refer to the Governance section of www.sampo.com.

Code of Conduct

Sampo Group's Code of Conduct defines how corporate governance is organized at Sampo, how people shall treat each other in the workplace, and the way employees shall serve customers and deal with other stakeholders, such as investors, partners, and authorities. All employees

of Sampo Group are required to comply with the Code of Conduct. Failure to adhere to the code can expose the employee in question, his/her colleagues, and Sampo to reputational, legal, and regulatory sanctions. If inappropriate business or personal conduct that is a potential or actual violation of the Code of Conduct is detected, employees are encouraged to report it to a manager or report it through a whistleblowing channel.

During 2018, training on dilemmas related to the Code of Conduct was conducted within the Group. The training was launched at If, Mandatum Life, and Sampo plc. The aim is that all employees of the companies should be trained in the code. In 2018, all Mandatum Life employees completed the training and it continues to be available for employees of If and Sampo. When updates to the Code of Conduct follow in the future, additional training will be provided to all employees, when considered necessary.

Whistleblowing

Sampo plc and its subsidiaries have their own whistleblowing channels where employees and relevant interest groups can give notifications of cases in which they have reasonable grounds to suspect that somebody employed by Sampo or any of the Group companies has breached legislation, regulations, or other rules relevant to the financial services industry. All whistleblowing notifications are investigated promptly in a confidential manner, while protecting the identity of the whistleblower.

If

If has a whistleblowing channel for suspected infringements of financial market regulations and anti-money laundering and counter-terrorism financing regulations. In addition, If has a whistleblowing routine in place in which other serious misconduct or negligence, such as unethical behavior, may be reported anonymously and confidentially. The whistleblowing channels are available to all employees in the local language on the If intranet. Reporting can take place 24/7.

If a whistleblowing report indicates the violation of external laws or regulations, and/or harmful violation of internal rules, the need for further investigation is evaluated in accordance with If's Internal Investigation Instruction, and if necessary, conducted by If's Investigation Unit. If there is a good reason to suspect criminal activity and such suspicions have a factual basis, the matter will be referred to the police. In 2018, five cases were reported to the police.

To supplement the whistleblowing channels, If also has an incident reporting system (i.e. a so-called Oops! reporting system). Oops! incident reporting is a channel for collecting statistics, and identifying and following up on risks. An Oops! incident is an event that either has occurred or was a near miss, and which had or could potentially have had a negative effect on If's operations, If's financial position, If's customers, the public's confidence in If, or the safety of If's employees. Incidents



reported through this system are reviewed and prioritized at operational level, then escalated to If's Risk Committee and finally to the Board of Directors, when necessary.

If requires that all employees, as well as consultants and partners, follow the company's Ethics Policy and ethical values. If organizes training courses, internal seminars, and discussions on business ethics at individual workplaces. New employees are informed of the policy and confirm that they have understood and undertake to follow it. Employees, as well as consultants, are reminded regularly of their obligations. If has an Ethics Committee that is an advisory and preparatory body to the CEOs in the respective If Group companies, which gives recommendations on ethical issues.

Topdanmark

Topdanmark has a whistleblower channel, which is intended to handle criminal and/or very serious matters relating to Topdanmark. These include, for example:

- overcharging, fraud, bribery, deception, and forgery
- matters relating to accounting, internal control, and corruption
- matters of serious breach of occupational safety
- matters of importance to Topdanmark Group as a whole
- matters that could be decisive for individuals' lives and/or health.

The channel is intended to offer Topdanmark's employees and others connected with Topdanmark, such as existing and previous alliance partners and previous employees,

the opportunity to report matters that could be in conflict with Topdanmark's policies or relevant legislation. Topdanmark's whistleblower scheme has been approved by the Danish Data Protection Agency.

The whistleblowing channel was proactively communicated to all employees of Topdanmark through the company intranet when it was established. Information and a link to the reporting channel is now available on the front page of the intranet in Danish. On Topdanmark's public website, the information is available in Danish and English. The whistleblowing channel is available 24/7. The system is internally managed by Topdanmark's general counsel and supervised by the internal auditor.

Topdanmark has a thorough reporting procedure ensuring that reports are handled confidentially, that no one other than the relevant persons in Topdanmark are informed and involved, that relevant employee procedures are taken into account, and that the police and other authorities are involved, where relevant. In 2018, no whistleblowing notifications were reported at Topdanmark.

According to the Danish Executive Order, Section 71 on management and control of insurance companies, Topdanmark shall monitor and report on operational risks. Therefore, in addition to the whistleblowing channel, Topdanmark has an incident reporting system for topics that do not fall under the whistleblowing routine. The incidents are collected in a database and communicated onward in the management system, when and if relevant, in order for the organization to learn from the mistakes.

Mandatum Life

Mandatum Life has a whistleblowing channel available for the employees for suspected infringements of financial market regulations and anti-money laundering and anti-terrorist financing regulations. The channel is managed independently by the Legal and Compliance unit. All reports are treated as confidential and investigated thoroughly by the unit. As the procedures ensure confidentiality, employees may use their own names in the reports, although they also have the option to provide anonymous reports. In 2018, no whistleblowing notifications were reported at Mandatum Life.

To supplement the whistleblowing channel, Mandatum Life has implemented an incident reporting system for topics that do not fall under the whistleblowing channel. Incidents reported through this system are first reviewed at operational level and then handled as part of the Operational Risk Management framework and finally reported to Mandatum Life's Board of Directors, when necessary. Employees have been instructed in using the whistleblowing channel and the incident reporting system.

Sampo plc

The parent company Sampo plc has a whistleblowing channel for reporting cases of market abuse according to Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (MAR). In 2018, no whistleblowing notifications were reported at Sampo plc.



Anti-Corruption and Bribery

At Sampo Group, it is believed that integrity is the core of sustainable business. Corruption and bribery, as well as dishonest and unfair competition, distort the markets and prevent healthy economic development. In general, the Nordic countries have the lowest perceived levels of corruption in the world. The Nordic countries are also the main area of business for Sampo Group companies. In addition, the Group companies have operations in the Baltics and small branch offices in Germany, France, the Netherlands, the UK, and Luxembourg. Therefore, it could be stated that corruption and bribery, as such, are not the most critical risk factors for the Sampo Group companies' own operations. However, it should be noted that, through its investments, the Group might have a higher exposure to anti-corruption and bribery. More on investments can be found in the section **Responsibility in Investments (page 66)**.

The Group's Code of Conduct states that Sampo does not accept any form of corruption, bribery, or conduct that could create the appearance of improper influence. All employees of Sampo Group companies must ensure that all payments to third parties are appropriate, for legitimate business reasons, and correctly recorded. At Group level, anti-corruption and bribery are part of the Code of Conduct training. More on Code of Conduct can be found on **page 17**.

If

The work against anti-corruption and bribery derives from If's Ethics Policy, and the policy itself is based on the Swedish Anti-Corruption Institute's (IMM) code against bribery. The Ethics Policy is updated annually, and it contains different educational dilemmas, such as dilemmas on bribery. Employees are informed on the intranet when the policy has been revised. Work against anti-corruption and bribery is also part of If's work to prevent money laundering and terrorist financing. If has controls in place by which If checks whether customers are politically exposed persons or on the EU or UN sanction lists.

In 2018, no incidents were reported related to corruption or bribery at If.

Topdanmark

Topdanmark aims to build a professional and trustworthy business environment, and the company does not tolerate corruption or bribery. Topdanmark joined the UN Global Compact in 2010 and, according to the principles of the Global Compact, businesses should work against corruption in all its forms, including extortion and bribery.

In 2016, Topdanmark conducted an assessment of the company's risk exposure to corruption and bribery. Following the assessment, Topdanmark will focus especially on activities regarding gifts and hospitality involving suppliers and other partners. Topdanmark is confident that the company's employees use their common sense and good judgment when it comes to gifts

and hospitality in relation to customers, suppliers, and other partners. To support its employees, Topdanmark has a policy in place that states when employees may give and receive gifts, and when they are allowed to hold or participate in events. The purpose of the policy is, among other things, to prevent and avoid business decisions being influenced by personal or non-business-related considerations and interests.

In 2018, no incidents were reported related to corruption or bribery at Topdanmark. Further information on anti-corruption and bribery at Topdanmark, and on Topdanmark's work regarding the Global Compact, can be found in **Topdanmark's CSR Report 2018 (www.sampo.com/year2018)**.

Mandatum Life

Sampo Group's Code of Conduct and Mandatum Life's internal code of conduct, Mandatum Life Way, set the overall requirements for anti-corruption and bribery at Mandatum Life. According to the codes of conduct, it is strictly forbidden to give or receive any gifts and/or hospitality that could have an improper influence on employees' or customers' behavior or decisions. During 2018, it was mandatory for all Mandatum Life employees to complete Sampo Group's Code of Conduct e-learning program.

In 2018, no incidents were reported related to corruption or bribery at Mandatum Life.



Sampo plc

In 2018, no incidents were reported related to corruption or bribery at Sampo plc.

Anti-Money Laundering and Counter-Terrorism Financing

The world economy is affected by money that is illegally acquired and used for illegitimate purposes. Large amounts of money are laundered every year, posing a threat to the global economy and its security. Sampo and its subsidiaries are subject to stringent anti-money laundering (AML) and counter-terrorism financing (CTF) regulations, as financial service companies tend to be favored channels through which illicit money is laundered. All Sampo Group companies comply with the applicable local AML and CTF rules and legislation, as well as various sanctions regimes imposed by the United Nations and/or the European Union.

The risk of AML and CTF is more significant in life insurance than in P&C insurance. This is reflected in the legislation, as in Sweden, Denmark, Estonia, Latvia, and Lithuania, AML legislation only applies to life insurance. In Norway and Finland, both life and P&C insurance are covered by the legislation. If's branch offices in France, Germany, the Netherlands, and the UK comply with their respective national AML and CTF legislation.

A defense against money laundering is required by law, but it also goes hand in hand with the insurance business in the sense of good risk selection. As an insurance company, being able to evaluate risks is at the core of business. In order to do that, Sampo Group companies, in some countries, have a legal obligation to know their customers (Know Your Customers, KYC), which means additional processes when working with customers. These obligations are based on legislation intended to, among other things, prevent money laundering, terrorism financing, and financial crimes.

The Sampo Group Code of Conduct and the Sampo Group Guideline for Required Internal Procedures to Prevent Money Laundering and Terrorist Financing set out principles in relation to AML efforts. Neither Sampo nor any of the Group companies enter into business relationships with customers who act contrary to the law or sound business practices. When providing insurance services, Sampo Group companies always follow authority regulations and required due diligence to prevent money laundering, terrorist financing, and other illegal activities.

If

If has implemented an Anti-Money Laundering and Counter-Terrorism Financing Policy, which establishes If's general framework against money laundering and terrorist financing, and forms part of If's Risk Management System. The policy is supplemented by instructions and

guidelines, which provide more details and specify the legal requirements set by each operating country.

If has appointed a board member with overall responsibility for coordinating the AML and CTF framework within If, and an AML Officer with responsibility for controlling and reporting obligations. There are further coordinators in each Nordic country, who work closely with the local AML and CTF competence groups. The groups consist of employees representing the different parts of the business, Legal, Compliance, and Internal Investigations in each country. Coordinators are, with support from the competence groups, responsible for performing a yearly risk assessment, taking into account risk factors for the company. If has risk-based procedures in place for identification, verification, and KYC procedures. Ongoing AML and CTF activities and any suspicions of or reported money laundering incidents are reported to the management.

To support employees regarding the matter, If has e-learning programs on risk-based AML and CTF. The e-learning programs are mandatory for all employees working with products covered by AML legislation in the Sales and Claims units. AML and CTF education is also part of the regular policy review, which takes place every two to three years, depending on the business area. In addition, targeted employees are required to undergo supplementary education.



As part of the implementation of the 4th AML directive, If conducted an awareness-raising activity for employees within the Sales, Claims, and Underwriting units in Norway, Finland, and Sweden during 2018 (Denmark follows in 2019). The course covered topics such as customer identification, signs of money laundering and terrorist financing, and practical examples of money laundering and terrorist financing. In total, 2,144 employees participated in the training.

In 2018, some suspicions were reported to the authorities, but there were no confirmed cases of money laundering or terrorist financing.

Topdanmark

Topdanmark Life Insurance has implemented an Anti-Money Laundering Policy and Procedure Framework designed to comply with AML laws and regulations throughout the company. These include counter-terrorism financing. The AML Officer has responsibility for compliance with relevant legislation and industry guidance. The ALM Officer is also responsible for surveillance of money laundering activities and provides the Executive Board with reports on risks, implemented measures, and internal controls on a quarterly basis. The ALM Officer works in cooperation with Internal Audit.

Topdanmark uses an overall risk assessment when reviewing money laundering and terrorist financing related risks. The assessment takes into account risk factors that include those relating to customers, geographic areas, products, transactions, and delivery channels. The risk assessment is reviewed regularly. Further, Topdanmark has risk-based procedures for identification, verification, and KYC procedures, including enhanced due diligence for those customers presenting higher risk, and identification of beneficial owners. In addition, Topdanmark Life Insurance categorizes all its customers in accordance with their risk potential regarding money laundering and terrorist financing. The company has also a process for identification of politically exposed persons, as well as internal procedures for observing suspicious transactions, and activities to ensure that the procedures are complied with in practice.

For employees, Topdanmark provides an e-learning program on risk-based AML. The e-learning program is mandatory for all new employees within the first month of employment at Topdanmark Life Insurance and for employees in Topdanmark Insurance handling life insurance products. In 2019, an updated e-learning program will be implemented.

Mandatum Life

At Mandatum Life, the work against money laundering and terrorist financing goes hand in hand with KYC. Mandatum Life has an Anti-Money Laundering and Counter-Terrorism Financing Policy, instructions, and risk assessment, which are evaluated and updated annually. Mandatum Life's compliance operation is responsible for the implementation of the policy and the necessary procedures.

Mandatum Life uses a risk-based approach for identification and classification of customers in different risk categories and applies enhanced due diligence measures for customers presenting higher risk, such as politically exposed persons or corporate customers operating in certain fields of business.

All Mandatum Life employees working with customers are required to participate in Mandatum Life's annual AML training. Additional training is organized when legislative changes or procedural changes occur. During 2018, the customer-facing personnel at Mandatum Life completed an online course on preventing money laundering in the business of investment service companies and in insurance services, and on KYC. The training continues to run during 2019.

In 2018, five cases of money laundering and terrorist financing were reported to the AML authority.



Data Privacy

Sampo Group companies operate in the financial and insurance sector, which is a highly regulated industry and characterized by a high amount of personal data processing. Most of the measures adopted in the field of insurance services concern data relating, directly or indirectly, to natural persons, meaning individual human beings. Therefore, the protection of personal data is of great importance for the Group companies.

Regarding data privacy, all Sampo Group companies comply with the relevant national legislation, together with the provisions and principles imposed by the European General Data Protection Regulation (GDPR). Personal data is business critical for Group companies and collected only for the explicit and legitimate purposes necessary to carry out business. The data is not further processed in a manner that conflicts with those purposes. Sampo Group is committed to processing personal data in a lawful, fair, and transparent manner.

At Sampo Group, the guidance document regarding data privacy is the Sampo Group Data Privacy Statement. The aim of the Data Privacy Statement is to ensure an adequate level of protection of personal data and compliance with the applicable laws by Sampo Group companies. The group-level statement demonstrates the general requirements to be met by all Sampo Group companies. Each Group company has adopted more

detailed policies and guidelines on data privacy for its own commercial purposes.

The aspect of data privacy has been a high priority for Sampo Group companies. There have been several projects ongoing to ensure compliance with the GDPR. Every employee in the Sampo Group is responsible for correct behavior regarding data privacy. Therefore, proper training of employees is an essential part of data privacy management.

If

If's Data Protection Office team directs and oversees the personal data protection activities within If to ensure continued compliance with the GDPR. The Data Protection Office team is led by the Data Protection Officer (DPO) with Data Protection Managers allocated in Sweden, Norway, Finland, and Estonia. The DPO is organizationally integrated into the Risk Management function and works closely with the Information Security unit. As required by law, the DPO acts independently and reports quarterly, annually, and when deemed necessary to the CEOs and Boards of Directors in If.

During 2018, If implemented policies, processes, and guidelines that establish the basis for minimizing the risk of data breaches, ensuring accountability, and demonstrating lawful, fair and transparent processing, integrity and confidentiality, data quality, limitation of purpose, and minimization of personal data. If's aim is to proactively prevent and minimize risk to customers

through the assessment of the company's own processes. In accordance with the GDPR, the Data Protection Office team regularly provides courses that increase awareness and instruct employees how to assess data privacy risks. During 2018, courses were held in the Nordic and the Baltic countries. This has enabled the business units to implement data privacy assessments as a practice. Assessments have been conducted since May 25, 2018 and will continue throughout 2019.

The main responsibility of If's the Data Protection Office is to assess whether a potential personal data breach is likely to result in a risk to the rights and freedom of If's customers. The assessment shall be conducted within 72 hours. During 2018 and since the enforcement of the GDPR on May 25, 2018, six personal data breaches were reported to the Supervisory Authority and corrective actions taken.

Topdanmark

Topdanmark complies with current personal data legislation and ensures that all information is stored and handled in such a way that the customers' privacy is never compromised. Topdanmark's IT systems ensure that: customer information is updated; customer information is never misrepresented; customer information is deleted when it is no longer relevant; and unauthorized persons cannot gain access to the information. Topdanmark only passes on information in connection with the handling of insurance, and this primarily involves partners and other insurance companies. The company does not sell



customer information. In addition, Topdanmark has processes in place to ensure that the company's employees know how to handle customer information.

The Board of Directors and the Executive Management of Topdanmark have overall responsibility for ensuring that Topdanmark's data privacy is at a satisfactory level and that adequate resources have been allocated to it. Topdanmark Group's Compliance is responsible for the company's data protection strategy, business procedures, guidelines, monitoring, and reporting, including reporting on personal data security breaches. Further, the Data Protection Officer focuses on the ongoing development and surveys regarding personal data protection.

Topdanmark's Compliance regularly checks compliance with the processes and that employees know how to detect data breaches. Data breaches are reported to the DPO. Topdanmark also complies with the rules on reporting data breaches, as set out by the Danish Data Protection Agency. Possible data breaches are investigated thoroughly and, if necessary, adaptations to processes are made to make sure similar breaches do not occur again.

In 2018, Topdanmark ensured compliance with the GDPR. This involved, among other things, ensuring that all Topdanmark employees complete an e-learning course regarding handling of personal data. New employees must also undergo an e-learning course, and all employees must take an e-learning course at regular intervals. In

addition, Topdanmark evaluated and updated a number of processes concerning data processing.

In 2019, Topdanmark will continue to ensure compliance with applicable legislation on the processing of personal data. A particular focus area will be the connection between the development of digital services and personal data legislation, as data security should be taken into consideration already in the planning and development phase of such services.

Mandatum Life

Mandatum Life has identified that protection of personal data is critical not only from a compliance perspective, but also from a business perspective. Handling personal data in an appropriate manner creates credibility for the business and enables solid and long-term business development.

Mandatum Life's Board of Directors and CEO are responsible for ensuring that Mandatum Life's data privacy is at an adequate level and that sufficient resources are allocated to it. The Data Governance unit, which is part of Legal and Compliance unit, is responsible for Mandatum Life's data protection strategy, policies, guidelines, monitoring, and reporting, and for addressing data protection deviations. In addition, the Data Governance unit highlights development needs related to data protection and promotes measures to meet them. The Data Governance unit is also responsible for information security and works in close co-operation with IT and business. Mandatum

Life may use subcontractors or outsource personal data processing to a third party, in which case Mandatum Life will guarantee, through contractual arrangements and regular monitoring of service, that the personal data is processed in the manner prescribed by the GDPR, and these third parties shall receive Mandatum Life's instructions on the secure processing of personal data.

In its operations, Mandatum Life complies with the principles of data protection by design and by default, with data protection principles being integrated into all stages of the processing of personal data and, by default, only processing personal data that is necessary for a specific purpose in the processing. Mandatum Life has legal grounds for processing personal data based on a customer relationship, a person's consent, a legal obligation, or the legitimate interest of Mandatum Life. The lifecycle of data is defined during the planning stage of data collection. When developing new procedures or acquiring new services, a Data Protection Impact Assessment (DPIA) is carried out in the planning stage in order to detect whether the planned data processing operations involve a high risk to the rights and freedoms of the data subjects. The results of the DPIA are used to reduce the risk levels and to ensure that the requirements of the GDPR have been taken into account.

In 2018, Mandatum Life established an inventory of IT systems, and identified every system containing personal data. During the year, retention periods were also updated to adhere to the GDPR, obsolete data was deleted, and



some data was anonymized to avoid risk of conflict with the GDPR. In addition, Mandatum Life ensured transparency in customer data processing by extending the documentation of data protection and registrants' rights to their own data.

Each person employed by Mandatum Life, or working on behalf of Mandatum Life, whose work involves processing personal data has the obligation to comply with the data privacy-related policies, principles, and guidelines and to ensure compliance with data privacy. Every employee at Mandatum Life shall participate in data privacy training, e-learning, every two years. The required training is provided to new employees during their introduction period. The training has also been extended to consultants of Mandatum Life, as needed. Due to the GDPR, there have been several role-based classroom training courses during 2018.

Due to the GDPR, Mandatum Life is required to report major privacy incidents to the authorities within 72 hours of detection. In 2018, there was one data breach reported that was related to personal data. All parties involved in the matter were contacted and the matter was resolved. Processes and instructions were both checked to avoid similar errors in the future.

Information Security

Similarly to data privacy, information security is one of the most important factors in ensuring that Sampo Group companies are successful in their business operations. Within the financial industry, information services should be provided quickly, effectively, and reliably at all times. In this connection, the protection of information and the handling of information are given special attention. The level of information security at each of the Group companies depends, for example, on how individual employees use the tools for handling information. For this reason, information security training has an important role at Sampo Group.

If

Information security at If is based on the company's Information Security Policy. The policy presents the minimum requirements on information security that are expected to be met by each If Group company and the companies' external partners. The policy also sets down general rules with regard to the use of information-handling tools. The policy is part of If's risk management system.

If has comprehensive information security governance, including policies, roles and responsibilities, defined controls, and reporting structures. The Chief Information Security Officer (CISO) at If has overall responsibility for If's information security policies and for directing and supervising information security activities. The CISO reports to the Chief Information Officer (CIO).

Information security risks are reported to the Operative Risk Committee as part of the reporting from the IT organization.

Further, If has security levels in relation to evaluated threats and risks that could occur against If's businesses. Changes in threats, risks, and the business environment are continuously monitored and have an impact on the information security level and information security work within If. The target is that business conducted by If shall not be jeopardized by lack of knowledge, shortcomings in technical solutions, thoughtlessness, insufficient loyalty, or criminal activities. At the end of the day, the level of information security at If depends on how each individual person uses the information-handling tools, such as computers, memory sticks, data communication tools, and the Internet. All If companies and employees shall comply with If's Information-Handling Principles.

If provides a comprehensive information security awareness program for its employees. The program is geared toward creating information security awareness through seminars, nano-learning, e-learning, and classroom training. E-learning is designed especially for IT developers. Practical classroom training is provided with the focus on how to manage and handle information security issues that are specific to If.

In 2018, the most significant focus area for If was the assessment and monitoring of cybersecurity risks. Cybersecurity risks are reported via If's operational



risk reporting structure. The 24/7 information security monitoring service introduced in 2017 has also strengthened If's capabilities to foresee, detect, and mitigate cyber threats.

If is required to report all severe information security incidents to the Swedish Financial Supervisory Authority. In 2018, one incident, a network failure, was reported to the authority.

Topdanmark

Information security at Topdanmark is based on the company's Information Security Policy. The policy presents the minimum requirements on information security expected to be met by internal and external stakeholders. The policy is part of Topdanmark's overall risk management system. Topdanmark Group's IT Security, led by the CISO, who reports to the CIO, is responsible for information security. Topdanmark's IT risk assessment, prioritization of IT risks, Information Security Policy, and IT Emergency Strategy are based on the ISO27001 standard and are revised and approved by the Board of Directors each year. Risk assessments of material or critical operational IT risks are made regularly, and the results of the assessments are reported to the Board of Directors, the Executive Board, the Risk Committee and the Topdanmark Compliance function.

Among various risk scenarios, Topdanmark experiences an increasing threat from cybercrime. This is handled by an IT Security Committee that regularly assesses the

threat and the measures necessary to secure the required security level. In 2017, Deloitte conducted a cybersecurity assessment on Topdanmark. The result showed that Topdanmark's cybersecurity maturity level is high compared to other financial or other regulated companies, and very high compared to corporations in general, including public authorities and private companies.

All new employees are introduced to Topdanmark's Information Security Policy. Classroom training sessions are held when needed for IT developers, to ensure that IT development complies with Topdanmark's Information Security Policy. In 2018, an e-learning program on information security was implemented. All employees and external consultants were obliged to pass the program. The e-learning program will be repeated annually.

In 2018, there were no information security incidents that would have required the activation of Topdanmark's IT Disaster Recovery Plan.

Mandatum Life

Information security at Mandatum Life is based on the company's Information Security Policy. The policy defines roles, responsibilities, goals, and implemented measures for information security within the Mandatum Life Group. The policy is augmented with principles and guidelines (e.g. Principles for Identity and Access Management, Principles for Email and Internet Use, Principles for Using Cloud Services). Mandatum Life's Board of Directors and CEO are responsible for ensuring

that Mandatum Life's information security is at an adequate level and that sufficient resources are allocated to information security. Mandatum Life's Board of Directors bears overall responsibility for compliance with the information security policy. The CISO is responsible for monitoring the level of information security.

The level of information security is continuously assessed in accordance with the agreed roles, taking into account Mandatum Life's key functions and resources, and the processed information and the threats affecting them. Any shortcomings are addressed, and sufficient measures are carried out to manage the risks. Mandatum Life has technical and organizational measures in place to identify information security risks and deviations. Particular attention is paid to information security risks affecting customers' information. The identified information security risks are addressed and reported on regularly, as part of operational risk management.

Mandatum Life's Information Security Policy requires employees to report identified threats to the company CISO. Realized risks are further reported to Mandatum Life's operative Risk Management Committee. Incident response procedures are documented in Mandatum Life's business continuity plans. Tests on processes and systems are also conducted on a regular basis.



At Mandatum Life, employees' information security awareness is ensured by regular and mandatory training. All Mandatum Life employees are required to undergo information security training whenever training material has been updated. In the past, updates have been made at least once every two years. Employees are also notified on the company intranet about imminent information security threats.

Information security at Mandatum Life is continuously improved in order to meet future regulatory and customer demands, as well as in order to respond to the changing information security environment. During 2018, cybersecurity situational awareness and incident reaction capabilities increased at Mandatum Life. This is in line with the company's information security strategy for the years 2017-2020. Capabilities for implementing the security strategy in forthcoming years was also increased by recruiting new information security personnel.

Mandatum Life is required to report major information security incidents to the Finnish Financial Supervisory Authority (FSA) annually. There was one incident, abuse of breached user credentials, reported to the Finnish FSA in 2018. The incident was detected at an early stage, and therefore it did not result in further consequences.

Human Rights

Sampo Group companies are committed to upholding internationally recognized human rights, as defined in the United Nations' Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. The Group is committed to ensuring that internationally accepted human rights are never infringed in its operations. Sampo Group companies are encouraged and expected to respect international human rights and to follow and comply with local legislation.

In addition, Sampo Group is committed to complying with the Core Conventions of the International Labor Organization (ILO). The aim of Sampo Group is to provide a non-discriminatory, agreeable, and open working environment, where each and every employee is treated fairly and equally, regardless of gender, race, religion, nationality, age, or physical ability. Discriminatory practices with regard to recruitment, promotion, remuneration, or general conduct in the workplace are not tolerated.

Sampo Group companies operate in the Nordic and Baltic countries, where freedom of assembly is generally respected and even protected by law. Workers have the right to organize, bargain collectively, and strike. Sampo operates in each of its operating countries according to the local legislation and grants its employees the rights that are lawfully theirs. Sampo does not collect data on how many of the Group's employees belong to trade

unions. However, it can be stated that, in general, the level of organizing is high in the Nordic countries compared to the rest of the world. For example, in Denmark, Finland, and Sweden, trade unions are strong and well organized, with over 70 per cent of the whole workforce belonging to trade unions.

Sampo and the Group companies acknowledge that the risk of possible direct human rights violations is relatively low in their operations, but recognize that their actions may have direct and indirect negative impacts on human rights. These risks are managed according to Sampo Group's Risk Management Principles. These concerns mainly arise from external factors, such as through customers, suppliers, and investments. Therefore, Sampo is committed to encouraging partners and third parties to respect and comply with human rights. In Sampo Group's own operations, the human rights issues identified to be most relevant are discrimination, equal opportunities, and customers' rights to privacy.

Data breaches and misuse of customer information may result in human rights violations, particularly if sensitive personal information is disclosed. Sampo Group companies have stringent policies and processes to ensure that all collected data is protected through security measures and adequate employee training. See the sections **Data Privacy (page 22)** and **Information Security (page 24)** for more detailed information.



If

If has an Ethics Committee, which discusses and coordinates ethics issues within the company and provides recommendations on ethical issues. If also has an Ethics Policy that describes the goals, principles, and responsibilities for the area. If requires that all employees follow the policy. If organizes courses, seminars, and discussions on ethics and ethical dilemmas in the workplace at individual offices. Human rights is part of If's e-learning course on ethics, which all employees take as a part of the onboarding process.

If has arranged training to raise awareness of relevant human rights topics, such as labor rights of employees and privacy rights of customers. Training is, for example, done by presenting dilemmas related to human rights concerns on the company intranet. During 2018, a new training program on ethics, diversity, and inclusion was developed and is being launched in 2019. The material consists of three elements: a short film, reading material, and workshop material. The aim is to highlight the need to be an inclusive company, making ethics a concrete part of every employee's thinking and making people more aware of their own biases and how they affect diversity in the company.

Even though the risk of direct human rights violations is relatively low in the company's operations, If recognizes that the company's actions might have indirect negative impacts on human rights. These concerns mainly arise from external factors, such as customers, suppliers, and

investments. Therefore, If also requires consultants and partners to follow the company's ethics policy, support If's ethical values, and respect human rights. During 2019, If will further develop how to measure and report on the work related to human rights.

Topdanmark

Topdanmark respects internationally recognized human rights, and the company's aim is to never infringe on them. Topdanmark follows and complies with Danish legislation, which incorporates internationally recognized human rights. Human rights is also one of Topdanmark's focus areas regarding corporate responsibility.

Topdanmark joined the UN Global Compact in 2010 and the company is working on integrating the ten principles, including a principle on human rights, into its policies and business. In December 2018, Topdanmark established a Policy for Human Rights and Ethical Guidelines for the use of Artificial Intelligence.

Inspired by the UN Guiding Principles on Business and Human Rights, Topdanmark closely monitors human rights issues that the company might face in connection with its various business activities. Topdanmark has concluded that the company's policies, initiatives, and management systems are in place when it comes to safeguarding human rights-related issues. This includes, for example: investment activities, where procedures and policies are in place **(more on investments on page 71)**; protection of personal data, where procedures and policies have been established **(more on data privacy on**

page 22); employee relations, where a wide range of HR policies and a management system have been established **(more on employees on page 38)**; and non-discrimination, where Topdanmark focuses especially on equal access to management positions for women and men **(more on diversity on page 44)**.

Irresponsible behavior in the supply chain, such as non-compliance with the principles of the UN Global Compact, is not only incompatible with Topdanmark's CSR Policy, but it can also damage the reputation and consequently the company's revenue. In order to counter this risk, Topdanmark has a CSR Program for suppliers, and the company assesses the suppliers it uses regularly in relation with CSR issues. Today, all Topdanmark's suppliers receive a CSR reference as an annex to their contract with Topdanmark. The annex, for example, specifies that Topdanmark is a signatory of the UN Global Compact. The aim of the annex, although not legally binding, is to encourage the respective company to integrate the principles of the Global Compact into their own business.

In 2017, Topdanmark outsourced a number of jobs to Lithuania, to a company called Cognizant. In 2018, Topdanmark outsourced additional jobs to the same supplier in India. In connection with this, Topdanmark conducted a risk analysis and has been in dialogue with the supplier regarding working conditions and human rights. The CSR reference concerning the UN Global Compact principles has also been written in as a legally



binding part of the contract. In Lithuania, Topdanmark has not found anything that would be in conflict with the company's CSR Policy or the principles of the Global Compact. In India, Topdanmark is aware of matters concerning human rights, such as the lack of a right to a collective agreement. Topdanmark is in an ongoing dialogue with Cognizant regarding the matter.

Further information can be found in the **Topdanmark CSR Report 2018** (www.sampo.com/year2018).

Mandatum Life

Human rights are considered throughout Mandatum Life's operations, ranging from investment decisions to employment issues. As a significant asset owner and investor, Mandatum Life takes companies' responsible employee practices into consideration when making investment decisions. Mandatum Life Wealth Management's portfolio holdings are regularly monitored for human rights violations based on the UN Global Compact. When violations are detected, Mandatum Life seeks to engage with the involved parties to rectify the issues. More information on Mandatum Life's measures regarding investments can be found in the section **Responsibility in Investments (page 69)**.

Mandatum Life emphasizes equality in all its actions and policies, and monitors, for example, the gender distribution in management positions. Equality issues are a part of the Mandatum Life Way leaflet given to all new employees as part of onboarding. Mandatum Life makes

sure that no employees are discriminated against based on, for example, race, religion, sexual orientation, gender, or age. Discrimination issues are monitored, for example, in the Great Place to Work employee satisfaction questionnaire sent to all employees annually. Further information on equality at Mandatum Life can be found in the section **Diversity (page 45)**.

In addition, Mandatum Life arranges regular e-learning courses for all personnel regarding customers' rights to privacy. More information on the topic is available in the sections **Data Privacy (page 23)** and **Information Security (page 25)**. In 2018, no incidents on human rights violations were reported through Mandatum Life's incident reporting systems.

In 2018, Mandatum Life joined the Ykkösketjuun-campaign, which calls for a Finnish law on mandatory human rights due diligence.

Sampo plc

In 2018, the Confederation of Finnish Industries (EK) launched a campaign called Work Does Not Discriminate. Sampo joined in with supporting the campaign, which challenges employees, businesses, and communities to create a truly equal work culture in all of Finland. The companies and organizations involved in the campaign believe that discrimination should not hinder anyone's employment or success at work. Non-discrimination benefits Finnish society as a whole, so that every employer, worker, and citizen profits. Also in 2018, Sampo

joined the Ykkösketjuun-campaign, which calls for a Finnish law on mandatory human rights due diligence.

Environmental Impacts of Group Operations

Sampo and the Group companies recognize the environmental impacts of the Group's own operations and are committed to reducing them. The reputational damage from negative environmental impacts are a key environmental risk for the Group companies' operations. Sampo Group impacts the environment both directly, mainly through the operations of If and Topdanmark, and indirectly, through the investment decisions of Sampo Group companies. Responsibility regarding investments is discussed further in the section **Responsibility in Investments (page 66)**.

If

If's environmental objective is to reduce the company's environmental impact and contribute to a sustainable future. If's Environmental Steering Group has developed an environmental strategy for the company, defining the Environmental Policy, as well as long-term and ongoing goals, and establishing a basis for the approach to minimize environmental impacts. During 2018, If employed a Sustainability Manager (as of January 2019, Head of Sustainability), who is responsible for expanding the work to include not only the environmental, but also the social and economic dimensions of corporate responsibility. If's



Environmental Steering Group changed its name to If's Steering Group on Sustainability in 2018. In 2019, If will establish new long-term sustainability targets for If's key sustainability areas: Climate; Supply Chain & Materials; Work Environment; Diversity & Gender Equality; and Responsible Business Practices.

If's commitments to customers, partners, and society are stated in the Environmental Policy and Environmental Strategy. The commitments stated are:

- If always endeavors to find the best possible environmental solution – for customers, suppliers, partners, and the company
- If develops products, processes, and loss prevention services in order to help customers act in a more environmentally friendly manner
- If encourages and supports suppliers and partners in their efforts to use more environmentally friendly methods in their operations
- If must always give its employees the opportunity to act in an environmentally friendly way, through the provision of guidelines and support
- If must always provide information about environmental risks and participate actively in the public debate concerning climate change.

The activities to tackle the environmental impacts of If's own operations can be divided into two categories: 1) activities related to If's employees and activities in its own operations, and 2) activities related to If's business operations. The activities related to If's employees and own operations include minimizing waste (e.g. during 2018 disposable plastic cups were phased-out from all If offices); increasing energy efficiency (e.g. installation of LED lightening in conjunction with renovations); supporting the use of renewable energy (e.g. all electricity purchased by If comes from renewable sources); increasing the number of virtual meetings instead of traveling, and promoting train travel as an alternative to air travel; focusing on training and awareness; increasing employee engagement through theme weeks; encouraging the local environmental groups of each If office; and increasing the amount of green IT. The activities related to If's business operations include, for example, integrating environmental criteria in the procurement policy and promoting environmentally friendly alternatives (e.g. If cooperates with the Nordic Ecolabel), as well as placing environmental and health-related requirements on property and vehicle repair contractors (e.g. encouraging reuse and recycling). All of these activities aim to reduce If's environmental impact and CO₂e emissions, and they also support If's long-term environmental targets. All

major If offices (approximately >100 employees) have some form of environmental action program in place.

If's aim is to continuously reduce the company's own emissions and If encourages its partners and customers to reduce theirs. As a provider of financial services If's carbon emissions are primarily linked to business air travel (68 per cent), business car travel (18 per cent), and energy use (14 per cent). In 2018, If's total direct and indirect CO₂e emissions were 9,002 tons, which is an increase of 2.3 per cent since 2017. The increase in total emissions is mainly due to an increase in the number of employees and increase in emissions from business air travel. CO₂e emissions per employee were 1.56 tons, which is a decrease of 1.3 per cent compared to 2017.

Since 2011, all CO₂e emissions arising from If's own operations have been offset. In 2018, If offset all its CO₂e emissions through a Gold Standard VER project called Breathing Space. More information is available in the section **Stakeholder Engagement (page 80)**.

Further information can be found in the **If Sustainability Report 2018 (www.sampo.com/year2018)**.



2016-2018 Targets and Results

If

	Results in 2018		Comments
	Achieved	Not achieved	
Reduce the number of flights by 5 per cent (baseline year 2016)		X	The total number of flights has increased by 5 per cent, mainly due to an increase in the number employees.
Reduce indirect energy consumption annually by 3 per cent	X		The average annual reduction during the period was 3.7 per cent.
Reduce paper consumption annually by 10 per cent	X		The average annual reduction during the period was 15 per cent.

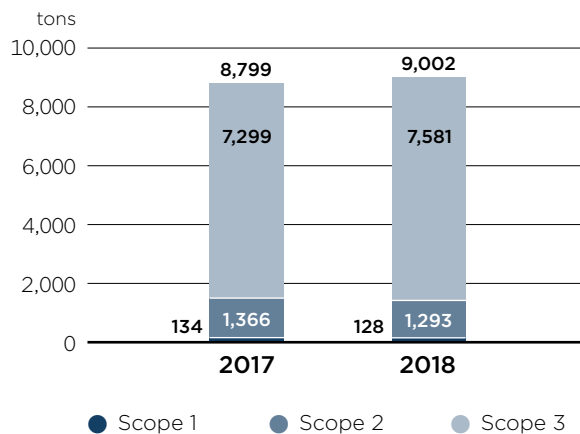
Ongoing Targets and Results in 2018

If

	Results in 2018		Comments
	Achieved	Not achieved	
Reuse of materials in vehicle repairs	X		In 2018, more than 3,500 tons of plastic and metal materials were reused in vehicle repairs.
Screen all significant suppliers regarding If's environmental requirements	X		In 2018, all significant (>10 000 euro) suppliers to If offices were screened.
ClimateWise score >60 per cent	X		In 2018, If's ClimateWise score was 64 per cent.

Total CO₂e Emissions

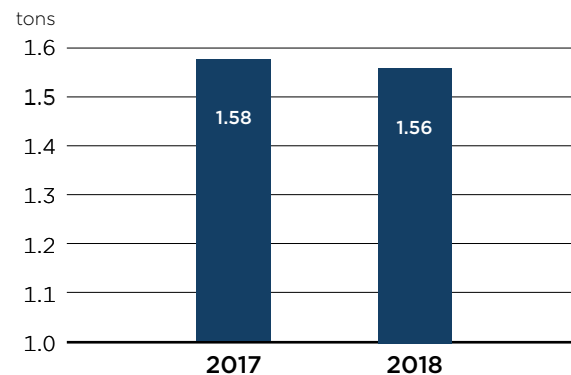
If



Includes If's operations in Finland, Sweden, Norway, and Denmark.

CO₂e Emissions per Employee

If



For the number of personnel FTE average is used. The emission calculations include If's operations in Finland, Sweden, Norway, and Denmark.



Topdanmark

Topdanmark wants to contribute to the sustainable development of society. Therefore, Topdanmark aims to combine the company's business goals with climate and environmental considerations. Topdanmark impacts the environment directly through its own operations and indirectly through its business activities. Minimizing the environmental impacts of the company's own operations is the main priority for Topdanmark. That is where the company can best define goals, implement initiatives, and decrease the company's carbon footprint.

Topdanmark's CSR Steering Group leads the work related to climate and the environment, defines related goals, and evaluates the results annually. Topdanmark has set a goal with regard to CO₂ emissions, because that is the most relevant area for Topdanmark to work on. Furthermore, Topdanmark has set a goal for contributing toward UN Sustainable Development Goal number 12 on responsible consumption and production.

CO₂ Reduction Activities and Results

In 2018, the reduction of Topdanmark's CO₂ emissions was mainly related to the company's two solar cell systems. The biggest solar cell system, extended in 2017, is located at Topdanmark's headquarters. The other one was put in to operation in 2017 at another Topdanmark location. In 2018, electricity production from the two solar cell systems was 1,531 MWh (1,093 MWh), which was a significant increase compared to previous years.

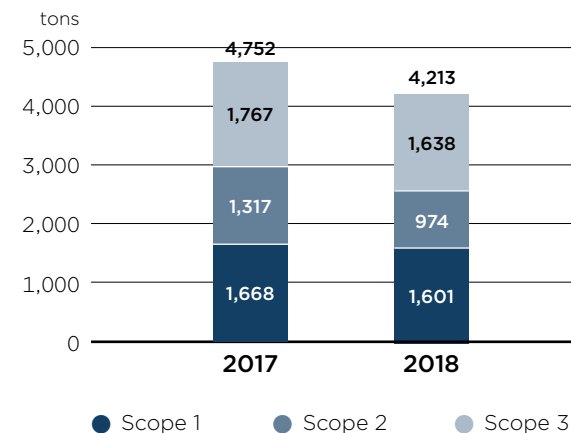
CO₂ Emissions: Goals and Results

Topdanmark

Goal for 2021	Unit	Baseline year 2017	Results in 2018	Comments
5 per cent in absolute annual reductions in relation to 2017 emissions	Tons CO ₂	4,752	4,213	CO ₂ emissions were reduced by 11 per cent compared to 2017, which exceeds the target.

Total CO₂ Emissions

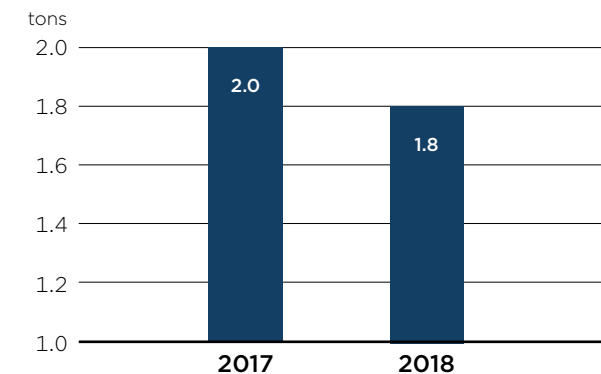
Topdanmark



Topdanmark also reports to the CDP (Carbon Disclosure Project), an international, not-for-profit environmental reporting initiative, which works for transparency and dialogue around CO₂ emissions and climate strategies in

CO₂ Emissions per Employee

Topdanmark



Comparison figure has been recalculated as FTE average is now used for the number of personnel.

businesses, with the purpose of making such information available to investors. In 2018, Topdanmark's CDP rating was C, the same as in 2017. The average for all responses to the CDP was C.



UN Sustainable Development Goal 12: Responsible Consumption and Production

As a signatory of the UN Global Compact, Topdanmark strives to contribute toward the UN's 17 Sustainable Development Goals. During 2018, Topdanmark analyzed all the goals to identify the ones that would relate to the company's business. As a result, Topdanmark decided on goal number 12 on responsible consumption and production. The goal is, among other things, about promoting recycling and reducing the amount of waste, which is an area that links directly to Topdanmark's business.

One of the targets of goal 12 is to substantially reduce waste generation by 2030, through prevention, reduction, recycling, and reuse. Topdanmark set the following KPIs for 2021 in support of this target. All of the KPIs arise from Topdanmark's business operations and ways of working, including how the company handles damage related to buildings or electronics, and how the company's own operations are organized.

Link to Topdanmark's business and operations

	KPI for 2021	Baseline	Results in 2018
If damages occur: • Repair (buildings, car windows, electronics) instead of opting for new, when possible. • Sell building materials for reuse. • Donate furniture and items in for recycling. • Use recycled parts, when possible. • Sell wrecked cars for recycling, when possible.	Increase the amount of furniture and items sent for recycling.	Baseline 2018: approx. 15 pieces of furniture donated to DanChurchAid	-
	Increase the percentage of car windows that are repaired.	Baseline 2018: 38 per cent	-
	Increase the percentage of phones, computers, and tablets that are repaired.	Baseline 2017: 57 per cent	66 per cent
Topdanmark's own operations: • Sorting of waste at the headquarters. • Minimization of food waste in the canteen at headquarters. • Minimization of single-use plastic materials. • Reduction of paper consumption through digitalization. • Sale or donation of used office furniture for reuse/recycling. • Sale of used IT equipment for reuse.			
	Decrease the use of single-use plastic materials, e.g. plastic cups.	Baseline 2018: 404,000 items	-

Mandatum Life

Mandatum Life's business operations do not give rise to significant direct emissions, which is why the company has identified the promotion of responsible investment as the best opportunity to engage in environmental responsibility. As a major investor, the company has a responsibility to contribute to reducing the carbon footprint of its investments. More information on Mandatum Life's measures can be found in the section **Responsibility in Investments (page 66)**.

Nevertheless, Mandatum Life aims to improve the environmental friendliness of its offices and working practices. Mandatum Life's headquarters has a BREEAM certificate (Very Good) for its environmental performance. In 2019, Mandatum Life will continue a comprehensive renovation of the main office buildings that was started in 2018. During the project, the environmental impacts of the building and operations will also be examined.



Over the past few years, Mandatum Life has reduced paper waste by removing personal printers and has encouraged employees to recycle by adding bio-waste bins in common areas and removing personal trash bins. For the year 2019, Mandatum Life has launched a four-step program that aims to promote a more environmentally friendly office. The four targets include removing

paper cups and plastic spoons from staff use, reducing personal printing, reducing electricity consumption, and promoting a vegetarian diet for lunchtime. In 2019, Mandatum Life will launch a campaign in collaboration with the Team Rynkeby Foundation to promote cycling as a way of travelling to work, while donating money for children suffering from critical illnesses.

Sampo plc

Sampo plc received WWF Finland's Green Office certificate in 2018. WWF Green Office guides workplaces to function sustainably. Sampo's aim is to focus more on managing the environmental impacts of its own office and operations.



RESPONSIBILITY AND EMPLOYEES

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Well-Being

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Engagement

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Professional
Development



Responsibility and Employees

In the financial industry, one of the biggest risks is losing talent, as value creation relies on intangible assets such as employee competence, customer service, creativity, and operational excellence. At Sampo Group, it is believed that intangible assets grow when employees are engaged and committed, and their professional development is encouraged. Employee engagement and commitment are dependent on the employees' fundamental motivation: motivation by one's own desire. Fundamental motivation is the product of inspired and supported employees who are treated with respect. Dedicated employees create results by delivering a first-class customer experience and operational improvements on a daily basis.

Human Resources Management

The Sampo Group Code of Conduct addresses the relationship that Sampo Group aims to uphold with all its stakeholders, not least its employees. Sampo Group

is committed to creating a non-discriminatory, open, and agreeable working environment where everyone is treated fairly and equally, regardless of gender, ethnic background, religion, language, nationality, age, sexual orientation, or physical ability.

Sampo Group offers a work environment that supports the commitment of all employees to the company and its operations. The high results of regular employee satisfaction surveys show that Sampo Group companies have succeeded well in inspiring and engaging their employees. The total reward package at Sampo Group also encompasses competitive remuneration and benefits such as private healthcare and broad insurance coverage, in addition to extensive competence development.

Sampo Group values the competence of employees and strives to offer employees possibilities to learn new skills and grow professionally. Sampo Group is a stable and trusted employer with international career opportunities

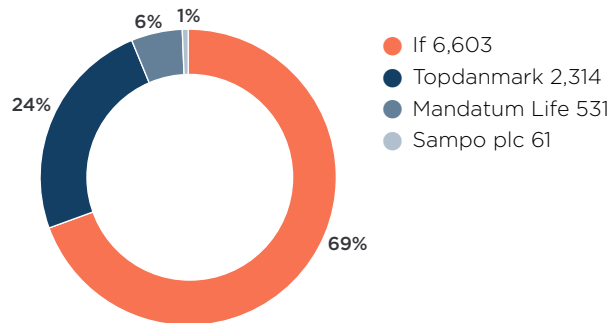
that attract new employees. Future managers and leaders grow from within Sampo Group and are offered challenging positions and projects, and are supported, for example, with mentoring programs.

In 2018, the average number of Sampo Group employees (FTE) was 9,509 (9,364). During January-December 2018, approximately 69 per cent (68) of the personnel worked at If, 24 per cent (26) at Topdanmark, 6 per cent (6) at Mandatum Life, and 1 per cent (1) at Sampo plc. In geographical terms, 31 per cent (32) of the personnel worked in Denmark, 24 per cent (24) in Finland, 22 per cent (20) in Sweden, 14 per cent (14) in Norway, and 10 per cent (10) in the Baltics and other countries.



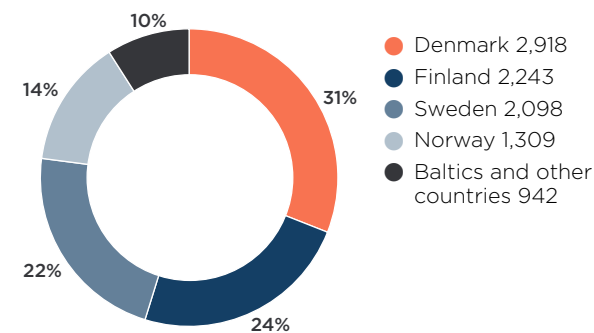
Number of Employees (FTE average) by Company

Sampo Group, 2018



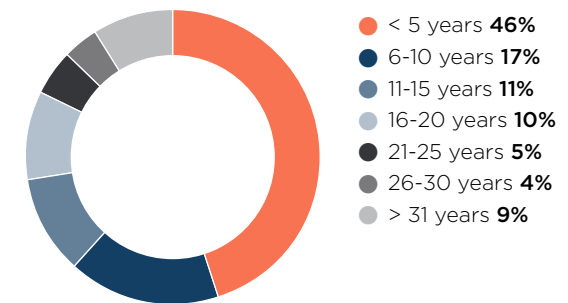
Number of Employees (FTE average) by Country

Sampo Group, 2018



Years of Employment

Sampo Group, 2018



Topdanmark's hourly paid employees are not included in the calculations.

If

If has about 3.7 million customers. If sells and renews more than 10 million insurance policies annually and handles 1.5 million claims. If's success is linked to how well the company does in all of these customer interactions. First-class customer focus through dedicated employees with professional insurance competence is, thus, the main determinant of success.

The success of If depends on the competence, ideas, enthusiasm, and work ethic of all its employees. This is reflected in the company's HR Policy. The policy points out that If offers a nurturing and developing work environment, where all employees have the right to experience good leadership and adequate competence development. On the other hand, the policy also demands accountability and acknowledges the employees' own responsibility for professional development and performance.

The number of employees at If increased slightly during 2018 compared to the previous year. In Sweden, the increase is mainly due to the insourcing of about 100 employees from an external sales service provider to Business Area Private. The relocation of support services and IT development to the Baltics continues to increase manning in the Baltic countries. There has been an increase in employee turnover in almost all countries.



In the Nordic countries, this is mainly connected to a high level of turnover in the customer centers. The customer centers have generally recruited young people, who on average are likely to change jobs more frequently. Especially in Sweden, the situation is also affected by a low unemployment rate and a high general turnover in the job market. If is working actively to develop the recruitment process, the salary model, and the onboarding and performance follow-up process, to reduce the turnover in the customer centers. Work environment and leadership development are also important focus areas going forward. In the Baltic countries, If works both externally and internally on employer branding in order to attract and retain employees.

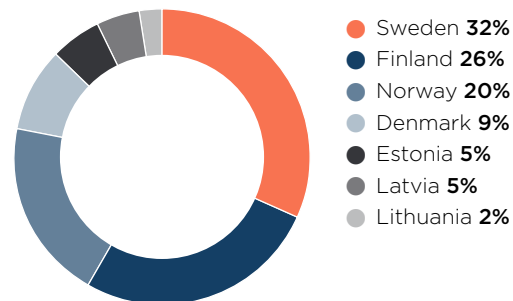
Number of Employees (FTE)

If

	31 Dec. 2018	31 Dec. 2017
Sweden	2,145	1,955
Finland	1,729	1,777
Norway	1,312	1,312
Denmark	618	592
Estonia	365	347
Latvia	333	292
Lithuania	154	153
Other	23	23
Total (FTE)	6,680	6,452
% of FTE on temporary contracts	1.8%	2.3%

Employees (FTE average) by Country

If, 2018



Employee Turnover*

If

	31 Dec. 2018	31 Dec. 2017
Sweden	19.5%	15.7%
Estonia	17.7%	18.2%
Latvia	14.7%	13.6%
Denmark	11.4%	10.0%
Finland	9.5%	9.3%
Lithuania	8.9%	7.9%
Norway	8.7%	10.0%
Total	13.4%	12.1%

* Departure turnover including permanent full-time employees with monthly pay. Calculated using headcount.

Employee Turnover* per Age Group

If

Age group	2018
< 30 years	22.5%
30-50 years	9.8%
> 50 years	10.8%

* Departure turnover including permanent full-time employees with monthly pay. Calculated using headcount.



Topdanmark

Topdanmark's employees are the most important resource for ensuring that the company's customers get the best service in every situation. Therefore, competent and motivated employees are crucial for the company. Topdanmark has a range of human resources policies that guide this work, for example, with regards to competence and talent development, employee commitment, job satisfaction, and health and well-being. The objective is for the company's employees, and the labor market in general, to consider Topdanmark as an attractive workplace characterized by a high-level of competence, a high-level of motivation, and trustful cooperation. In 2019, Topdanmark will launch a new people strategy with the aim of establishing a clear direction for how the organization should develop to support Topdanmark's business strategy.

A close dialogue between the Executive Board and the employees is important. At Topdanmark, this is realized through a Cooperation Committee with employee representatives. The committee's task is to take on, discuss, and solve organizational problems. In addition, Topdanmark

has a Competence Committee that specifically considers training and development-related topics.

To be able to offer competitive products and services, Topdanmark has gradually made its business operations more efficient by, for example, increasing the automation of processes. As a result, the number of employees working at Topdanmark decreased again in 2018 compared to the previous year. Therefore, the employee turnover has been above the industry average for a number of years. Generally high mobility in the Danish labor market has also contributed to higher turnover rates. In 2019, the level is expected to remain the same as in 2018.

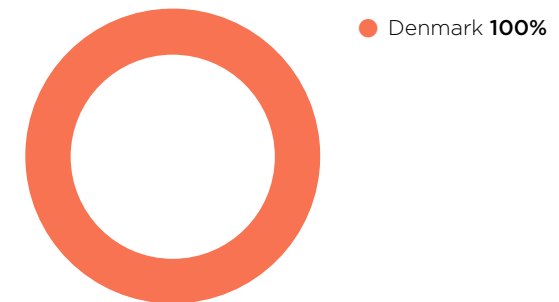
Number of Employees (FTE)

Topdanmark

	31 Dec. 2018	31 Dec. 2017
Denmark	2,307	2,403
Luxembourg	2	2
Total (FTE)	2,309	2,405
% of FTE on temporary contracts	2.4%	1.7%

Employees (FTE average) by Country

Topdanmark, 2018



Employee Turnover*

Topdanmark

	31 Dec. 2018	31 Dec. 2017
Employee turnover	14.0%	14.3%
Employee turnover in the Danish finance industry	NA**	13.0%

* Departure turnover, including employees who have left the organization voluntarily, have been dismissed, have resigned, or have left for other reasons. The figure also includes terminated temporary contracts.

** Statistics for 2018 were not available when this report was written.



Mandatum Life

Mandatum Life has more than 500 employees, and the company operates mainly in Finland and the Baltics. Mandatum Life believes that only satisfied employees give rise to satisfied customers. That is why investing in personnel practices not only reflects the company's values but also makes good business sense.

Employee satisfaction is one of Mandatum Life's long-term strategic targets. The objective is to build a work culture based on trust, where having the right people in the right places results in the highest quality of service for the company's customers. Employees want challenging work, respect and recognition, opportunities for advancement, professional growth and development, and a flexible work environment. During 2018, the number of employees at Mandatum Life increased slightly in Finland but decreased in the Baltics as part of the cost efficiency program, aiming for a more efficient and sales-oriented organization.

Number of Employees (FTE)

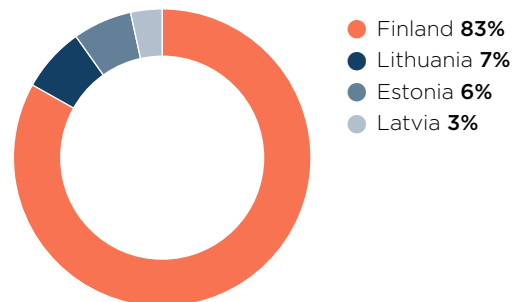
Mandatum Life

	31 Dec. 2018	31 Dec. 2017
Finland	441	427
Lithuania	38	37
Estonia	35	31
Latvia	15	26
Luxembourg	3	*
Sweden	1	*
Total number of employees (FTE)	533	521

* As of 2018, Luxembourg and Sweden are included in the calculations. Figures for 2017 have not been modified to include these countries. In 2017, Mandatum Life had two employees in Luxembourg and one employee in Sweden.

Employees (FTE average) by Country

Mandatum Life, 2018



Employee Turnover*

Mandatum Life

	31 Dec. 2018	31 Dec. 2017
Employee turnover	11.5%	11.8%

* Departure turnover, including permanent full-time employees with monthly pay working in Finland. Calculated using head-count.



Diversity

Being treated fairly and equally is a basic human right, according to the UN, and provides the foundation for a diverse and inclusive work environment and organizational culture. Employees who work in a diverse and inclusive work environment are more likely to feel engaged and satisfied. In a diverse environment, employees feel that they have the same possibility to develop and advance their careers. A diverse work culture also boosts innovation and growth of intellectual capital through a wealth of perspectives and through the satisfaction that employees feel from working for a company with sound and modern values.

Furthermore, a lack of diversity limits a company's access to both important customer segments and interesting segments in the talent market. A lack of diversity through discrimination or unconscious bias therefore has a negative impact on business performance. In other words, diversity is important because it is profitable, but also because a lack of it is morally and ethically wrong.

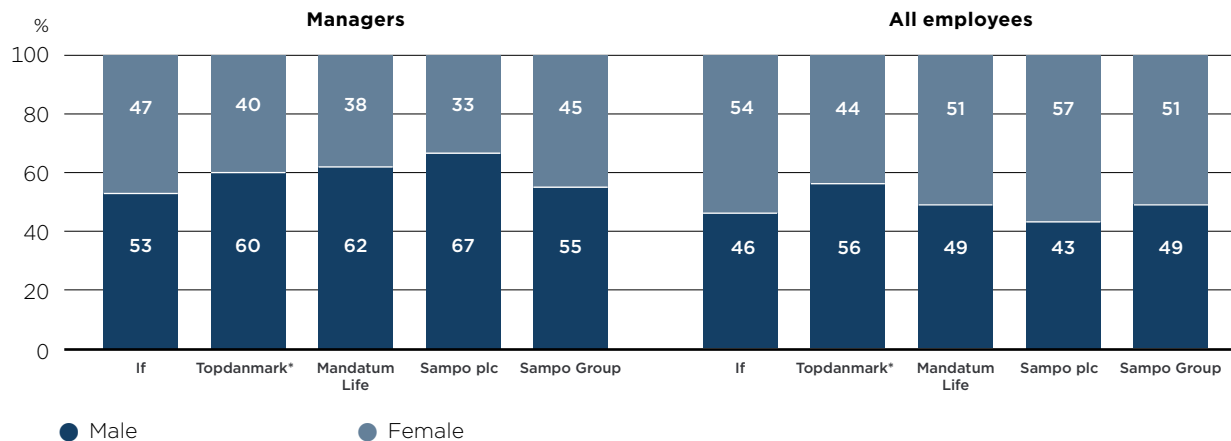
Diversity of Sampo Group's Board of Directors and Personnel

Diversity and non-discrimination are highlighted in Sampo Group's governance documents. The Sampo Group Code of Conduct describes how Sampo Group as a whole aims to provide a non-discriminatory, agreeable, and

open work environment that encourages entrepreneurship and in which exemplary performance is rewarded. Sampo and the Group companies recognize that all employees should be treated fairly and equally, regardless of gender, ethnic background, language, religion, nationality, age, sexual orientation, or physical ability.

Gender Distribution

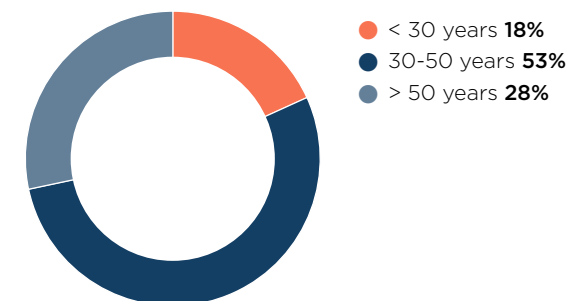
Sampo Group, FTE 31 December 2018



*Topdanmark's hourly paid employees are not included in the calculations.

Age Distribution of Personnel

Sampo Group, FTE 31 December 2018



Topdanmark's hourly paid employees are not included in the calculations.

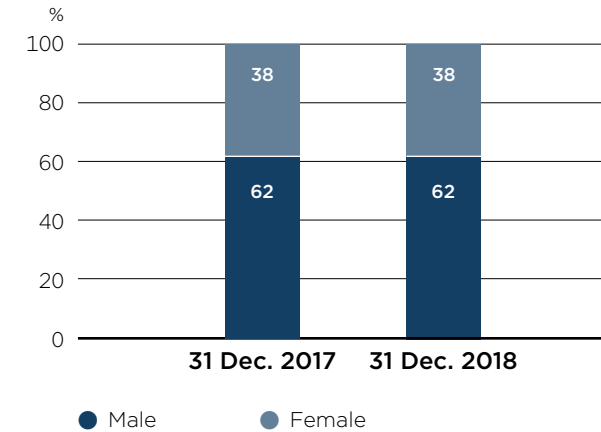


Further, the Policy on Diversity with Regard to the Board of Directors of Sampo plc states that both genders shall be represented on the Board of Directors. When electing the Board of Directors, a broad set of qualities and competencies are sought, and it is recognized that diversity, including age, gender, geographical provenance, and educational and professional background, is an important factor to take into consideration.

Sampo has also set a target on board equality. The Nomination and Compensation Committee considers gender equality and ensures that both genders are always represented on the Board of Directors, and has as its target a share of at least 37.5 per cent of the total number of members for both genders. At the end of 2018, the Board of Directors had three women and five men. The share of women was 38 per cent and, thus, the target was met, as was the case the previous year.

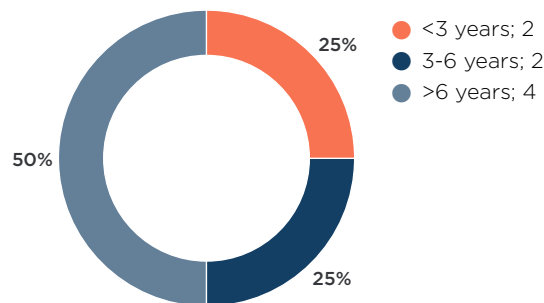
Gender Distribution of the Board Members

Sampo plc



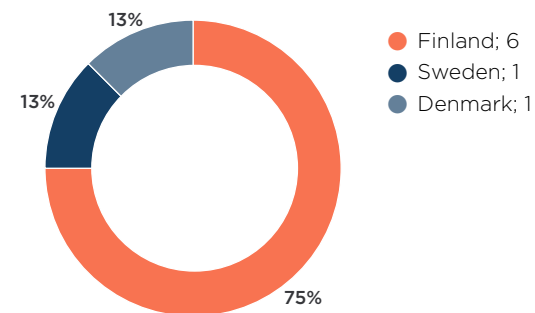
Length of Tenure of the Board Members

Sampo plc, 31 December 2018



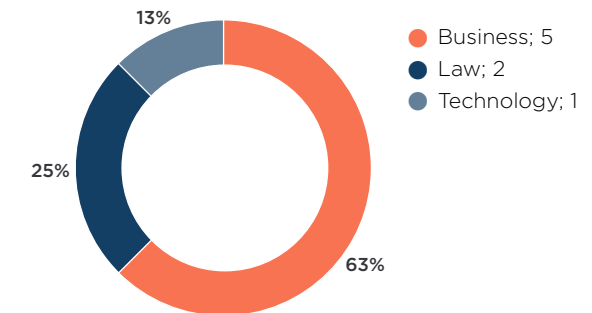
Geographical Mix of the Board Members

Sampo plc, 31 December 2018



Educational Background of the Board Members

Sampo plc, 31 December 2018





If

Diversity and equality are key focus areas for If. If's Ethics Policy states that the business culture shall promote equality and diversity and that no kind of discrimination, harassment, or bullying is tolerated. Decisions on recruitment, promotion, development, and compensation are based on the employee's abilities and skills only, and must never be based on irrelevant factors such as gender, age, ethnic background, religious belief, or sexual orientation. The ethics policy also states that all employees must actively work against discrimination in relation to If's external stakeholders. The policy applies to If's suppliers and subcontractors as well, as If expects them to uphold the same ethical standards. In 2019, If aims to develop a supplier code of conduct, and actively work toward including diversity and equality in the company's sustainability standards and requirements.

If generally has equal gender representation with nearly 50/50 female and male employees. The overall number of female leaders at If was 47 per cent in 2018. In the top management team, female representation was 17 per cent. However, on the levels immediately below the top management team, the balance is more equal and several recent senior leader appointments have been female. There are also certain functions at If that are male or female dominated, for example, IT and HR. In these areas, the main challenge is to make sure that the available talent pool when recruiting becomes more equal. If's internal monthly reporting includes gender diversity KPI's for all countries, in which If operates. Additionally, annual gender equality and salary mappings are done in accordance with local requirements. The plan is to continue developing diversity related work in 2019, especially regarding diversity in recruitments.

If has a Diversity and Inclusion board, established in 2015. The board consists of representatives of senior management and includes members from the top management team. The board discusses equality and diversity, analyzes statistics, and recommends actions to further achieve equality in the company. During 2018, the Diversity and Inclusion board continued its work by, for example, hosting workshops in management teams. Based on the proposals of the board, HR processes, such as recruitment, succession planning, and leader evaluation, are being further strengthened in order to support gender equality in the company. In 2018, 14 voluntary diversity ambassadors were appointed by the board. Out of 82 applicants, 9 women and 5 men of different ages and nationalities were chosen, and their task is to promote diversity from both a business and an ethical perspective. During 2018, the ambassadors facilitated workshops



on unconscious bias, mentored new employees, and reviewed the recruitment process. In 2019, the work will continue and includes building a training program focusing on inclusion, ethics, and diversity.

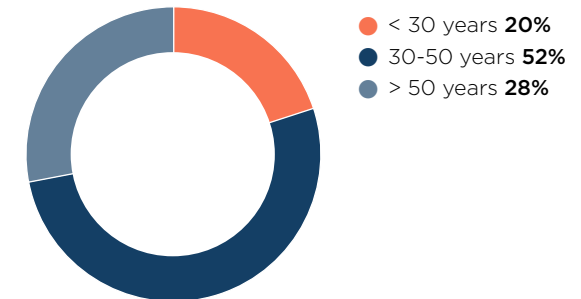
During the fall of 2017, the #metoo campaign brought cases on sexual harassment in society to the general public's attention. If immediately took forceful action and increased its already existing activities to prevent sexual harassment. In 2018, the onboarding training was developed in all countries and includes discussions on expected behavior, how to prevent harassment, and how to act if witnessing or experiencing inappropriate behavior. A mentoring program was set up by the company's diversity ambassadors in the Claims unit in Business Area Private.

In Sweden, all leaders were trained to recognize and deal with sexual harassment, and material for team workshops was developed and distributed to all leaders. Furthermore, workshops on working environment, including discussions on sexual harassment, were held in all locations in Sweden, in cooperation with the unions. If also performed a company-wide survey on harassment, which will be conducted again in 2019. The process for reporting sexual harassment was clarified in all countries and the cooperation between HR and the internal investigations unit was improved. This work will continue as a prioritized focus area in 2019.

More information can be found in the **If Sustainability Report 2018** (www.sampo.com/year2018).

Age Distribution of Personnel

If, FTE 31 December 2018





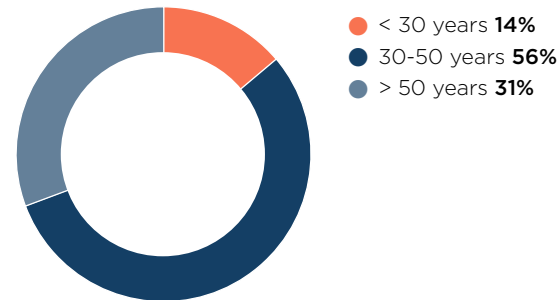
Topdanmark

Topdanmark works on maintaining and developing openness in its business culture, preventing any kind of discrimination with regard to gender, race, nationality, social and ethnic origin, religion, political views, physical disability, age, or sexual orientation. The company's target is that both genders should make up at least 40 per cent of management at all levels, and that there should always be at least one female candidate for executive positions. In addition, Topdanmark complies with the legislative definition of even gender distribution on the company's Board of Directors.

More information can be found in the **Topdanmark CSR Report 2018** (www.sampo.com/year2018).

Age Distribution of Personnel

Topdanmark, FTE 31 December 2018



The Share of Women on the Board of Directors

Topdanmark

	2018	2017
The share of women	44%	56%

Women in Management

Topdanmark

Goal	2018	2017
Minimum of 40 per cent of both genders at all levels of management	40%	42%
At least one female candidate at job interviews for advertised managerial positions*	53%	76%

* The number indicates the percentage of the total number of interviews for vacant positions where female candidates have been interviewed. When the goal has not been met, the reason has been either that there were no female applicants or that the female applicants did not match the competencies of the male applicants.

Share of Women at Different Management Levels

Topdanmark

Management Level	2018	2017
Level 1 (including Executive Board and top management team)	23%	19%
Level 2	38%	33%
Level 3	44%	48%



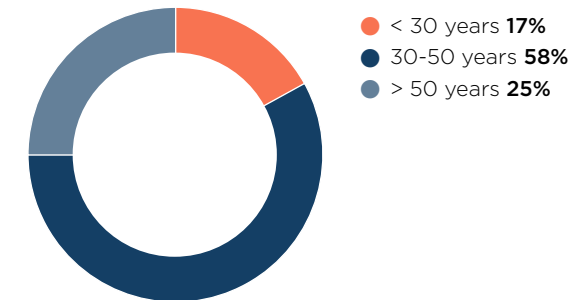
Mandatum Life

Mandatum Life strives to promote equality among all employee groups, and the company aims to emphasize equality in its actions and policies. By tapping into the employees' different backgrounds, know-how, and capabilities, Mandatum Life aims to create a more innovative, fair, and caring work environment. Equality issues are a part of the Mandatum Life Way leaflet, which is given to all new employees as part of onboarding.

Mandatum Life strives to be one of the best places to work in Finland, including offering all its employees a work environment that promotes diversity. According to the Great Place to Work Finland survey conducted in 2018, 91 per cent (92) of Mandatum Life employees feel that everyone at Mandatum Life is treated equally regardless of age, race, gender, or sexual orientation. In terms of gender, equality among employees is well-balanced, with men comprising 52 per cent (51) and women 48 per cent (49) of the personnel at the end of 2018. When it comes to managers, men have a larger representation.

Age Distribution of Personnel

Mandatum Life, FTE 31 December 2018





Health and Well-Being

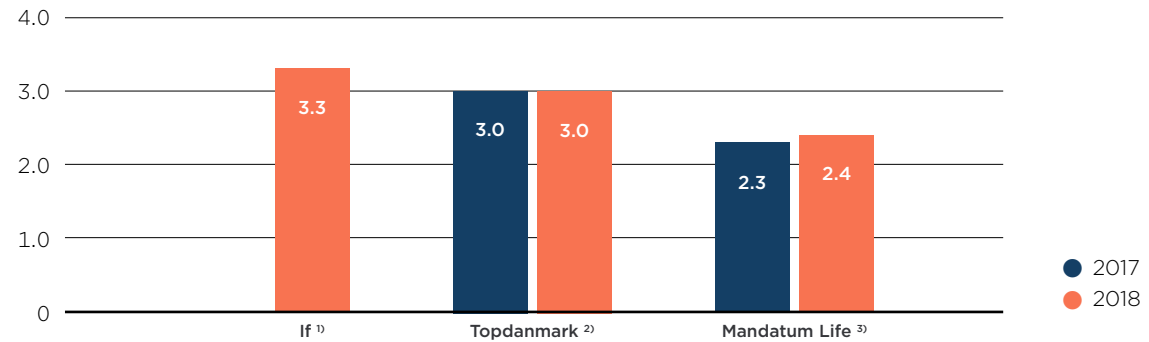
Sampo Group's business relies on delivering first-class customer service and preserving good relations with all other important stakeholder groups. The key to success in the financial field is a motivated and driven workforce, which is built upon the assumption that employees who are healthy and well perform better.

Mental well-being is crucial in working life. Employees who have a good work-life balance and good stress endurance perform better at work and are healthier. Investing in the mental and physical health of employees can act as a preventive measure in employee healthcare and can bring the company savings in the long-term.

In accordance with the Sampo Group Code of Conduct, Sampo Group promotes the well-being of its employees and strives toward building a healthy workplace for everyone. Mental and physical well-being are managed by offering employees meaningful work assignments, possibilities to develop skills, and a low organizational hierarchy, as well as through organized team activities, good design of offices, co-operation, benefits, and sports programs.

Absence Due to Illness*

If, Topdanmark, and Mandatum Life



* Note that the figures for different companies are not comparable to each other due to different calculation methods.

¹⁾ Statistics are based on If's internal reporting standards and may deviate from locally published statistics. The calculation method changed from sick hours to sick days in connection with the implementation of the new HR system in 2018. Due to the change, comparison figures for 2017 are not available. The percentage is for the whole year and it covers all monthly paid employees.

²⁾ The figures indicate that, on average every employee took sick leave for the stated percentage of the total number of working hours in each year. The figure covers all employees.

³⁾ Statistics are based on Mandatum Life's internal reporting standards and may deviate from locally published statistics. The figure includes Mandatum Life's full-time and part-time employees in Finland.



If

Adhering to local rules and regulations is the starting point for a sound work environment. If's Ethics Policy states that If seeks to ensure a healthy and safe work environment for all its employees. Furthermore, the Leader in If Business Instruction states that creating and sustaining a healthy workplace requires a shared approach involving employees, leader, HR, and union representatives.

If works continuously on health promotion and rehabilitation. In all countries and almost all locations, employees have easy access to training facilities or to a comparable wellness allowance. In addition, most employees have the opportunity to work flexible hours. When work assignments allow it, remote work is also possible.

If works extensively on promoting well-being. By focusing on well-being, If is trying to secure a stable and low level of sick leave. In 2018, If continued to work on reducing the amount of sick leave in all its operating countries. HR arranged Health Days and Health Weeks to promote a healthy lifestyle and If as a healthy workplace. Both physical and mental well-being have been in focus in different lectures, seminars, and intranet articles during the year.

In Sweden, a wellness allowance was established for employees outside the main office.

In the Baltic countries, the number of sick days continued to be low during 2018. In Finland, on the other hand, an analysis of the reasons behind the increased absence due to illness in the customer centers was conducted together with an external healthcare service provider in 2018. The analysis resulted in a number of recommended actions. Since then, the customer center facilities have been improved (e.g. noise reduction and air quality) and breaks for stretching have been introduced. The healthcare provider is closely monitoring short-term sick leave and actively contacting employees. Three-party discussions between the healthcare provider, the employee, and the leader are held if there are numerous instances of short-term sick leave. HR is also actively monitoring long-term disability cases and coaching leaders on recommended actions. The co-operation model with the healthcare provider has been revised in order to better tackle the root causes of absence due to illness. In all countries, HR business partners follow up absence due to illness on a monthly basis, and discuss trends and possible actions in management teams and with leaders.

Absence Due to Illness

If

	2018
Norway	4.7
Finland	3.5
Sweden	3.3
Denmark	2.2
Estonia	1.8
Latvia	1.4
Lithuania	0.7
Total	3.3

Statistics are based on If's internal reporting standards and may deviate from locally published statistics. The calculation method changed from sick hours to sick days in connection with the implementation of the new HR system in 2018. Due to the change, comparison figures for 2017 are not available.

Topdanmark

Topdanmark wants to support its employees' health.

Health creates well-being and job satisfaction, and this in turn provides a strong platform from which Topdanmark can deliver the best service to its customers. In practice, employees are offered a range of health-related initiatives, for example, cycling activities such as the Cycle to Work campaign, and healthy canteen food. Every second year, all



Topdanmark employees are offered a health check during working hours. The previous health check took place in 2017, and 40 per cent of employees accepted the offer.

In 2018, employees who were at risk of lifestyle diseases were offered an individual health program, My Health. 30 programs were made available to employees for a small co-payment; each program lasted 3-4 months. Topdanmark has previously implemented similar programs among its employees, and they have provided good results in long-term and sustainable lifestyle changes. In addition, in 2018, a massage scheme for all employees was established. The purpose is to prevent disabilities, such as neck and arm pain, and further promote mental well-being.

In Denmark in general, the number of people who take sick leave because of stress is increasing. At Topdanmark, too, an increase has been seen among the company's employees. Therefore, Topdanmark has initiated efforts to prevent incipient stress and to take care of employees suffering from stress. All Topdanmark's employees have the option of anonymous stress counseling provided by experienced psychologists. This service can be used as a first step for employees who experience symptoms of stress. In cases of serious and long-term stress, a program tailor-made for the individual is available as part of the employee health insurance scheme.

When it comes to absence due to illness, Topdanmark's goal is that it should be below the figure for the entire industry, as calculated by the Danish Employer's Association for the Finance Sector. In 2018, Topdanmark's percentage for absence due to illness was 3.0 per cent (3.0). The industry figure for 2018 was not available at the time this report was written, but the industry figure for 2017 was 2.9 per cent. Topdanmark is closely following the absence due to illness percentage, as the aim is to bring it below the industry average.

Further information can be found in the **Topdanmark CSR Report 2018** (www.sampo.com/year2018).

Mandatum Life

At Mandatum Life, the main focus in managing employee health is preventive measures in well-being at work. The company invests in a motivating work environment and preventive occupational healthcare. Mandatum Life offers comprehensive occupational healthcare services to employees, including among other things, consultations with a work psychologist, regular ergonomic visits to the workplace, specialist services, and examinations related to illnesses. In addition, among the practices in place are support for returning to work following a long illness and the preventive early intervention model. Mandatum Life works in close cooperation with the occupational healthcare service provider.

Mandatum Life also supports various forms of physical exercise, different work patterns, and practices that facilitate daily work by offering, for example, possibilities for remote work and free assistance in caring for a sick child for three weekdays. Employee benefits include discounts for various exercise and sport facilities and services. In addition, a free yoga class is offered weekly at the headquarters' premises. In 2019, Mandatum Life will support the Team Rynkeby Charity Cycling campaign and encourages its employees to cycle more and use a bicycle for commuting. The number of kilometers cycled during the campaign will determine the amount donated to the campaign's charity, which supports critically ill children. During the year, Mandatum Life will host events and arrange activities to encourage all employees to take part.

In the results of the Great Place to Work Finland study, which measures among other things well-being at work, Mandatum Life's Finnish operations received an overall rating of 84 per cent (85) in 2018. The response rate for the survey was 87 per cent (86). In addition, absence due to illness at Mandatum Life has been at a low level for many years. On average, an employee is absent for two days a year.



Employee Engagement

An engaged, committed, and motivated workforce lays the ground for value creation. Motivated employees equal better everyday performance, but also increased intellectual capital value. Employee engagement is a competitive advantage that cannot be copied. Employee engagement at Sampo Group is linked directly to employee well-being, diversity, and professional development.

If

A modern and complex service organization like If, with a competent and highly trained staff, encourages individual employees to take responsibility for customer service, performance, and professional development. When recruiting, If is looking for talented individuals who are customer oriented and have a strong sense of responsibility for their impact on the working environment in their teams.

At If, employee satisfaction is measured twice a year. The aim is to provide an overview of the current situation and further strengthen the collaboration between team members and between the team and the leader. Questions are divided into three categories: Environment & Culture, Leadership, and Self & Team. The results of the survey are intended to be used to identify themes that require specific attention, or organizational areas with challenges that require actions. Leaders have access to their team's results, share them with their employees, and discuss actions to ensure continued good results or to develop certain areas. Furthermore, the data at an aggregated level

is used by management teams as an input to organizational development processes.

Overall, the employee satisfaction survey results, including the employee Net Promoter Scores (eNPS), confirm that employee satisfaction is on a high level at If. In addition, the results have been improving steadily over the last few years. If's employees give a score of 6.12 (6.04) on a 7-grade scale on the question "I enjoy working within If". If is now focusing on taking employee engagement further. If will update the employee survey to better reflect the importance of employee engagement. An initiative to outline the purpose and evaluate options has started, aiming to launch the new survey tool during the second half of 2019.

Topdanmark

Topdanmark wants to promote a motivating and inspiring work culture at all organizational levels. In 2018, Topdanmark took a step forward in the development of new tools for the work related to well-being, motivation, and involvement. Topdanmark shifted the focus from figures and statistics to dialogue in employee teams.

Until 2016, Topdanmark had used a traditional method for measuring well-being, where the employees would answer 75 questions every second year. The new tool consists of just 15 questions, which all functions must discuss twice a year. The questions concern the individual's motivation and involvement, as well as the cooperation within a function or a team. The new well-being dialogues were implemented in May 2018. By the end of the year,

around 80 per cent of all employees and managers had completed the first round of dialogue. The new method for working with well-being and motivation has been received well among the employees.

Further information can be found in the **Topdanmark CSR Report 2018** (www.sampo.com/year2018).

Mandatum Life

Mandatum Life is proactively identifying and fostering the growing potential that lies within the company and thereby ensuring that it is an attractive workplace for new talent. This requires a culture with a low hierarchy, confidence building, and employee engagement.

Employee satisfaction is one of Mandatum Life's long-term strategic targets. At Mandatum Life, it is believed that a positive employee experience leads to a good customer experience. The objective is to build a work culture based on trust, where having the right people in the right places results in the highest quality of service for the company's customers.

Mandatum Life measures its employee satisfaction every year through the Great Place to Work Finland survey. The target is for 90 per cent of Mandatum Life's personnel to feel that they are employed in a very good workplace. Mandatum Life's focus on well-being at work has paid off. In 2018, the target was exceeded for the fourth year in a row and was 90 per cent (94). In addition, Mandatum Life's efforts to provide a truly good workplace for its employees are bearing fruit. According



to the survey carried out in 2018, 91 per cent (91) of the company's personnel would recommend Mandatum Life as a workplace.

In 2018, Mandatum Life started a significant renovation and work space uplift project at its Bulevardi headquarters, which was also identified as one of the most important development issues in the Great Place to Work survey. The first renovated spaces were ready during the fall and the project will continue in 2019. The planning is done together with the employees so that the new office premises will reflect the needs and wishes of the personnel. The aim is that, in the future, the premises will work as a factor that increases both employee motivation and well-being.

Sampo plc

In 2018, Sampo plc measured its employee satisfaction for the second time. Sampo also changed the survey provider to better meet the needs of the company's organizational structure. Therefore, the results for 2018 are not comparable to the previous year. According to the survey conducted in 2018, employee satisfaction at Sampo plc is on an excellent level. The company's personnel feel that they are employed in a very good workplace, the score being 4.43 on a scale of 1-5. Further, the majority of the personnel would recommend Sampo plc as an employer, the score being 4.41.

Professional Development

The insurance industry is developing at a fast speed and is facing changes such as digitalization and changing customer needs. Companies and their employees need to stay on top of these changes. There is a need for competent employees and good leadership.

The competition for top talent is hard, and finding the right people is crucial for companies operating in a knowledge-intensive business like the financial industry. The possibility to develop and learn enhances motivation, increases loyalty, and helps in attracting and retaining top talent.

As employers, Sampo Group companies want their personnel to be able to develop to their full potential. If people do not feel that they can develop, their motivation might drop, and the company could face a risk of losing crucial intellectual capital. Fair and rewarding remuneration for all employees is an important factor in Sampo Group's ability to enhance shareholder value in a competitive business environment, but it is an equally important determinant of success in the competition for talent. Further information on remuneration in Sampo Group can be found at www.sampo.com/remuneration.

If

If aims to be the leading property and casualty insurance company in the Nordic and Baltic countries. To achieve this, If must have the best in-depth understanding of the customers' insurance needs and, correspondingly, the best underwriting skills. If strives to be the most service-oriented company in the industry and expects employees to be passionate about being the most skilled and competent professionals in their field of specialization. The financial industry is changing rapidly, and If recognizes that in order to realize these ambitions, it is vital to ensure that the competence of its employees is up-to-date and improved continuously.

In 2018, If created a virtual Leadership Center, focusing on leadership development. The center offers leadership-related materials, information, and suggestions for training. In addition, If offers traditional training programs, such as a basic leadership program for new leaders, personal leadership, change management, leading high-performance teams, and situational leadership. HR also organizes regular leadership forums on various topics. In line with the restructuring of leadership development, If has also continued to invest in the development of all employees. If's Employee Learning Center offers a professional and structured onboarding



process, a holistic path for compliance training, and help for the development of many additional workplace skills, such as project management, communication, languages, and coaching.

During 2018, If's competence development focused on customer orientation. The business areas are driving change through strengthening the competence of both employees and leaders, especially with regard to digitalization and customer service. Senior competence partners are working in close cooperation with business leaders in setting the competence development agenda.

In Business Area Private, the Private Ahead journey continued during 2018. A Nordic Team Leader Academy has been established to increase the front-line leaders' resilience and adaptability to change. In 2018, 70 team leaders participated in the training sessions (out of a total of 190), and the program continues in 2019. The main themes of the program are employee engagement, business knowledge, and knowledge sharing. In Business Area Commercial, the SEE journey (Safe, Easy, Express) continues to challenge both managers and employees to take an intense customer focus. For example, the concept of SEE Camps for new employees joining Commercial has been developed to onboard them on the SEE journey. In Business Area Industrial, the Challenger Approach continues to focus on customer orientation and teamwork around key customers.

Approximately half of If's employees are subject to the training requirements of the new Insurance Distribution Directive (IDD). In 2018, all of these employees were trained in accordance with the legal requirements of each country. All business areas have been offered training in anti-money laundering and competition law.

If has invested in a new learning platform, which was launched in January 2019. This provides a more modern and flexible learning environment and enables detailed reporting and analytics.

Topdanmark

Targeted competence development for individual employees is important for all Topdanmark's employees. Therefore, Topdanmark has a comprehensive training and development program for all occupational groups.

Topdanmark places importance on management development, because good management is key to attracting and retaining qualified employees. The company's management program targets both newly appointed and experienced managers. Newly appointed managers are offered a 6-month program with a specific focus on their role as managers. Topdanmark offers experienced managers a development program in cooperation with Copenhagen Business School Executive Program, comprising both customer orientation and personal

development. In addition to courses and training, there is a focus on development in the job itself, and all managers can get regular support in handling managerial tasks from experienced, internal HR consultants.

For many years, Topdanmark has also focused on talent development and ran programs to encourage talented employees to use their competencies to contribute to Topdanmark's growth and the delivery of results. Topdanmark wants to get a good understanding of how Topdanmark, as an insurance and pension company, should navigate in a society experiencing increasing technological development. In 2018, nine selected Topdanmark specialists completed a talent program in cooperation with Singularity University Nordic, which focused on an innovative mindset and culture change. The purpose was to introduce new competencies into the organization and to resolve some strategically important tasks.

In 2019, Topdanmark will launch a new people strategy, which also includes a new management development program. Topdanmark will focus even more on management development to support the realization of the company's ambitious goals.



Mandatum Life

Valuing expertise and developing competence are core elements of Mandatum Life's future success. Competence development at Mandatum Life is based on the 70-20-10 model. According to this model, 70 per cent of learning takes place at the workplace through interesting and challenging assignments, 20 per cent through feedback and learning from other members of the work community, and 10 per cent through training programs. The goal is for every employee at the company to be able to develop their personal competence at work and keep their skills up to date in a fast-paced environment.

Learning at work is encouraged by opportunities to take part in development projects and working groups that cross unit boundaries. The idea is to use internal job rotation to fill temporary open positions, such as maternity leave vacancies. Learning through feedback is supported by, among other things, a mentoring program, which was organized for the seventh time in 2018.

A 360-degree evaluation is carried out every two years to support leadership development. Feedback is given by the employees who work under the manager, by colleagues, and by the manager's manager. Based on the latest 360-degree evaluation carried out in 2017,

supervisory work at Mandatum Life is at a high level compared to other Finnish expert organizations. Based on the feedback, the strengths of the supervisory work are enthusiasm, customer focus, taking responsibility, leading by example, approachability, and ease of cooperation. Identified development areas include, among other things, controlled implementation of new procedures, efficiency of resources and work organization, and time management challenges. On a scale of 1-7, the weakest scores were 5.5 and the top scores were 6.5, on average. Of the personnel, 96 per cent responded to the survey.

All new Mandatum Life managers participate in the introduction training for managers when they take on their new role. In addition, in their first year of working for the company, all managers participate in the Mandatum Life Management School, which is a coaching program that aims to examine the role and tools of managers, as well as interaction in situations involving managerial work. The coaching provides a foundation for analyzing and developing one's own supervisory work and for managing the team's activities. The goal of the program is to maintain a consistent leadership culture at Mandatum Life. The program was arranged for the eighth time in 2018, and more than 95 per cent of the company's managers have taken part in it.

The Great Place to Work Finland survey is also an important measure of a manager's success, as it provides not only company-specific results, but also team-level results. Team satisfaction is one of the criteria in determining the bonus for each manager.

Investments in training programs continued in 2018, especially in the field of customer service. In collaboration with Aalto Executive Education, Mandatum Life launched a training program, which focused on developing business projects in small groups across unit boundaries. The aim of the training was to provide participants with new operating models and tools to increase customer understanding. Another training program in the field of customer service was done in collaboration with a service design agency, with the aim of clarifying Mandatum Life's service identity through a service design project. Some customers also took part in this project.



RESPONSIBILITY AND CUSTOMERS

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Responsible
Products and
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Responsible
Sales and
Marketing
Practices

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Customer
Satisfaction



Responsibility and Customers

The Sampo Group Code of Conduct sets the requirements for products and services, and responsible sales and marketing practices, outlining how Sampo Group companies should always strive to act in the interests of their customers, providing products and services that are fair, clear, and designed to help meet the evolving needs of customers. As requirements related to products, services, and sales and marketing practices are constantly evolving, appropriate care shall be taken to ensure that customers are given transparent information and that marketing activities are professional and never give an erroneous or exaggerated image of the company's products.

Responsible Products and Services

As a risk manager, risk carrier, and investor, Sampo and its subsidiaries play an important role in fostering stability and economic development in society. Sampo Group companies aim to offer customers correctly priced insurance solutions that provide customers with security and stability in their daily lives. While encouraging better risk management, Sampo Group companies also offer products and services that help customers create positive social or environmental impacts.

Large insurance businesses rely on suppliers and contractors around the globe. Today, a larger proportion

of suppliers than ever before are able to provide environmentally sound services and products. By actively requesting innovative solutions, resource efficiency, and transparency, companies can have a significant positive impact on the environment and stimulate sustainable production and consumption.

If

If works with risk, safety, and protection on a daily basis, and therefore knows which solutions increase customers' safety. If's priority is to help customers manage risks and to provide support when accidents occur. By providing If's customers with guidance on how to prevent losses, If helps them to both save money and protect the environment.

Loss Prevention

Over the years, If has gathered extensive knowledge of how people are affected by losses and how such losses can be avoided. This knowledge is increasingly sought after and important – both for If as a company and for the general public. Loss prevention is also the most important issue that If discusses with its customers. By providing customers with guidance on how to prevent losses, If helps them to reduce risk and economic cost, and at the same time to protect the environment. According to a study conducted by Insurance Sweden, preventative measures not only lead to reduced risk of damage but also reduced greenhouse gas emissions. Fire and water damage are the most common types of damage that

If's customers experience. The average amount of CO₂ emitted from a household fire is 25 tons, while the amount of CO₂ emitted from water damage is 300 kilograms.

If offers, together with its partner Anticimex, house assessments to private customers who own their own house and have insurance policies with top coverage. The house assessments provide the customer with a report that helps them plan the maintenance of the property and minimize the risk of unpleasant surprises, including climate-related damage. According to If's statistics, houses that have been subject to house assessments have a lower risk of damage, and especially water and fire damage. Customers can get a house assessment free of charge every fourth year. Since 2012, If and Anticimex have completed approximately 100,000 house assessments in the Nordic countries, and in the coming years, If expects to do approximately 30,000 assessments a year.

If also has more than 1,300 industrial customers (i.e. companies with more than 500 employees) with business operations all over the world. These customers are offered advanced risk management services, in which If takes a comprehensive approach to fully understand their specific insurance and risk management requirements. If's risk engineers conduct on-site risk assessments and provide recommendations on concrete and cost-effective preventative measures, which, for instance, can reduce climate-related risks. Loss prevention reports, with risk

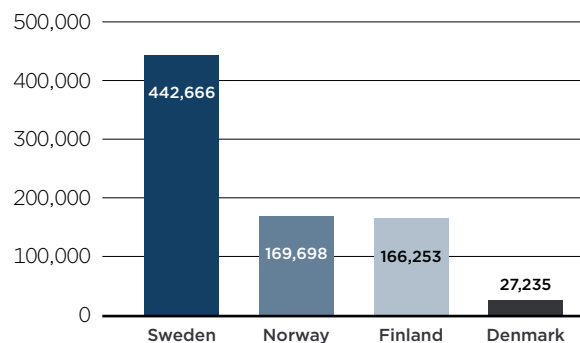


improvement recommendations, are sent to customers within three weeks of each visit.

If also provides loss prevention information on its website to all its customers. The website serves as the primary reference point for advice and documentation regarding loss prevention. Every year, more than 800,000 customers visit the Tips & Advice page, where information on how to prevent fires, burglary, and water damage at home is available. In addition, If has an online If Safety Shop in each Nordic country, where customers can acquire safety products, such as bicycle helmets and fire alarms. During 2018, the total turnover from the safety shops was approximately EUR 1.9 million.

Number of Page Views on Loss Prevention Website

If, 2018



In addition, safety continues to be an important loss prevention theme for If. During recent years, If has focused its efforts on fire and traffic safety, as well as the safety of children and youth. If's fire safety work is realized by creating awareness on the topic, especially among children and families. Further, the If Safety Fund is part of If's loss prevention activities to promote road safety for children and young people. The Fund allocates EUR 5,000 worth of security products (such as reflectors and reflective safety vests) per month to selected groups, only for security-promoting purposes. In addition, If has an If Personal Fund, which sponsors hobbies or acquisitions of safety equipment. Most of the sponsor objects are sports clubs.

More information is available in the **If Sustainability Report 2018** (www.sampo.com/year2018).

Sustainable Cooperation with Suppliers

If encourages and supports the company's suppliers and partners in their efforts to use more environmentally friendly methods in their operations. Strict requirements and close cooperation with suppliers and partners enable If to develop business while contributing to more sustainable development. If prioritizes environmentally friendly alternatives that take the whole life-cycle of the product into account, and prefers products and services that are certified according to existing ecolabel criteria or an environmental management system.

If's Procurement Policy and processes form the basis of the company's work on supply-chain sustainability. Suppliers and claims-handling services must meet strict

environmental requirements. Through If's policy guide for partners, If demands not only that all suppliers follow laws and regulations, but also that they are reliable as suppliers. All If's suppliers are obliged to follow labor laws and local regulations, agree to respect human rights, and actively take steps toward preventing discrimination. If's suppliers must also avoid conflicts of interest. All cases in which personal interests conflict with business interests should be reported and managed appropriately. Companies that deliver services and products to If are obliged to compete in a fair and honest way. If also encourages all suppliers not only to report and correct mistakes, but also to learn from them. During 2019, If will continue to advance its sustainable procurement processes and will start to develop a supplier code of conduct, which will include updated versions of environmental requirements and ethical standards.

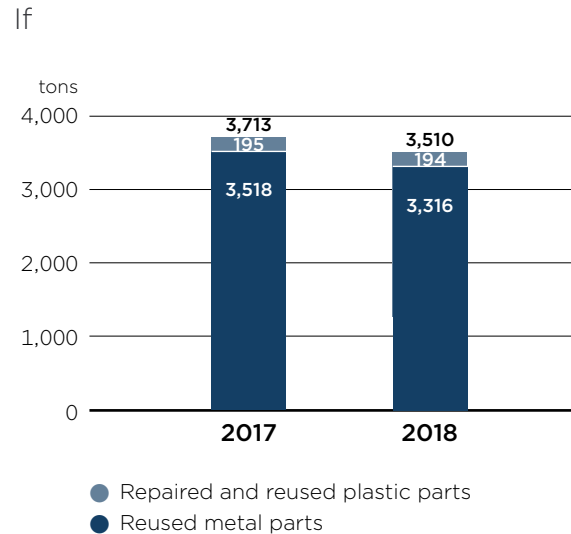
If cooperates with approximately 450 property repair suppliers and 3,000 suppliers that perform vehicle repairs. Together with its suppliers, If handled approximately 596,000 cases of car damage and 432,000 cases of property damage during 2018. Waste from these amounts of damaged materials can have a substantial impact on the environment, if not dealt with correctly. If's priority is to ensure that waste and materials from repair processes are managed in the best possible way. Therefore, If focuses on increasing the recycling and reuse of undamaged vehicle parts instead of disposing of them, as well as reducing the amount of waste from property repairs.



If regularly assesses whether the company's suppliers comply with If's policies and requirements. For example, in vehicle repair contracts, a key requirement is that spare parts must be reused and recycled. The number of reused and recycled spare parts must also be reported monthly. As a result, If's contractors reuse thousands of tons of metal and plastic each year, instead of using brand new spare parts. If has also set expected levels of plastic repairs, as well as used parts, that are being monitored and reported regularly. In addition, smart transportation of vehicles and spare parts is important in order to avoid unnecessary emissions. Regarding property repairs, If is continuously seeking new ways to increase recycling and minimize waste, for example by improving waste transportation by using lighter containers and, as an alternative, industrial bags in densely populated areas.

More information is available in the **If Sustainability Report 2018** (www.sampo.com/year2018).

Reuse of Materials in Vehicle Repairs



Digitalization

If has been focusing on digitalization for almost two decades. The digital insurance services that the company offers today combine environmental thinking with customer preferences regarding communication. If's online insurance service and e-invoices reduce paper consumption and increase the accessibility of If's services. Using a simple log-in system, customers can access a complete overview of their insurance matters anytime and anywhere, order e-invoices, adjust payment preferences, sign new agreements, change the coverage of their insurance, and track payments and the status of their claims handling.



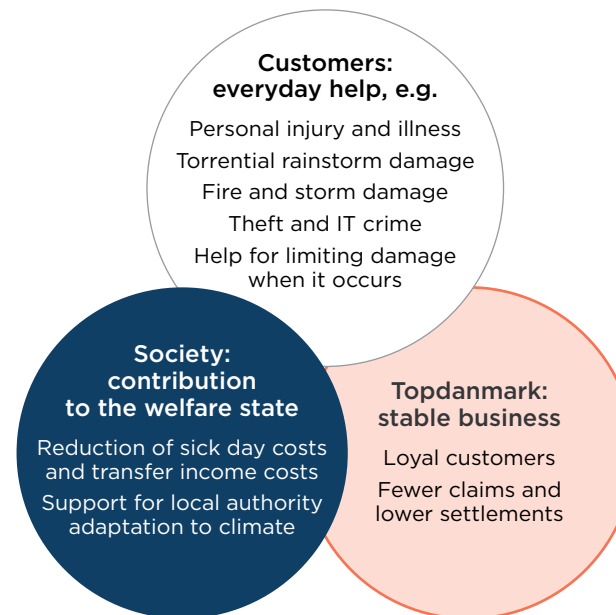
Topdanmark

Topdanmark's aim is to help customers in their everyday lives regardless of the situation. This is done by offering targeted products, services, and advice when they are relevant for the customer. Topdanmark constantly works to improve the company's services in all situations, for example by: securing coverage suited to the customer's needs and requests; providing good service before, during, and after a claim or illness; providing access to digital solutions; securing easy and fair claims handling; and giving the customer easy access to a fair complaints process.

In 2018, Topdanmark received the award for Denmark's best customer experience in KMPG's survey. In addition, Topdanmark was elected as the insurance company of the year at the car industry's Auto Awards, and the insurance company of the year at the conference Årets Finansvirksomhed (Finance Company of the Year) organized by FinansWatch.

Loss Prevention

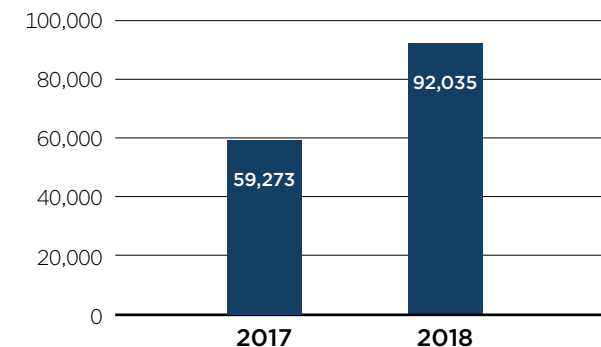
Topdanmark provides financial security to its customers through insurance and pension products. However, the consequences of claims are often more than purely financial for the individual customer, for Topdanmark, and for society in general. For example, accidents can leave behind physical or mental disabilities that can have a burdensome effect on customers' everyday lives. Therefore, Topdanmark works toward preventing losses and limiting the consequences of accidents. Loss prevention is a part of Topdanmark's CSR and overall business strategy.



The company integrates loss prevention, for example, in its advice to customers. On its website, Topdanmark provides customers, as well as other stakeholders, with advice on how to prevent damage and injuries. Examples of such advice include how to prevent water damage or injuries during a skiing holiday. Advice is provided to all Topdanmark's customers, ranging from private individuals to small and medium-sized businesses. Customer interest in this type of information, based on the number of page views on Topdanmark's loss prevention webpage, increased by 55 per cent from 2017 to 2018.

Number of Page Views on Loss Prevention Website

Topdanmark





During 2018, Topdanmark started many initiatives concerning loss prevention. These included, for example, testing the use of an intelligent water alarm together with approximately 1,000 customers, and preventing damage to farmers' slurry tanks by using an IoT platform to monitor the remaining capacity of a tank. The water alarm keeps track of the customer's water usage and sends a notification when a leak is detected. It can prevent extensive water damage and can thus save the customer a great deal of inconvenience. Slurry tank damage and leaks are very inconvenient for farmers. The usage of an IoT platform can prevent such damage. If damage does occur, it is detected quickly, and efforts can be implemented to limit the extent of the damage and the slurry leakage into fields, water courses, or lakes.

Further information can be found in the **Topdanmark CSR Report 2018** (www.sampo.com/year2018).

Digitalization

Topdanmark is in the process of digital transformation. When Topdanmark develops its digital solutions, the customer is always the first priority. The aim is that digitalization should make it easier and more straightforward to be a Topdanmark customer, in purchases, in everyday life, and in connection with a claim. Digital solutions contribute toward increased information and transparency for the conditions and, in particular, the process concerning a claim. Customers can report claims directly on Topdanmark's website, and the claim reporting process has been made simple by keeping the customer perspective in mind. Topdanmark has

also established an individual customer profile called My Topdanmark (Mit Topdanmark) for its customers. This helps in establishing an overview of the customer's insurance situation. The service is developed on an ongoing basis, and it contains personalized and relevant information for the individual customer.

Mandatum Life

Corporate responsibility is the cornerstone of Mandatum Life's business operations: securing and increasing the financial welfare of customers and safeguarding them against financial risks. In Mandatum Life's view, sustainable business attracts customers, long-term investors, and motivated employees. Mandatum Life's main corporate responsibility themes also relate directly to its customers and to society in general: responsible investing and promoting responsible personnel practices in work life.

Responsible Investing at Mandatum Life

Customer assets at Mandatum Life Wealth Management are managed responsibly. An ESG (Environment, Social, and Governance) analysis is integrated in all investment analyses and decision-making. Portfolio holdings are regularly screened for possible violations of international norms, such as the UN Global Compact. Companies with business involvement in controversial business areas are excluded. Further information on investments at Mandatum Life can be found in the section **Responsibility in Investments (page 66)**.

Ensuring Financial Security

Mandatum Life offers its customers risk insurance that fills a gap in the customers' and their families' financial security when statutory social security falls short. Mandatum Life's services also aim to increase the financial well-being of customers and ensure a better income level during retirement: the offering includes ways to save and grow wealth, as well as supplementary pension insurance. In addition, Mandatum Life's services supplement the statutory cover of entrepreneurs and their families to secure the continuity of their business. Entrepreneurs are responsible for their own pension cover and managing risks for their business, which makes it especially important that they are well prepared for unexpected changes.

Employers can play a key role in their employees' well-being and in taking care of their employees' financial security during and after their working career. Mandatum Life believes that employer-paid insurance is an effective way to arrange the financial security of individuals. Simultaneously, the benefits for the employer are better commitment levels of employees and an enhanced employer image. In 2018, Mandatum Life paid out a total of EUR 403 million in pensions to 65,000 pensioners, and the number of other indemnities paid was in total 50,000.

Employees' ability to work and their well-being requires proactivity. Mandatum Life proactively guides and advises entrepreneurs and private and corporate customers to take proper actions early on. The ways to do this are, for example, through personal discussions,



ensuring that relevant information is easily available, and sharing practical content to learn from.

Responsible Personnel Practices

Mandatum Life promotes responsible personnel practices in its operations with customer organizations and in Finnish working life in general. Mandatum Life encourages employers to secure the pension and insurance cover of their personnel. In addition, Mandatum Life helps its customer companies to develop their management practices by developing compensation and reward schemes. Well-planned and communicated employee reward schemes have been shown to improve work motivation and productivity. When employees are rewarded in a manner that supports the achievement of targets, the company is guiding work efforts in the right direction. It is important for employees to understand what their pay and other forms of compensation are made up of and why. When a company's pay scheme is consistent, employees feel their pay is fair, which increases work satisfaction. Mandatum Life also compiles its customers equal pay reports, which are required by law for all companies with more than 30 employees in Finland.

Reward practices are one way of supporting employees in making responsible choices. By setting sustainability-related targets, a company can, for example, reward

employees for making environmentally friendly decisions. Mandatum Life manages roughly 90 personnel funds used for rewarding the entire personnel, and they cover a total of approximately 46,000 employees, or members. In 2018, 21 new personnel funds were established, and the number of members grew by more than 3,000. Personnel funds require responsible bonus systems and KPIs, which are annually reviewed by the Finnish Ministry of Economic Affairs and Employment.

Personnel funds established by Mandatum Life enable customer companies' personnel to invest their bonuses in a long-term strategy. Professional wealth management ensures that funds are invested reliably and responsibly, while increasing the general wealth of the Finnish employed population. Personnel funds that invest in their employer's stock make employees part-owners of the employing company, entitling them to part of the profits. A personnel fund also increases cooperation and mutual trust between companies and their employees.

In addition to the work Mandatum Life does together with its customers, the company actively participates in the general discussion of management and reward practices, for example, by publishing articles in its own print magazine and online media and in cooperation with traditional media. Mandatum Life also collaborates

with other service providers and stakeholders to increase knowledge of responsible reward practices. For example, Mandatum Life partners with the Directors' Institute Finland. Together, the organizations improve Finnish directors' and board members' awareness of how responsible management and rewards affect employee satisfaction and productivity, and how corporate responsibility matters can be advanced by linking related targets to executive pay schemes.

Digitalization

In 2018, Mandatum Life continued to invest in digitalization. Digital services enable, for example, better customer satisfaction through more efficient processes, transparency, accessibility, and a real-time overview of savings. During the year, Mandatum Life directed a major part of its private customers, around 220,000, to a paper-free service, which enables customers to receive most of their documentation digitally, reducing paper consumption. In April 2018, Mandatum Life launched a new digital service that enables all customers to save and invest in an easy way, and to benefit from Mandatum Life's investment expertise. The new service enables Mandatum Life to take care of customers' assets based on their objective and chosen level of risk. A new Mandatum Life Trader service for active investors will be available at the beginning of 2019.



Responsible Sales and Marketing Practices

Insurance companies are often approached when there is a need to prepare for risks or at an actual moment of adversity. For an insurance company, it is important to gain the trust of customers by ensuring that the products and services offered are clearly explained and transparently marketed. The trust that customers have in Sampo Group companies' integrity is what the companies' positive reputation is built on.

To ensure compliance with regulations and internal policies, Sampo Group companies have continuous training programs that develop personal conduct and increase the competence of the companies' sales teams and other customer representatives. Customer feedback channels are also offered to make it easy for customers to give feedback on their experiences.

If

If's sales and marketing practices focus on meeting the needs of the customer and providing the customer with the information necessary to make well-informed decisions. If's Underwriting Guidelines include instructions on responsible sales practices. The guidelines are implemented through targeted training sessions,

which might vary depending on the business area. If also arranges separate training on responsible sales practices. For example, If's Business Area Private has placed a lot of focus on mapping customer journeys in order to provide a better customer experience. During 2018, If also launched a new marketing campaign, promoting itself as the un-difficult insurance company, in all the Nordic countries to demonstrate that If strives to make it easy and smooth for customers to take care of their insurance matters.

During the past year, If has continued to focus on initiatives such as improving stable pricing; ensuring that all customers are fairly and correctly insured; and providing more accessible services for all customers. As a result of the work conducted toward securing more stable pricing, customers can now foresee more transparently the development of the future price of their insurance policy, as discounts have been removed at subscription. This helps customers avoid surprising increases in prices. Another focus point has been making sure that the price is the same, no matter where the customer buys the product or service.

In order to ensure that every customer is correctly insured, If has removed sales bonuses from its sales processes, to encourage customer focus and to avoid

inessential motivation by sales in customer contacts. Another change toward greater customer focus has been shifting the focus of claims personnel from primarily handling claims to advising customers.

If is continuously developing the control and follow-up routines around better incident handling regarding product and service information and marketing communications. Customer feedback is monitored to analyze the actual reasons behind complaints, thereby gaining insights that can be used for changes and improvements. The aim is to better learn from complaints in all areas and, thus, the channel functions as a tool for constant development.

If a customer reports a complaint related to misleading marketing or sales of products, If holds discussions with the consumer ombudsman. If also has an internal customer ombudsman function, which the customer can contact. These authority contacts are reported to the Risk Committee and from there to If's Board of Directors. The customer is also entitled to appeal to public external boards in each country. In recent years, cases have gone in If's favor most of the time. The recent decrease in the percentage of cases in If's favor is due to the increase in the number of cases in the first place, as If's share of the total number of cases has remained rather stable.



Cases at Public External Boards

If

	Number of If cases 2016	Number of If cases 2017	If's share of the total number of cases 2016	If's share of the total number of cases 2017	Percentage of cases in If's favor 2016	Percentage of cases in If's favor 2017
If in Sweden	63	67	8%	8%	95%	87%
If in Finland	107	195	23%	18%	91%	76%
If in Norway	33	57	7%	12%	61%	79%
If in Denmark	35	38	3%	3%	63%	79%

Source: The National Board for Consumer Disputes in Sweden; the Finnish Financial Ombudsman Bureau; the Norwegian Financial Services Complaints Board; the Insurance Complaints Board in Denmark

Data for 2018 was not available when this report was written.

Topdanmark

Topdanmark is aware that the contents and terms of insurance and pension products can be difficult to understand. Therefore, Topdanmark works on making product, price, and coverage information as easy to comprehend as possible. Topdanmark also uses customer complaints as a way to assess how the company can improve its communication and service with its customers.

Topdanmark emphasizes the importance of clearly informing customers of their complaint options, as well as ensuring a fair and transparent complaint process. In private customers' insurance cases, if the customer disagrees with Topdanmark's decision on a claim, the customer is entitled to appeal to the Danish Insurance Complaints Board. Topdanmark's foremost objective is to reduce the number of claims in the first place, but as

claims always occur, the goal of the company is to succeed in appeal cases brought before the Insurance Complaints Board. Regardless of the outcome of the appeal cases, Topdanmark always analyzes how the company can improve communication with its customers.

Cases at the Danish Insurance Complaints Board

Topdanmark

	Number of Topdanmark cases 2017	Number of Topdanmark cases 2018	Percentage of cases in Topdanmark's favor 2017*	Percentage of cases in Topdanmark's favor 2018*
Topdanmark (General Insurance)	131	129	77%	78%
Topdanmark (Life Insurance)	11	21	82%	100%

Source: Ankenævnet for Forsikring www.ankeforsikring.dk

* In other decisions, the ruling has been against or partially against Topdanmark.



Mandatum Life

At Mandatum Life, the principle is to act in accordance with the best interests of the customers and to avoid conflicts of interest. Communication, in both sales and marketing, is to be transparent, understandable, and according to applicable laws and regulations. The basis for responsible sales practices is identifying customers' needs and determining suitable services to meet those needs. This approach to sales is implemented through mandatory training, which includes training in the needs-based sales model and sales process, including tools and

systems used with sales, and which meets the statutory requirements. All customer-facing employees must complete certain product and policy training courses in order to gain a sales license. Mandatum Life has internal instructions for marketing and customer communications, and specified groups of customers to whom certain products or campaigns may not be marketed.

In the case of a complaint, Mandatum Life's first priority is to negotiate with the customer in order to find a solution that is satisfactory to both parties. If a consensus

cannot be achieved, the customer can bring the matter before an alternative dispute resolutions (ADR) body, which is either the Insurance Complaints Board operating with the Finnish Financial Ombudsman Service (FINE) or the Consumer Disputes Board, or ultimately the matter can be submitted to the local district court. In 2018, there were only a few client cases handled by the ADR bodies, and they concerned mainly matters defined in the policy conditions.



Customer Satisfaction

Serving customers in a transparent and responsible manner will increase customer satisfaction. Satisfied customers are a cornerstone of successful business, as satisfied customers are more loyal and prone to recommend products and services forward, and in general secure trust in insurance providers within a society. In accordance with Sampo Group's Code of Conduct, all customer relations are conducted with integrity, fairness, loyalty, confidentiality, and service mindedness. To track how well the Group companies accomplish this, customer feedback is collected continuously. Both positive and negative feedback are carefully analyzed and used to further develop and improve products and services.

If

At If, customer orientation remains top priority, with numerous actions to improve customer experience. Good customer experience results in an increase in the number of customers and better customer retention. At If, customer experience is monitored continuously. The External Performance Satisfaction Index (EPSI) and Net Promoter Score (NPS) are used across most of If's business areas to measure customer experience and to rate If's

performance. Customer satisfaction performance is reported to If's top management, and it is integrated into the compensation of managers.

Underpinning If's customer-centric attitude, the company runs a multi-lingual Customer Experience (CX) program across all its customer touchpoints. To embed the program across its business, If also has a CX governance model. This ensures that customer feedback is not only collected, but also followed up on and handled appropriately. For example, If has established teams to follow up with dissatisfied customers in order to repair or improve their experience, simultaneously giving If the possibility to learn. This model also ensures that If can take tactical and strategic action based on direct customer feedback.

In 2018, Business Area Private's management continued to organize roadshows for all big If offices and held presentations and discussions regarding customer focus and improving customer journeys. In October, If established the Nordic Team Leader Academy to share input on customer experience cross-border. If has also established a tool to gather input and development ideas from personnel in direct contact with customers.

During 2018, the internal CX program showed high levels and improvements in customers contact. In addition, renewal rates are increasing (i.e. actual loyalty). As EPSI also measures customers who have not been in contact with If or reported a claim lately, the overall perceptions include customer impressions from elsewhere, as well. If's goal is to continue to improve its NPS scores.

Customer Satisfaction, Consumer Trust Index (CSI)

If

	2016	2017	2018
If, Sweden	67.8	68.1	70.8
- industry in Sweden	71.5	70.2	72.3
If, Norway	71.6	73.8	72.7
- industry in Norway	72.0	73.7	74.2
If, Finland	74.2	77.7	75.2
- industry in Finland	75.9	77.9	75.1
If, Denmark	74.1	77.7	74.8
- industry in Denmark	76.2	77.7	77.4

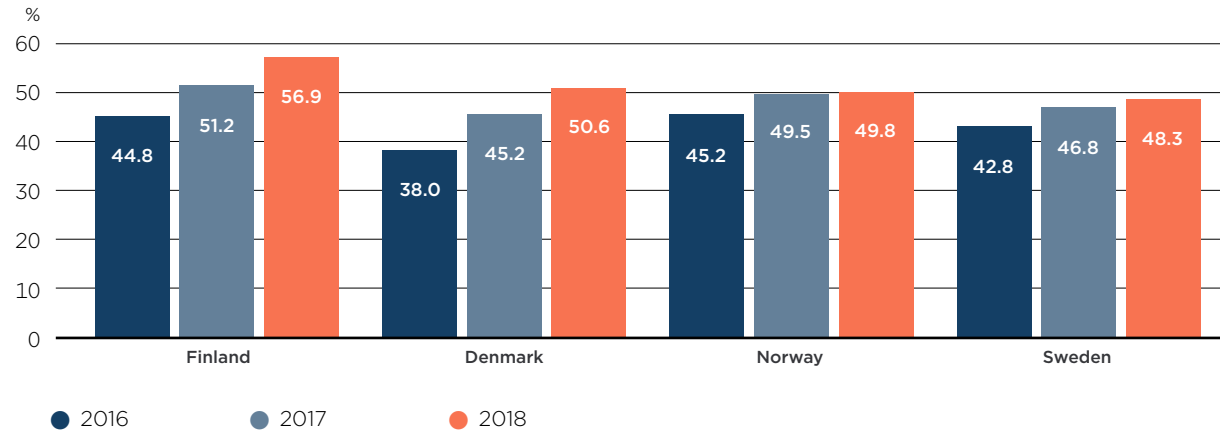
Source: EPSI

Differences need to be more than 2-2.5 points to be statistically significant.



Net Promoter Score (NPS) Based on Calls to Contact Center

If



Topdanmark

Topdanmark has high ambitions for customer service: all Topdanmark's customers should feel served with proper care in all situations. Topdanmark works continuously on providing information on prices and insurance coverage to customers in a format that is as easy to comprehend as possible. Topdanmark's goal is for customers to be so satisfied with the company's products and services that they want to recommend Topdanmark to others. Consequently, Topdanmark evaluates customers' perceptions of the company regularly. This takes place, for

example, through more than 30,000 customer responses by phone a year, as well as systematic online surveys.

The EPSI and Aalund surveys are independent analyses of customer satisfaction with Topdanmark and Topdanmark Life Insurance. Topdanmark monitors the results closely in order to learn from them and improve the company's customer service.

More information can be found in the **Topdanmark CSR Report 2018** (www.sampo.com/year2018).

Customer Satisfaction, TrustScore on

Trustpilot*

Topdanmark

	2016	2017	2018
Overall customer score on Trustpilot - Topdanmark (0 to 10)	8.9	8.8	8.6

* TrustScore is a measure of customer satisfaction based on the service reviews collected on Trustpilot. Trustpilot is a website founded in Denmark, which publishes reviews of businesses.

Customer Satisfaction Survey Goals and Results

Topdanmark

Survey	Goal	2016	2017	2018
Topdanmark survey	Increase in number of ambassador customers*	46.2%	48.0%	46.8%
EPSI survey for private customers (scale 0-100)	Increase	74.5	76.8	77.5
EPSI survey for SME customers (scale 0-100)	Increase	73.5	73.5	NA**
Aalund survey	Maintain a ranking as the company with the most satisfied customers ***	2 nd place	1 st place	1 st place

* Customers who are so satisfied with Topdanmark that they recommend Topdanmark to others.

** EPSI did not carry out a survey of business customers in 2018.

***From the three parameters included in the survey - satisfaction, image, and loyalty - Topdanmark reports on satisfaction.



Mandatum Life

Mandatum Life aims to provide the best customer experience in the industry. Mandatum Life has measured customer satisfaction and implemented development programs for several years. As a result, customer satisfaction has taken major steps forward.

Through systematic measurement of customer satisfaction, Mandatum Life wants to identify the factors that are valued by the company's customers. Simultaneously, Mandatum Life aims to recognize the parts of the customer journey that should be improved. For example, during 2017 and 2018, Mandatum Life introduced a new identity for customer service, based on customers' needs and wishes. The new attributes help employees to pay attention to customers' points of view, and also guide Mandatum Life in customer service development.

Customer satisfaction is one of Mandatum Life's key performance indicators and is linked to the compensation of the company's personnel. Customer satisfaction is measured in the context of customer meetings, telephone calls, and web messaging. Mandatum Life also conducts additional customer satisfaction surveys on specific topics. The status and development of customer satisfaction is reviewed weekly at individual and unit levels, and monthly in executive teams.

In 2018, Mandatum Life updated the customer satisfaction survey that the company uses. Previously, the method used was an internal model based on NPS, but this was not entirely comparable with the proper NPS. As of January 2018, the scale and the survey question are formulated so that Mandatum Life's customer satisfaction survey is in line with the NPS. Otherwise, the method of

collecting and tracking customer satisfaction remains the same. For this reason, comparable data from previous years is not available.

Mandatum Life's target for the NPS is 70.0 by the end of 2020. Mandatum Life continues to improve customer satisfaction by developing performance in every interaction with customers and developing new web and other services.

Customer Satisfaction, Net Promoter Score (NPS)

Mandatum Life

	2018
Number of answers	8,783
Net Promoter Score (NPS)	66.2



RESPONSIBILITY IN INVESTMENTS

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Investment
Management
at Sampo (If,
Mandatum Life
excl. Wealth
Management,
and Sampo plc)

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Investment
Management
at Mandatum
Life Wealth
Management

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Investment
Management at
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Carbon
Footprint of
Investments



Responsibility in Investments

In recent years, the discussion on environmental, social, and governance (ESG) criteria in investment decision-making has intensified. Sampo believes that ESG issues have an impact on the long-term performance, risks, and value of all companies. Hence, taking these issues into consideration in the investment process is an important instrument to improve the risk-return profile of investments, and it is a critical success factor of investment activities, especially in the long run.

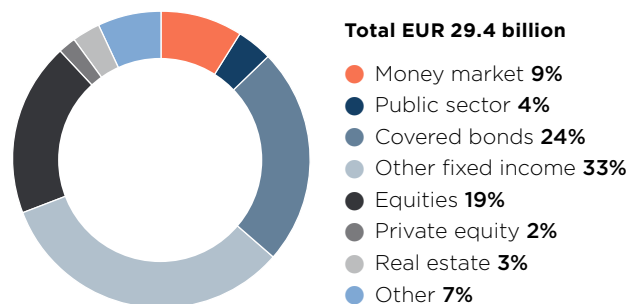
Investment Management at Sampo (If, Mandatum Life excl. Wealth Management, and Sampo plc)

The parent company, Sampo plc, and its two wholly owned insurance subsidiaries, If and Mandatum Life, have a common group-wide infrastructure for investment management, as well as for performance and risk reporting, which facilitates simultaneous company

and group-level reporting. This creates cost efficiencies in investment activities and also enables group-wide monitoring of portfolios.

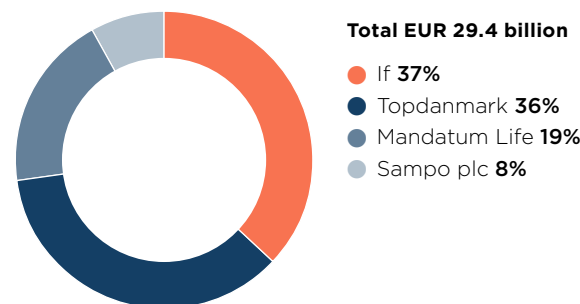
Sampo Group's Chief Investment Officer (CIO) is responsible for managing investments according to the investment policies prepared by If and Mandatum Life and approved by the companies' boards of directors. This excludes Mandatum Life's investments covering unit-linked policies, which are presented in the section **Mandatum Life Wealth Management (page 69)**. In its investment activities, Sampo prefers simple matured instruments and transparency. Hence, most of the investments are in fixed income securities and listed equities, which are tradable and subject to daily mark-to-market valuation.

Investment Allocation by Sector Sampo Group, 31 December 2018



Investments of If, Topdanmark, Mandatum Life, and Sampo plc.

Investment Allocation by Company Sampo Group, 31 December 2018



Investments of If, Topdanmark, Mandatum Life, and Sampo plc.

ESG Considerations in Investment Activities

Sampo's investment philosophy is to invest directly in individual companies' shares and debt instruments instead of allocating funds to chosen industries or geographical areas. These companies are carefully studied before any investments are made, and ESG issues are considered in parallel with other factors affecting the risk-return ratio of separate investments. Taking the ESG issues into account in the investment analysis and decision-making is part of the work profile of every person at Sampo, If, and Mandatum Life who is making investment decisions and analyzing investment objects.



In 2018, Sampo supplemented the investment policies of the Group companies to strengthen the role of ESG matters in investment analysis and decision-making. The investment policies were updated to include instructions on how to take ESG issues into account in the context of direct investments by using an internal ESG traffic light model. The traffic light model is based on ESG risk ratings provided by an external data provider. The risk ratings measure companies' exposure to ESG-related risks and management of material ESG issues. Based on the risk ratings, Sampo classifies investment objects into risk categories: low risk, medium risk, high risk, and severe risk. Depending on the risk category of a current or potential investment, a portfolio manager is required to, for example, conduct additional research on the investment in question, study further the possible causes and effects of the ESG-related risks, and request an additional authorization from the Group CIO.

If Sampo's positive view about a current or potential investment changes due to a high ESG risk rating or any other issue, after thorough background work, studying, and sometimes even a dialogue with the company, Sampo might decide not to make an investment or new investments in the company, and investments already in the portfolio might be sold over time.

Companies for which there is no ESG risk rating provided by the data provider are analyzed carefully, considering all factors affecting the risk-return ratio. The analysis is based on publicly available information and includes ESG issues.

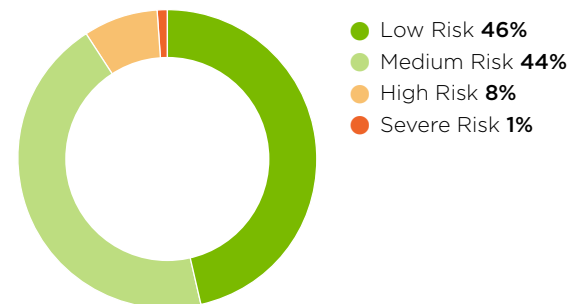
Risk Categories of the ESG Traffic Light Model



During the year, Sampo developed, in particular, internal reporting on investments from the ESG point of view. The ESG traffic light model and the corresponding reporting ensure continuous monitoring of ESG issues as part of internal reporting. Sampo Group's investment units provide regular reports for internal committees, such as the Asset and Liability Committee (ALCO). The reports provide the internal committees with the possibility to follow the allocation of investments based on the risk categories of the traffic light model. Each company's own internal committee then analyzes the investment portfolios together with the portfolio managers and reports to the Board of Directors, if this is considered necessary.

Investment Allocation According to the ESG Risk Categories

If, Mandatum Life (excl. Wealth Management), and Sampo plc, 31 December 2018



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At the moment, Sampo plc, If, and Mandatum Life (excl. Wealth Management) do not have further ESG investment guidelines that would, for example, exclude some business areas or companies beyond the scope of investment opportunities, or earmark funds for sustainable investments, such as green bonds. In 2019, Sampo will continue to integrate ESG considerations into Group's investment activities and will fully launch the ESG-related internal reporting on investments. In 2018, a decision was made to investigate the possibility of signing the UN's Principles for Responsible Investment (UNPRI) during 2019.

Responsibility in Real Estate Investments

With regard to Sampo's real estate investments, actions for improved energy efficiency and more sustainable properties have been taken into account for several years now. Sampo was among the first companies to join the property sector's voluntary Energy Efficiency Agreement and set an energy savings target of at least 10.5 per cent for the years 2014–2025. By the end of 2017, the target had already been met and, for that reason, new targets are being considered, but have not yet been decided on. During 2018, Sampo continued to work on energy efficiency actions, which included, for example, renewal of building automation systems and lighting (LED).

At the beginning of 2019, remote monitoring of Sampo's properties was started. With remote monitoring, the indoor conditions of properties are optimized, and energy and water consumption are further reduced. The energy consumption of properties is monitored by means of a

remote reading system, which collects data every hour. This enables fast reaction to consumption deviations. Through continuous energy management, the available energy-saving potential is detected and energy efficiency targets are set. Sampo is working towards the set targets with an action plan, which is reviewed and agreed on annually.

Sampo also wants to offer healthy and sustainable properties for its tenants. In 2018, Sampo increased the number of its environmentally certified properties by one. Sampo now has five properties that are certified under the international environmental certification systems (LEED®, BREEAM®). In one of the properties, the district heating is provided with EkoPlus 100 per cent renewable heat.

Investment Management at Mandatum Life Wealth Management

Mandatum Life Wealth Management manages customer assets responsibly, as responsibility is an essential part of the company's risk management process. Mandatum Life's Wealth Management signed the UN's Principles for Responsible Investment in 2011. Investment operations linked to the management of customers' wealth are implemented according to these principles. In addition, Mandatum Life has a Policy for Responsible Investing, which is updated annually.

Mandatum Life Wealth Management's investment strategy is to favor the best companies in each sector, while

taking into account long-term return expectations. The ESG analysis of investment objects has been integrated into the investment analysis and decision-making process. When assessing the risks of an investment object, Mandatum Life considers ESG issues as part of the holistic risk analysis. The ESG risk analysis focuses on the sustainability of business growth and cash flow, costs, and the ability to uphold, prepare, and adapt to environmental, social, and governance norms and requirements.

In decision-making, Mandatum Life employs best-in-class screening and exclusion. Best-in-class screening is the predominant method used to manage carbon exposure and climate-related investment risk. A decision to exclude an investment object may be taken based on, for example, sector, business involvement, norm-based factors, or controversy.

Mandatum Life Wealth Management monitors its direct equity and fixed income holdings on a quarterly basis for possible failures to respect established norms, such as the UN Global Compact. If a failure or alleged failure is detected, the following actions are considered, depending on the severity and the scale of the failure: direct dialogue with the company management or collaborative engagement. As the option of last resort, divestment of the investment is possible, if the company is unresponsive to engagement and does not take action to remediate.

In 2018, Mandatum Life set criteria for direct equity and bond holdings based on the business involvement of the issuer. Holdings are screened quarterly. If an issuer does



not meet these criteria (direct or indirect or both), the security is excluded or already existing investments are divested within six months. Sector and involvement-based criteria are categorized into three tolerance groups based on the nature of business involvement.

- a) **Zero tolerance:** The issuer of a security held may not have any direct or indirect business involvement.
- b) **Low tolerance:** The issuer of a security held may not have direct business involvement. Some indirect involvement (below 50 per cent of turnover) is tolerated.
- c) **Partial tolerance:** The issuer of a security held may have business involvement of up to 50 per cent of turnover.

Direct involvement refers to direct sales from the product/product group or line of business in question. Indirect involvement refers to an indirect revenue stream, such as subcontracting or distribution, from the product group or line of business in question. The information is based on publicly available data.

Taking ESG considerations into account when selecting and monitoring investment objects is part of the work profile of every person who is making investment decisions and analyzing investment objects at Mandatum Life Wealth Management. Portfolio managers and analysts are best positioned to gain an in-depth understanding of the ESG issues of companies they cover, and to engage in a dialogue with business executives to influence matters.

Exclusion Criteria for Direct Equity and Fixed Income Investments Based on Business Involvement

Mandatum Life Wealth Management

Line of business	Limit as a share of turnover		Legend
	Zero tolerance	Direct involvement	Indirect involvement
Controversial weapons	0%	0%	Companies with any involvement in production, subcontracting, or distribution of controversial weapons are excluded.
Low tolerance	Direct involvement	Indirect involvement	
Tobacco	0%	50%	Companies that produce tobacco products, or whose main line of business is subcontracting or distributing tobacco products, are excluded.
Adult entertainment	0%	50%	Companies that produce adult entertainment, or whose main line of business is subcontracting or distributing adult entertainment, are excluded.
Coal	0%	50%	Companies, which extract thermal coal, or the main line of business of which is subcontracting of coal extraction or coal-based energy production or distribution of coal-based energy, are excluded.
Partial tolerance	Direct involvement	Indirect involvement	
Alcohol	50%	50%	Companies whose main line of business is producing or distributing alcohol products or subcontracting alcohol production are excluded.
Gambling	50%	50%	Companies whose main line of business is gambling services or subcontracting for the gambling industry are excluded.
Defense materiel	50%	50%	Companies whose main business line is producing or distributing defense materiel or subcontracting production of defense materiel are excluded.



Investment object analysis is based on ESG data collected from public sources. To back their analysis, portfolio managers and analysts at Mandatum Life also use ESG analyses produced by external service providers. Additionally, one of Mandatum Life Wealth Management's engagement methods is the decision to participate or not to participate as a financier in primary bond and share issues.

Mandatum Life Wealth Management's operating practices of responsible investment are assessed and improved as a part of an ongoing business development. With the availability of ESG data improving and data granularity increasing, the risk analysis and portfolio management processes are continuously being refined and the level of ESG risk integration deepened.

The responsibility for coordinating and integrating ESG practices and developing ESG tools within the organization lies with the Sustainable Investing Working Committee, which consists of members from the investment organization, Sales, Legal, and Risk Management and Development. Mandatum Life's Risk Management and Development unit is responsible for monitoring and reporting on sustainable investment activities.

Investment Management at Topdanmark

Topdanmark aims to attain the biggest possible return on investments in relation to risk, but also to ensure that value creation is responsible and not in violation of the

internationally recognized standards and principles as well as conventions adopted by Denmark. To ensure this, Topdanmark has joined the UN Global Compact, which consists of ten principles concerning human rights, workers' rights, the environment, and corruption. These principles are an integrated part of Topdanmark's Responsible Investment Policy. In addition to the Responsible Investment Policy, Topdanmark has a Policy for Active Ownership. The board of Topdanmark Asset Management has overall responsibility for the policies, while Topdanmark Asset Management is responsible for implementing them and continually monitoring and ensuring that investments follow the principles set by the policies.

Topdanmark Asset Management invests primarily in listed shares. In 2018, Topdanmark carried out a screening

and an assessment of the company's existing share portfolios with consideration given to the Global Compact principles. New investments are generally not made in companies that violate the ten principles of the UN Global Compact. In 2018, no equity investments were made that would have been in conflict with the principles of the Global Compact.

As a result of its Policy for Active Ownership, Topdanmark has decided to report on its actions as an active owner. Topdanmark reports the extent to which it has participated in the companies' General Meetings, and the extent to which Topdanmark has voted. The reporting scope includes Danish companies of which Topdanmark controls more than 2 per cent of the votes or the share capital, and in which Topdanmark is not represented on the board of directors.

Activities and Results Regarding Active Ownership

Topdanmark, 2018

	Ownership on 31 December 2018	Participated in the General Meeting	Voted in the General Meeting	Meeting with the management	Investor meeting	Important outstanding accounts
H+H International A/S	4.63%	No	Yes/The board of directors' power of attorney	No	Yes	No
Scalepoint Technologies Holding A/S	3.36%	No	No	Yes	No	No

Further information on Topdanmark's responsible investment approach, as well as the Responsible Investment Policy and Policy for Active Ownership, is available in **Topdanmark's CSR Report 2018** (www.sampo.com/year2018) and website (www.topdanmark.com/en/csr/responsible-investment/).



Carbon Footprint of Investments

For Sampo Group companies, investment activities are the most significant way of affecting the mitigation of climate change. By publishing the carbon footprint of the investment portfolio, Sampo Group wants to contribute towards a more transparent and sustainable investment sector.

Carbon Footprint of Sampo Group Investments

Sampo measured the carbon footprint of the Group's investments again in 2018. The analysis included If, Topdanmark, Mandatum Life (excl. Wealth Management), and Sampo plc's direct equity and fixed income investments at the end of 2018. Topdanmark's investments were included in the Group's calculations for the first time this year, and therefore the figures published are not comparable to those of 2017.

To enable calculations, a small number of equity and fixed income instruments had to be left outside the scope. Such

instruments included shares that are not listed and some loan investments without certain identification codes. In addition, the calculation methods used by the service provider ISS-climate and the general availability of information had an effect on the number of instruments that ended up in the final analysis.

In the end, the carbon footprint calculations included 72.8 per cent of Sampo Group's total direct equity investments and 76.9 per cent of direct fixed income investments as at 31 December 2018. The equity and fixed income portfolios included in the carbon footprint report had market values of EUR 2,863 million and EUR 14,022 million, respectively. That means that the carbon footprint analysis covered 57.4 per cent of all Sampo's investments at the end of 2018.

Global indices were chosen as benchmarks: MSCI World ETF for the equity portfolio (similarly to the previous year), and iBoxx Euro Corporate for the fixed income portfolio (previously iShares US & Intl High Yield Corp Bond ETF). The reason behind the change in the fixed

income benchmark is that the iBoxx Euro Corporate index reflects better the Group's fixed income portfolio now that Topdanmark is included in the calculations. Both indices are well-known, and they have carbon footprints and weighted average carbon intensities that are clear and easily calculable. However, it should be noted that the benchmark indices aim to provide a general baseline for analysis and should only be considered as suggestive. The used indices do not directly reflect Sampo Group's equity or fixed income portfolios. More information on the calculation method is available in the appendix **Calculation Principles (page 86)**.

Equity Portfolio

The total carbon footprint of Sampo Group's (excl. Mandatum Life Wealth Management) equity portfolio was 334,382 tCO₂e at the end of 2018. This corresponds to a relative footprint of 87.4 tCO₂e/EUR million invested. The footprint is 40.4 per cent below the benchmark index.

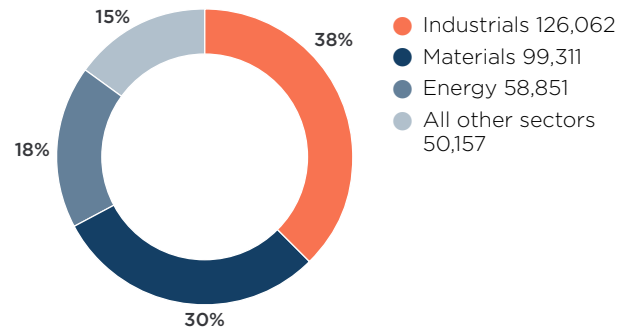
PORTFOLIO OVERVIEW	Coverage			Financed emissions				
	Disclosed holdings	Share (by number of companies)	Share (by weight)	Financed emissions Scope 1 and 2 (tCO ₂ e)	Financed emissions incl. Scope 3 (tCO ₂ e)	Relative carbon footprint (tCO ₂ e/EURm invested)	Carbon intensity (tCO ₂ e/EURm revenue)	Weighted average carbon intensity (tCO ₂ e/EURm revenue)
Equity portfolio	149	63.1%	72.8%	334,382	1,504,981	87.4	110.8	117.5
Benchmark index (MSCI World ETF)	875	75.2%	83.2%	560,708	2,244,837	146.6	222.7	193.8
Net performance	-	-12.1 p.p.	-10.4 p.p.	+40.4%	+33.0%	+40.4%	+50.3%	+39.4%

The table includes absolute and relative figures for portfolio carbon emissions as well as intensity measures. The Financed Emissions section measures the carbon footprint of a portfolio taking Scope 1 & 2 as well as Scope 3 emissions into account. The relative carbon footprint is a normalized measure, defined as the total carbon emissions of the portfolio per million EUR invested. Carbon intensity is a metric that applies the ownership approach to also determine an investor's share of revenue and subsequently dividing one by the other. By linking to revenue, the metric aims at describing the carbon efficiency of the underlying holdings. The weighted average carbon intensity is derived directly from the TCFD recommendations, where GHG emissions are allocated based on portfolio weights rather than the ownership approach.

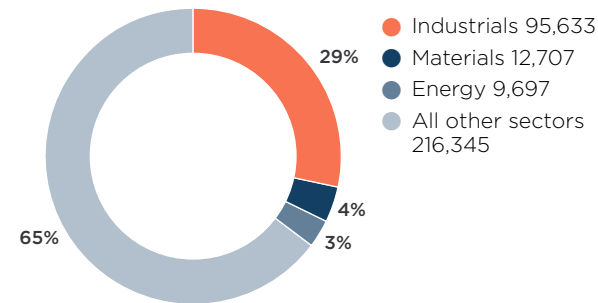
* p.p. = percentage points

**Direct Equity Portfolio, Sector Contribution to Financed Emissions (tCO₂e)**

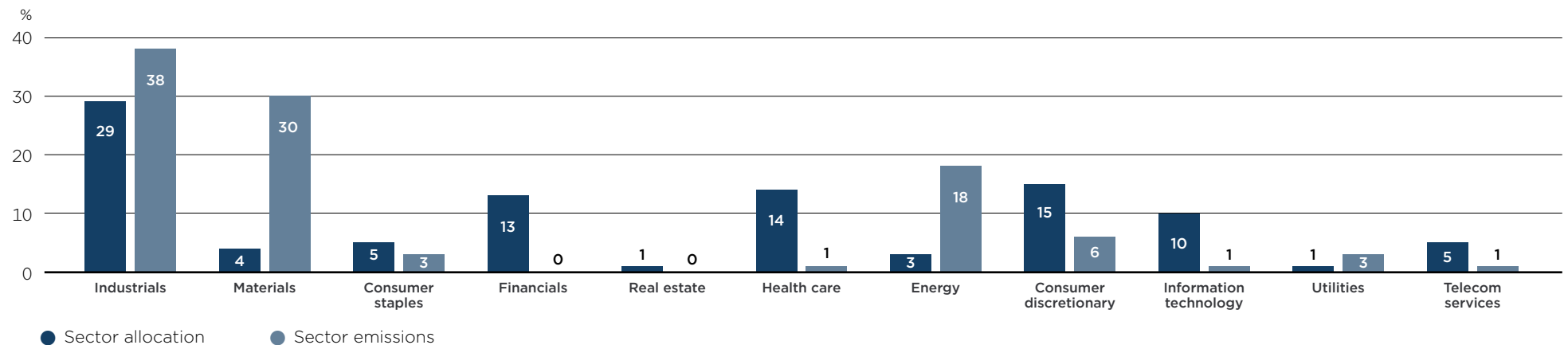
Sampo Group, 31 December 2018

**Direct Equity Portfolio, Sector Weight (tCO₂e)**

Sampo Group, 31 December 2018

**Direct Equity Portfolio, Allocation vs. Emissions**

Sampo Group, 31 December 2018





Fixed Income Portfolio

The total carbon footprint of Sampo Group's (excl. Mandatum Life Wealth Management) fixed income portfolio was 1,478,900 tCO₂e at the end of 2018. This corresponds to a relative footprint of 101.9 tCO₂e/EUR million invested. The footprint is 82.4 per cent below the benchmark index.

PORTFOLIO OVERVIEW	Coverage			Financed emissions				
	Disclosed holdings	Share (by number of companies)	Share (by weight)	Financed emissions Scope 1 and 2 (tCO ₂ e)	Financed emissions incl. Scope 3 (tCO ₂ e)	Relative carbon footprint (tCO ₂ e/EURm invested)	Carbon intensity (tCO ₂ e/EURm revenue)	Weighted average carbon intensity (tCO ₂ e/EURm revenue)
Fixed income portfolio	182	72.2%	76.9%	1,478,900	5,601,043	101.9	134.2	52.1
Benchmark index (iBoxx Euro Corporate)	298	82.3%	91.6%	8,382,247	28,167,270	577.7	398.6	236.5
Net performance	-	-10.1 p.p.	-14.7 p.p.	+82.4%	+80.1%	+82.4%	+66.3%	+78.0%

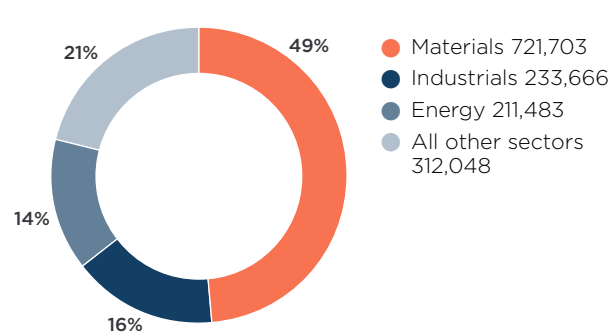
The table includes absolute and relative figures for portfolio carbon emissions as well as intensity measures. The Financed Emissions section measures the carbon footprint of a portfolio taking Scope 1, 2 and 3 emissions into account. The relative carbon footprint is a normalized measure, defined as the total carbon emissions of the portfolio per million EUR invested. Carbon intensity is a metric that applies the ownership approach to also determine an investor's share of revenue and subsequently dividing one by the other. By linking to revenue, the metric aims at describing the carbon efficiency of the underlying holdings. The weighted average carbon intensity is derived directly from the TCFD recommendations, where GHG emissions are allocated based on portfolio weights rather than the ownership approach.

* p.p. = percentage points



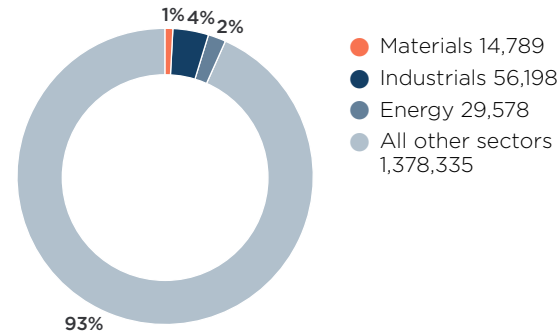
Direct Fixed Income Portfolio, Sector Contribution to Financed Emissions (tCO₂e)

Sampo Group, 31 December 2018



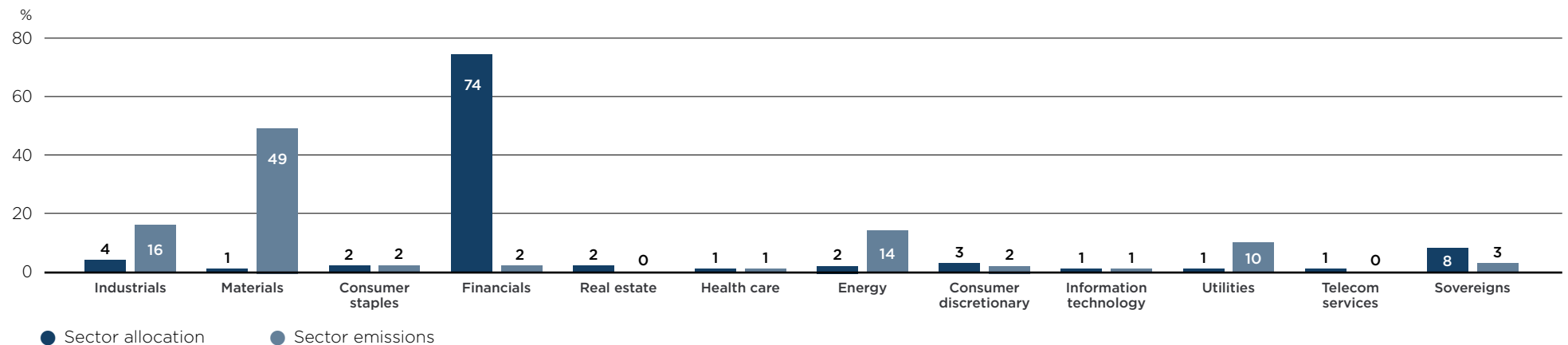
Direct Fixed Income Portfolio, Sector Weight (tCO₂e)

Sampo Group, 31 December 2018



Direct Fixed Income Portfolio, Allocation vs. Emissions

Sampo Group, 31 December 2018





Carbon Footprint of Mandatum Life Wealth Management's Investments

Managing the climate risks of investments is one of the focal points of Mandatum Life's responsible investment activities. With the aim of reducing the carbon footprint of its investments over the long-term, Mandatum Life Wealth Management has joined the international Portfolio Decarbonization Coalition and the UN's Montreal Pledge. As part of the UN's Montreal Pledge initiative, Mandatum Life Wealth Management has committed to measuring and publishing the carbon footprint of its investments, which is a measure of the investment objects' annual carbon dioxide emissions. Mandatum Life Wealth Management measured the carbon footprint of the unit-linked equity and fixed income investment portfolios under its management and its discretionary wealth management for the third time in 2018.

In 2018, the annual carbon footprint of the investments was 980,257 tCO₂e (780,948). Compared to 2017, the carbon footprint increased due to the growth in assets under management that are within the scope of the measurement and the increase in the carbon footprint of fixed income investments. The increase in the carbon footprint of fixed income investments is mainly related to changes in debt levels of individual companies whose bonds were overweight in the portfolios. The carbon footprint of equity investments continued to decrease. The comparison figures for 2017 have been re-calculated to account for changes in the calculation methods, as well as improved data availability, and therefore differ from the ones published previously.

In addition to the overall carbon footprint of investments, financed emissions and average carbon intensity are also reported annually and compared to relevant market indices for improved transparency and intelligibility.

Relevant market indices are the benchmark indices of each portfolio, or, if a benchmark index is not defined for an individual portfolio, a market index that best corresponds to the exposure of the portfolio.

A Summary of Carbon Footprint, Financed Emissions, and Average Carbon Intensity of Mandatum Life Wealth Management's Investments

	Equity investments	Fixed income investments	Total investments including alternative investments
Carbon footprint (tCO₂e)			
2018	38,834	724,855	980,257
2017	49,520	492,171	780,948
Change, %	-22	47	26
Financed emissions* (tCO₂e/EURm)			
2018	95	527	330
2017	120	367	288
Change, %	-21	44	15
Relevant market indices 2018	135	401	293
Difference from market indices	-30%	31%	12%
Average carbon intensity** (tCO₂e/EURm)			
2018	145	336	259
2017	170	328	266
Change, %	-15	3	-3
Relevant market indices 2018	182	292	277
Difference from market indices	-20%	15%	-6%

* Financed emissions are calculated by dividing emissions by invested capital. For equity investments, the emissions of a company are divided by market capitalization, and, for fixed income investments, the emissions of a company are divided by its total amount of debt. The emissions are further allocated to the portfolio as a proportion of ownership of either equity or debt.

** Average carbon intensity is an alternative measure of carbon risk in a portfolio. The carbon intensity of a company is calculated by dividing the emissions of the company by its annual revenue. The reported average carbon intensity of the investment is the weighted average of the carbon intensity of portfolio holdings.



The measurement covered the investment assets managed by Mandatum Life Wealth Management within the company's own investment baskets and funds, full-mandate wealth management, and portfolio management service, as per the situation on 31 December 2017. The measurement covers approximately 90 per cent of the

unit-linked investment assets managed by Mandatum Life Wealth Management. Consultative wealth management, structured products, and index investment baskets were not taken into account in the measurement. The carbon footprint of investments was measured in cooperation with ISS-climate. The carbon footprint of the investee

companies is based on ISS' data as per the end of 2017. More information on the calculation method is available in the appendix **Calculation Principles (page 86)**. Further information on the results can be found on Mandatum Life's website english.mandatumlife.fi/csr.



RESPONSIBILITY IN COMMUNITIES

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Responsibility in Communities

Sampo Group companies promote the general social welfare and economic security of their customers by offering high-quality insurance products in compliance with locally applicable legislation and authority regulations. At the same time, the Group companies aim to offer a fair contribution toward their employees. Profitable business enables Sampo to promote the healthy development of society, not only as a reliable employer but also as a significant taxpayer. The Group companies also strive to be part of the communities in which they conduct business, by engaging in dialogue with different stakeholder groups.

Contributions as an Employer

Sampo Group's remuneration strategy is based on accountability toward the Group's employees and shareholders. This means that the long-term financial stability and value creation of Sampo Group guides the remuneration design. The starting point of any compensation mechanism is to encourage and stimulate employees to do their best and surpass their targets.

At the same time, compensation mechanisms shall not generate conflicts of interest and shall not entice or encourage employees to excessive or unwanted risk-taking. Risk-sensitive, but fair and rewarding compensation mechanisms enhance Sampo Group's ability to create

stakeholder and shareholder value. The different forms of remuneration used in the Group are fixed and variable compensation, as well as pensions and other benefits.

Remuneration

Sampo Group, 2018

Fixed compensation

All employees:
approximately
10,100
employees

Variable compensation

Short-term incentives:
approximately 7,700
employees

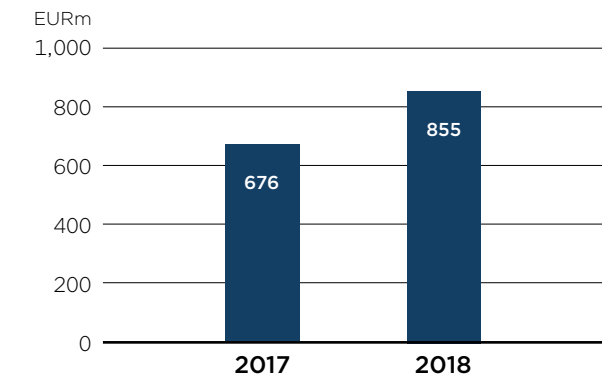
Long-term incentives:
approximately 190
key employees

Pensions and other benefits

The Board of Directors has established the Sampo Group Remuneration Principles, which apply to all Sampo Group companies. The Remuneration Principles are part of Sampo Group's internal governance framework and describe the remuneration structure and the principles for setting up remuneration systems in Sampo Group. More information on remuneration in Sampo Group is available at www.sampo.com/remuneration. In addition, the Remuneration Statement, including the Remuneration Report, is available at www.sampo.com/remuneration-statement.

Staff Costs

Sampo Group

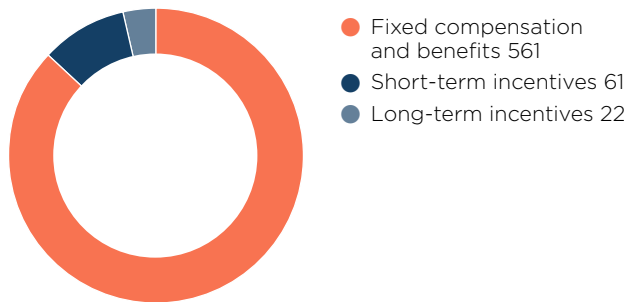


Total staff costs include wages and salaries, cash-settled share-based payments, pension costs, and other social security costs. Please see Sampo Group's Financial Statements 2018 for more detailed information.



Remuneration (EURm)

Sampo Group, 2018



Excluding supplementary pensions

Stakeholder Engagement

There are no group-level principles or guidelines for stakeholder engagement work in Sampo Group, but there is a common desire to contribute to a safer and better society. The intention is to engage in activities and dialogue that are best aligned with the purposes of each individual company and their stakeholders. Therefore, every year, Sampo Group companies each independently decide which initiatives they wish to support and how they wish to engage with their stakeholders. The purpose of this work is to make a positive contribution in the communities in which Group companies conduct

business, and to build trust between the Group and its various stakeholders.

The Group companies engage in dialogue with stakeholders such as industry associations, educational institutions, suppliers, the media, and non-governmental organizations. Through stakeholder engagement projects, Sampo Group companies foster and support their local and international communities. The Group companies want to build relationships and, when possible, offer support, for example, by sharing the companies' expertise, know-how, and time.

If

Climate change and other environmental considerations have been the main themes of If's stakeholder engagement work for several years, as global warming will affect the whole insurance business and the societies it serves. The frequency and magnitude of extreme weather conditions, such as storms, heavy rains, and floods, will increase due to climate change. If's activities and commitment to climate involve mitigation as well as adaptation. If's aim is to be a frontrunner in the management of risks related to climate change.

If participates actively in the local debate on climate change and its consequences in the different Nordic countries. The purpose is to share knowledge and increase awareness among policy-makers about risks related to climate change in the Nordic countries and the role of the insurance industry in combating these issues. For example, If participates in a committee appointed by the

Norwegian government that focuses on climate resilience and improving infrastructure to handle increased rainfall. If's role in the committee is to provide expertise in climate resilience and adaptation issues in the policy-making process. If also founded Insurance Sweden's Climate Group in 2005 and has been an active member since then. The Climate Group has regular meetings with the Swedish parliament's agricultural and environmental committee.

If's commitments related to climate change:

- The Trillion Tonne Communiqué is a global call to arms from businesses that are taking the science of climate change seriously, supporting a global goal of net zero greenhouse gas emissions and demanding a proactive policy response at the sub-national, national, and international levels. If is one of 159 signatories worldwide.
- Insurance Europe is the European insurance and reinsurance federation. In the run-up to the Conference of the Parties to the United Nations Framework Convention on Climate Change (COP21) in Paris in December 2015, Insurance Europe ran its public "target two degrees" campaign. The "target two degrees" campaign calls on stakeholders, from policymakers and insurance industry leaders to the general public, to pledge their support for a worldwide commitment to limit the increase of global warming to 2°C. If signed up to the campaign in 2015.



- Joining the Paris Pledge for Action (L'Appel de Paris) is a further example of If's commitment to climate change actions. The pledge demonstrates that non-party stakeholders are ready to play their part to support the objectives of the Paris Agreement. If joined the pledge in 2015 and is committed to ensuring that the target set out by the Paris Agreement is met or exceeded.

In addition, If supports and participates in several research projects in order to increase knowledge on how to effectively combat climate change. An example is the cooperation with the CICERO Center for Climate Research in Oslo, Norway. This cooperation takes the form of a five-year research plan, in which world-renowned scientists at CICERO are studying the effects of cloudbursts in a changing climate. In order to help people adapt to changes in the climate, the findings of the studies are then shared with If's customers and the general public. If is also supporting a research application by the IVL Environmental Research Institute that will study how, and to what extent, extreme weather events propagate across international supply chain trade networks, and the impact these propagated weather shocks have on Swedish firms and, in aggregate, on the Swedish economy. If will be contributing to and participating in the research project, which will start during spring 2019.

Since 2011, all CO₂/CO₂e emissions arising from If's own operations have been offset. Again in 2018, If offset the company's CO₂e emissions. This time it was done through a Gold Standard VER project called Breathing Space.

The Breathing Space project reduces CO₂e emissions of households in rural India by replacing highly polluting traditional cookstoves with fuel-efficient stoves, which require less wood and charcoal. More importantly, the stoves provide health and other social benefits to 200,000 households in the rural areas. Using the more efficient stoves reduces the amount of smoke produced, limiting dangerous pollutants and the risk of illness and premature death. The project also facilitates women's empowerment by training female entrepreneurs and actively involving them in the marketing and sales of the cookstoves. This enables women in rural India to generate their own income, thereby improving their livelihoods and social standing in their communities.

Gold Standard projects enable global collaboration in the funding and implementation of emission reduction projects in developing countries. These projects reduce CO₂e emissions and generate so-called verified emission reduction (VER) credits, each for one ton of CO₂e. The projects are funded by the purchase of such credits. Without the credits, the projects would not have been financially feasible.

More information can be found in the **If Sustainability Report 2018** (www.sampo.com/year2018).

Topdanmark

Topdanmark's stakeholders, such as customers, shareholders, employees, NGOs, the media, and suppliers, with whom the company wishes to have a constructive dialogue, play an important role in the company's business. Topdanmark's business operates, grows, and develops due to these connections.

One of Topdanmark's values is responsibility. The company's social responsibility finds its voice in, among other things, contributions to organizations and campaigns with humanitarian and other purposes beneficial to society. In 2018, Topdanmark's community engagement work included, for example, monetary donations and fundraising to support various organizations, such as the Fight Cancer campaign and Doctors Without Borders. In addition, Topdanmark's employees donated clothes to the Red Cross and blood to the Danish Blood Bank.

Topdanmark also works closely with its suppliers and alliance partners, for example, in connection with claims handling, loss prevention, and IT and office equipment. Quality, trust, and credibility are key in cooperation with suppliers, who deliver vital services to Topdanmark's customers in critical situations. Topdanmark wants to be known by its customers and shareholders as a professional and responsible company.

More information can be found in the **Topdanmark CSR Report 2018** (www.sampo.com/year2018).



Mandatum Life

Mandatum Life's stakeholder engagement endeavors are closely related to climate change. Mandatum Life works actively to mitigate climate change in various ways, especially by steering the investment sector to adjust its operations to the level required by the 1.5–2-degree temperature goal agreed on in the Paris Climate Agreement.

Mandatum Life has cooperated with WWF Finland since 2017 to achieve the temperature goal. As part of the cooperation, in January 2018, WWF Finland and Mandatum Life published a guide on promoting the climate sustainability of investments. The objective of the Investor's Guide on Climate Risk Management: From Risks to Opportunities is to encourage all investors, especially cities, municipalities, foundations, universities, and other entities, to take climate change mitigation into account in their investment policies. The guide sheds light on the investment risks pertaining to climate change and helps investors reduce the carbon footprint of their investments, while also taking into account their own investment goals. The guide has been widely distributed among Mandatum Life Wealth Management's customers and stakeholders of both organizations. Mandatum Life and WWF Finland also wrote a collaborative article dealing with responsible investment and new legislation proposed by the European Union. The article was published in Kauppalehti, the Finnish financial newspaper, on February 2019.

Mandatum Life has also collaborated with the Baltic Sea Action Group (BSAG) in order to promote the protection

of the Baltic Sea. In 2018, among other things, Mandatum Life (and Kaleva) made a EUR 10,000 Christmas donation to the BSAG. In addition, Mandatum Life organizes an annual seminar on responsible investment, which brings together opinion leaders in the sector from Finland and abroad to discuss the risks related to climate change. The next event will be held in 2019.

Climate change is not the only focus point of Mandatum Life's engagement work, though. The company focuses also on social responsibility. For example, in order to prevent the marginalization of youth at risk of exclusion, Mandatum Life is cooperating with the Tukikummit Foundation. Mandatum Life donates accident insurance policies to children in need. To date, more than 2,500 children have benefited from donated accident insurance policies.

In 2018, Mandatum Life launched the web hub TULEVA (www.tuleva.fi) in collaboration with the insurance company Kaleva. The hub's mission is to act as a safety net and provide important information for those who have had, either themselves or among loved ones, unexpected events related to, for example, difficult illnesses. The purpose is also to aid understanding of why it is important to secure one's personal risks.

Mandatum Life also aims to promote entrepreneurship and new, collaborative ways of working in Finland by teaming up with operators such as Innovation House Finland. Through these collaborations, for example, start-ups are given opportunities to create new business

and ways to connect with stakeholders. In addition, Mandatum Life provides non-monetary support to all NGOs with which it cooperates, including free advertising, promotional content, and the use of the company's facilities.

Sampo plc

In 2018, Sampo plc became a partner of the Hanken & SSE Executive Education (Hanken School of Economics in Finland and Stockholm School of Economics in Sweden) Business Lead Program. The Business Lead Program is a unique integration program for unemployed refugees and immigrants. The aim of the program is to introduce and integrate educated refugees and immigrants into Finnish working life. The program ends with an internship in a company in Finland. Since Sampo was a partner of the program, an internship was provided for one of the students.

In December 2018, Sampo plc made a Christmas donation of EUR 50,000 to the Tukikummit Foundation. Tukikummit supports Finnish children who are from disadvantaged families and in danger of being marginalized due to financial reasons. In addition, Sampo plc's employees took part in the Joulupuu charity. The aim of the charity is to provide a Christmas present to children and young people in deprived families, who would otherwise be left without a gift.



Tax Footprint

Sampo Group companies are significant and responsible tax payers. All the companies in the Group have committed to operating responsibly and to meeting all obligations and requirements defined by the valid legislation in each country. Sampo Group companies pay their taxes in the countries in which their actual business operations take place. All taxes are to be paid on time without delay. With the information provided by the tax footprint the Group companies want to increase transparency regarding the Group's taxes.

In 2018, the taxes payable and collected by Sampo Group totaled EUR 1,512.5 million. If represents 55.0 per cent, Topdanmark 15.2 per cent, and Mandatum Life 22.3 per cent of the total. The parent company Sampo plc's share was 7.5 per cent, which is mainly due to taxes withheld on dividends, as the parent company does not usually conduct other significant taxable operations. In 2018, Sampo Group's effective tax rate was 21.9 per cent. The effective tax rate is the profit for the year in relation to the taxes directed for the year, excluding the share of the associated companies.

If is committed to ensuring full compliance with all statutory obligations and full disclosures to the relevant tax authorities. The company views tax compliance as an important part of its corporate responsibility, both as an insurance company and as a member of a listed group of companies. If's governance model, the mandatory legal and regulatory requirements, and the supervision carried

out by the financial supervisory authorities ensure that If maintains a high level of tax compliance.

Topdanmark contributes to the Danish state through direct corporate taxes and indirect taxes. Topdanmark pays all its corporate taxes in Denmark, which is unusual given the organization's size, since other big Danish companies pay a large share of their corporate taxes abroad due to activities in international markets. According to the information provided by the local tax authorities,

Topdanmark was the 17th largest corporate taxpayer in Denmark in 2017.

Mandatum Life has been a significant taxpayer in Finland for many years. Mandatum Life continues to consider this as an important way of acting as a responsible corporate citizen, bearing responsibility toward society through the company's business profits. According to the information provided by the local tax authorities, Mandatum Life was the 8th largest corporate taxpayer in Finland in 2017.

Taxes Payable and Collected

Sampo Group, 2018

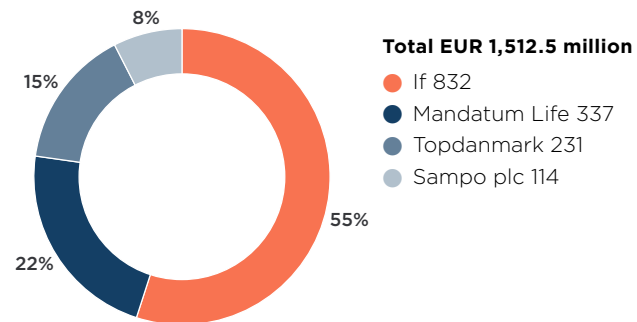
EURm		Sampo Group total
Taxes payable by the Group		
Corporate income tax	Corporate income tax accrued for the financial year	315.9
Employment taxes	Social security charges and other similar taxes payable on salaries	113.0
Other taxes		6.4
Taxes collected by the Group		
VAT	Total payable VAT	81.2*
Insurance premium tax	Insurance premium taxes payable to domestic and foreign tax authorities	378.6
Withholding tax	Taxes withheld on employee salaries and taxable claims payments	511.5
Withholding tax	Taxes withheld on dividend	105.9
Total		1,512.5

*Includes a one-time tax payment of EUR 52.8 million related to the renewal of the cooperation with Danske Bank.



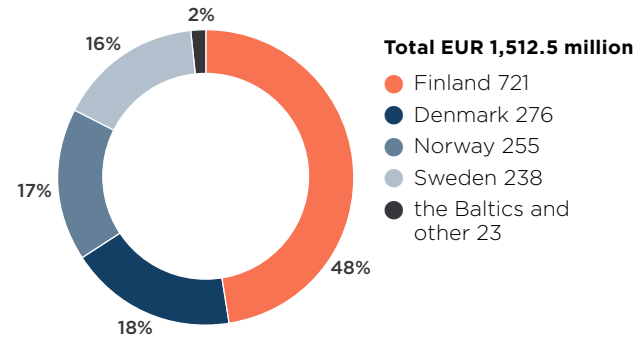
Distribution of Total Payable and Collected Taxes by Company

Sampo Group, 2018



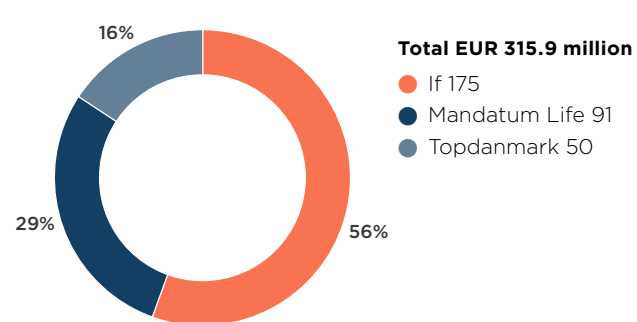
Distribution of Total Payable and Collected Taxes by Country

Sampo Group, 2018



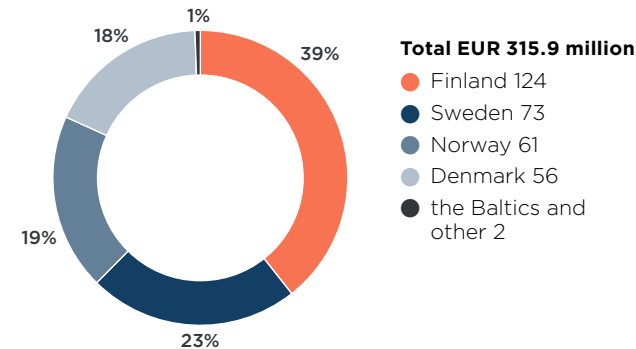
Distribution of Corporate Income Tax by Company

Sampo Group, 2018



Distribution of Corporate Income Tax by Country

Sampo Group, 2018





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Appendices

Appendix 1: Calculation Principles

The report refers to the period from 1 January to 31 December 2018, unless otherwise stated. The report provides group-level information, with some exceptions depending on the accessibility of the data due to a lack of comparable information between subsidiaries or the nature of the Group and the Group companies. The reporting coverage regarding material sustainability aspects is the same as in Sampo Group's consolidated financial statements. Financial information presented in the report is collected from the Sampo Group consolidated financial statements. To read about the coverage of the report, see the section on **Coverage of the Report (page 4)**.

Human resources data is reported on a group level; other personnel information is presented on a subsidiary level. All exceptions to this division are marked in connection with the data tables. Full-time equivalent (FTE) is used to report personnel figures, except for turnover figures, which are calculated according to headcount. On a group level, human resources data is presented as an FTE average; on a subsidiary level, FTE at the end of the year is used. To enable comparison, figures from the previous year are provided.

Health and safety figures are calculated for all subsidiaries. For health and safety figures, the calculation methods

differ between subsidiaries. As all of the subsidiaries have their own reporting structures, these figures are not comparable. The calculation method for each company is described in conjunction with the presented data.

With regard to environmental information, the most important environmental impacts are presented for each Sampo Group company. The direct environmental impact of the companies' own operations is most significant for If and Topdanmark. If and Topdanmark report the carbon footprint of their own operations. Both If and Topdanmark report upon Scope 1, Scope 2, and Scope 3 carbon emissions, and both companies report their carbon dioxide emissions based on the Greenhouse Gas Protocol Guidelines. However, the calculation methods differ, and therefore the figures are not comparable between the two companies.

If calculates Scope 1 emissions directly from the use of company cars; Scope 2 emissions from energy bought in the form of electricity, heating, and cooling; and Scope 3 emissions from energy used in business travel and paper use. The Scope 2 calculations are made using a market-based calculation method. The calculations are made by an external third party.

Topdanmark reports Scope 1 emissions directly from the private and business use of company cars and from natural gas consumption for heating; Scope 2 emissions

from energy bought in the form of electricity and heating (the figure includes cooling); and Scope 3 emissions from the use of non-company cars for business purposes, copy paper, and employee commuting. Topdanmark reports the location-based figure for Scope 2 emissions. The carbon emission calculations are made internally at Topdanmark using the Climate Compass calculation tool.

The investment allocation is reported on a group level, including the investments of If, Topdanmark, Mandatum Life (excl. Wealth Management), and Sampo plc. The numbers reported in this report differ from those reported in the context of Sampo Group's financial information. In this report, all investments of Topdanmark are included in the calculations (elsewhere investments of Topdanmark life insurance are excluded). This is to match the coverage of the investment allocation in this report with the investments included in the carbon footprint analysis, which as of 2018 includes all investments of Topdanmark.

Sampo Group (If, Topdanmark, Mandatum Life excl. Wealth Management, and Sampo plc) and Mandatum Life's Wealth Management report the carbon footprint of their direct equity and fixed income investments annually. The carbon footprint was calculated together with ISS-climate. ISS-climate's methodology is based on two pillars: (1) ISS-climate collects self-reported GHG data from all available sources, including CSR reports, the CDP, investor relations communication, websites and so



on. This self-reported data is validated by ISS-climate's analysts. Usually, 20–25 per cent of this data is dismissed as not trustworthy. (2) For all non-reporting or poorly reporting companies, ISS-climate has developed an approach for modeling such data. ISS-climate's approach relies on about 800 subsector-specific models, applied on a proprietary, carbon-focused, subsector classification

system. The carbon footprint is measured by financed emissions, in which the carbon emissions of each portfolio company have been measured against its market value. In the investment portfolio, the carbon emissions are calculated in proportion to the share of ownership of each company (tCO₂e /EUR million invested).

Topics related to customers are reported on a subsidiary level. Each subsidiary has its own way of measuring customer data, and so the reporting is adjusted to each subsidiary and its specific business structure.

Remuneration and tax information is reported on a group level.



Appendix 2: GRI Content Index

Disclosure Number	Disclosure Title	Pages
GRI 102: GENERAL DISCLOSURES		
1. Organizational Profile		
102-1	Name of the organization	p. 4
102-2	Activities, brands, products, and services	p. 7-9
102-3	Location of headquarters	p. 7, 94
102-4	Location of operations	p. 7-9
102-5	Ownership and legal form	p. 8
102-6	Markets served	p. 7-9
102-7	Scale of the organization	p. 36-39
		p. 7-12 (the Board of Directors Report and the Financial Statements)
		p. 39, 166 (the Board of Directors Report and the Financial Statements)
		p. 40, 167 (the Board of Directors Report and the Financial Statements)
102-10	Significant changes to the organization and its supply chain	p. 13 (the Board of Directors Report and the Financial Statements)
		p. 21-26 (the Board of Directors Report and the Financial Statements)
102-12	External initiatives	p. 92, Topdanmark (CSR Report), If (Sustainability Report)
102-13	Membership of associations	p. 92
2. Strategy		
102-14	Statement from senior decision-maker	p. 5-6
102-15	Key impacts, risks, and opportunities	p. 10-12, 19, 26, 28-29, 35
3. Ethics and Integrity		
102-16	Values, principles, standards, and norms of behavior	p. 13-15, 17-20
102-17	Mechanisms for advice and concerns about ethics	p. 12, 14, 17-18

Disclosure Number	Disclosure Title	Pages
4. Governance		
102-18	Governance structure	p. 13-15
102-19	Delegating authority	p. 11, 12, 14
102-20	Executive-level responsibility for economic, environmental, and social topics	p. 13
102-22	Composition of the highest governance body and its committees	p. 7-8 (Corporate Governance Statement)
102-23	Chair of the highest governance body	p. 3 (Corporate Governance Statement)
102-24	Nominating and selecting the highest governance body	p. 7-8 (Corporate Governance Statement)
102-26	Role of highest governance body in setting purpose, values, and strategy	p. 13, 93
102-27	Collective knowledge of highest governance body	p. 13
102-28	Evaluating the highest governance body's performance	p. 13
102-29	Identifying and managing economic, environmental, and social impacts	p. 13-15
102-30	Effectiveness of risk management processes	p. 13-15
102-31	Review of economic, environmental, and social topics	p. 13
102-32	Highest governance body's role in sustainability reporting	p. 4, 93
102-33	Communicating critical concerns	p. 14, 17-18
102-35	Remuneration policies	p. 10 (Corporate Governance Statement) p. 18-19 (the Board of Directors Report and the Financial Statements)
102-36	Process for determining remuneration	p. 10 (Corporate Governance Statement)
102-37	Stakeholders' involvement in remuneration	p. 10 (Corporate Governance Statement)
5. Stakeholder Engagement		



Disclosure Number	Disclosure Title	Pages
6. Reporting Practice		
102-45	Entities included in the consolidated financial statements	p. 4 p. 14, 44-45 (the Board of Directors Report and the Financial Statements)
102-46	Defining report content and topic boundaries	p. 4
102-47	List of material topics	p. 15
102-48	Restatements of information	p. 4
102-49	Changes in reporting	p. 4
102-50	Reporting period	p. 4
102-51	Date of most recent report	p. 4
102-52	Reporting cycle	p. 4
102-53	Contact point for questions regarding the report	p. 94
102-55	GRI content index	p. 4 GRI index p. 88-89
102-56	External assurance	p. 4
GRI 103: MANAGEMENT APPROACH		
103-1	Explanation of the material topic and its boundary	p. 13-15, 19, 26, 28, 35, 86
103-2	The management approach and its components	p. 10-11, 12, 13-15, 17
103-3	Evaluation of the management approach	p. 13-15, 17
GRI 201: ECONOMIC PERFORMANCE		
201-1	Direct economic value generated and distributed	p. 33-34, 39, 166 (the Board of Directors Report and the Financial Statements)
201-4	Financial assistance received from government	p. 9 p. 23-24 (the Board of Directors Report and the Financial Statements)
GRI 205: ANTI-CORRUPTION		
205-2	Communication and training about anti-corruption policies and procedures	p. 17, 19
205-3	Confirmed incidents of corruption and actions taken	p. 19-21

Disclosure Number	Disclosure Title	Pages
GRI 206: ANTI-COMPETITIVE BEHAVIOR		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 19-21
GRI 305: EMISSIONS		
305-1	Direct (Scope 1) GHG emissions	p. 30-31
305-2	Energy indirect (Scope 2) GHG emissions	p. 30-31
305-3	Other indirect (Scope 3) GHG emissions	p. 30-31, 72-76
GRI 401: EMPLOYMENT		
401-1	New employee hires and employee turnover	p. 36-45
GRI 403: OCCUPATIONAL HEALTH AND SAFETY		
403-2	Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	p. 46-47, 86
GRI 404: TRAINING AND EDUCATION		
404-2	Programs for upgrading employee skills and transition assistance programs	p. 50-52
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY		
405-1	Diversity of governance bodies and employees	p. 40-44
GRI 407: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	p. 26



Appendix 3: Relevant Governance Documents

Below is a list of governance documents, which can be considered as the most relevant to Sampo Group's corporate responsibility reporting and provide support for this report. The list does not include all Sampo Group companies' policies and governance documents.

Sampo Group: Code of Conduct	public, www.sampo.com
Sampo Group: Competition Compliance	non-public
Sampo Group: Compliance Principles	public, www.sampo.com
Sampo Group: Data Privacy Statement	public, www.sampo.com
Sampo Group: Disclosure Policy	public, www.sampo.com
Sampo Group: Internal Audit Policy	non-public
Sampo Group: Procedures to Prevent Money Laundering and Terrorist Financing	public, www.sampo.com
Sampo Group: Guidelines for Selecting and Assessing Company Management and Other Key Personnel	non-public
Sampo Group: Remuneration Principles	public, www.sampo.com
Sampo Group: Risk Management Principles	public, www.sampo.com
Sampo plc: Balance Sheet Policy	non-public
Sampo plc: Data Security Policy	non-public
Sampo plc: Fit and Proper Policy	non-public
Sampo plc: Internal Control Policy	non-public
Sampo plc: Investment Policy	non-public
Sampo plc: Policy on Diversity	public, www.sampo.com
Sampo plc: Remuneration Policy	non-public

If: Anti-Fraud Instruction	non-public
If: Anti-Money Laundering and Anti-Terrorist Financing Policy	non-public
If: Anti-Money Laundering and Anti-Terrorist Financing Instructions	non-public
If: Compliance Policy	non-public
If: Conflicts of Interest Policy	non-public
If: Environment Policy	non-public
If: Ethics Policy	public, www.if.se/fi/no/dk
If: Fit and Proper Policy	non-public
If: HR Policy	non-public
If: Information Security Policy	non-public
If: Internal Audit Policy	non-public
If: Internal Control Policy	non-public
If: Investment Policy	non-public
If: Operational Risk Policy	non-public
If: Personal Data Policy	non-public
If: Personal Data Privacy Instructions	non-public
If: Purchasing Instructions	non-public
If: Remuneration Policy	non-public
If: Risk Management Policy	non-public
If: Underwriting Policy	non-public



Mandatum Life: Anti-Money Laundering and Counter Terrorist Financing Principles	non-public
Mandatum Life: Code of Conduct "ML Way"	non-public
Mandatum Life: Communication Policy	non-public
Mandatum Life: Compliance Policy	non-public
Mandatum Life: Conflict of Interests Policy	non-public
Mandatum Life: Data Protection Policy	non-public
Mandatum Life: Fit and Proper Policy	non-public
Mandatum Life: Information Security Policy	non-public
Mandatum Life: Internal Audit Policy	non-public
Mandatum Life: Internal Control Policy	non-public
Mandatum Life: Investment Policy	non-public
Mandatum Life: Outsourcing and Procurement Policy	non-public
Mandatum Life: Product Governance Policy	non-public
Mandatum Life: Remuneration Policy	non-public
Mandatum Life: Risk Management Policy	non-public
Mandatum Life: Underwriting Policy	non-public

Topdanmark: Anti-Corruption Policy (Gifts and Hospitality)	non-public
Topdanmark: Climate and Environmental Policy	public, www.topdanmark.com
Topdanmark: CSR Policy	public, www.topdanmark.com
Topdanmark: Data Protection Policy	public, www.topdanmark.com
Topdanmark: Disclosure Policy	non-public
Topdanmark: Diversity Policy – Board of Directors	public, www.topdanmark.com
Topdanmark: Diversity Policy – Executive Functions in Topdanmark Group	public, www.topdanmark.com
Topdanmark: Engagement Policy (active ownership)	public, www.topdanmark.com
Topdanmark: Ethical Principles for Artificial Intelligence	public, www.topdanmark.com
Topdanmark: HR Policies	non-public
Topdanmark: Information Security Policy	non-public
Topdanmark: Loss Prevention and Loss Limitation Policy	public, www.topdanmark.com
Topdanmark: Operational Risk, Compliance and Internal Control Policy	non-public
Topdanmark: Policy for Human Rights	public, www.topdanmark.com
Topdanmark: Procedures to Prevent Money Laundering and Terrorist Financing	non-public
Topdanmark: Remuneration Policy	public, www.topdanmark.com
Topdanmark: Responsible Investment Policy	public, www.topdanmark.com
Topdanmark: Risk Management Policy	non-public



Appendix 4: Initiatives and Commitments

Corporate responsibility field is constantly developing and moving forward with new voluntary actions, initiatives, commitments, and reporting frameworks. The list shows some of the most significant commitments Sampo Group companies have made or the initiatives they are part of as per situation on 31 December 2018.

If

- Baltic Sea Action Group (BSAG)
- Business for Climate (Norway)
- ClimateWise
- Earth Hour
- The Climate Pact (Sweden)
- The Nordic Swan Network: Buy Ecolabelled (Nordic)
- UN Sustainable Development Goals, SDGs (focus on goals 5, 8, 10, 12, 13, and 17)
- WWW Green Office (If Finland)

Topdanmark

- Dansif, Denmark's Sustainable Investment Forum
- CDP
- UN Global Compact
- UN Sustainable Development Goals, SDG's (focus on goals 3 and 12)

Mandatum Life

- FIBS (Finnish Business & Society)
- Finsif, Finland's Sustainable Investment Forum

Mandatum Life Wealth Management

- Montréal Pledge
- Portfolio Decarbonization Coalition
- Principles for Responsible Investment (PRI)

Sampo plc

- FIBS (Finnish Business & Society)
- WWF Green Office



Signatures to the Corporate Responsibility Report

Helsinki, 8 May 2019

Sampo plc

Board of Directors

Björn Wahlroos
Chairman

Jannica Fagerholm
Vice Chairperson

Kari Stadigh
Group CEO and President

Christian Clausen

Fiona Clutterbuck

Johanna Lamminen

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2018

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