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[Business management
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[Corporate
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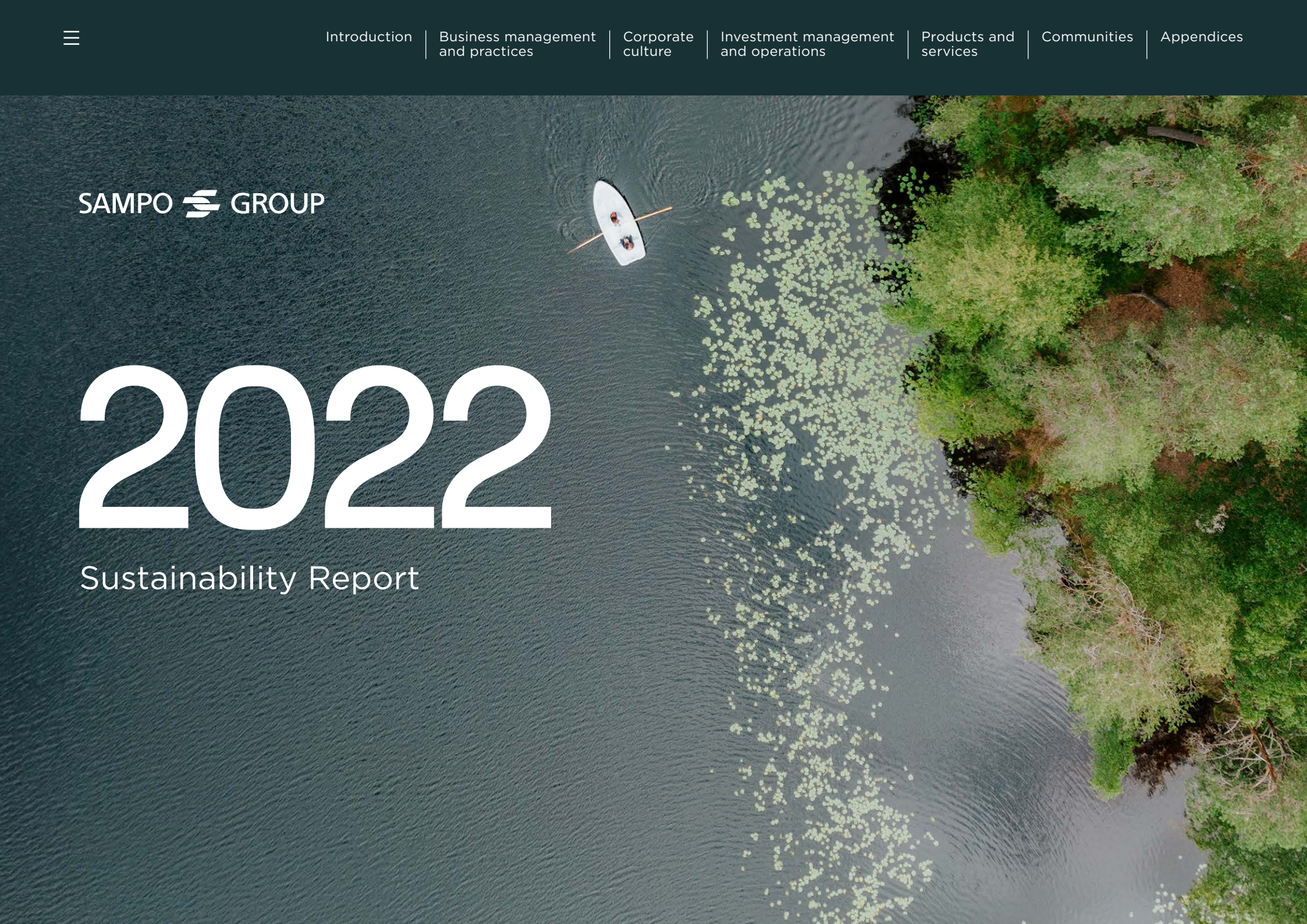
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SAMPO  GROUP

2022

Sustainability Report



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REPORTS FOR THE YEAR 2022
WWW.SAMPO.COM/YEAR2022

About the report

This is Sampo Group's Sustainability Report 2022, published on 10 May 2023. The reporting scope covers Sampo plc and its subsidiaries If P&C Insurance Holding Ltd (publ) (If), Topdanmark A/S (Topdanmark), Hastings Group (Consolidated) Ltd (Hastings), and Mandatum Holding Ltd (Mandatum). The report gives an overview of a wide array of topics regarding how the Sampo Group companies ensure sustainable business operations, integrate sustainability into investments and insurance activities, develop people, and engage in communities.

The key stakeholder groups considered in the report are investors, customers, and employees of the Group companies, as well as suppliers and other business partners, regulators and authorities, the general public, and the media. The information in this report is aimed at a specialist sustainability audience.

More information on the report in general is available in Appendix 1: Calculation principles (page 181).

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2022 highlights

SAMPO GROUP

- Employed 13,490 employees.
- Spent over EUR 734,000 on donations.
- Paid EUR 326.4 million in corporate income taxes.



- Exceeded the employee engagement (eNPS) target of above 50.
- Provided approximately 30,000 house assessments to private homeowners.
- Launched the One Responsible If education programme for all employees and the If Leadership Compass programme for leaders.

Hastings

- Committed to set ambitious science-based climate targets through the SBTi.
- Achieved 9th place in the Inclusive Top 50 UK Employers list.
- Exceeded the target of having 30% women in senior roles according to the 30% Club.

Topdanmark

- Committed to the Science Based Targets initiative (SBTi) and its Net-Zero Standard.
- Integrated UN Global Compact principles into the insurance underwriting of commercial customers.
- Strengthened ESG integration in the supply chain.

MANDATUM

- Received the Future Workplaces certificate based on the Signi employee survey.
- Excelled as one of the best real estate portfolios in its peer group in the GRESB assessment.
- Launched a new Senior Secured Loan Fund, which is classified as an SFDR Article 9 sub-fund targeting a positive net impact on society.

Preface



In 2022, we continued to work on sustainability in line with the Group's strategic sustainability themes, and sustainability was one of the focus areas for Sampo Group as a whole. Our initiatives and projects are bearing fruit, and we were able to see progress and good results in many areas during the year.

Sustainability is an integral part of our business

I want to highlight the work that we have done in integrating environmental, social, and governance (ESG) considerations further into insurance underwriting in 2022. Both If and Topdanmark expect their corporate clients to comply with the principles of the UN Global Compact, including commitments to fundamental human rights, labour rights, the environment, and anti-corruption. These principles have been integrated into relevant internal policies and processes, and corporate customers are screened and analysed against them.

We also emphasise sustainability in our investments. In 2022, we strengthened our investment policies by adding further instructions on how to take ESG considerations into account in investment processes. Paying attention to climate change and the efficient management of climate risk were among our focus areas.

As of 2022, all Sampo plc's fully owned businesses are also committed to the Principles for Responsible Investment (PRI), as Hastings signed the principles during the year.

In 2022, we focused on sustainable supply chain management. We, for example, screened suppliers for ESG risks, introduced ESG questionnaires for suppliers, and increased the share of suppliers that have signed a supplier Code of Conduct. We will continue this work during the coming years with the aim of improving sustainability across our supply chains.

Competent employees generate satisfied customers

The year 2022 brought uncertainties due to geopolitical and macroeconomic events, but we have been and are committed to supporting and working together with our customers and employees during these unusual times. Customers' trust in our expertise remained strong throughout the year, and customer satisfaction scores were high across the Group. This is an indication that our employees feel valued and are offered a working environment that always enables them to put our customers first.

To ensure continued focus on our employees and overall sustainable corporate culture, we, for example, updated relevant policies, introduced new employee surveys, and supported the competence development of employees during the year. The results of the continued efforts are visible as, for example, Mandatum received a Future Workplaces certificate for a proven highly rated employee experience, and If and Topdanmark exceeded their employee engagement targets in 2022.

We also consider it important that all our employees can feel included. To make progress in this, we introduced many new initiatives related to diversity, equity, and inclusion (DEI). A good example of the results achieved is the fact that Hastings was ranked 9th in the Inclusive Top 50 UK Employers list in 2022.

Increasing ambition on climate and the environment

In 2022, we strengthened the Group's focus on climate and the environment. All the Group's non-life insurers have joined the Science Based Targets initiative (SBTi), as Topdanmark and Hastings completed their commitments during the year. The commitment means mandatory science-based climate targets for our own operations and investments.

In addition, it is possible to develop voluntary targets where relevant. If, having made its commitment to the SBTi already earlier, continued to develop its targets during 2022 and is preparing to validate and publish them in 2023. As a next step, we are aiming to finalise group level involvement with the SBTi in 2023.

Eyes on the future

I value the work we have done together as a Group to drive progress for a more sustainable future. We have a growing number of employees who are directly involved in the sustainability work. This proves that sustainability is an integral part of our business.

In the future, we want to further increase our ambition level. Our sustainability strategy will be increasingly centred around the Group's overall strategy, which focuses on high-quality P&C insurance operations. To support this work and develop our business going forward, we will continue to spend a lot of time with our broad group of stakeholders.

Torbjörn Magnusson

Group CEO

Sampo Group in brief

Sampo Group is a significant Nordic insurance group made up of the parent company Sampo plc and its insurance subsidiaries If, Topdanmark, Hastings, and Mandatum. The Group's non-life insurance and life insurance activities are conducted by the subsidiaries. The parent company Sampo plc is a listed holding company and has no insurance activities of its own.

The Sampo Group companies' main operating countries are Finland, Sweden, Norway, Denmark, the United Kingdom (UK), Estonia, Latvia, and Lithuania. In addition, the Group companies have operations or offices in Spain, Gibraltar, France, Germany, the Netherlands, Luxembourg, and the United States (US).



Sampo plc is the parent company of Sampo Group and has been listed on the Nasdaq Helsinki (Helsinki Stock Exchange) since 1988 and the Nasdaq Stockholm since 2022. Sampo plc controls the Group's strategy, capital allocation, investment policy, risk management, group accounts, investor relations, and sustainability, as well as legal and tax matters. The company employs approximately 50 people, and the headquarters is in Helsinki, Finland.



If

If provides insurance solutions for individuals, businesses, and international industrial enterprises. The company has approximately 3.9 million customers in the Nordic and Baltic countries, and it is the largest property and casualty (P&C) insurer in the Nordic region. If also has branch offices in France, Germany, the Netherlands, and the United Kingdom for customers that conduct international operations. If's operations are divided into four business areas: Private, Commercial, Industrial, and Baltic. If has approximately 7,600 employees, and it is a wholly owned subsidiary of Sampo plc. If's headquarters is located in Stockholm, Sweden.



Topdanmark

Topdanmark is a leading Danish non-life insurer. The company focuses on the private, agricultural, and SME markets. Topdanmark's headquarters is in Ballerup, Denmark, and the company has approximately 2,150 employees. Topdanmark's shares are listed on Nasdaq Copenhagen. As of 31 December 2022, Sampo plc owned 48.3 per cent of the company's shares.



Hastings

Hastings is one of the leading non-life insurance providers to the UK car, van, bike, and home insurance markets. The company has over 3.2 million customers and approximately 3,000 employees. Hastings' headquarters is located in Bexhill, United Kingdom, with additional sites in Leicester, Gibraltar, and London. Hastings is a wholly owned subsidiary of Sampo plc.

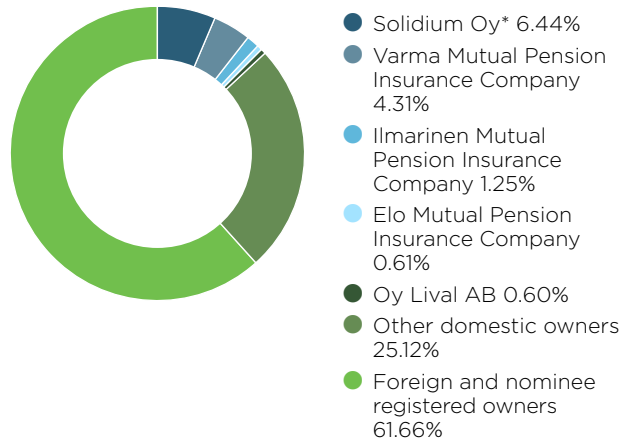


Mandatum

Mandatum Group consists of two business areas: life insurance (Mandatum Life Insurance Company Limited, Mandatum Life) and asset management (Mandatum Asset Management Ltd, MAM). Mandatum offers services in wealth management, asset management, rewards, and personal insurance. The company has an estimated 330,000 private and 20,000 corporate customers. MAM manages around EUR 16.1 billion in assets. Mandatum's headquarters is in Helsinki, Finland. Mandatum has approximately 630 employees, and it is a wholly owned subsidiary of Sampo plc.

Shareholder structure

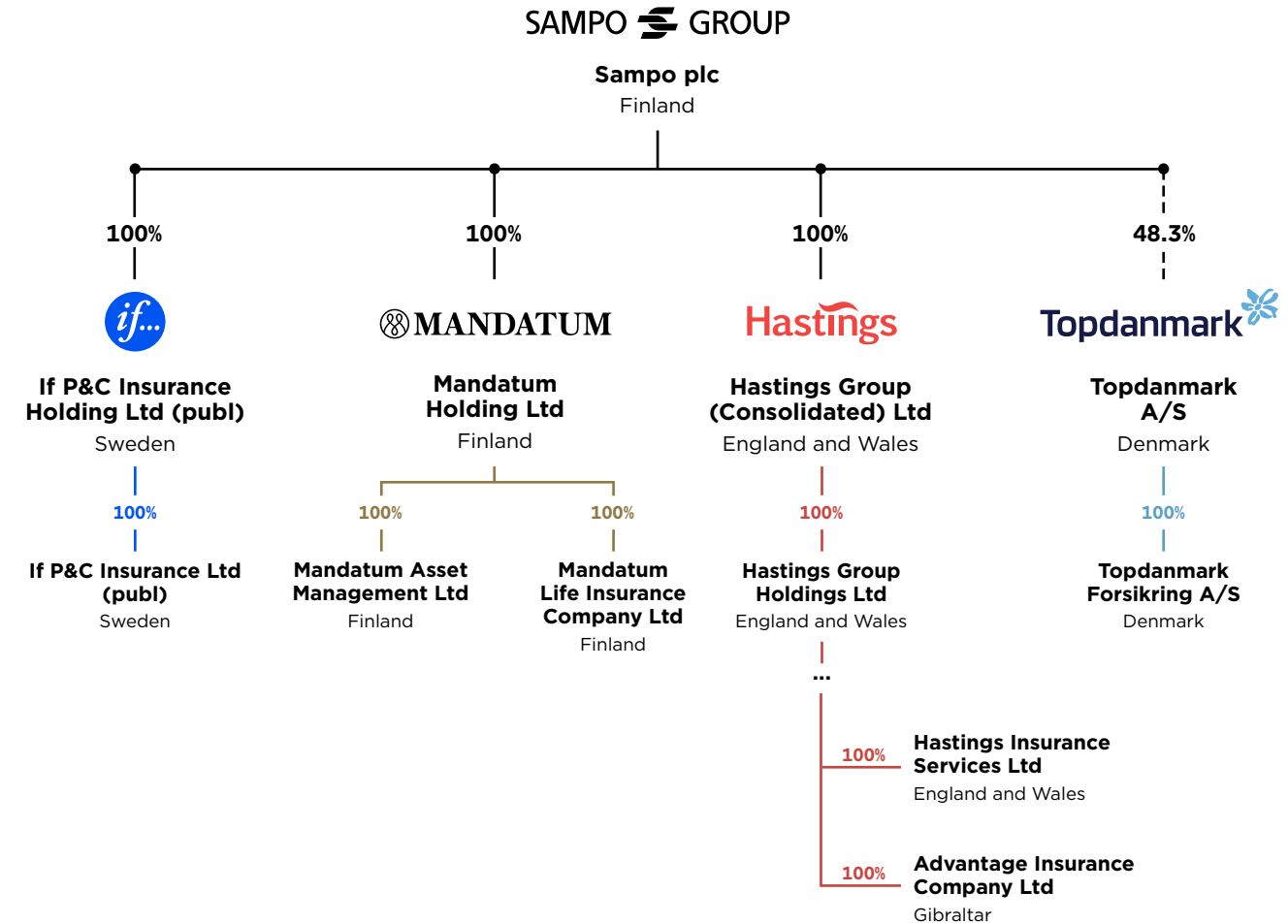
Sampo plc, 31 December 2022



* Solidium Oy is entirely owned by the Finnish state.

Group structure

31 December 2022



The official legal structure of the Group on 31 December 2022 is available in the [Board of Directors Report 2022](#).

Group strategy

Sampo's strategy is to focus Sampo Group on P&C insurance, investing in and developing its P&C insurance subsidiaries across the Nordic countries, the UK, and the Baltics. Sampo Group's purpose statement is 'Safety and value through understanding risks', a mission underpinned by Sampo Group's values of Trust, Integrity, and Excellence. Sampo Group creates value and provides safety to its stakeholders through high-quality insurance solutions, which are developed by understanding risks and managing them responsibly.

Sampo plc's main direct stakeholder groups are its subsidiaries, investors, employees, and vendors. The interest of Sampo plc's subsidiaries' customers is what firstly informs Sampo Group's business model, as those views are constantly being taken into consideration by employees who deliver services for Sampo Group's customers. These interests are complemented by Sampo

Nordic P&C insurance markets:

www.sampo.com/investors/marketoverview/pc-insurance-markets

Nordic life insurance markets:

www.sampo.com/investors/marketoverview/life-insurance-markets

Principles and policies:

www.sampo.com/sustainability/policies

Group's employees and vendors' views and interests, which also inform both Sampo Group's business model(s) and strategy. Finally, the interests and views of investors in securities issued by Sampo plc, such as the views of Sampo's shareholders, also inform Sampo's strategy and business model via dialogue with Sampo Group's management and Investor Relations function. Sampo plc takes all direct and indirect stakeholder groups into consideration when developing its strategy and business model(s), including society at large.

Group business model

Sampo plc's insurance subsidiaries, If, Topdanmark, Hastings, and Mandatum, organise their business activities to implement the strategic decisions made by the parent company. Sampo plc's main management tool is the work conducted on the subsidiaries' boards of directors. The boards of If, Hastings, and Mandatum mainly consist of Sampo Group's management. Regarding the wholly owned subsidiaries, Sampo plc provides a group-wide framework of general principles and policies (e.g. Code of Conduct, Risk Management Principles, Remuneration Principles, and Compliance Principles) within which the parent company expects the subsidiaries to organise and carry out their businesses, and there is frequent dialogue between Sampo plc and the subsidiaries on major operational matters. In addition, Sampo plc monitors performance, risks, and capitalisation at a detailed level.

Normative framework

Sampo Group

External normative framework

Laws, regulations, authority recommendations, industry standards, etc.

Group level guidance

Principles: Code of Conduct, Risk Management Principles, Remuneration Principles, and Compliance Principles.

Other guidelines: Internal Control Policy, Information Security Principles, Guidelines for Insiders, Data Privacy Statement, Guideline for Required Internal Procedures to Prevent Money Laundering and Terrorist Financing, Disclosure and Communication Policy, etc.

Company-level guidance

E.g. risk management policies, investment policies, underwriting policies, remuneration policies, internal audit and control policies, compliance policies, HR policies, information security and data privacy policies, anti-money laundering/corruption/bribery/conflicts of interests policies, codes of conduct, environmental policies.

Topdanmark has also adopted Sampo Group's group-wide principles and policies. However, the dialogue between Sampo plc and Topdanmark focuses primarily on performance, risk, and capitalisation reporting, and is not as detailed as that between Sampo plc and its wholly owned subsidiaries. At Topdanmark, the chair and two other board members are from Sampo Group's management. They constitute three of the six board members elected by the annual general meeting (AGM).

The subsidiaries have their own infrastructures and management, as well as operative processes. On the basis of and in compliance with the group-wide framework, each subsidiary designs and implements supplementary company-specific policies, and governance and risk management frameworks, which steer, limit, and control all operations. Each individual Group company is responsible for following up and monitoring compliance with the policies.

Value creation and the description of the value chain

Sampo Group creates value by providing safety to customers through high-quality insurance solutions. Safety, and thus value, is enabled by a detailed understanding of various risks that Sampo Group insures and underwrites. By pooling risks, Sampo balances the various risks of the customer base and provides insurance coverage for events that can be complex for customers to quantify.

Sampo Group accomplishes the safety and value creation through teams of professionals employed and through partnerships with vendors. The value created for customers flows to fair compensation to Sampo Group's employees and vendors, and to Sampo plc's shareholders. The safety created also benefits society at large, enabling multiple other sectors to continue to create value through their value chains.

Sampo Group's main customer groups are private individuals and corporate clients ranging from SME customers to commercial and industrial clients. Sampo Group also has large networks of suppliers, in which, for example, vehicle and property contractors and partners in health and travel services play a big role. In addition, suppliers in ICT, external consultancy, and office supplies, for example, support the running of the business.

There were no significant changes in sector, value chain, and business relationships during the year or compared to the previous reporting period.

Sustainability governance

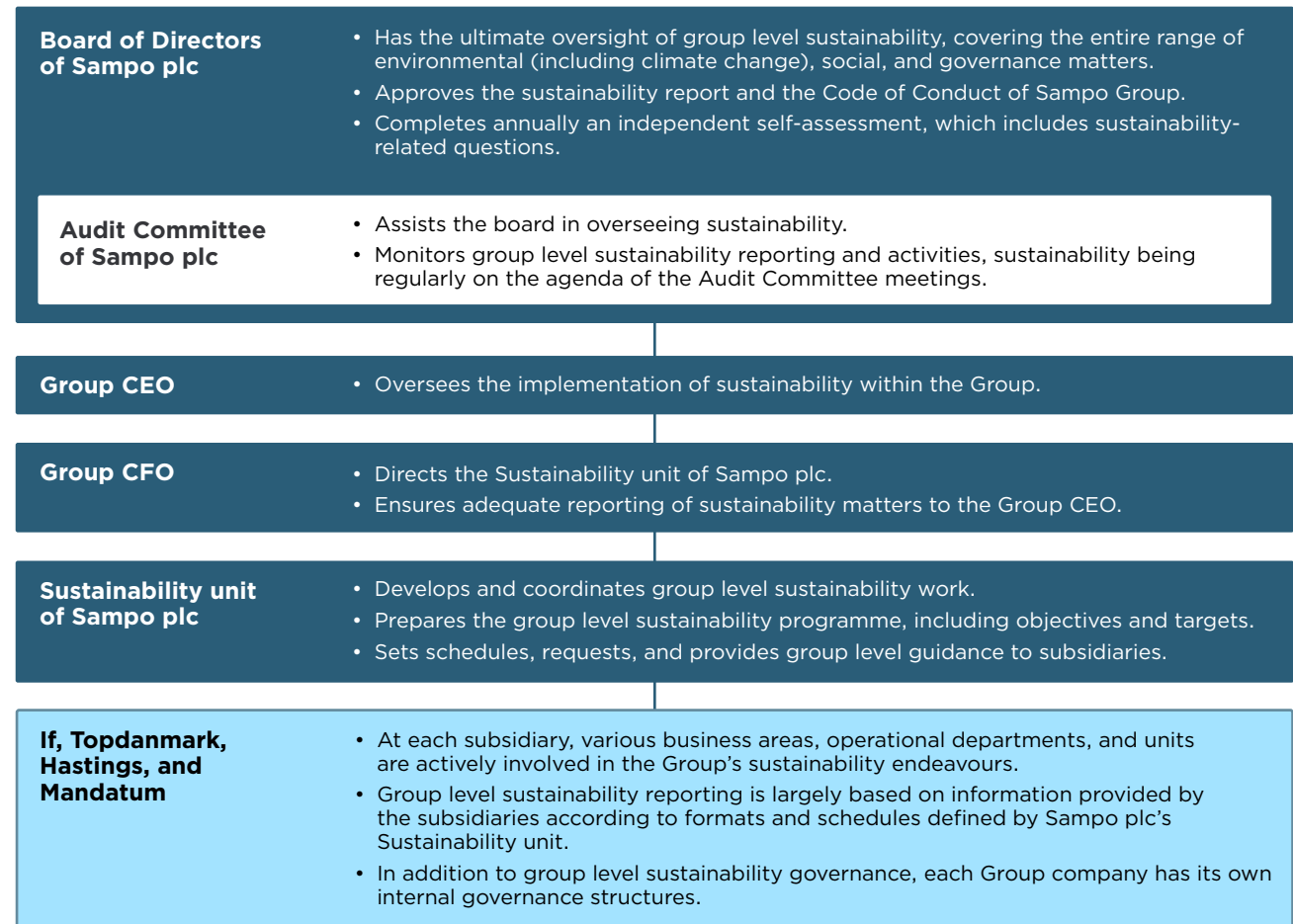
Sustainability organisation and reporting

Sampo plc's Board of Directors has ultimate oversight over group level sustainability, covering the entire range of environmental (including climate change), social, and governance (ESG) matters. The board has assigned its Audit Committee to monitor Sampo Group's sustainability reporting and activities. The Audit Committee reviews and approves the sustainability programme of the Group, including the material sustainability topics. In addition, the annually published sustainability report of the Group and the annually updated Sampo Group Code of Conduct are reviewed and approved by both the Audit Committee and the Board.

The Group Chief Financial Officer (CFO), who is a member of the Sampo Group Executive Committee, directs Sampo plc's Sustainability unit. The CFO also ensures that adequate reporting on sustainability matters is provided to the Group CEO. The Sustainability unit of Sampo plc, led by the Head of Sustainability, is responsible for the development and coordination of sustainability at Group level. The unit prepares the group level sustainability reporting and the sustainability programme, which sets the direction for the Group's sustainability work. In addition, the unit sets schedules, requests, and group

Sustainability organisation and reporting structure

Sampo Group, 31 December 2022



level guidance for the subsidiaries, and organises regular sustainability meetings.

The Group CFO and Sampo plc's Sustainability unit report to the Board of Directors and the Audit Committee on sustainability matters at least twice a year, and more frequently when deemed necessary. During 2022, sustainability as a standalone topic was on the agenda at Board and Audit Committee meetings a total of four times. In addition to the Sustainability unit, other units, such as Compliance, Risk Management, Investment Management and Operations, and HR, provide reporting to the Board and/or its committees and the Group Executive Committee regularly. This reporting can also include sustainability matters, as sustainability is an integral part of operations. The Board and its committees receive meeting materials before each Board and/or committee meeting and have time to provide feedback. During a meeting, a presentation on the topic in question is provided before a decision is made.

According to Sampo plc's Board Diversity Policy, the Board of Directors shall possess the requisite knowledge and experience in the social, business, and cultural conditions of the regions and markets in which the main activities of the Group are carried out. The policy states

that when electing the Board of Directors, a broad set of qualities and competencies are sought. Training can be provided for the Board when it is considered necessary.

At each subsidiary, various business areas, operational departments, and units are actively involved in the Group's sustainability endeavours and reporting. Group level sustainability reporting is largely based on information provided by the subsidiary companies, according to formats and schedules defined by Sampo plc. Each subsidiary is responsible for its respective reporting to the parent company, to ensure correctness of information. Information on If, Topdanmark, Hastings, and Mandatum's sustainability governance can be found in their respective reporting.

Board skills matrix:

[www.sampo.com/governance/
board-of-directors/board-skills-matrix](http://www.sampo.com/governance/board-of-directors/board-skills-matrix)

Board diversity:

[www.sampo.com/governance/
board-of-directors/board-diversity](http://www.sampo.com/governance/board-of-directors/board-diversity)

Sustainability reports of the Group companies:

www.sampo.com/year2022

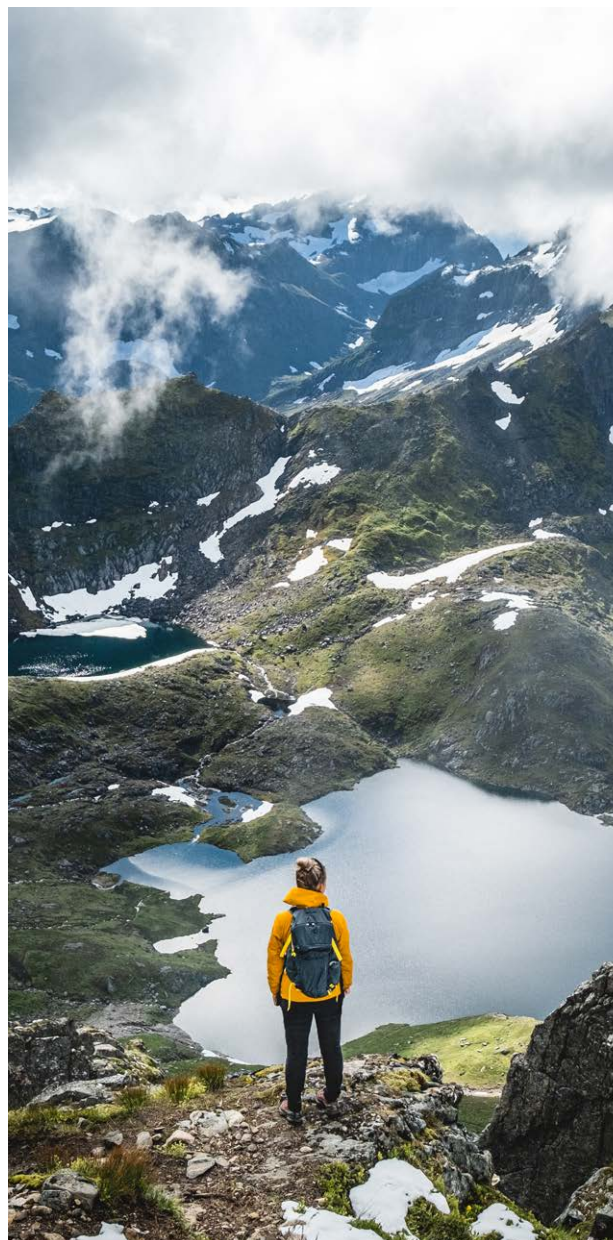
Sustainability programme and materiality analysis

Sampo Group has a sustainability programme, which drives group level sustainability work. The programme consists of five strategic sustainability themes: Business management and practices, Corporate culture, Investment management and operations, Products and services, and Communities. Under each theme, the most material sustainability topics have been identified using materiality analysis. The selected material topics include areas that are especially important to a company operating in the insurance industry. In addition, they link to Sampo Group's overall business and are seen as important by the Group's various stakeholders.

Representatives from all the Sampo Group companies have been involved in drafting the programme and analysing the material topics. In addition, regulatory requirements regarding current and future sustainability reporting, feedback from investors and personnel, industry best practices, relevant reporting frameworks (e.g. the GRI Standards, the TCFD), and the views of various ESG rating agencies have been taken into account. The sustainability programme also links the Group's sustainability work to the UN Sustainable Development Goals (SDGs).

In this Sustainability Report, the most material sustainability topics at Sampo Group are presented under individual sections. In each section, the major actions taken to manage the topic and its impacts, progress against targets, and developments related to policies, processes, and/or working methods during the reporting year are covered. The significance in terms of reporting is viewed from Sampo Group and its stakeholders' perspective, meaning that the reporting focuses on the impacts most material to the Group and its stakeholders.

The latest sustainability programme, including material sustainability topics, was approved by the Group CFO in December 2021 and by Sampo plc's Audit Committee in February 2022. During 2023–2024, Sampo plc plans to conduct a double materiality analysis to better meet the requirements of the GRI Standards and prepare for future sustainability legislation (e.g. Corporate Sustainability Reporting Directive, European Sustainability Reporting Standards).



Whistleblowing channels and grievance mechanisms

Sampo plc and its subsidiaries have their own whistleblowing channels, through which employees and external stakeholders can raise concerns if they have reasonable grounds to suspect that someone employed by Sampo plc or any of the Group companies has breached the law or rules and regulations applicable to the financial services industry.

In addition, the Sampo Group companies encourage their employees to report grievances, unethical practices, or possible violations of laws, regulations, or internal policies through specific grievance procedures.

Whistleblowing channels:















www.sampo.com/sustainability/sustainable-business-management-and-practices/whistleblowing

Grievance mechanisms:

www.sampo.com/sustainability/sustainable-business-management-and-practices/grievance-procedures

Sustainability programme

Sampo Group

Strategic sustainability themes	Material topics	Objective	Examples of business rationale	Link to the Group selected SDGs
Business management and practices	<ul style="list-style-type: none"> • Anti-corruption and bribery • Anti-money laundering and counter-terrorist financing • Data privacy • Information security and cybersecurity • Human rights and labor practices • Environmental impacts of group operations • Political involvement and lobbying 	Sampo Group ensures sustainability in governance and business operations.	Compliance Risk management Stakeholder demand	  
Corporate culture	<ul style="list-style-type: none"> • Empowering working environment • Diversity, equity, and inclusion • Health and well-being • Competence development • Sustainable remuneration 	Sampo Group provides a non-discriminatory corporate culture promoting employee well-being, diversity and inclusion, and professional development. Sampo Group's corporate culture and employer image attract and retain talent.	Compliance Risk management Employer image Financial performance Stakeholder demand	  
Investment management and operations	<ul style="list-style-type: none"> • Responsible investment strategies across asset classes • Carbon footprint and climate impact of investments 	Sampo Group integrates ESG criteria (including climate change) into its investment management and operations across asset classes.	Risk management Financial performance Stakeholder demand	 
Products and services	<ul style="list-style-type: none"> • Sustainable product and service offering • Sustainable supply chain management • Sustainable sales and marketing practices • Customer satisfaction 	Sampo Group integrates ESG criteria (including climate change) into its product and service offering and supply chain management.	Compliance Risk management Financial performance Stakeholder demand	   
Communities	<ul style="list-style-type: none"> • Stakeholder engagement and dialogue • Donations and other humanitarian efforts • Tax footprint 	Sampo Group provides safety, well-being, and financial security in society.	Risk management Employer image Stakeholder demand	 

Risk management and group risks

Sustainability-related risks, including climate change, are a part of Sampo Group's overall risk management. Sampo plc's Board of Directors is responsible for ensuring that the Group's risks are properly managed and controlled. The Board defines financial targets for the Group and for the wholly owned subsidiaries and approves group level principles that steer the subsidiaries' activities. The Audit Committee is responsible, on behalf of the Board, for the preparation of Sampo Group's risk management principles and other related guidelines. The committee ensures that the operations follow these guidelines, controls Sampo Group's risks and risk concentrations, and controls the quality and scope of risk management in the Group companies.

Risk Management Report 2022:

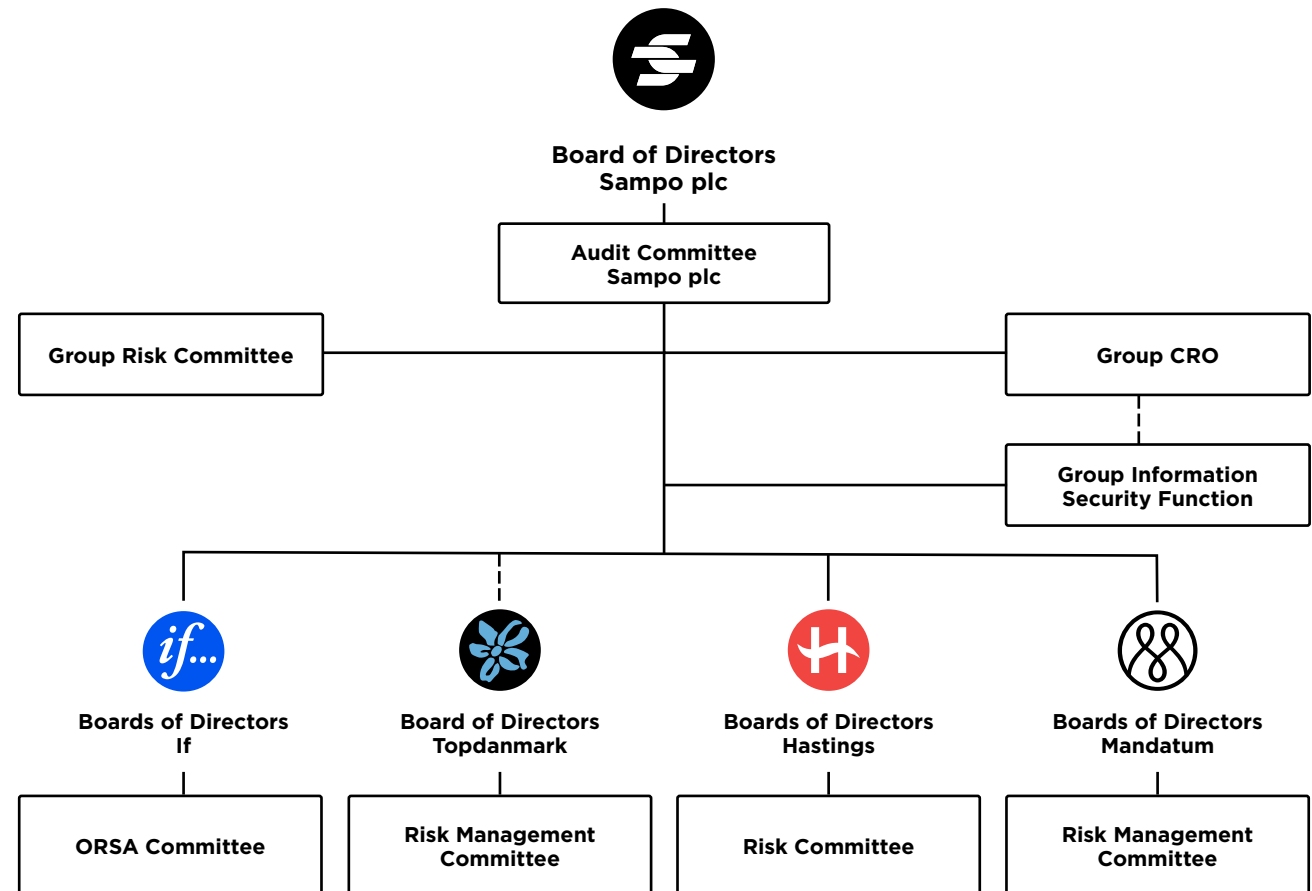
www.sampo.com/year2022

Risk Management Principles:

www.sampo.com/governance/internal-control/risk-management

Risk management governance framework

Sampo Group, 31 December 2022



The Sampo Group CFO chairs the Group Risk Committee, which ensures communication and cooperation in supporting risk management, including internal control, and risk reporting in Sampo Group. The committee assists both the Board of Directors and the Group CEO in the effective operation of the risk management system.

The Group Chief Risk Officer (CRO) is responsible for ensuring appropriate risk management at the group level. The CRO's responsibility is to monitor Sampo Group's aggregated risk exposures, and to control and monitor company-specific and group level risk management.

The boards of directors of If, Topdanmark, Hastings, and Mandatum are the ultimate decision-making bodies of the respective companies and have overall responsibility for the risk management processes.

Sustainability as a business risk driver

Business risk is the risk of losses due to changes in the competitive environment and/or a lack of internal operational flexibility. The key sustainability-related business risk drivers for Sampo Group can be divided into five main categories:

Sustainable business management and practices are fundamental to the Sampo Group companies' operations. Good governance in Sampo Group means effective policies, management practices, and training that provide assurance that the Group companies and their personnel, suppliers, and other business partners comply with laws, regulations, and generally accepted principles on human rights, labour rights, the environment and climate, anti-money laundering, counter-terrorist financing, and anti-corruption and bribery. Furthermore, they include comprehensive information security and cybersecurity governance systems, and data privacy activities.

Sustainable corporate culture includes factors relating to the work environment, diversity, equity and inclusion, employee health and well-being, competence development, remuneration, and talent attraction and retention. The Sampo Group companies want to provide customers with the best service in all situations. Here,

skilled and motivated employees are an essential success factor. Losing talent or being perceived as an unattractive employer would pose large risks for the businesses. Therefore, the Sampo Group companies strive to ensure a sound work environment, not only because it is stipulated by law but also because it lays the foundation for sustainable business performance. Diversity and inclusion are key focus areas for the Sampo Group companies, which are committed to providing a non-discriminatory, open, and agreeable work environment where everyone is treated fairly and equally. Risks related to these themes are managed, for example, by having strong internal policies and governance structures, conducting organisational development programmes, and offering employees training, interesting career opportunities, and attractive remuneration packages.

Sustainable investment management and operations are important in managing investment risks and in mitigating potential adverse impacts on the Group's reputation. Therefore, the Sampo Group companies take ESG issues (including climate change) into account when assessing the security, quality, liquidity, and profitability of investments. Investment opportunities are carefully analysed before any investments are made, and ESG issues are considered along with other factors that might affect the risk-return ratio of individual investments. Depending on the asset class, the Group

companies use different ESG strategies to ensure the effective consideration and management of investment risks arising from ESG issues. The strategies used include, for example, ESG integration, sector-based screening, norms-based screening, and engagement with investee companies.

Sustainable product and service offerings are important in meeting the evolving needs of all customers and in mitigating potential adverse impacts on the Group's reputation. Therefore, the Sampo Group companies aim to take ESG issues, including climate change, into account in product and service development, insurance underwriting, and supply chain management. Additionally, a sustainable product and service offering requires being attentive to the risks relating to inappropriate customer advice and product sales, errors in claims handling and complaint processes, and a lack of clarity on conditions, prices and fees. The focus in sales and marketing practices is on meeting the demands and needs of the customer and providing the customer with the information necessary for them to make well-informed decisions on their insurance coverage. The Sampo Group companies manage risks related to these themes, for example, by having effective internal policies and governance structures, and offering employees training.

Environmental issues and climate change are factors that are expected to have a mid- and long-term effect on Sampo Group's businesses. Climate-related risks can be categorised into physical risks and transition risks. The strength of the risks depends on the trajectory of global warming. A scenario in line with the Paris Climate Agreement, limiting the temperature rise to 1.5°C, would have moderate consequences, whereas 3–5°C scenarios would have severe consequences for industry, infrastructure, and public health.

Physical risks are risk factors affecting especially the financial position and results of Sampo Group's non-life insurers. The increasing likelihood of extreme weather conditions and natural disasters is included in internal risk models. Climate-related risks are also managed effectively with reinsurance programmes and price assessments. Since climate change could increase the frequency and/or severity of physical risks, the Sampo Group companies conduct sensitivity analyses using scenarios in which the severity of natural catastrophes is assumed to increase. The Sampo Group companies also help their corporate and private customers to manage climate-related risks. Extreme weather events can, for example, damage properties and lead to crop failure and business interruption. Loss prevention is an essential

part of insurance services, as it helps customers to reduce economic losses and mitigates the impacts of climate change.

The Sampo Group companies' investments can be exposed to both physical risks and transition risks, depending on the investment in question. Investments are particularly exposed to physical risks in the form of losses incurred from extreme weather events. The transition to a low-carbon society, with potentially increasing environmental and climate regulation, more stringent emission requirements, and changes in market preferences, could in turn cause transition risks for the Group's investments, and a possible revaluation of assets as operating models in carbon-intense sectors change. To manage physical risks and transition risks, investment opportunities are carefully analysed before any investments are made, and climate-related risks are considered along with other factors affecting the risk-return ratio of individual investments. The methods used by Sampo Group companies include annual analysis of the carbon footprint and climate impact of investments, sector-based screening and ESG integration, monitoring the geographical distribution of investments, and engagement with investee companies.

Sustainability factors as risk drivers

Sampo Group

Sustainability factors	Risks and effects		Examples of risk management practices
Sustainable business management and practices (e.g. anti-corruption and bribery, anti-money laundering and counter-terrorist financing, data privacy, information security and cybersecurity, human rights and labour practices, environmental impacts of group operations)	Reputation	<ul style="list-style-type: none"> • underwriting volumes • well-performing staff • underwriting results 	<ul style="list-style-type: none"> • Strong policies and guidelines • Effective governance structures • Topical training and competence development programmes
	Quality of operations	<ul style="list-style-type: none"> • operational risks • costs 	
	Penalty fees	<ul style="list-style-type: none"> • operational risks • costs 	
Sustainable corporate culture (e.g. empowering work environment, diversity, equity, and inclusion, health and well-being, competence development, remuneration)	Reputation	<ul style="list-style-type: none"> • underwriting volumes • well-performing staff • underwriting results 	<ul style="list-style-type: none"> • Strong policies and guidelines • Effective governance structures • Topical training and competence development programmes • Attractive remuneration packages
	Quality of operations	<ul style="list-style-type: none"> • operational risks • costs 	
Sustainable investment management and operations	Reputation	<ul style="list-style-type: none"> • underwriting volumes • underwriting results 	<ul style="list-style-type: none"> • Strong policies and guidelines • Effective governance structures • Topical training and competence development programmes • Competent employees
	Quality of operations	<ul style="list-style-type: none"> • operational risks • costs 	
	Performance of investee companies	<ul style="list-style-type: none"> • market risks • investment returns 	
Sustainable products and services (e.g., sustainable product and service offering, sustainable supply chain management, sustainable sales and marketing practices)	Reputation	<ul style="list-style-type: none"> • underwriting volumes • underwriting results 	<ul style="list-style-type: none"> • Strong policies and guidelines • Effective governance structures • Loss prevention • Integrating ESG into repairs, replacements, and other claims services • Topical training and competence development programmes • Competent employees
	Claims frequency and severity	<ul style="list-style-type: none"> • underwriting risks • underwriting results 	
Environmental issues and climate change	Reputation	<ul style="list-style-type: none"> • underwriting volumes • well-performing staff • underwriting results 	<ul style="list-style-type: none"> • Strong policies and guidelines • Effective governance structures • Internal risk modelling and sensitivity analysis • Reinsurance programmes and price assessments • Loss prevention • ESG strategies and analysis tools
	Claims frequency and severity	<ul style="list-style-type: none"> • underwriting risks • underwriting results 	
	Performance of investee companies	<ul style="list-style-type: none"> • market risks • investment returns 	

EU Taxonomy

Background

The EU Taxonomy is a green classification system that translates the EU's climate and environmental objectives into criteria for specific economic activities. The Taxonomy is part of the EU's efforts to achieve ambitious development goals in line with Agenda 2030 and the Paris Climate Agreement. The aim is to provide a common language to help investors and companies navigate the transition to a low-carbon, resilient, and resource-efficient economy.

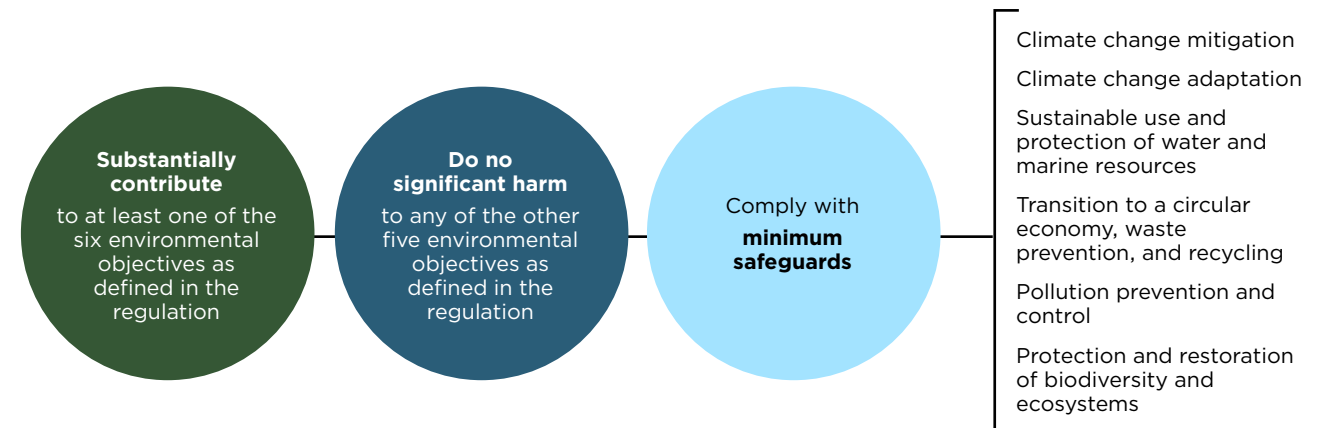
The basic principle of the Taxonomy is that for an economic activity to be recognised as environmentally sustainable, it must make a substantial contribution to at least one of the EU's climate and environmental objectives listed in the picture Basic principles of the EU Taxonomy Regulation. At the same time, the economic activity must not significantly harm any of these objectives and must meet minimum social safeguards. The Taxonomy Delegated Acts establish and maintain clear criteria (i.e. technical screening criteria) for activities, in order to define what it means to make a substantial contribution and what it means to do no significant harm. The Taxonomy Regulation (Regulation (EU) 2020/852) entered into force in July 2020. However,

it is still under development, and as of 31 December 2022 only two of the environmental objectives, climate change mitigation and climate adaptation, have been defined with technical screening criteria.

The EU Taxonomy is implemented gradually, meaning that reporting on Taxonomy eligibility (i.e. reporting on whether the economic activity is included in the Taxonomy Regulation) is only required for the reporting

years 2021 and 2022 for an insurance company. Reporting on Taxonomy alignment (i.e. reporting on whether the economic activity meets the technical criteria for i) substantial contribution, ii) do no significant harm, and iii) comply with minimum social safeguards) is required for reporting from the year 2023 onwards. Therefore, in 2024, Sampo Group will report the EU Taxonomy alignment of its insurance and investment portfolios for the first time.

The basic principles of the EU Taxonomy regulation



The Sampo Group companies are working to integrate sustainability and the Taxonomy into their business strategy and product development processes. The level of incorporation will be evaluated in more detail in the upcoming years. The Group companies' customers and other counterparties are involved in these processes by means of, for example, stakeholder engagement.

Mandatory disclosures

The EU Taxonomy Regulation requires large financial and non-financial companies that fall under the Non-Financial Reporting Directive (NFRD) to disclose to what extent the activities that they carry out meet the criteria set out in the Taxonomy. Insurance companies are required to report key performance indicators (KPIs) on

sustainable underwriting activities (the proportion of the non-life gross written premiums (GWP) – in relation to total non-life GWP – corresponding to insurance activities identified as environmentally sustainable in the EU Taxonomy) and sustainable investments (the proportion of the insurer's or reinsurer's investments that are directed at or associated with funding economic activities that qualify as environmentally sustainable).

Sustainable underwriting activities

Non-life insurance and reinsurance are recognised as enabling economic activities that can make substantial contributions to one or more of the objectives of the Taxonomy with regard to, for example, climate change adaptation.

Methodology

In 2022, the non-life insurance companies of Sampo Group, meaning If, Topdanmark, and Hastings, assessed the Taxonomy eligibility regarding their underwriting activities. As a first step, the companies assessed the proportion of total GWP that relates to the non-life insurance activities listed in the delegated acts to the Taxonomy Regulation. As a second step, the coverage against climate-related perils was assessed since, to be eligible, the non-life insurance activities must also provide coverage against climate-related perils (e.g. flooding, landslides, and heat stress). If, Topdanmark, and Hastings performed the second step by business area. The assessment was completed by underwriters and product owners with in-depth knowledge of the terms and conditions for the different products and contracts, with support, for example, from the Legal, Accounting, Group Control, and Sustainability units.

As long as an insurance policy does not explicitly exempt climate-related events from coverage, the Group companies concluded that the insurance product encompasses coverage against climate-related perils. The Sampo Group companies' interpretation, which is in line with Insurance Europe's interpretation, is that if there is some cover against climate-related perils for an insurance activity, total premiums shall be assessed as eligible even though there might be some climate-related exceptions in the terms and conditions.

Premiums related to life insurance and general liability insurance are not listed in the Taxonomy and thus are not eligible.

Underwriting KPIs

The analysis, which is based on the above-mentioned interpretations to the best of the Group companies' abilities, shows that 92.34 per cent of Sampo Group's total GWP were Taxonomy-eligible in 2022.

Taxonomy-eligible and non-eligible non-life insurance and reinsurance activities

Sampo Group, 2022

	GWP (EURm)	% of total GWP
Eligible insurance activities	7,512	92.34
Non-eligible insurance activities	624	7.66
Total non-life insurance activities	8,136	100.0

Taxonomy-eligible non-life insurance activities per line of business

Sampo Group, 2022

	GWP (EURm)	% of total GWP
Medical expense insurance	309	3.79
Income protection insurance	534	6.56
Workers' compensation insurance	304	3.74
Motor vehicle liability insurance	1,535	18.86
Other motor insurance	2,123	26.10
Marine, aviation, and transport insurance	128	1.57
Fire and other damage to property insurance	2,376	29.21
Assistance	31	0.39
Total eligible non-life insurance GWP	7,340	90.22

Taxonomy-eligible reinsurance activities per line of business

Sampo Group, 2022

Reinsurance activity	GWP (EURm)	% of total GWP
Marine, aviation, and transport insurance	19	0.23
Fire and other damage to property insurance	153	1.88
Total eligible reinsurance GWP	172	2.11

Sustainable investment activities

In 2022, the Taxonomy Regulation requires insurance companies, both non-life and life, to report the proportion of underlying investments that are Taxonomy eligible. To facilitate this type of reporting at portfolio level, all holdings need to be screened and analysed in relation to the economic activities of the Taxonomy.

Methodology

The EU Taxonomy analysis of Sampo Group's investments, meaning the investments of If, Topdanmark, Hastings, Mandatum, and Sampo plc, was performed with the use of data from an external data provider, Upright Oy (Upright). Upright identified companies engaged in economic activities covered by the Taxonomy and produced all the Taxonomy eligibility indicators directly on a company's own reporting of Taxonomy eligibility.

All underlying investments were analysed, except for sovereign exposures that are to be excluded from the Taxonomy analysis according to Taxonomy requirements. When analysing Taxonomy eligibility, derivatives and non-NFRD companies were excluded from the numerator, in line with the reporting requirements. Non-NFRD companies are companies that themselves are not covered by reporting requirements under the Taxonomy Regulation.

Investment KPIs

According to the analysis, the Taxonomy eligibility of Sampo Group's covered with profit assets was 5.5 per cent, and the Taxonomy eligibility of unit-linked assets was 2.6 per cent on 31 December 2022. 72.8 per cent of Sampo Group's with profit investments and 77.1 per cent of Sampo Group's unit-linked investments consisted of exposures to companies that were not themselves obliged to publish a Taxonomy report on 31 December 2022. Based on the Taxonomy reporting requirements, those companies are not included in the eligibility analysis.

In addition, 0.3 per cent of Sampo Group's underlying with profit investments and 0.2 per cent of Sampo Group's underlying unit-linked investments were derivatives, which should also be left out of the eligibility analysis. As required in the Taxonomy Regulation, sovereign exposures, such as exposures to central governments, central banks, or supranational issuers, are also excluded from the calculation. Sovereign exposures made up 4.3 and 5.7 per cent of Sampo Group's with profit and unit-linked assets, respectively, on 31 December 2022.

Taxonomy-eligible investment activities Sampo Group, 31 December 2022

	Share of covered assets*	Share of total assets**
Exposure to Taxonomy-eligible economic activities	4.7%	4.4%
Exposure to Taxonomy-non-eligible economic activities	95.3%	95.6%
Of which: With profit assets		
With profit assets	70.3%	70.0%
Exposure to Taxonomy-eligible economic activities (with profit)	5.5%	5.3%
Derivatives (with profit)		0.3%
Exposure to non-NFRD companies (with profit)		72.8%
Exposure to central governments, central banks, and supranational issuers (with profit)		4.3%
Of which: Unit-linked assets		
Unit-linked assets (life insurance contracts)	29.7%	30.0%
Exposure to Taxonomy-eligible economic activities (unit-linked)	2.6%	2.4%
Derivatives (unit-linked)		0.2%
Exposure to non-NFRD companies (unit-linked)		77.1%
Exposure to central governments, central banks, and supranational issuers (unit-linked)		5.7%

* Investment assets excluding sovereign investments.

** Investment assets including sovereign investments.

Sustainable business management and practices

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Anti-corruption and bribery

Materiality

The Sampo Group companies can be exposed to corruption and bribery especially through their investments, customers, and supply chains. Sampo Group can face reputational risks, legal risks, business risks, and potential costs if it fails to effectively combat corruption in all its forms. The risks are mitigated, for example, by screening investments and customers against international norms and standards and by encouraging sustainability in supply chains.

Group level approach

The Sampo Group Code of Conduct sets the overall guiding principles on working against corruption and bribery within Sampo Group. Sampo Group is also a signatory of the UN Global Compact, which supports work against corruption.

The managing director of each company in Sampo Group has the ultimate responsibility to ensure that sufficient resources are allocated to the prevention of corruption

and bribery. Each Group company organises duties and takes other necessary and appropriate measures to comply with the applicable local rules and various sanctions regimes, which may be imposed by the UN and/or the European Union (EU).

Reporting on anti-corruption and bribery activities, as well as on potential incidents, is organised in each Group company in a manner that ensures that the management and the boards of directors of relevant companies receive all material information without undue delay, and that Sampo plc's Risk Management organisation is informed of all relevant incidents. Sampo plc's Risk Management organisation is responsible for reporting relevant incidents to Sampo plc's Audit Committee and Board of Directors.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-business-management-and-practices/anti-corruption-and-bribery

Group goals and ambitions

Sampo Group has zero tolerance towards corruption and bribery, and it expects its employees, customers, suppliers, and other business partners to share the same view.

Group actions and results

In 2022, no incidents related to corruption or bribery were reported at Sampo Group.

Reported corruption and bribery incidents

Sampo Group

	2022	2021	2020
If	0	0	0
Topdanmark	0	0	0
Hastings	0	0	-
Mandatum	0	0	0
Sampo plc	0	0	0
Sampo Group, total	0	0	0

If

Approach

At If, the work against corruption and bribery derives from the company's Ethics Policy, which is based on the Swedish Anti-Corruption Institute's code against bribery. The Ethics Policy is updated annually, and it contains rules on gifts, participation in events, and hospitality. In addition, the supplementary policy material includes different practical educational dilemmas. Employees are informed on the intranet when the policy has been revised, and there are voluntary and mandatory learning programmes connected to the policy. Upon employment, all employees sign a statement that they will follow If's policies and instructions, including the Ethics Policy.

Furthermore, work against corruption and bribery is part of If's work to prevent money laundering and terrorist financing. If has controls in place by which it checks whether customers are politically exposed persons or on the EU or UN sanctions lists.

Any suspicions of corruption or bribery can be reported through If's whistleblowing system. Reports can also be made directly to If's Investigation unit. Any incidents or events connected to corruption or bribery are reported to If's Ethics Committee, If's Own Risk and Solvency Assessment (ORSA) Committee, and further to the Board of Directors.

Actions and results

In 2022, If launched a learning programme, One Responsible If. It is mandatory for all If employees to complete the programme annually. Leaders have access to a system where they can monitor that their team members have completed the programme. The programme includes a module on business ethics.

During 2022, If piloted a new fraud detection system that utilises machine learning and artificial intelligence. If considers it important to use modern technology to identify deviating patterns in customer behaviour, in addition to relying on the expertise of employees. The new system has been created by combining knowledge from the Investigation and Data Management units at If.

Topdanmark

Approach

In accordance with the principles of the UN Global Compact, Topdanmark works against corruption in all its forms. To support its employees, Topdanmark has guidelines that state when employees may give and receive gifts, and when they can hold or participate in events. The purpose of the guideline is, among other things, to prevent and avoid business decisions being influenced by personal or non-business-related

considerations and interests. In addition, Topdanmark's approach to anti-corruption is embedded in the company's internal Code of Conduct.

Topdanmark has assessed that the biggest risk of corruption and bribery for the company is related to gifts and events relating to customers, suppliers, and other business partners. In general, the risk is considered low.

Actions and results

In 2022, Topdanmark prepared a formal policy on anti-corruption. The policy describes in more detail the company's objectives and targets related to anti-corruption, expectations regarding employees, and roles and responsibilities. Topdanmark's decentralised compliance functions monitor compliance with the policy in their respective departments. The compliance functions also work as help desks for employees. Topdanmark Group Compliance carries out controls of compliance with the policy in connection with general compliance inspections. If Group Compliance identifies any breaches of the policy, the normal procedure for non-compliance with policies will be followed. This includes the preparation of a report on the breach, a decision on measures to rectify the breach, and a follow-up on whether the recommendation is implemented within the given timeline.

Hastings

Approach

Hastings' approach to the prevention of corruption and bribery is embodied in its Anti-Bribery and Corruption Policy, which reflects the company's obligations under regulations and laws, especially the UK's Bribery Act 2010 and Part 24 of Gibraltar's Crimes Act 2011. The policy is reviewed annually.

Upon starting employment at Hastings, all employees sign an undertaking of compliance with all Hastings Group policies. All employees are informed of any policy revisions through the company's intranet, with annual mandatory training on this subject delivered and monitored through the company's e-learning platform.

Any suspicions of corruption or bribery can be reported via Hastings' whistleblowing channel or via less formal internal channels. Any incidents or events connected to corruption or bribery, or breaches of the policy, are reported to the appropriate management and governing body forums.

Actions and results

In 2022, Hastings conducted an annual review of the Anti-Bribery and Corruption Policy. The company also reviewed its approach to anti-corruption and bribery within the context of regulatory guidance and its anti-financial crime framework as a whole.

Mandatum

Approach

Mandatum's anti-corruption and bribery framework is based on the Sampo Group Code of Conduct and Mandatum's Conflict of Interest policies, which are supplemented by the Mandatum Way guide and Gifts and Hospitality guidelines. Together, the policies and guidelines set the principles against corruption and bribery and aim to promote ethical and responsible business operations and to safeguard Mandatum's reputation by preventing inappropriate influence and conflicts of interest.

In addition, the work against corruption and bribery is an integral part of Mandatum's anti-money laundering (AML) and counter-terrorist financing framework. Mandatum has implemented processes for enhanced monitoring of politically exposed persons and screening against the national and international sanctions lists. The AML officers and Mandatum's Group Legal unit support the management and business units in complying with the company policies.

Anti-corruption and bribery topics are part of all new and existing employees' mandatory training programmes. Furthermore, all employees must, on a regular basis, complete compliance e-learning programmes, in which employees are reminded of the Sampo Group Code of Conduct and Mandatum's internal procedures.

Any suspicions of corruption or bribery can be reported through Mandatum's whistleblowing system or otherwise directly to the Compliance function.

Actions and results

During 2022, Mandatum launched Group-wide guidelines for gifts and hospitality to define the principles for permissible practices in business relationships. All employees were required to complete an e-learning course on the new guidelines. The e-learning course is also a mandatory part of all new employees' training programmes. The completion of training is supervised through reporting from the training system.

In 2023, Mandatum will continue to enhance employee awareness by implementing an updated Compliance e-learning programme that includes a section on anti-corruption and bribery. Mandatum's whistleblowing channel will also be made available to external stakeholders on Mandatum's website, in accordance with new regulatory requirements to be enforced in Finland during 2023.



Sampo plc

At Sampo plc, the CEO, together with Risk Management, ensures that sufficient resources are allocated to the prevention of corruption and bribery. Sampo plc is also in charge of the annual review and update of the Sampo Group Code of Conduct, which includes group level guidelines on anti-corruption and bribery.

All Sampo plc's employees are required to familiarise themselves with the Sampo Group Code of Conduct upon employment, and after that to take part in internal training every other year. In 2022, 98 per cent of the company's employees participated in the Code of Conduct training.

Anti-money laundering and counter-terrorist financing (AML and CTF)

Materiality

Sampo Group recognises that money laundering and terrorist financing are serious problems for society in general, and financial services companies tend to be favoured channels through which illicit money is laundered. Robust and well-resourced operations to counter money laundering and terrorist financing are critical factors in the Group companies' success.

A defence 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. For an insurance company, being able to evaluate risks is at the core of business. For Sampo Group, the risk of money-laundering and terrorist financing is considered low overall.

Group level approach

The Sampo Group Code of Conduct and the Sampo Group Guideline for Required Internal Procedures to Prevent Money Laundering and Terrorist Financing set out the group level principles for AML and CTF efforts. The Group companies are committed to having sufficient controls, procedures, and training in place to prevent the use of

the Group companies' services and products for money laundering and terrorist financing purposes. When providing insurance services, the Group companies follow the authorities' regulations and required due diligence to prevent money laundering and terrorist financing. Customer databases are screened and updated regularly to ensure accuracy of data and appropriate record-keeping. In addition, the Group companies' appointed specialists assess high-risk decisions and business relationships separately.

In some countries, the Sampo Group companies have a legal obligation to know their customers (Know Your Customers, KYC), which means that additional processes are necessary when working with customers. These obligations are based on legislation intended to, among other things, prevent money laundering, terrorist financing, and financial crimes.

Group goals and ambitions

Sampo Group has zero tolerance towards money laundering and terrorist financing, and it expects its employees, customers, suppliers, and other business partners to share the same view.

Group actions and results

During 2022, the Sampo Group companies reported to the authorities a total of 426 suspicions of money laundering or terrorist financing related to customer transactions. This reporting shows that the internal guidelines and procedures work in identifying and following up on unusual or suspicious customer activities. The higher number of suspicions reported by If compared to the other Group companies is due to the size of the company and the legislation in its operating countries. In Finland and Norway, AML and CTF legislation applies both to life and non-life insurance, whereas for example in

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Sampo Group guideline to prevent money laundering and terrorist financing and other additional information:

www.sampo.com/sustainability/sustainable-business-management-and-practices/anti-money-laundering-and-counter-terrorist-financing

Denmark (Topdanmark's market) and the UK (Hastings' market), legislation is limited to life insurance. In 2022, the increase in suspicions reported by If is also a result of improved internal processes.

During 2022, Mandatum improved both its monitoring system and its personnel's awareness to detect suspicious activities. In addition, the intense sanction measures had an impact on Mandatum's numbers. Topdanmark's reported suspicions were all related to the discontinued life insurance business.

Money laundering and terrorist financing suspicions reported to the authorities

Sampo Group

	2022	2021	2020
If	410	248	222
Topdanmark	3	3	8
Hastings	1	0	-
Mandatum	12	3	6
Sampo plc	0	0	0
Sampo Group, total	426	254	236

If

Approach

Governance

If has an Anti-Money Laundering and Counter-Terrorist 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 that provide more details and specify the legal requirements set by each operating country.

If has risk-based KYC procedures in place, including identification and verification of customers. In addition, If's customer databases undergo screening to identify politically exposed persons, in accordance with national legislation. Identified politically exposed persons are assessed by authorised decision-makers, and all decisions are stored. Payments to countries that are under increased monitoring by the Financial Action Task Force (FATF) are automatically stopped and controlled. Furthermore, payments to countries on which restrictive measures are imposed by the EU (and in some cases by the UN) regarding asset freezes and prohibitions on making funds available are also stopped and controlled.

If has appointed a board member with overall responsibility for coordinating the AML and CTF framework, and an

AML/CTF compliance officer responsible for controlling and reporting obligations. Furthermore, there are AML/CTF competence groups in each country, consisting of appointed Business Area and Claims coordinators and representatives from Legal, Compliance, and Internal Investigations. The competence groups are responsible for performing a yearly risk assessment and considering ML/TF risk factors for the company.

If's AML and CTF risk assessments are updated annually in accordance with local legal requirements.

Employee training

Training in AML and CTF is included in If's mandatory annual One Responsible If learning programme for all employees. In addition, targeted employees are required to undergo supplementary training.

Actions and results

In 2022, If continued to raise employee awareness of AML and CTF and streamlined the AML and CTF-related processes and internal reporting of local AML and CTF activities. If also improved system development related to AML and CTF processes on a Nordic level.

In 2022, country-specific AML and CTF training was offered to all If employees as a part of the new mandatory One Responsible If learning programme.

Topdanmark

Approach

Topdanmark complies with laws and regulations on AML and CTF, including the UN and EU regulations on increased risk and financial sanctions. Legislation on money laundering and terrorist financing in Denmark only applies to life insurance business and does not include Topdanmark's non-life insurance business.

Actions and results

In 2022, Topdanmark signed an agreement with Nordea Life Holding AB on the divestment of Topdanmark Liv Holding A/S. The transaction was completed on 1 December 2022. Following the divestment, Topdanmark sells and provides advice on life insurance and pensions products for Nordea via a distribution agreement that is subject to the AML and CTF regulation. In this context, Topdanmark complies with the authorities' regulations and the required maintenance and control of the processes to prevent money laundering and terrorist financing. The risk of money laundering and/or terrorist financing is assessed to be low in this collaboration.

Sales of Topdanmark's own non-life insurance products and services are not subject to the AML and CTF regulation. Regardless, during 2023, Topdanmark will clarify the processes and structures required for AML and CTF in its continued business.

Hastings

Approach

Governance

Hastings has a risk-based approach towards assessing and managing the money laundering and terrorist financing risks it faces, with details set out in the related Anti-Money Laundering and Counter Terrorist Financing Policy. This policy considers all relevant laws and statutes and sets out the company's controls and reporting framework, which monitor adherence and facilitate the reporting of breaches. Key risks in relation to financial crime, controls, any breaches, suspicious transaction reports, and audit findings are reported to the company board on an annual basis by Hastings' Money Laundering Reporting Officer.

Employee training

All employees are informed of any policy revisions through Hastings' intranet, with mandatory training on this subject delivered and monitored through the company's e-learning platform. Mandatory training is undertaken by all employees on an annual basis.

Actions and results

During 2022, Hastings conducted an annual review of the Anti-Money Laundering and Counter Terrorist Financing Policy. The company also reviewed its approach to money laundering, terrorist financing, and sanctions within the context of regulatory guidance and its anti-financial crime framework as a whole.

Mandatum

Approach

Governance

Mandatum evaluates money laundering and terrorist financing risks at least annually, considering the risks relating to customers, countries and geographical areas, products, services, transactions, technologies, and distribution channels. Mandatum considers its investment and savings products to have a normal risk of money laundering and terrorist financing, whereas the risk for pension products and life insurance products is regarded as low.

Mandatum uses a risk-based approach to classify customers in different risk categories, and it applies enhanced due diligence measures for customers presenting a higher risk, such as politically exposed persons or customers with ties to high-risk jurisdictions. Derived from the risk-based approach, each Mandatum Group company has implemented an Anti-Money Laundering and Counter-Terrorist Financing Policy, which sets out the requirements for complying with relevant AML and CTF laws and regulations. The policies are supplemented with guidelines and instructions to specify procedures in the different business areas.

The main forum for AML and CTF matters at Mandatum is the AML Steering Group, which is headed by Mandatum's AML directors and AML officers and has representatives from the Legal, Compliance, Client Service, IT, and Back Office functions. The AML Steering Group is an expert group providing support to Mandatum's AML directors, who have overall responsibility for AML and CTF matters at Mandatum Group. The Board of Directors of each Mandatum Group company reviews and approves the AML policies and the business-wide risk assessments at least annually. Mandatum's business units are responsible for the implementation of the policies and necessary procedures, with support from the AML officers.

Employee training

Mandatum's employees are required to participate in annual AML and CTF training, in accordance with their work profiles. The company organises additional training when legislative changes or procedural changes occur. New employees are introduced to Mandatum's AML and CTF procedures and internal guidelines during the onboarding programme.

Actions and results

In 2022, due to organisational changes and increasing regulatory demands, Mandatum increased resources for AML and CTF functions and clarified roles and responsibilities. Significant efforts, such as additional

letter and call campaigns, were also made to enhance the collection of customers' KYC information. In addition, Mandatum improved its sanction screening process. Identification of money laundering and terrorist financing risks was enhanced through raising awareness of AML and CTF matters throughout the organisation.

All Mandatum employees completed the mandatory AML and CTF training during 2022.

Sampo plc

Sampo plc's CEO, together with the Compliance organisation, ensures that sufficient resources are allocated to the prevention of money laundering and terrorist financing at Sampo plc. Sampo plc is also in charge of the annual review and update of the Sampo Group Code of Conduct, which includes group level guidelines on anti-money laundering and terrorist financing.

All Sampo plc's employees are required to familiarise themselves with the Sampo Group Code of Conduct upon employment, and after that to take part in an internal training every other year. In 2022, 98 per cent of the company's employees participated in the Code of Conduct training.

Data privacy

Materiality

Protecting customers and other stakeholders' personal data is of utmost importance for the Sampo Group companies. The insurance sector, which is a highly regulated industry, is characterised by a high amount of personal data processing. Sampo Group can face business risks, operational risks, and reputational risks if it fails to comply with data privacy regulations and guidelines.

Group level approach

At Sampo Group, the guidance documents regarding data privacy are the Sampo Group Code of Conduct and the Sampo Group Data Privacy Statement, which are both reviewed annually and approved by the Board of Directors of Sampo plc. In addition, each Group company has adopted supplementary policies and guidelines for its own purposes.

The Sampo Group companies are committed to processing personal data in a lawful, fair, and transparent manner. All Group companies aim to ensure that the privacy of the employer, employees, customers, and other stakeholders is not breached, and that adequate data privacy training is offered to all employees and contingent workers of the company. The Group companies also

ensure that incident investigation and processes for corrective actions are in place.

Group goals and ambitions

The goal of the Sampo Group companies' data privacy operations is to protect employees, customers, and other stakeholders' personal data.

Group actions and results

During 2022, the Sampo Group companies received a total of 3,111 requests from data subjects. During the year, 9 complaints were received from data protection authorities and 119 from data subjects. The complaints from data protection authorities were mainly customer complaints filed directly with the authorities or responses to requests for clarification. The increase in complaints from data subjects is primarily due to the data subjects' overall greater awareness of their rights.

In 2022, human and technical errors were identified as root causes for the majority of the 175 data breaches reported to the authorities. Data subjects and data protection authorities were notified accordingly, and appropriate measures were taken to resolve the incidents,

such as a change in procedures or a reminder of due care. Even though there is a great focus on data protection and related management systems, human and technical errors can be difficult to avoid completely. Therefore, the Group companies collect key findings from incidents to prevent them from happening again.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Sampo Group Data Privacy Statement and other additional information:

www.sampo.com/sustainability/sustainable-business-management-and-practices/data-privacy

If Data Privacy Policy:

www.if-insurance.com/about-the-website/handling-of-personal-data

Topdanmark Data Privacy Policy:

www.topdanmark.com/en/privacy-policy

Hastings Data Privacy Policy:

www.hastingsgroup.uk/info/privacy-policy,
www.hastingsdirect.com/legal/privacy-notice.shtml

Mandatum Data Privacy Policy:

www.mandatumlife.fi/en/footer/privacy

Requests from data subjects

Sampo Group

	2022	2021	2020*
Right of access	2,433	1,975	322
Right to rectification	3	12	0
Right to erasure	583	508	132
Right to restriction on processing	59	0	0
Right to data portability	1	0	2
Right to object	32	79	0
Right not to be subject to a decision solely by automated processing	0	0	0
Number of requests from data subjects, total	3,111	2,574	456

* Excluding Hastings

Complaints from data subjects and data protection authorities

Sampo Group

	2022	2021	2020*
Number of complaints from data subjects	119	60	74
Number of complaints from data protection authorities	9	18	10

* Excluding Hastings

Data breaches reported to local data protection authorities

Sampo Group

	2022	2021	2020*
Number of data breaches reported to local data protection authorities	175	175	110

* Excluding Hastings

If

Approach

Governance

If's Data Protection Office aims to ensure that data protection rules are respected within the company. If's data privacy is built upon a foundation comprising a code of conduct, security policy, data privacy policy, ethics policy, and data processing agreements. If has a data privacy management framework that helps create a culture of commitment to data protection. The framework includes appropriate awareness-raising, reporting structures, screenings, assessments, security measures, and data processing agreements.

If's data protection officer (DPO) reports to the chief compliance officer (CCO). As required by law, the DPO acts independently and reports quarterly and, when deemed necessary, to the CEO and the Board of Directors of If. In addition, If has a personal data breach manager and privacy officers located in Sweden, Norway, and Finland.

The Data Protection Office safeguards the foundation of data privacy through screening and early data protection impact assessments (DPIA) of the organisation's processing activities, new technologies, development projects, systems, services, and third-party providers. During screening and DPIAs, third parties who will

process data on If's behalf are reviewed to ensure they help If uphold its obligations under the GDPR. When third parties handle personal data on If's behalf, this is done in accordance with applicable data protection laws, and If enters into a data processing agreement. The agreement states how If's suppliers and, if applicable, sub-suppliers shall handle If's data. If's third-party data processors are assessed annually.

Employee training

If's Data Protection Office uses awareness-raising activities to prevent and mitigate user risk. The activities are designed to help employees and contingent workers understand the role they play in helping to combat personal data breaches.

If's awareness-raising activities include mandatory data privacy e-learning courses, refresher courses, DPIA courses, privacy by design and default courses, and internal networking through 120 experts called privacy champions. These activities help employees and contingent workers understand appropriate data protection and the risks associated with their actions. In addition, If's internal data privacy web page provides a source of information for all employees and contingent workers, offering practical help, contacts, training, guidelines, and information on data privacy processes and methods.

Actions and results

In 2022, the Data Protection Office continued to further enhance data protection within If by raising awareness, providing training, giving advice on DPIA, and performing monitoring activities. In addition, the Data Protection Office continued its efforts to ensure that, when necessary, personal data breaches are efficiently and effectively reported to the Swedish Data Protection Authority, as well as to ensure that If takes appropriate measures to resolve incidents.

During 2022, If launched the new One Responsible If learning programme, which will help facilitate awareness of data protection issues within If. Other activities included advising and supporting functions and projects on the principles of processing personal data and ensuring the interpretation or application of the processing principles.

Topdanmark

Approach

Governance

Topdanmark has a comprehensive management system for data privacy, including procedures and policy on how to handle personal data. The Board of Directors and the Executive Management of Topdanmark have overall responsibility for and focus on ensuring that the company's data privacy is at an adequate level and that sufficient resources have been allocated to it.

Topdanmark conducts supplier risk assessments and instructs suppliers on how to handle personal data using data processing agreements. The company makes decisions on the extent and frequency of supervision of data processors based on the risk assessments. In addition, Topdanmark works closely with the Danish Data Protection Agency, which is responsible for examining complaints and provides support in risk identification and awareness creation.

Topdanmark's DPO provides advice and recommendations to ensure continuous improvement of personal data protection and data subjects' rights. Where security measures are concerned, advice is provided in close cooperation with the Group's CISO. In addition, the DPO carries out regular surveys on Topdanmark's

personal data protection and reports quarterly to the Board of Directors and the Executive Board of the company.

Employee training

Topdanmark ensures data privacy by continuously training its employees. At Topdanmark, all new employees undergo an e-learning programme that focuses on lawful and secure processing of personal data. At regular intervals, existing employees also undergo data privacy training. In addition, employees have the possibility to contact the DPO and GDPR lawyers for advice. Guidance related to personal data is also available on a dedicated page on the company intranet.

Actions and results

In 2022, Topdanmark established a Centre of GDPR team in Group Legal, which will ensure central governance and that policies, guidelines, and procedures are always updated. The team supports the entire Topdanmark Group in maintaining compliance with personal data legislation.

By January 2022, all existing employees had completed the new e-learning on data privacy, introduced in 2021. Additionally, all new employees complete the training when joining the company.

In 2022, a new set of ethical data principles regarding transparency, personalisation, prevention, and data security, were approved by Topdanmark's Board of Directors. In addition, to further strengthen the usage and management of data, Topdanmark appointed a Vice President for Data.

Hastings

Approach

Governance

Hastings has a Data Protection policy and Retention policy that apply to all its operations, including data relating to existing and potential customers, and employees. The company ensures that its approach to the collection, use, sharing and retention of user data is lawful, fair, transparent, clearly stated, and available to all data subjects.

Hastings has a dedicated Data Governance Steering Group. The steering group comprises the Group Chief Risk Officer, Chief Operating Officer, Group Chief Financial Officer, Chief Information Security Officer, Head of Data Governance, and Data Protection Officer. Each business area leader is responsible for ensuring that Hastings' data protection policy is adhered to within their business

areas. Reviews are held monthly at board level, as well as in monthly Data Governance Steering Group meetings. Hastings has a network of Data Protection Champions across the company to assist with the task of embedding the principles of data protection and privacy by design and default within the business. Hastings employs the services of expert external auditors to independently assess its data protection policies and procedures and commits to acting on any recommendations appropriately.

Regarding contractors, Hastings ensures that there are clauses within their contracts stating it is their responsibility to be up to date with the latest data protection training. Where relevant, the company also ensures that the contractors have data protection policies in place.

Employee training

All Hastings employees undertake mandatory training on data privacy on joining the company and on an annual basis thereafter. In addition, with the assistance of the Data Protection Champions, the Data Protection team conducts role-specific data protection training across the business to continuously improve the organisation's data protection awareness and knowledge.

Actions and results

In Q2/2022, Hastings' external auditors conducted a review of the company's data protection policies and procedures. Auditors did not identify any issues, and Hastings received a good rating.

During 2022, Hastings' Data Protection team handled all subject access requests within the regulatory time period. All personal data incidents were logged and investigated, with one requiring a report to the Information Commissioner's Office (ICO).

At the end of 2022, 98 per cent of Hastings' employees had completed the mandatory data privacy training.

In 2022, Hastings embedded privacy by design into its change process, and it is now a standard requirement for all change projects. Following a standard process, if a potential, higher risk to data privacy is identified, a DPIA is completed with mitigations put in place to minimise the risk of any impact on Hastings' customers or employees' privacy.

In 2022, using its network of Data Protection Champions, Hastings implemented the ICO's Accountability Framework, which is a methodology for assessing and improving an organisation's data protection competence. Based on the framework, Hastings now has a clear methodology for further improvements.

Mandatum

Approach

Governance

Personal data management at Mandatum is based on the Data Protection Policy, which is approved annually by MAM and Mandatum Life's boards of directors. It applies to all personal data processing carried out in Mandatum and concerns all persons in Mandatum's service and its outsourcing partners. The Data Protection Policy provides information about the processing of personal data at Mandatum, the type of personal data processed and used, the sharing of personal data with the authorities and Mandatum's partners according to legal requirements, and the rights data subjects have regarding the processing of their data. The policy is supplemented by data protection principles and guidelines, which are brought to the attention of employees and, if needed, to material third parties. Third parties are required to sign a data processing agreement (DPA) as part of the sourcing contract.

The boards of directors and the CEOs of Mandatum Asset Management and Mandatum Life are responsible for ensuring that the companies' data privacy is at an adequate level and that sufficient resources are allocated to it. The Compliance unit directs and supervises the

data protection at Mandatum. The DPO reports to the business management team, the boards of directors, and the Sampo Group Audit Committee on a quarterly basis and whenever necessary. The DPO can be contacted by data subjects, whether they are employees or customers. The DPO is responsible for Mandatum's data protection strategy, policies, guidelines, monitoring, and reporting, and for addressing data protection deviations. In addition, the DPO highlights development needs related to data privacy and promotes measures to meet them.

Mandatum complies with data protection by design and by default, and with the other obligations stipulated in the regulation. Data protection risk management is part of the company's operational risk management process. Data protection risks are assessed regularly by business units, and the risk assessment is reviewed quarterly. The likelihood and severity of the risk to the rights and freedoms of the data subject are determined by reference to the nature, scope, context, and purpose of the processing. The most significant risks are reported to both the Risk Management Committee and the boards of directors quarterly. In addition, DPIAs are conducted when new processing methods or technologies are introduced, or when major changes are made to the existing ones.

The Data Protection Policy is also closely linked to other internal policies, such as the Information Management Policy and the Information Security Policy. The purpose of the Information Management Policy is to set forth the identification of information and the determination of

ownership, as well as the classification of information. The policy is additionally complemented by the Information Management Principles, which lay down in greater detail the means for implementing roles and tasks, as well as the processing that corresponds to the classification.

The systems used by Mandatum are classified and safeguarded according to their inherent risks. During the planning phase of acquiring services or implementing new procedures or technology, a DPIA is carried out when it appears likely that the data processing operations will involve a high risk to the rights and freedoms of the data subjects. The results of the DPIAs are used to reduce the risk levels and to ensure that the requirements of the GDPR have been appropriately considered.

At Mandatum, access to data is controlled based on user access rights management. Processing personal data without a work-based reason is strictly prohibited by the Data Protection Policy. Such processing is logged and monitored. In customer online services, strong authentication is required, and communication is encrypted.

Employee training

Every Mandatum employee participates in data protection training annually. The training is provided to new employees during their onboarding. The training is extended to the providers of outsourced services as

needed. The completion rate of the data privacy-related e-learning is monitored periodically. In addition to the general e-learning, different teams and units are provided with customised training throughout the year. Data protection awareness and training is also supported by the Information Security e-learning and security awareness solution for phishing attacks.

Actions and results

In 2022, Mandatum evaluated system solutions for managing compliance with the GDPR. The most important requirements were the production of reports in accordance with Article 30, support for performing Data Protection Impact Assessments (DPIA) and Transfer Impact Assessments (TIA), data mapping and data flows, metrics, and templates or forms to perform surveys and questionnaires to develop third-party assessments. The solution was acquired in Q3/2022 and implementation continues in 2023.

In addition, Mandatum updated its data governance model to include definitions of roles and responsibilities for different data categories, and it determined data quality criteria and KPIs. In addition, a security awareness solution for phishing attacks was implemented in Q3/2022.

In 2022, the completion rate of the annual data protection training was 99 per cent, considering the induction period for the new employees.

Sampo plc

Sampo plc's Legal unit directs and oversees the data privacy activities within Sampo plc to ensure continued compliance with relevant regulations. This includes ensuring that employee awareness of data privacy matters is at an adequate level, assisting business units in identifying data privacy-related processes, and processing personal data, as well as other topics arising from the GDPR.

During 2022, Sampo plc's focus was on increasing awareness of process ownership, as well as erasing personal data that it is no longer necessary to keep. In addition, documentation related to identifying, storing, and retaining personal data was emphasised to increase employee awareness of Sampo plc's data privacy obligations.

In the coming years, Sampo plc intends to continue to strengthen its involvement in group level cooperation regarding data privacy matters.

Information security and cybersecurity

Materiality

It is of paramount importance to the Sampo Group companies that the level of information and cybersecurity is adequate for the nature and scope of the business and the general level of technical development, and that it corresponds to the level generally expected from a financial company. The Group companies are exposed to information security and cybersecurity risks due to the high quantity of sensitive data the companies handle and due to operations in countries with strict data protection regulations. It is important to address these risks to ensure that customers and other stakeholders' data is always protected, and that operations can continue without disruption.

Group level approach

The group level guidance documents regarding information security and cybersecurity are the Sampo Group Code of Conduct and the Sampo Group Information Security Principles, which are both reviewed annually and approved by the Board of Directors of Sampo plc. In addition, each Group company has adopted supplementary policies and guidelines for its own purposes.

The Sampo Group companies are committed to performing regular risk analyses, conducting continuity planning, and having effective internal processes, high-quality systems, and infrastructure to ensure information security and cybersecurity preparedness. The Group companies measure their performance regularly and are committed to continuous development. At Sampo Group, the requirements in relation to information security and cybersecurity are set and expected to be met by both internal and external stakeholders (e.g. third-party data processors).

All Sampo Group employees must adhere to the highest standards of information security and cybersecurity by following internal rules and guidelines, using appropriate tools, and acting responsibly. The Sampo Group companies ensure that suitable training is provided to all their employees and contingent workers.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Sampo Group Information Security

Principles and other additional information:

www.sampo.com/sustainability/sustainable-business-management-and-practices/information-security-and-cybersecurity

Group goals and ambitions

The Sampo Group companies' goal is to protect all types and forms of information according to its sensitivity and importance to Sampo Group, and in compliance with applicable rules and regulations.

Group actions and results

All Sampo Group companies are required to report major information security incidents to the local authorities annually and on an ad-hoc basis. During 2022, If reported one information security incident to the authorities. The incident was related to a short disruption in customer self-service in the Baltics, due to a technical failure.

Information security and cybersecurity incidents reported to the authorities

Sampo Group

	2022	2021	2020
If	1	1	1
Topdanmark	0	0	0
Hastings	0	0	-
Mandatum	0	0	0
Sampo plc	0	0	0
Sampo Group, total	1	1	1

If

Approach

Governance

If has comprehensive information security and cybersecurity governance, including information security policies, standards, roles and responsibilities, defined controls, risk management, and reporting structures. The company's Information Security Policy and Information Security Standards are aligned with the ISO 27001 standard and express the minimum requirements for information security and cybersecurity that are expected to be met by each If Group company and relevant partners and suppliers, which are regularly assessed for risks and compliance. Non-conformance may lead to disciplinary actions.

The CISO has the overall responsibility for coordinating the information security and cybersecurity work within If. The CISO also supports the Board of Directors in matters

related to the status of information security and its deployment. The CISO works in the second line of defence and reports directly to the Chief Risk Officer. In the first line of defence, reporting to the Chief Information Officer (CIO), there is an IT security manager who specialises in information and communications technology security and leads a team of IT security specialists and application testers, as well as an IT risk and security compliance officer.

Information security and cybersecurity risks are reported to the board-level ORSA Committee, responsible for information and cybersecurity. An overview of If's risk profile and the capital situation is reported quarterly to the ORSA Committee and to the Board of Directors. A more detailed ORSA report is submitted to the Board of Directors once a year. The report contains a three-year forward-looking Own Risk and Solvency Assessment. Metrics on security controls and risk activities are measured and reported monthly to the CIO and key stakeholders, such as the Head of IT Services, the CRO, the Head of Business Continuity, Risk Control and Reporting staff, and the IT Service Delivery staff.

Before If launches any new solutions, and before major changes in any critical applications or systems are made, an independent internal team of experts conducts security tests using a risk-based approach as a part of change management procedures. Specialised third-party security testers also conduct regular security penetration tests of applications and the IT infrastructure.

Employee training

If provides training on information security and cybersecurity for all employees and contractors upon hire, and annually through a combination of e-learning, in-person sessions, and intranet articles. Topics covered in the training sessions include requirements, roles and responsibilities, current security risks, and reporting potential security issues. Security awareness is provided to all individuals through intranet articles, webinars, and regular phishing simulations replicating real attacks.

All employees and consultants are subject to an annual security awareness programme, which includes web-based training, webinars, and continuous phishing training.

Actions and results

Russia's invasion of Ukraine triggered various crisis teams at If to meet regularly to assess related threats and prepare for a potential escalation of the situation. However, the situation did not introduce any significant cyber threats on If. During 2022, If's cyber security remained stable, and many security investments were made, for instance in office and data centre network security and redundancy, Denial-of-Service attack mitigation, security testing, incident response, and disaster recovery.

During the year, If was also able to improve digital capabilities in several areas. This included all-time high service availability, fewer vulnerabilities in infrastructure, server, application, and workstation software, and a continued excellent security score assessed by a third-party security rating provider.

If's information security plans and ambitions for 2023 are essentially focused on alignment with insurance sector regulations related to digital resilience and cyber- and information security. Activities will include strengthening the company's ICT risk management, cybersecurity, and response capabilities and plans, as well as the protection of unstructured data.

Topdanmark

Approach

Governance

Topdanmark has an Information Security Policy and an Information Security Management System (ISMS), which are both based on the ISO 27001 standard. Topdanmark's Information Security Policy is part of the overall risk management system, and it applies to both company employees and external business partners.

Each year, Topdanmark's Board of Directors approves the Information Security Policy and an IT contingency plan based on an updated IT risk assessment. A risk assessment of significant or critical operational IT risks, including cyber risk, is performed regularly, and in addition to the Board of Directors, it is reported to the Executive Board, the Risk Committee, and Topdanmark's Compliance department. The day-to-day responsibility for information security and cybersecurity at Topdanmark lies with the CISO, who reports to the Vice President of Technology, Architecture and Security (VP TAM), who reports to the CTO on the Executive Board.

Topdanmark uses several levels of security systems to prepare for information security and cybersecurity threats. For example, the company has invested in early warning and incident management technologies. Topdanmark also performs vulnerability assessments continuously, and tests new systems for weaknesses before they are put into production. To counteract business interruption caused by information security or cybercrime, Topdanmark has a comprehensive contingency plan to ensure that business can be re-established as soon as possible.

Topdanmark's Cyber Security Board (including members such as the VP TAM, Director IT Operations, DPO, and CISO) regularly assesses the risk arising from cybercrime and the measures necessary to achieve the required security level. The risk is managed and reduced, for example, by collaborating with external specialists within the field. Topdanmark's Board of Directors is annually briefed on cyber risks and the planned initiatives to reduce those risks.

Furthermore, Topdanmark sets requirements for external data processors on implementing sufficient security measures. This requirement is also applicable to suppliers.

Employee training

All new employees are introduced to Topdanmark's Information Security Policy. In addition, Topdanmark has a separate e-learning course on information security. All employees and external consultants are obliged to complete and pass the course every second year. An employee's breach of Topdanmark's information security policy can have employment-related consequences, including, at worst, dismissal.

Actions and results

In 2022, to protect business against cybercrime, Topdanmark introduced a new tool to train its employees in detecting phishing emails.

In 2021, the company initiated a comprehensive project to improve the physical security at its locations, as this is an important element in cyber and data security. It includes, among other things, improved access control, as well as shell security and perimeter protection. The project was completed in 2022.

Hastings

Approach

Governance

Hastings has an information security framework, which seeks to address process and human vulnerabilities, reduce the complexity of Hastings' technology and data estate, and embed security considerations by design in all its business decision-making. The framework is aligned to the ISO 27001 standard, with appropriate supporting policies and processes.

Hastings has measures in place to monitor and respond to information security and cybersecurity events and incidents, which are routinely and independently validated and tested. Testing is undertaken by CBEST-certified partners and includes vulnerability assessments and penetration testing alongside internally run phishing campaigns and exercises to check the resilience and robustness of incident management procedures.

Hastings has dedicated Information Security, Cyber Security, Data Protection, and Compliance teams, which are in place to protect and support its business, manage policies and controls, assess risks, and prevent unauthorised or inappropriate access to information. Hastings is active across the industry in the areas of cyber and security threat intelligence and has membership in

cyber co-ordination groups sponsored by the industry regulators and supported by government agencies such as the UK National Cyber Security Centre (NCSC).

Employee training

Hastings has mandatory training for all employees and supplementary cyber awareness training available as required. The company regularly engages with employees, so they are aware of threats and what to do if something goes wrong.

Actions and results

Throughout 2022, Hastings continued to invest in its programme for information security and cyber resilience. This included ongoing security stress testing of the environments, support and enhancements towards colleague cyber awareness, and crisis management exercises focused on the threats associated with ransomware.

Hastings took appropriate responses throughout the year towards the evolving threat landscape influenced by the geopolitical situation driven by events between Russia and Ukraine. Specific attention was paid to the regularly updated guidance issued by the UK NCSC in response to events, and Hastings took steps to make sure it was operating in line with UK government expectations.

Mandatum

Approach

Governance

Mandatum's information security management system is certified by the ISO/IEC 27001:2013 standard. Annual audits are performed by the certificate issuer. The information security risk management model is being adapted as part of the operational risk management model. In addition, Mandatum has determined KPIs and risk appetite, and there is a separate category for cyber risks in the risk taxonomy.

Mandatum's information security and cybersecurity are developed systematically and in accordance with the information security strategy approved by the management. Considering the ever-changing cyber threat environment, amendments may be possible during the strategy period. The primary objective of the strategy is to ensure that the management has visibility of the status of information security, to determine the priorities of development activities and to provide adequate resourcing to implement them.

Daily operations in information and cybersecurity management at Mandatum are based on the Information Security Policy, approved by the boards of directors of Mandatum Life and MAM annually. The policy applies

to all Mandatum employees and the representatives of stakeholders who process Mandatum's information in connection with their assignments. The requirements of the policy are also included in agreements with subcontractors, service providers, and other external stakeholders. The policy is closely linked to other internal policies, such as the Information Management Policy and Data Protection Policy. Supplementary principles include Principles for use of the internet, data network, and email, User right principles, Log entry principles, Principles for the use of cloud services, Encryption principles, and the Mandatum Information Security Management System, amongst several different guidelines and best practices.

Mandatum's first and second lines of defence have their own information security organisations. Operational information security work is the responsibility of the Business Technology unit, which plans and implements technical and administrative solutions related to information and cybersecurity. The strategic and tactical control of information security, as well as the monitoring and supporting of other units, is centralised in the risk management function, where it is led by the CISO.

The level of information security and cybersecurity is continuously assessed, and tests on processes and systems are conducted on a regular basis. Both information security and cybersecurity risks are monitored actively and reported quarterly to the Information Security and Cyber Risk Committee.

Employee training

Everyone employed by Mandatum or working on behalf of the company has the obligation to comply with the information security policy, principles, and guidelines, and to ensure compliance with relevant legislation. The information security awareness and competence of employees is ensured through information security training and guidelines. The completion rate for e-learning is monitored periodically. In addition to general e-learning, different teams and units are provided with customised training as needed.

The information security awareness and competence of third parties is ensured through agreements and guidelines and, where applicable, through training.

Actions and results

Due to the situation in Ukraine, the focus of Mandatum's development work was on cybersecurity and contingency planning during 2022. Operational and technology-related cybersecurity responsibilities were moved from Risk Management to the Business Technology unit, where they are developed and coordinated by the Cybersecurity Manager.

During 2022, Mandatum revised its information security strategy. It now includes more strategic elements such as vision and success factors along with the objectives and roadmap. The key development goals include, among

other things, implementation of compliance requirements (e.g. Digital Operational Resilience Act), vulnerability management, and supply chain risk management.

In 2022, Mandatum participated in the largest national cyber exercise between companies and authorities, Tieto22. The focus of the exercise was on the finance sector, and it involved an imaginary large-scale payment disruption. In addition, an internal cyber exercise was arranged between Risk Management, Legal, IT, and business units. The internal exercise was facilitated by an external service provider specialised in arranging such training.

In 2022, Mandatum implemented an ongoing, game-based security awareness solution to raise employees' awareness of phishing attacks. In addition, employees were notified of security issues and phishing campaigns on the intranet.

In 2022, 27 cloud service and 9 other security and data protection third-party audits were conducted.

At the end of 2022, the completion rate for the new employees' information security e-learning at Mandatum was 99 per cent. During the year, the company also organised external training for specialists with specific security responsibilities.

No information or cybersecurity incidents were escalated to the Mandatum Crisis Management team during 2022.

Sampo plc

Sampo plc's information security and cybersecurity systems are a part of If's IT infrastructure. In addition, Sampo plc has strong internal controls and additional resources for company-specific purposes. Sampo plc updates information on cyber threats continuously, and updates instructions on IT security frequently on the company intranet.

At Sampo plc, information security and cybersecurity are part of new employees' onboarding. Existing employees are offered internal training sessions twice a year, and employee participation is monitored. Training sessions and other resources (e.g. training material) are available to employees at all times.

In 2022, Sampo plc introduced several new monitoring activities for anomalies, to achieve higher transparency in system environments, such as network traffic, privileged access rights, business-critical services, and system redundancies, among other things. A process for reacting and responding to information security and cybersecurity incidents was also implemented.

Sampo plc participated in the annual IT and cybersecurity exercise organised by If during autumn 2022. The exercise format was extended to include business units in a more active role. Findings and feedback from the exercise were reviewed and will be used to improve continuity and develop future exercise scenarios.

During the year, Sampo plc updated employee onboarding material on information security and cybersecurity. Sampo plc also continued phishing email simulation training for employees on an ongoing basis as a part of the company's cybersecurity training programme.

Sampo plc has placed more focus on IT and business continuity and application security since the escalation of the crisis in Ukraine. Several improvements were implemented in server and workstation protection and detection, identity and access management, cyberattack response and visibility, and resilience against large scale cyberattacks. In addition, Sampo plc increased efforts in the security testing area accordingly.

Sampo plc's information security processes were audited internally during 2022.

During 2022, Sampo plc started preparation activities for migrating to a new, more secure and energy-efficient data centre. The actual migration is planned for 2023.

Human rights and labour practices

Materiality

For the Sampo Group companies, managing human rights is not only about doing the right thing and obeying the law, but also about protecting the bottom line. Failure to identify and respond to human rights issues can lead to, for example, legal action, investor divestment, reputation damage, and financial loss.

Group level approach

The group level guidance document regarding human rights and labour practices is the Sampo Group Code of Conduct, which is reviewed annually and approved by the Board of Directors of Sampo plc. Sampo Group is also a signatory of the UN Global Compact, which supports work on human rights. In addition, each Group company has adopted supplementary policies and guidelines for its own purposes. The Sampo Group companies are committed to continuous development of their policies and processes related to human rights, including conducting human rights due diligence, applying precautionary principle, and taking remedy.

The risk of human rights violations may arise directly from the Group's own operations or indirectly from external factors, such as customers, investments, and

supply chains. In the Group's own operations, human rights violations may arise, for example, in discrimination and from lack of equal opportunities. In terms of customers, data breaches and misuse of customer information may result in human rights violations, particularly if sensitive personal information is disclosed. The Sampo Group companies have stringent policies and processes to ensure that all collected data is protected through data privacy and information security measures and adequate employee training. Regarding investments and corporate customers, the Sampo Group companies screen investments and customers against international norms and standards, including those related to human rights.

The Sampo Group companies are also committed to encouraging suppliers and other business partners to respect and comply with human rights. This is communicated, for example, in the Sampo Group Code of Conduct, which suppliers and other business partners are encouraged to adopt. Furthermore, the Group companies have more specific policies on these matters for their own suppliers and sub-suppliers (e.g. supplier codes of conduct).

Communication of human rights-related policy commitments to different stakeholders is done, for

example, through training, the intranet, contractual discussions, questionnaires, audits, and site visits.

Group goals and ambitions

Sampo Group aims to respect and protect human rights throughout the Group's operations.

Group actions and results

During 2022, there were no reported human rights incidents at Sampo Group. This refers to any severe violations of human rights and labour rights legislation.

In 2021, the Sampo Group companies started to report the number of incidents of discrimination externally. In 2022, the reporting was broadened to include cases of

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-business-management-and-practices/human-rights-and-labor-practices

harassment (including sexual harassment). The two topics are combined in the reporting to secure the privacy of the reporters. Both If and Topdanmark reported incidents, the majority of which were investigated and solved, with necessary corrective actions taken already during the reporting year.

On 31 December 2022, 66.1 per cent of Sampo Group's employees were covered by collective bargaining agreements. The figures include only employees who are truly covered by collective agreements. In addition, at If, Topdanmark, Mandatum, and Sampo plc, the

agreement applies to most employees' (e.g. excluding top management) terms of employment, even if they are not covered by the agreement. Hastings does not formally recognise a trade union, preferring to communicate and engage with employees directly, either through the Hastings Colleague Forum, through the YourVoice employee survey, by email and intranet, and/or directly with individual employees, as appropriate. Trade union membership is not, however, prohibited, and the company does not restrict union representation at a grievance or disciplinary meeting, should any employee request it. The company also compares the terms of employment to market practices at regular intervals.

Number of internally reported human rights incidents

	2022	2021	2020
If	0	0	0
Topdanmark	0	0	0
Hastings	0	0	-
Mandatum	0	0	0
Sampo plc	0	0	0
Sampo Group, total	0	0	0

Employees covered by collective bargaining agreements by company

%	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
If	85.5	86.4	87.7
Topdanmark	96.9	96.5	96.6
Hastings	0.0	0.0	0.0
Mandatum	48.7	48.9	52.9
Sampo plc	-	-	-
Sampo Group	66.1	66.5	66.9

During 2023, Sampo Group will conduct a group-wide human rights impact assessment to prepare for future legislative requirements and will further strengthen the Group companies' human rights-related governance and processes (e.g. due diligence).

Number of internally reported incidents of discrimination and harassment*

	2022	2021
If	5	0
Topdanmark**	2	0
Hastings	0	0
Mandatum	0	0
Sampo plc	0	0
Sampo Group, total	7	0

* In 2022, the reporting was broadened to include reported cases of harassment.

** One of the incidents was related to the discontinued business.

Employees covered by collective bargaining agreements by country

Sampo Group

%	31 Dec. 2022	31 Dec. 2021
Sweden	99.5	99.6
Denmark	96.9	96.6
Norway	96.0	96.3
Finland	79.5	81.8
Baltic countries	18.7	18.7
United Kingdom	0.0	0.0
Other countries	83.4	78.3

If

Approach

Governance

Responsibility for human rights and labour practices at If has been divided among different functions, including Compliance, Risk Management, and HR. In addition, If has an Ethics Committee, which is an advisory and preparatory body to the CEO. The committee meets at least four times a year. The chair of the committee is the Head of HR, and members represent corporate functions, business areas, claims, and the unions, for example. The committee discusses, assesses, and coordinates ethics issues within If and provides recommendations on related matters, including human rights and labour practices.

All If's policies relating to human rights and labour practices are approved by If's Board of Directors.

Employees

If's Ethics Policy, which is based on the UN Global Compact, describes ethical standards, goals, principles, and responsibilities, including the company's commitment to respecting human rights. The policy applies to all If employees and states that no kind of discrimination, harassment, or bullying is tolerated. In addition, If has a Diversity, Equity, and Inclusion Instruction.

If strives for a constructive and trustful dialogue with employees and their elected representatives, such as unions, with the purpose of developing If and safeguarding the correct treatment of all employees. If respects employees' freedom of association, and the company's business processes are designed to ensure equal treatment regardless of unionisation, based on employees' constitutional rights. All employment conditions, whether they are covered by a collective agreement or not, are largely regulated by local labour legislation and apply to all employees. Upon changes in the organisation, union members are informed and/or consulted accordingly.

Corporate customers

If has integrated sustainability directly into its underwriting standards and into the existing customer due diligence process for corporate clients. The

framework is based on the UN Global Compact principles and covers, for example, human and labour rights. To assess whether corporate clients are respecting the Global Compact, If utilises research and grading by an external service provider. If the grading does not meet If's internally set threshold, a referral is made to If's internal ESG assessment team for further action.

Suppliers and other business partners

If expects its suppliers and other business partners to adopt business practices compliant with human rights, labour rights, and other employment practices within their business and supply chains. If has a Supplier Code of Conduct, which defines the minimum requirements If expects suppliers to respect when conducting business with the company. Through the Supplier Code of Conduct, If ensures it does not engage suppliers or other counterparties that have substantially neglected their obligations to their business partners, employees, or the general public. Therefore, If also respects the rights of contingent workers in its operations.

Investments

If has a responsible investment policy, which guides responsible investment at the company. Information on how human rights are considered in the context of If's investments is available in the section Investment management and operations.

Employee training

If organises courses, seminars, and discussions on ethical matters and dilemmas at local offices. All If employees are trained to pay attention to human rights topics as part of the One Responsible If learning programme, which is a mandatory introduction to If's responsible corporate culture and business practices. The programme includes a module on ethics that reflects the content of If's Ethics Policy. The programme is part of new employees' onboarding, and it is an annual activity for all existing employees.

Actions and results

In Q1/2022, If launched a learning programme, One Responsible If, which includes an e-course on ethics that reflects the content of the Ethics Policy. The programme is mandatory for all employees and will be taken annually. In 2022, about 93 per cent of all If's employees completed the programme.

Since the integration of the UN Global Compact principles in underwriting in June 2021 and up until December 2022, If has assessed a total of 677 corporate clients. In total, 19 cases were sent for referral and assessed by the ESG assessment team. During 2022, five clients improved their rating and are therefore no longer referral cases.

To avoid and address possible adverse impacts on human rights, labour rights, the environment and anti-corruption associated with its operations, supply chains and business partners, If developed a due diligence process in accordance with the OECD Guidelines for Multinational Enterprises during 2022. The due diligence process will be incorporated into If's purchasing processes. The work started in Norway on 1 July 2022, due to the Norwegian Transparency Act, and continues during 2023.

During 2022, If developed a self-assessment questionnaire (SAQ) for its suppliers. The SAQ is part of If's approach to assessing suppliers' compliance with If's Supplier Code of Conduct. In spring 2022, the SAQ was provided to 919 property and vehicle repair contractors. As a next step, contractors who provided unsatisfactory answers will be contacted for supplementary information.

Topdanmark

Approach

Governance

Topdanmark has policies, internal guidelines, management systems, and initiatives in place to ensure that human rights are respected. Examples include responsible investment practices and policies for investment management; a supplier programme for sustainable supply chain management; ESG screening of customers for sustainable underwriting; processes, policies, and guidelines for management of customer relations; and HR policies and management systems for ensuring employee well-being.

In addition, Topdanmark has a due diligence process in which the company can identify potential negative impacts on human rights, either by the company directly or by suppliers or partners. If potential negative impact lies with the company, Topdanmark offers the

people involved a suitable remedy depending on the nature of the breach. If the negative impact is identified with the partners or suppliers, Topdanmark starts a dialogue with the partner in question. If this dialogue does not lead to a change and a remedy for the persons affected, Topdanmark can end the cooperation. The due diligence process is part of the general processes for monitoring risks under the auspices of Topdanmark's Risk Committee. The process also includes monitoring potential and actual ESG risks, including the risk of a negative impact on human rights.

Employee training

Topdanmark's employees have a responsibility to comply with the company's human rights policy. In addition, it is mandatory for all employees to take and pass the Code of Conduct e-learning, which includes a module on human rights.

Actions and results

In 2022, Topdanmark prepared a new policy on human rights to be approved by the company's Board of Directors in 2023. The policy considers both Topdanmark as an organisation and the company's suppliers and other business partners. The new policy will be implemented, among other things, in the mandatory e-learning on the Code of Conduct.

In 2023, Topdanmark will improve its human rights due diligence and overall ESG risk management processes. Moreover, the company will look at extending the human rights module of its Code of Conduct e-learning to include a more comprehensive understanding of the fundamental human rights and the severity of breaching human rights.

Hastings

Approach

Governance

Hastings understands and delivers its responsibilities to protect and respect internationally accepted human rights, specifically those defined within the UK's Human Rights Act of 1998. Hastings also has the appropriate mechanisms to both identify and remedy any conduct or situation that falls below the standards it has set.

Hastings is committed to acting responsibly in business relationships and ensuring that slavery and human trafficking does not occur anywhere in its business operations. Hastings also requires its suppliers and business partners to take the necessary steps to avoid slavery and human trafficking. The company has a statement in place, available and accessible to all parties who do business with Hastings, which is approved by the Board, the Company Secretary and the Company Executive Committee.

Hastings applies these same principles and standards of conduct to the way it treats its customers, third-party partners, and suppliers, seeking to protect their human and statutory rights as it does for its employees. Hastings also conducts appropriate due diligence to ensure that suppliers adhere to and adopt the appropriate standards of behaviour and compliance.

Hastings complies with applicable human rights and employment legislation and strives to ensure that all its employment policies, processes, and practices support its commitment to value and uphold the human rights of its employees. By adopting this integrated approach, Hastings supports the articles of the UK Human Rights Act which it believes have the greatest impact on the employment relationship, namely:

- Article 6: right to a fair and public hearing
- Article 7: right to respect for private and family life
- Article 9: freedom of thought, conscience, and religion
- Article 10: freedom of expression
- Article 11: freedom of assembly and association
- Article 14: prohibition of discrimination

Hastings has an employee consultation group, the Hastings Colleague Forum (HCF). The company recognises the HCF for the purposes of statutory collective consultation and also recognises the trade union membership of its employees in the context of individual formal processes (e.g. conduct, grievance, performance, sickness absence management). The HCF is made up of democratically elected members acting as representatives, who engage with their business areas to represent the general views of Hastings employees, discussing collective issues and feedback in addition to the consultation process.

Employee training

Hastings ensures that its employment policies, processes, and practices are compliant with UK law and that its employees and their leaders understand their individual responsibility to adhere to agreed practices and standards of conduct and governance. The company provides appropriate and ongoing training to all employees to support this. In addition, all of Hastings' leaders have access to three online learning modules that provide them with the information and guidance they need to effectively address and resolve colleague complaints.

Actions and results

Hastings listens to and engages with its employees through its intranet, bi-annual employee engagement survey, roadshow events, and day-to-day performance conversations. The company takes employee feedback seriously, responding to and acting on points raised throughout the year with a summarised 'you said, we did' communication published at the end of the year. Changes made as a result of employee feedback in 2022 include the creation of a new leadership Learning for Growth programme for the wider leadership community, the introduction of the cost-of-living support package, and changes to the community fundraising approach.

During 2022, the HCF worked to affect change within the company, such as changes to pricing within onsite canteens. In doing so, it raised the forum's profile, resulting in increased engagement from employees.

Mandatum

Approach

Mandatum respects internationally recognised human rights and is committed to ensuring that human rights are not infringed in its operations. Human rights are considered throughout Mandatum's operations and value chain, ranging from investment decisions to employment issues.

Mandatum's investment management operations are committed to responsible investing, and ESG issues form a key part of the investment risk management process. The company's portfolio holdings are regularly monitored for human rights violations as a part of norms-based screening. If violations are detected, Mandatum seeks to engage with the involved parties to rectify the issues.

Regarding employee relations, Mandatum has HR policies and procedures in place to safeguard human rights-related matters. All the policy commitments are approved at the most senior level in the company. Mandatum emphasises equality in all its actions and policies and

monitors the gender distribution in management positions. Equality issues are part of the Mandatum Way guide given to all new employees as part of onboarding.

Mandatum also expects its suppliers to conduct their business lawfully and ethically. To ensure this, Mandatum conducts a check against the Sampo Group Code of Conduct as a part of supplier assessment prior to agreeing and during cooperation. The key areas included in the check are commitment to human rights and ensuring equal treatment, environmental objectives, data protection and information security, and governance-related issues, such as bribery and corruption.

Actions and results

In 2022, Mandatum continued to screen new service providers and cooperation partners (e.g. related to IT) using a specific questionnaire launched in 2021. The questionnaire includes questions on human rights, equal treatment of employees, and environmental objectives, among other things. In 2023, Mandatum plans to extend the monitoring of these issues to cover the whole lifecycle of the cooperation with its suppliers.

Sampo plc

Sampo plc is responsible for the annual review and update of the Sampo Group Code of Conduct, which includes group level guidelines on human rights. All Sampo plc's employees are required to familiarise themselves with the Sampo Group Code of Conduct upon employment and, after that, to take part in an internal training every other year. In 2022, 98 per cent of the company's employees participated in the Code of Conduct training.

Environmental impacts of group operations

Materiality

Sampo Group is committed to protecting the environment and combatting climate change. The Group can face reputational risks, legal risks, business risks, and potential costs if it fails to take climate, environmental, and biodiversity considerations into account in its operations.

As an insurance group, Sampo Group does not cause large amounts of GHG emissions directly. However, the Group companies face the consequences of climate change in the form of more unpredictable and extreme weather, for example, which has an impact on the business as an increased risk and a potential increase in claims costs. By reducing their direct GHG emissions, the Group companies contribute to the common goal of limiting global warming.

Group level approach

The group level guidance document regarding climate, the environment, and biodiversity is the Sampo Group Code of Conduct, which is reviewed annually and approved by the Board of Directors of Sampo plc. In addition, each Group company has adopted supplementary policies and guidelines for its own purposes. The work is also driven by the Group

companies' commitments to the Science Based Targets initiative (SBTi) and the Group's involvement in various initiatives (e.g. UN Global Compact) and reporting requirements (e.g. TCFD), as well as internal and external stakeholder demand.

Group goals and ambitions

The Sampo Group companies are committed to reducing the environmental and climate impacts of the Group's own operations.

Group actions and results

In 2022, Sampo Group's total GHG emissions from its own operations were 20,840.1 tonnes, which equals 1.57 tonnes per employee. Scope 1 emissions were 5.7 per cent (17.6), Scope 2 emissions were 19.5 per cent (23.1), and Scope 3 emissions were 74.8 per cent (59.3) of the total. Most of the emissions originated from business travel, employee commuting and remote working, and electricity, with the shares being 28.5 per cent (25.8), 26.5 per cent (-), and 14.4 per cent (18.8), respectively.

In 2022, Sampo Group's calculated and reported emissions almost doubled. The results were impacted by

the inclusion of If's Baltic operations into calculations, a significant increase in business travel as COVID-19 restrictions were lifted, and improved reporting on Scope 3 categories. Reporting on Scope 3 categories such as waste, food services, other goods and services, business travel by taxi, paper consumption, IT equipment, and employee commuting and remote working was developed to better align reporting across the Group, and especially employee commuting and remote working affected the total GHG emissions. Without these additions, Sampo Group's total emissions would have been 14,334.8 tonnes, which would have entailed a 34.7 per cent increase in total emissions from 2021.

In 2023, Sampo Group plans to commit to the SBTi and start the development of group level science-based climate targets accordingly.

A complete set of environmental data is available in Appendix 2: GHG emissions ([page 188](#)).

Sampo Group Code of Conduct:

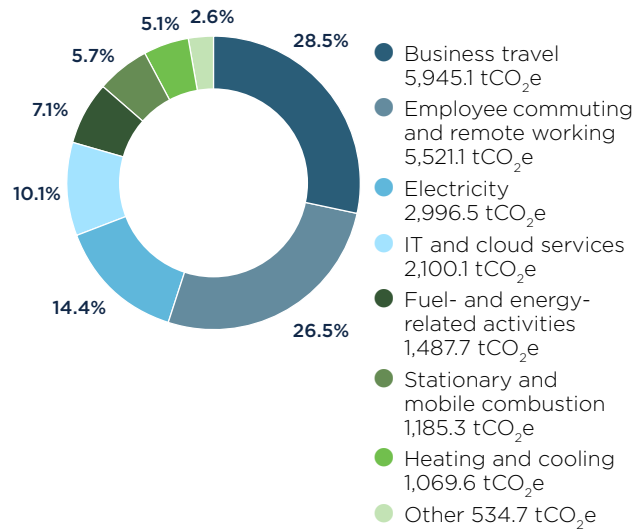
www.sampo.com/governance/code-of-conduct

Sampo Group TCFD reporting:

www.sampo.com/sustainability/climate-and-environment

Source of GHG emissions

Sampo Group, 2022



GHG emissions

Sampo Group

tCO ₂ e	2022	2021	2020*	Change 2022/2021, %
Scope 1: Direct GHG emissions	1,188.0	1,867.9	1,515.0	-36.4
Scope 2: Indirect GHG emissions	4,066.1	2,458.5	2,886.6	65.4
Scope 3: Other indirect GHG emissions	15,586.0	6,314.9	6,925.1	146.8
Scope 1-3 GHG emissions, total	20,840.1	10,641.3	11,326.8	95.8
GHG emissions per employee	1.57	0.89	1.26	76.4

* Excluding Hastings

GHG emissions by company

tCO ₂ e	2022	2021	2020	Change 2022/2021, %
If	10,310.0	3,638.0	4,210.4	183.4
Topdanmark	7,712.2	5,471.5	6,022.7	41.0
Hastings	1,782.6	943.8	-	88.9
Mandatum	848.7	508.7	976.6	66.8
Sampo plc	186.7	79.2	117.2	135.8
Sampo Group, total	20,840.1	10,641.3	11,326.8	95.8

If

Approach

The environmental perspective is embedded in If's strategy and commitments to both the company's employees and society. If supports the transformation to a low-carbon society and is continually working on reducing its carbon footprint.

If TCFD reporting 2022:
www.sampo.com/year2022

Goals and ambitions

If committed to the SBTi in October 2021. Following the commitment, If has 24 months to develop science-based climate targets, submit them for validation, and communicate them externally. If will set targets for aligning the company's investment portfolio with the Paris Climate Agreement, as investments represent a majority of If's total GHG emissions. If will also set targets for its claims handling, since claims compose another substantial proportion of the emissions. In addition, If will develop targets for its own operations, meaning company vehicles and offices (energy and electricity use, waste, office supplies, water, and IT).

Meanwhile, in 2022, If had a business travel target of reducing the total number of flights by 50 per cent compared to the 2019 level. For 2023, If will have the same target, which is to reduce the number of flights by 50 per cent compared to 2019.

Actions and results

In 2022, If initiated three parallel projects to further investigate the target-setting opportunities for investments, claims, and its own operations. As part of the project, If measured and reported GHG emissions from its own operations in the Baltics for the first time. Concerning claims, If commissioned IVL Swedish Environmental Research Institute to calculate the GHG emissions from the company's property and vehicle repairs, using life-cycle assessment methodology and input data from If's claims. If also conducted a detailed bottom-up analysis and investigated different target-setting approaches for investments. This work will be completed in early 2023.

GHG emissions

If

tCO ₂ e	2022	2021	2020	Change 2022/2021, %
Scope 1: Direct GHG emissions	65.9	77.2	97.2	-14.6
Scope 2: Indirect GHG emissions	1,174.2	281.9	394.4	316.5
Scope 3: Other indirect GHG emissions	9,069.9	3,278.9	3,718.8	176.6
Scope 1-3 GHG emissions, total	10,310.0	3,638.0	4,210.4	183.4
GHG emissions per employee	1.42	0.60	0.71	136.7

GHG emissions

In 2022, the total GHG emissions from If's own operations were 10,310.0 tonnes. Scope 1 emissions were 0.6 per cent (2.1), Scope 2 emissions were 11.4 per cent (7.7), and Scope 3 emissions were 88.0 per cent (90.1) of the total. In 2022, most of If's GHG emissions arose from business travel, employee commuting, and IT and cloud services, with 35.3 per cent (36.5), 33.5 per cent (-), and 12.4 per cent (43.8), respectively.

In 2022, the total GHG emissions from If's own operations increased heavily compared to 2021. This was mainly due to increased business travel after COVID-19, the inclusion of If's Baltic operations in the calculations for the first time, and the inclusion of employee commuting in the Scope 3 reporting. Therefore, the results are not entirely comparable to those of previous years.

During 2020 and 2021, business air travel was exceptionally low due to COVID-19. If's business travel

target was to reduce the total number of flights by 50 per cent in 2022 compared to the 2019 level, the last ordinary travel year. If achieved this target, as the number of flights was 51 per cent lower in 2022 than in 2019.

During 2022, If installed approximately 150 Teams-compatible rooms in the Nordic countries. The purpose of this is to support the company's travel policy (e.g. reduce the number of flights) and to make sure that offices are well equipped. In 2022, more than 40,000 Teams meetings were organised each month.

Employee training

If launched a learning programme, One Responsible If, in Q1/2022. One of the topics covered by the programme is sustainability, including climate and environmental matters. As of December 2022, 93 per cent of all employees had completed the programme.

Sustainable offices

If does not own any of its office buildings (except for If Security Centre's office and the training building in Hobøl, Norway), but it is in continuous dialogue with its landlords on how to improve the offices' environmental performance and work environment. Examples of discussion topics and measures used include optimising

office space, upgrading ventilation systems, thermostatic control, installing LED lighting, and reducing waste.

If has moved to new and more energy-efficient buildings in several locations, and as a result, energy use in If's offices decreased by 41 per cent during 2012–2022. In 2022, If's indirect energy use in the Nordic countries was 21,477 MWh, which is an increase of 5 per cent compared to the previous year. In 2020 and 2021, indirect energy use was lower than normal due to remote working during the COVID-19 pandemic. In Finland, If's new Espoo office received the WELL Health Safety Rating in January 2022, the WELL Platinum certificate in June 2022, and the WWF Green Office certificate in June 2022. The renovation of If's office in Turku, Finland, was completed during summer 2022, and the office was awarded the WWF Green Office certificate. In Norway, the renovation of the Vækerø office was also completed in 2022. All the Espoo, Turku and Vækerø offices have been transformed into activity-based offices with a clear environmental vision.

In 2019, If developed minimum environmental requirements for its major offices (i.e. offices with more than 100 employees) in the Nordic countries. These requirements are currently being updated and transformed into environmental standards during 2022–2023. The new environmental standards define concrete measures, targets, and guidance on topics such as office supplies, canteen operations, energy efficiency, greening of rental agreements, and reducing waste. If

has also invested in new property technology to optimise facility management and to gain knowledge that can support sustainable action.

In addition, If has stated that environmentally friendly alternatives should be prioritised when procuring office supplies and services. The following criteria should be prioritised: ecolabelled or environmentally certified, energy-efficient, recyclable, minimal waste production, and possibility to repair. If, for example, requires that > 50 per cent of total supplies bought should be ecolabelled with the Nordic Swan or equivalent. If has a well-established collaboration with the Nordic Swan ecolabel, and it is a member of their procurement networks in all the Nordic countries.

During 2022, If focused on local sustainability events to raise knowledge and awareness on environmental matters among employees. In September 2022, If became involved in the mission to stop food waste and supported the International Day of Awareness of Food Loss and Waste. On 29 September, all If's major offices participated in the event and organised a friendly food waste competition between If countries. In parallel with the competition, If launched internal and external communication campaigns to spread information about food waste and to share tips and advice on how to reduce it. In the future, If aims to organise internal events regularly every year.

Topdanmark

Approach

Topdanmark supports the Paris Climate Agreement and wants to contribute to limiting the temperature rise to a maximum of 1.5°C. Therefore, Topdanmark aims to reduce its direct GHG emissions. Furthermore, the company wants to create a framework for a green workplace in which all employees can participate and take responsibility. Topdanmark tries to motivate its employees to a greener everyday life, both in the office and at home.

Topdanmark TCFD Report 2022:

<https://www.topdanmark.com/en/sustainability/sustainability-in-topdanmark/reports/?category=TCFD-reports>

Goals and ambitions

In 2019, Topdanmark set a goal to become carbon neutral in 2030. This includes the operations of the company locations (Scope 1 and Scope 2), company driving in privately owned cars, air travel, water, and waste (Scope 3).

In June 2022, Topdanmark joined the SBTi and its Net-Zero Standard. This means that it is mandatory for Topdanmark to set science-based climate targets for the GHG emissions arising from the company's own operations (Scope 1 and Scope 2), as well as for GHG emissions arising from the company's investments (Scope 3). Furthermore, Topdanmark plans to set voluntary climate targets for its supply chain. Topdanmark will send its targets to the SBTi for validation no later than June 2024.

Actions and results

GHG emissions

In 2022, the GHG emissions of Topdanmark's own operations were 7,712.2 tonnes. Scope 1 emissions were 11.5 per cent (26.7), Scope 2 emissions were 34.2 per cent

(36.9), and Scope 3 emissions were 54.3 per cent (36.4) of the total. Most of Topdanmark's GHG emissions arose from electricity and business travel, with 32.9 per cent (35.2) and 21.8 per cent (22.9), respectively.

The increase in GHG emissions is mainly due to increased air travel compared to the previous year and improved Scope 3 reporting. In 2022, Topdanmark added business travel by taxi, paper consumption, cloud services, IT equipment, sold IT devices, and employee commuting to its Scope 3 reporting categories. In particular, the addition of employee commuting to the calculations affected the results. In 2022, low-emission cars constituted 9 per cent (2.8) of the company's combined car fleet.

GHG emissions

Topdanmark

tCO ₂ e	2022	2021	2020	Change 2022/2021, %
Scope 1: Direct GHG emissions	886.5	1,458.3	1,351.7	-39.2
Scope 2: Indirect GHG emissions	2,637.5	2,019.8	2,122.5	30.6
Scope 3: Other indirect GHG emissions	4,188.2	1,993.4	2,548.5	110.1
Scope 1-3 GHG emissions, total	7,712.2	5,471.5	6,022.7	41.0
GHG emissions per employee	3.24	2.29	2.48	41.5

Carbon neutrality

In 2022, Topdanmark continued to work on concrete actions to become carbon neutral by 2030. The planned actions so far are listed in the table Actions leading to carbon neutrality.

Internal community for a green workplace

In 2022, Topdanmark established an internal community for a green workplace. The community consists of nine representatives: one from each organisational area. The community is named Work Greener, and it is responsible for developing new internal initiatives and solutions that support the targets Topdanmark has set, such as reducing energy consumption and GHG emissions, as well as paper consumption and single-use plastic items.

The representatives have a responsibility to communicate the work and initiatives from Work Greener to their respective colleagues and organisational divisions, and to ensure that the solutions made in the community take root in the organisation. In addition, the representatives gather ideas from colleagues and bring them back to the community to qualify them and present them to respective internal decision-makers.

Actions leading to carbon neutrality

Topdanmark

Focus area	Action plan
Operation of the company's buildings	<ul style="list-style-type: none"> A step-by-step plan for 2021–2025: Includes phasing out natural gas, concrete optimisation actions, and a shift to carbon-neutral electricity. Optimisation of the cooling system: Expected to lead to a GHG emission reduction of approximately 110 metric tonnes. Shift to LED lighting: All light bulbs changed to LED bulbs on an ongoing basis.
Use of company cars (Topdanmark has leased approximately 100 cars)	<ul style="list-style-type: none"> Reduction of driving: Hybrid workplace and continued use of digital collaboration tools. Transition to low-emission cars: A gradual transition to hybrid or electric vehicles.
Use of private cars for business travel (primarily business-related driving in privately owned cars by the company's salespeople and claims adjusters)	<ul style="list-style-type: none"> Reduction of driving: Hybrid workplace and continued use of digital customer meetings, and introduction of digital tools for inspections of properties and buildings in connection with making an insurance contract or after a claim. Shift to low-emission cars: Yet to find a model for the transition to low-emission cars for privately owned cars because the company has little influence on the choice of cars. The work continues in the years to come.
Air travel (primarily external IT developers employed by Topdanmark in connection with different projects, travel to investor meetings, other business meetings and conferences, etc.)	<ul style="list-style-type: none"> Reduction of air travel: Hybrid workplace and continued use of digital platforms.

Sustainable offices

Topdanmark focuses on climate and the environment in procurement. The aim is to increasingly exchange purchases of office supplies and materials for events, for instance, for more sustainable choices.

Topdanmark has goals to reduce the use of single-use plastic items (e.g. single-use cutlery and plates) by 70 per cent and paper consumption by 50 per cent by 2025. In 2022, the purchase of single-use plastic items increased. In 2021, however, the company purchased fewer plastic items and focused on using up what was in stock, which was also the case for 2022. The plan is to replace single-use plastic with biodegradable alternatives throughout the organisation. In 2022, Topdanmark reduced paper consumption by 28 per cent compared to 2021. This is primarily due to less physical mail and printing at the offices.

Topdanmark also focuses on the circular economy concerning electronics in its own operations. When devices are no longer used by Topdanmark, they are sold for reuse. In 2022, 74.7 per cent of electronics, primarily laptops, were repaired and sold for reuse directly and 15.5 per cent were used for parts (recycling). Topdanmark buys high-quality laptops with a longer lifecycle and less need for repair compared with cheaper products. Laptops are replaced after 36 months so that they can run the latest software.

Sustainable procurement of office supplies, goals and results

Topdanmark

Goal	Baseline	2022	2021	2020
70 per cent reduction in single-use plastic items by 2025	2021	77,526 purchased units	75,188 purchased units	395,000 purchased units
50 per cent reduction in paper consumption by 2025	2021	9.2 tonnes	12.7 tonnes	14.5 tonnes

Other environmental considerations

Topdanmark

	2022	2021	2020
Waste	<ul style="list-style-type: none"> • 39 per cent of all waste was recycled. • 41 per cent of all waste from the headquarters was recycled. 	<ul style="list-style-type: none"> • 33 per cent of all waste was recycled. • 38 per cent of all waste from the headquarters was recycled. 	<ul style="list-style-type: none"> • 48 per cent of all waste was recycled. • 51 per cent of all waste from the headquarters was recycled.
IT equipment (sold for recycling or responsible scrap)	• 7,924 kg	• 2,227 kg	• 4,075 kg
Bicycles (donated for reuse)	• 109 pcs	• 133 pcs	• 54 pcs
Disposable paper cups (reduction compared to 2019)	• 70 per cent	• 67 per cent	• 64 per cent

Hastings

Approach

Hastings considers the environmental impacts of its own operations and is focused on reducing its Scope 1, 2, and 3 GHG emissions. Overseen by the Chief Operating Officer and led by the company's Business Services Director, Hastings has a dedicated ESG team comprising an ESG manager and ESG Support Analyst. The team has a large focus on reducing environmental impact and embedding sustainability within the company's business operations.

Goals and ambitions

Hastings has a long-term goal to be a net-zero organisation by 2050 at the latest. This goal is supported by the company's commitment to the SBTi, which Hastings joined in September 2022. The plan is to set science-based climate targets for the GHG emissions arising from the company's own operations (Scope 1 and Scope 2), as well as for GHG emissions arising from the company's investments (Scope 3) during the next two years. In the meantime, the company continues to reduce its GHG emissions where possible.

Actions and results

GHG emissions

In 2022, Hastings' overall GHG emissions were 1,782.6 tonnes. Scope 1 emissions were 10.4 (26.9) per cent, Scope 2 emissions were 6.7 (2.7) per cent, and Scope 3 emissions were 82.9 (70.4) per cent of the total. Most of Hastings' total GHG emissions arose from IT equipment and remote working, with 30.6 per cent (41.8) and 23.5 per cent (-), respectively.

During 2022, Hastings launched a hybrid working model that sees its employees working in a more flexible way, with a blend of home and office-based working. This provided an opportunity to make the best use of company office spaces whilst mothballing some underutilised areas. The activity supported the reduction of GHG emissions arising from stationary combustion and electricity consumption by decreasing energy use in lighting, heating, and air conditioning, and removing over 800 workstations drawing stand-by power. Hastings'

Scope 3 emissions increased as a result of increased air travel after the COVID-19 restrictions were lifted and the inclusion of remote working in the GHG accounting.

2022 saw Hastings complete its implementation of a new IT infrastructure with a move from on-site hosted data centres to a cloud-based solution. Removing on-site data centres, previously stored in climate-controlled rooms, provides GHG emissions reductions, offering longer-term sustainability through reduced running costs, better scalability, and increased IT operational efficiencies. This change enables Hastings to enhance voluntary Scope 3 reporting with more accurate emissions data captured in real time, which will be monitored throughout 2023 for a baseline and included in future reporting.

As a data-driven company, Hastings seeks to review and improve data capture where possible. This includes a constant review of enhancing Scope 3 emissions data, allowing Hastings to baseline, manage, and reduce emissions. To support science-based target setting in 2023, Hastings is baselining the company's GHG emissions from 2022, including additional, voluntary Scope 3 measurements.

GHG emissions

Hastings

tCO ₂ e	2022	2021	Change 2022/2021, %
Scope 1: Direct GHG emissions	185.9	253.8	-26.8
Scope 2: Indirect GHG emissions	118.7	25.1	372.6
Scope 3: Other indirect GHG emissions	1,478.0	664.9	122.3
Scope 1-3 GHG emissions, total	1,782.6	943.8	88.9
GHG emissions per employee	0.59	0.31	90.3

Sustainable offices

During 2022, Hastings took action to reduce its waste by working with venues hosting company events to ensure that drinks and food containers were recyclable or compostable. Within its onsite canteens, Hastings worked to reduce the waste footprint even further by removing disposable coffee cups from use. Canteens also extended plastic removal to drinks containers, with all plastic drink bottles being removed from sale, with plans to reduce residual single-use plastic in 2023.

In 2022, Hastings launched its internal sustainability initiative, Go Green, which focuses on raising awareness of environmental challenges, opportunities, and related events. The initiative includes the company's Go Green Travel programme, which works with local councils, public transport providers, companies, and charities promoting active travel to make these options more accessible for employees, supporting them in making sustainable transport choices.

As part of the Go Green programme, Hastings began building a network of Green Ambassadors comprising employees, acting as sustainability champions within their teams, across the business to raise awareness on how everyone can reduce their environmental impact, as well as to promote Go Green events and initiatives. In 2022, there were 13 Green Ambassadors, with plans for the company to expand this over the coming years.

With the support of its Green Ambassadors, Hastings ran several activities throughout 2022 to encourage employees to consider how day-to-day activities can have an impact on the environment, with suggestions on small positive changes to habits. This included running Earth Day quiz competitions, free bicycle maintenance, Veganuary workplace challenges supported by nutritionists and onsite canteens, and a 'New 2 Me' swapping event at which employees are encouraged to swap items rather than shop.

Mandatum

Approach

Mandatum has committed to a variety of initiatives with positive impacts on the environment and society, and it aims to find new ways to reduce the company's GHG emissions throughout its operations. Mandatum collaborates with relevant stakeholders to combat the environmental impact of its operations and aims to bring about positive change.

All Mandatum's offices follow Mandatum's internal green office policy, Have a Green Day, which supports the reduction of waste, electricity, and paper consumption, and encourages recycling and eating more plant-based food, among other green objectives. When organising customer and stakeholder events, healthy and local food is preferred. The aim is to reduce food waste at Mandatum's events.

Goals and ambitions

Mandatum is committed to reducing the GHG emissions of its own operations and finding more sustainable alternatives when possible.

Actions and results

GHG emissions

In 2022, the total GHG emissions of Mandatum's own operations were 848.7 tonnes. Scope 1 emissions were 5.0 per cent (13.8), Scope 2 emissions were 12.9 per cent (24.5), and Scope 3 emissions were 82.1 per cent (61.6) of the total. During 2022, most of the total emissions arose from business travel and employee commuting and remote working, with 30.1 per cent (14.7) and 21.9 per cent (-), respectively.

In 2022, Mandatum's Scope 1 and 2 emissions were reduced by active measures. Mandatum increased the amount of hybrid and electric cars in use. There were also changes in the office facilities, such as increased use of LED lighting. In 2022, Mandatum lowered the indoor temperature of its headquarters in Helsinki, Finland, by 1°C to save energy. Mandatum's headquarters has a BREEAM® certificate (Good) for its environmental performance.

In 2022, Mandatum expanded the reporting of its GHG emissions to cover new Scope 3 categories, which increased Mandatum's Scope 3 GHG emissions. The new categories include business travel by taxi, employee commuting and remote working, other purchased goods and services, and other capital goods.

In addition, business travel increased Mandatum's Scope 3 emissions compared to the previous year. In 2022, the amount of business travel, events, and stakeholder meetings increased significantly as the restrictions caused by the COVID-19 pandemic were lifted. In addition, MAM accelerated its international business operations.

Mandatum offset the GHG emissions arising from its own operations through the Prony Wind Power project, a Gold Standard VER project in New Caledonia. The project also creates jobs and supports the region's development in accordance with the UN's sustainable development goals (e.g. goals 7, 8, 9, and 13).

GHG emissions

Mandatum

tCO ₂ e	2022	2021	2020	Change 2022/2021, %
Scope 1: Direct GHG emissions	42.5	70.4	55.1	-39.6
Scope 2: Indirect GHG emissions	109.8	124.8	363.6	-12.0
Scope 3: Other indirect GHG emissions	696.3	313.6	557.9	122.0
Scope 1-3 GHG emissions, total	848.7	508.7	976.6	66.8
GHG emissions per employee	1.42	0.99	1.96	43.4

Sustainable offices

Mandatum engages personnel in making healthy and environmentally friendly choices. In 2022, the company introduced benefit bikes for employees. The benefit bike is a personal benefit provided by the employer, with which the employee can purchase a new bicycle or electric bike at lower cost. Benefit bikes are tax-free up to a taxable value of EUR 1,200 per year.

Sampo plc

In 2022, the GHG emissions of Sampo plc's own operations were 186.7 tonnes. Scope 1 emissions were 3.9 per cent (10.3), Scope 2 emissions were 13.8 per cent (8.7), and Scope 3 emissions were 82.3 per cent (81.0) of the total. Most of the emissions derive from business travel and purchased goods and services, with the shares being 43.7 per cent (26.4) and 17.1 per cent (31.5), respectively.

In 2022, Sampo plc focused on improving data quality and increasing the scope of data collection to align with the other Sampo Group companies. As a result, inaccuracies in energy calculations were clarified and food services and waste were added as new Scope 3 categories. The increase in Scope 2 emissions is due to improved data quality. Scope 3 emissions increased, too, mainly due to air travel picking up after the pandemic, and improved data availability in the purchased goods and services category.

Together with Mandatum, Sampo plc offset the GHG emissions arising from its own operations through the Prony Wind Power project, a Gold Standard VER project producing renewable energy in New Caledonia.

In 2022, Sampo plc introduced benefit bikes for its employees. The benefit bike is a personal benefit provided by the employer, with which the employee can purchase a new bicycle or electric bike at lower cost. Benefit bikes are tax-free up to a taxable value of EUR 1,200 per year.

GHG emissions

Sampo plc

tCO ₂ e	2022	2021	2020	Change 2022/2021, %
Scope 1: Direct GHG emissions	7.3	8.2	11.0	-11.0
Scope 2: Indirect GHG emissions	25.8	6.9	6.2	274.1
Scope 3: Other indirect GHG emissions	153.7	64.2	100.0	139.5
Scope 1-3 GHG emissions, total	186.7	79.2	117.2	135.8
GHG emissions per employee	3.73	1.34	1.75	178.4

Compliance with laws and regulations

In 2022, Sampo Group started to report externally the total number and the monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by fines that occurred during the current reporting period, and fines that occurred during previous reporting periods.

During 2022, there were no cases of non-compliance resulting in fines. However, a total of four fines were paid during 2022, which all concerned events that took place before the reporting period. One of the incidents concerned a violation of the rules regarding the delayed disclosure of large shareholdings under the Norwegian Securities Trading Act, and the other three fines concerned a failure to comply with the Danish Equal Rights Act, which resulted in fines for all insurance companies operating in Denmark.

The total amount of fines that were paid during the reporting period was approximately EUR 160,000.

In addition, there was one significant non-monetary sanction during the reporting year concerning a reprimand from the Swedish Authority for Privacy Protection for failure to provide customer access to their personal data.



Number of cases of non-compliance

Sampo Group

	2022
Number of cases resulting in fines	4
Number of significant cases resulting in non-monetary sanctions	1

Fines paid

Sampo Group

EUR	2022
Fines for instances during the reporting year	0
Fines for instances in previous reporting periods	160,000

Business management and practices

Objective: Sampo Group ensures sustainability in governance and business operations.

Material topics	Main goals	Indicators monitored at the group level
Anti-corruption and bribery	Sampo Group <ul style="list-style-type: none"> To promote zero tolerance towards corruption and bribery 	Sampo Group <ul style="list-style-type: none"> Incidents related to corruption and bribery
Anti-money laundering and counter-terrorist financing	Sampo Group <ul style="list-style-type: none"> To promote zero tolerance towards money laundering and terrorist financing 	Sampo Group <ul style="list-style-type: none"> Suspensions (i.e. suspicions related to customer transactions) related to money laundering and terrorist financing reported to the authorities
Data privacy	Sampo Group <ul style="list-style-type: none"> To protect employees, customers, and other stakeholders' personal data 	Sampo Group <ul style="list-style-type: none"> Requests and complaints from data subjects and authorities Data breaches
Information security and cybersecurity	Sampo Group <ul style="list-style-type: none"> To protect all types and forms of information according to its sensitivity and importance 	Sampo Group <ul style="list-style-type: none"> Major information security incidents
Human rights and labour practices	Sampo Group <ul style="list-style-type: none"> To respect and protect human rights throughout the group's operations 	Sampo Group <ul style="list-style-type: none"> Internal human rights incidents Discrimination and harassment incidents Employees covered by collective bargaining agreements
Environmental impacts of group operations	Sampo Group <ul style="list-style-type: none"> To reduce the environmental and climate impacts of the group's operations If <ul style="list-style-type: none"> To set science-based climate targets for own operations approved by the SBTi by October 2023 To reduce business travel (number of flights) by 50% in 2022 and in 2023 compared to 2019 Topdanmark <ul style="list-style-type: none"> To become carbon neutral in 2030 (scope specified on page 55) To set science-based climate targets for own operations approved by the SBTi by June 2024 To reduce the use of single-use plastic items by 70% and paper by 50% by 2025 Hastings <ul style="list-style-type: none"> To set science-based climate targets for own operations approved by the SBTi by September 2024 	Sampo Group <ul style="list-style-type: none"> GHG emissions (Scope 1, 2 and 3) If <ul style="list-style-type: none"> The reduction of business travel Topdanmark <ul style="list-style-type: none"> The reduction of GHG emissions The reduction of single-use plastic items and paper

Corporate culture

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Empowering work environment

Materiality

Employees are the most important resource for ensuring that the Sampo Group companies' customers get the best service in every situation. Dedicated employees create results by delivering first-class customer experiences daily. That is why investing in personnel practices and an empowering work environment not only reflects the Group companies' values but also makes good business sense.

Employees and their contributions are also the Group companies' most important source of competitive advantage. Insurance products can be copied, but copying the company culture and the attitude, competence, and engagement of great employees is much harder.

An engaged and motivated workforce lays the ground for value creation. Employee engagement depends on the company's ability to create an empowering work environment and on the employees' motivation to contribute to the company's goals. It is important to attract and retain talent, as a lack of competent employees can pose a business risk for the Group companies.

Group level approach

The Sampo Group Code of Conduct, together with company-specific policies, addresses the relationship that Sampo Group aims to uphold with its employees. The Group companies aim to offer a work environment that supports the commitment of all employees to the company and its operations.

At Sampo Group, employee engagement is measured by employee turnover and employee engagement surveys. When possible, the Sampo Group companies compare turnover rates to industry averages within their operating countries, to evaluate the healthiness of the turnover rates. Employee engagement surveys are conducted at company level instead of group level to ensure the suitability of the surveys for each Group company and its individual needs and characteristics.

Group goals and ambitions

Sampo Group wants employee turnover to be at a healthy level at the Group companies. This means that the employee turnover rate should present more opportunities than headaches. In addition, each individual Group company has a target for employee engagement.

Group actions and results

In 2022, Sampo Group employees returned to the office after approximately two years of restrictions, and the focus of the Group companies was on adjusting to post-pandemic work life. While a physical presence at the office is promoted, as it is a necessity for collaboration and building culture together, employees have increased flexibility and freedom to decide where to work.

In 2022, the number of Sampo Group employees (full-time equivalent, FTE) increased slightly compared to the previous year. The total number of employees working at If saw an increase of 4.7 per cent compared to 2021. In the Nordic countries, this was to a certain extent related to growing teams across Sweden in particular, and organically within IT in the light of digitalisation. Within Sales, part of the growth was related to stabilising higher turnover within customer centres.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-corporate-culture/empowering-working-environment

Topdanmark saw a 9.8 per cent decrease in the number of employees in 2022 compared to the previous year. This was mainly due to organisational changes, as Topdanmark Liv Holding A/S was sold to Nordea Life Holding AB in December. In addition, Topdanmark closed its Luxembourg office in November. The number of employees working at Mandatum also decreased by 1.4 per cent compared to 2021. This was a result of Mandatum's Baltic life insurance business being sold to Lithuanian investment management and insurance group Invalda INVL in July.

The number of employees working at Hastings remained stable in 2022.

Most of the employees of the Sampo Group companies were working full-time and were employed on permanent contracts at the end of the year. No large-scale redundancies or significant job cuts were made at Sampo Group during the past three years.

In 2022, Sampo Group started to report the number of contingent workers by company and non-guaranteed hours employees by company, country, and binary gender. Contingent workers are workers who are not employees of the Group companies but who work for the companies on a temporary or project basis (e.g. consultants, freelancers, other independent contractors, and employees employed by a staffing company). There were no significant fluctuations in the number of contingent workers during the reporting year. As this was the first year of reporting these figures, it is not possible to comment on the fluctuations between reporting periods. At Sampo Group, only If and Topdanmark had some employees working on non-guaranteed hours contracts. The non-guaranteed hours employees can be, for example, students working some hours while studying, and they are not included in headcount and FTE numbers.

In 2022, the employee turnover (external turnover, including monthly paid permanent employees and employees leaving on a pension) increased at If, but decreased at Topdanmark, Hastings, and Mandatum. The reasons behind this development have been described in the company-specific sections. In addition to the external employee turnover, Sampo Group started to report voluntary and involuntary turnover by company and country in 2022. Voluntary turnover means that an employee chooses to leave an organisation by resigning or retiring, and involuntary turnover means that the employment is terminated by the employer or the employment ends, for example, due to health-related reasons, e.g. disability pension.

Number of employees (FTE) by company

	31 Dec. 2022	% of the total	31 Dec. 2021	% of the total	31 Dec. 2020	% of the total	Change 2022/2021, %
If	7,630	56.6	7,287	54.6	7,120	54.0	4.7
Topdanmark	2,143	15.9	2,374	17.8	2,456	18.6	-9.8
Hastings	3,037	22.5	2,995	22.5	2,965	22.5	1.4
Mandatum	629	4.7	638	4.8	568	4.3	-1.4
Sampo plc	51	0.4	45	0.3	69	0.5	13.3
Sampo Group	13,490	100	13,340	100	13,178	100	1.1

Number of employees (FTE) by country

Sampo Group

	31 Dec. 2022	% of the total	31 Dec. 2021	% of the total	31 Dec. 2020	% of total	Change 2022/2021, %
United Kingdom	3,015	22.3	2,967	22.2	2,943	22.3	1.6
Denmark	2,739	20.3	2,946	22.1	3,031	23.0	-7.0
Finland	2,486	18.4	2,320	17.4	2,249	17.1	7.2
Sweden	2,409	17.9	2,344	17.6	2,302	17.5	2.8
Norway	1,592	11.8	1,549	11.6	1,507	11.4	2.8
Latvia	492	3.6	443	3.3	401	3.0	10.9
Estonia	418	3.1	414	3.1	394	3.0	0.9
Lithuania	161	1.2	183	1.4	189	1.4	-12.4
Spain	128	0.9	118	0.9	113	0.9	8.5
Gibraltar	27	0.2	33	0.2	28	0.2	-16.7
France	6	0.0	6	0.0	6	0.0	0.0
Germany	6	0.0	5	0.0	5	0.0	18.5
Netherlands	6	0.0	5	0.0	4	0.0	18.4
Luxembourg	4	0.0	5	0.0	5	0.0	-20.0
United States	1	0.0	1	0.0	1	0.0	0.0
Sampo Group	13,490	100	13,340	100	13,178	100	1.1

Full-time and part-time employees (FTE) by company and binary gender

	31 Dec. 2022				31 Dec. 2021				31 Dec. 2020			
	Women		Men		Women		Men		Women		Men	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
If	3,785	274	3,488	83	3,604	292	3,300	90	3,493	322	3,211	94
Topdanmark	771	105	1,248	19	862	135	1,360	18	874	153	1,414	15
Hastings	1,183	288	1,491	76	1,131	316	1,448	100	1,145	315	1,387	118
Mandatum	265	21	332	11	280	29	313	16	257	24	276	10
Sampo plc	26	0	25	0	24	0	21	0	37	0	32	0
Sampo Group	6,030	687	6,584	189	5,901	773	6,442	224	5,807	814	6,320	237

Full-time and part-time employees (FTE) by country and binary gender

Sampo Group, 31 December 2022

	Women		Men		Total	
	Full-time	Part-time	Full-time	Part-time	Full-time	Part-time
United Kingdom	1,174	286	1,480	75	2,654	361
Denmark	1,008	142	1,563	27	2,571	168
Finland	1,301	106	1,054	26	2,355	131
Sweden	1,111	105	1,161	32	2,272	137
Norway	701	35	831	25	1,532	60
Latvia	209	2	279	2	488	4
Estonia	325	6	87	0	412	6
Lithuania	120	1	39	1	159	2
Other countries	82	4	90	3	172	7
Sampo Group	6,030	687	6,584	189	12,614	876

Employees on permanent and temporary contracts (FTE) by company and binary gender

31 December 2022

	Women		Men		Total	
	Permanent	Temporary	Permanent	Temporary	Permanent	Temporary
If	3,986	73	3,546	25	7,532	98
Topdanmark	855	21	1,244	23	2,099	44
Hastings	1,464	6	1,559	8	3,023	14
Mandatum	270	16	327	16	597	33
Sampo plc	26	0	25	0	51	0
Sampo Group	6,600	116	6,701	72	13,302	188

Employees on permanent and temporary contracts (FTE) by country and binary gender

Sampo Group, 31 December 2022

	Women		Men		Total	
	Permanent	Temporary	Permanent	Temporary	Permanent	Temporary
United Kingdom	1,454	6	1,547	8	3,001	14
Denmark	1,125	24	1,566	24	2,691	48
Finland	1,372	34	1,055	24	2,428	58
Sweden	1,209	7	1,189	4	2,398	11
Norway	716	20	845	11	1,561	31
Latvia	203	8	281	0	484	8
Estonia	328	3	87	0	415	3
Lithuania	107	14	39	1	146	15
Other countries	86	0	93	0	178	0
Sampo Group	6,600	116	6,701	72	13,302	188

Contingent workers by company

	31 Dec. 2022
If*	N/A
Topdanmark	689
Hastings	415
Mandatum	81
Sampo plc	8
Sampo Group	1,193

* If was not able to report the number of contingent workers in 2022 due to a lack of system support. The plan is to include If in the reporting in 2023.

Non-guaranteed hours employees by company and binary gender

31 December 2022

	Women	Men	Total
If	85	58	143
Topdanmark	54	62	116
Hastings	0	0	0
Mandatum	0	0	0
Sampo plc	0	1	1
Sampo Group	139	121	260

Non-guaranteed hours employees by country and binary gender

Sampo Group, 31 December 2022

	Women	Men	Total
Denmark	55	71	126
Sweden	62	24	86
Norway	22	25	47
Finland	0	1	1
Estonia	0	0	0
Latvia	0	0	0
Lithuania	0	0	0
United Kingdom	0	0	0
Other countries	0	0	0
Sampo Group	139	121	260

Company-specific employee turnover by binary gender and age group

	2022						2021						2020					
	Women	Men	<30 years	30-50 years	>50 years	Total	Women	Men	<30 years	30-50 years	>50 years	Total	Women	Men	<30 years	30-50 years	>50 years	Total
If	12.5	13.6	24.6	11.0	9.5	13.0	10.0	12.2	20.5	8.9	8.8	11.0	9.2	11.2	16.8	8.1	9.1	10.1
Topdanmark*	10.7	15.5	22.2	14.4	8.8	13.5	15.0	17.9	22.1	16.2	15.1	16.7	11.1	10.9	12.6	10.1	11.7	11.0
Hastings	27.4	27.6	44.9	19.3	18.3	27.5	31.5	26.7	45.8	18.6	20.1	29.2	-	-	-	-	-	-
Mandatum	7.8	12.8	19.0	11.1	4.4	10.4	8.5	12.7	20.5	9.8	6.8	10.6	8.0	8.3	10.3	6.8	10.2	8.1
Sampo plc	0.0	8.6	0.0	4.1	5.0	4.0	0.0	3.3	0.0	3.1	0.0	1.6	8.0	0.0	0.0	5.8	4.4	4.5
Sampo Group	15.4	17.2	31.7	13.4	10.1	16.3	15.5	16.7	30.8	12.3	11.3	16.1	9.4	10.9	15.7	8.4	9.8	10.1

* 2022: Excluding life business

Country-specific employee turnover by binary gender and age group

Sampo Group

	2022						2021						2020*					
	Women	Men	<30 years	30-50 years	>50 years	Total	Women	Men	<30 years	30-50 years	>50 years	Total	Women	Men	<30 years	30-50 years	>50 years	Total
United Kingdom	27.3	27.5	45.0	19.1	18.1	27.4	31.7	26.9	46.0	18.9	19.7	29.4	-	-	-	-	-	-
Sweden	15.9	16.4	32.6	12.4	9.2	16.1	11.1	14.1	26.4	8.8	6.2	12.5	11.5	12.8	21.4	9.2	7.5	12.1
Denmark	11.9	15.4	21.4	14.7	9.5	13.9	14.7	17.5	22.8	15.9	14.3	16.3	11.8	12.0	14.0	10.8	12.8	11.9
Norway	11.2	10.9	21.6	9.6	9.0	11.0	9.0	10.4	18.6	8.3	8.2	9.7	8.5	9.8	15.4	8.0	8.4	9.2
Estonia	10.8	10.5	17.0	10.7	7.1	10.8	9.6	10.0	11.7	11.2	4.1	9.7	9.1	16.9	11.9	10.6	10.2	10.7
Latvia	7.1	10.9	12.7	8.6	0.0	9.2	7.4	9.3	11.1	7.9	5.0	8.5	7.5	10.0	11.4	8.3	0.0	8.8
Finland	8.6	9.7	14.1	8.4	8.1	9.1	8.0	10.0	13.7	6.8	10.1	8.8	5.5	7.2	8.0	4.5	7.9	6.2
Lithuania	6.6	15.4	7.0	9.0	10.2	8.8	8.4	13.4	6.3	10.8	8.2	9.8	7.6	5.7	6.3	7.0	8.6	7.1
Other countries	41.6	44.6	60.0	42.8	25.1	43.2	22.3	19.9	25.3	16.5	26.1	21.1	29.4	14.5	35.7	12.1	30.6	22.3

* Excluding Hastings

Voluntary and involuntary turnover by company

2022

%	Voluntary turnover	Involuntary turnover
If	11.8	1.2
Topdanmark	9.4	4.1
Hastings	23.7	3.8
Mandatum	10.3	0.2
Sampo plc	4.0	0.0
Sampo Group	14.1	2.2

Voluntary and involuntary turnover by country

Sampo Group, 2022

%	Voluntary turnover	Involuntary turnover
United Kingdom	23.6	3.8
Sweden	15.2	0.9
Norway	11.0	0.1
Denmark	9.8	4.1
Estonia	8.9	1.9
Finland	8.6	0.5
Latvia	8.2	1.0
Lithuania	7.5	1.3
Other countries	34.3	9.0

If

Goals and ambitions

If's goals are to have employee turnover below 12 per cent and eNPS (employee Net Promoter Score) 50 or above.

Actions and results

Employee turnover at If

Employee turnover at If is monitored monthly both by country and by business area, and it is part of management reporting. In 2022, the employee turnover target was not achieved, as the employee turnover showed an increase in several If countries and business areas towards the end of the year. The figures were analysed, but no specific cause was identified. In the Nordic countries, high turnover is primarily still connected to the customer centres. To reduce the employee turnover in customer centres, If has, for example, continued to develop the recruitment process, onboarding, and the performance and follow-up processes regarding absence due to illness.

During 2022, If continued to make significant investments in improving talent acquisition practices through, for example, employer branding initiatives, social media, and external collaborations aimed at increasing visibility among all the main target groups. If continuously invests in sourcing new talent through trainee programmes. In 2022, If was able to recruit 15 new trainees within Analytics, IT, and Underwriting, and 16 new summer interns in various areas. Further investments in structuring and strengthening the recruitment process and toolbox have been made through internal education, building a talent pipeline, offering in-house recruitment support within IT, and taking on all volume recruitment in the customer centres and claims centres. As a response to the increased recruitment needs, the Talent Acquisition team grew significantly to deliver on these promises.

Employee engagement at If

Through the bi-annual survey HeartBeat, If conducts an engagement and culture survey, additionally focusing on the physical work environment in the spring and the psychosocial work environment in the autumn. The results from the HeartBeat survey are a basis for the ongoing working process, focusing on engagement on a team, unit, and company level. One measurement in HeartBeat is the eNPS.

In the spring 2022 survey, If exceeded its eNPS target, and this was further improved in the autumn survey. Leaders have access to their team's results and share them with team members to take relevant action to ensure continued strong results or to reach agreement on development areas. Furthermore, data on an aggregated level is used by management teams as input into organisational development processes.

During 2021 and until September 2022, If conducted an additional monthly pulse survey called HeartRate to gain insight into employees' situations and their perception of If as an employer. The results were used by top management and HR to proactively identify potential development areas and determine where mitigating actions were needed. In December 2022, HeartRate was replaced by the Employee Voice survey, which will focus on specific themes on each occasion. Depending on the topics at hand, the survey may be a one-off or part of a mini-series to gather sufficient employee experience data and develop accurate and meaningful actions. In December, the theme of the first Employee Voice survey was hybrid work.

Number of employees (FTE) by country

If

	31 Dec. 2022	% of total	31 Dec. 2021	% of total	31 Dec. 2020	% of total	Change 2022/2021, %
Sweden	2,402	31.5	2,340	32.1	2,299	32.3	2.7
Finland	1,817	23.8	1,721	23.6	1,692	23.8	5.6
Norway	1,592	20.9	1,549	21.3	1,507	21.2	2.8
Denmark	596	7.8	574	7.9	577	8.1	4.0
Latvia	492	6.4	429	5.9	385	5.4	14.7
Estonia	418	5.5	386	5.3	368	5.2	8.4
Lithuania	161	2.1	149	2.0	157	2.2	7.5
Spain	128	1.7	118	1.6	113	1.6	8.5
United Kingdom	6	0.1	6	0.1	7	0.1	7.1
France	6	0.1	6	0.1	6	0.1	0.0
Germany	6	0.1	5	0.1	5	0.1	18.5
Netherlands	6	0.1	5	0.1	4	0.1	18.4
If	7,630	100	7,287	100	7,120	100	100

Employee turnover by country

If

%	2022	2021	2020
Sweden	16.2	12.5	12.1
Denmark	15.3	14.8	15.3
Norway	11.0	9.7	9.2
Estonia	10.8	9.1	9.8
Latvia	9.2	8.5	8.7
Lithuania	8.8	11.8	7.4
Finland	8.7	8.4	6.0
Other countries	43.9	24.6	23.2
If	13.0	11.0	10.1

Employee engagement

If

Survey	Target	Scale	2022		2021		2020	
			Spring	Autumn	Spring	Autumn	Spring	Autumn
HeartBeat (eNPS)	50	-100-100	51	53	54	51	54	48

Topdanmark

Goals and ambitions

Topdanmark's goals are that employee turnover should be at industry level or below, and employee engagement should remain at least at 79 points until 2025.

Actions and results

Employee turnover at Topdanmark

Topdanmark monitors employee turnover actively. In 2022, the company worked on onboarding and retention of new employees to reduce the voluntary employee turnover. This focus started in the aftermath of the COVID-19 pandemic, when Topdanmark experienced a high turnover of new employees due to a lack of professional and social interaction with colleagues. The results of the new initiatives are promising, and Topdanmark has continued to work specifically on retention of new employees.

Employee engagement at Topdanmark

Back in 2021, Topdanmark estimated that 79 points, which was the result of the 2021 employee engagement survey, was extraordinarily high and impacted by the new initiatives on increased flexibility in work life. However, the score in 2022 was 80 points in the spring and 81 points in the autumn, showing another increase in engagement. In autumn 2022, there was a notable all-time high response rate of 94 per cent, which shows that the employees value and prioritise the engagement survey.

Following up on every engagement survey, all teams that scored below 60 points in the survey were obligated to conduct Team Talks, where specific elements of the survey were discussed and areas of concern addressed. Team Talks is a new initiative that was run as a pilot in 2022, with special attention on areas of concern, improving the job satisfaction, and the general well-being of employees. Topdanmark will expand the Team Talks to include more teams in 2023.

During 2022, Topdanmark asked employees to assess the psychological safety in their respective teams. This was measured by asking whether employees felt safe in expressing their opinions. The result showed a general high degree of psychological safety among leaders and employees, but also a difference between women and men, meaning that men tend to answer this question more positively. Topdanmark will focus on this in 2023.

Number of employees (FTE) by country

Topdanmark

	31 Dec. 2022	% of total	31 Dec. 2021	% of total	31 Dec. 2020	% of total	Change 2022/2021, %
Denmark	2,143	100.0	2,372	99.9	2,454	99.9	-9.7
Luxembourg	0	0	2	0.1	2	0.1	-100.0
Topdanmark	2,143	100	2,374	100	2,456	100	-9.8

Employee turnover by country

Topdanmark

%	2022	2021	2020
Denmark	13.5	16.7	11.0
Topdanmark, including all countries	13.5	16.7	11.0

Employee engagement

Topdanmark

Survey	Target	Scale	2022		2021		2020*
			Spring	Autumn	Spring	Autumn	Spring
Group engagement survey	2025: 79	0-100	80	81	79	80	78

* The survey was conducted only once in 2020.

Hastings

Goals and ambitions

Hastings' target is to have full-year (autumn) employee engagement at 73 per cent.

Actions and results

Employee turnover at Hastings

Throughout 2022, the UK resourcing landscape experienced a continuation of unprecedented levels of labour market demand and movement as a result of both Brexit and post-pandemic lockdown easing. The labour market remained very competitive both within and outside of the Financial Services industry, offering competitive pay for all roles.

Employee turnover at Hastings was low during 2020 and 2021, largely due to the COVID-19 pandemic, but as restrictions have eased throughout 2022, many employees have continued to seek alternative career paths. Hastings has continued to focus on building attraction strategies for customer-facing roles, using

Number of employees (FTE) by country

Hastings

	31 Dec. 2022	% of total	31 Dec. 2021	% of total	31 Dec. 2020	% of total	Change 2022/2021, %
United Kingdom	3,009	99.1	2,961	98.9	2,937	99.0	1.6
Gibraltar	27	0.9	33	1.1	28	1.0	-16.7
United States	1	0.0	1	0.0	1	0.0	0.0
Hastings	3,037	100	2,995	100	2,965	100	1.4

Employee turnover by country

Hastings

%	2022	2021
United Kingdom	27.4	29.4
Gibraltar	36.6	6.6
Hastings, including all countries	27.5	29.2

Employee engagement

Hastings

Survey	Target	Scale	2022		2021	
			Spring	Autumn	Spring	Autumn
Your Voice survey	73	0-100%	70	73	70	74

direct sourcing and partnering with an outsourcing partner to enable realisation of demand peaks. Further supporting UK attraction and retention of talent, salaries for Hastings' customer-facing employees increased by an average of 9.4 per cent over the course of 2022 and remain under review.

Employee engagement at Hastings

Hastings measures employee engagement bi-annually using the Your Voice survey. The spring (mid-year) survey is shorter, and the autumn (full-year) survey is a complete set of questions for all employees.

Hastings' autumn 2022 employee survey reported a sustained high level of employee engagement at 73 per cent. The survey had the highest response rate to date, with 87 per cent of employees completing the survey. In all, 81 per cent of participants agreed that they "could feel comfortable being themselves at Hastings", 82 per cent of employees agreed that they "understand how the work they do contributes to achieving Hastings' goals", and 86 per cent of employees agreed that they "could easily speak to their leader about work-related issues".

The results were driven by Hastings' continued investments in initiatives such as training and career development, developing operational leaders to create high-performing teams, and actively managing the diversity and inclusion agenda. In 2022, Hastings also introduced several initiatives to support employees during the cost-of-living crisis. Employee sentiment and comments were positive in response to this and resulted in an uplift in scores in all associated questions in the Your Voice survey.

Mandatum

Goals and ambitions

Mandatum's goal is to keep the total employee turnover at a healthy level.

Actions and results

In summer 2022, Mandatum launched a year-long Mandatum Group level Governance, Risk and Compliance project (GRC), which aims to reinforce the company's risk management culture and clarify decision-making processes to create a clear framework and common operating principles in response to the new corporate structure, the growing number of personnel, increasing regulatory requirements, and the evolving global situation. The primary objective is to build capabilities and safeguard the continuity of the company's operations.

Due to structural changes in 2021, Mandatum focused on building a common corporate culture within the company in 2022. The message to Mandatum's employees and customers is "One Mandatum, multiple opportunities", which refers to Mandatum being more than the sum of its parts. The Mandatum Way guide was also updated during the year to better take all Mandatum Group companies into consideration. The implementation of the renewed corporate culture will continue in 2023.

Employee turnover at Mandatum

During 2022, employee turnover at Mandatum decreased from 11.0 per cent to 10.6 per cent. In July 2022, Mandatum completed the sales of its Baltic life insurance operations to Invalda INVL, which had an impact on turnover.

Employee engagement at Mandatum

For 13 years, Mandatum measured its employee engagement annually using the Great Place to Work® survey. Mandatum was listed as one of the best places to work in Finland eleven times in a row, and in 2020 and 2021, was selected as the best place to work in the category of large-size companies in Finland. Mandatum also ranked among the best large organisations in all of Europe (10th in 2020 and 17th in 2021).

In January 2022, Mandatum launched a new employee engagement survey, Siqni. It is a step towards taking Mandatum's employee experience into a more employee-centred phase and gaining a deeper understanding of the meaningful factors at work for employees.

The first-ever result was excellent. Mandatum reached a Siqni index of 83, which entitled it to a Future Workplaces certificate for a proven highly rated employee experience. The following aspects were realised best in the workplace by Mandatum employees: skilled colleagues, a fair and capable leader, freedom to work independent of time and place, strong team spirit in the workplace, and meaningful work tasks.

Each leader has a goal related to personnel satisfaction. In 2022, the measure of the goal was the Siqni index of the unit/team, and the target range was 81–86. The weight of the goal was a minimum of 10 per cent of the team goals and personal goals.

Number of employees (FTE) by country

Mandatum

	31 Dec. 2022	% of total	31 Dec. 2021	% of total	31 Dec. 2020	% of total	Change 2022/2021, %
Finland	623	99.0	558	87.4	490	86.4	11.7
Luxembourg	4	0.6	3	0.5	3	0.5	33.3
Sweden	2	0.3	0	0.0	0	0.0	-
Lithuania	0	0.0	34	5.3	32	5.6	-100.0
Estonia	0	0.0	29	4.5	26	4.6	-100.0
Latvia	0	0.0	15	2.3	17	2.9	-100.0
Mandatum	629	100	638	100	568	100	-1.4

Employee turnover by country

Mandatum

%	2022	2021	2020
Finland	10.5	11.0	7.3
Mandatum, including all countries	10.4	10.6	8.1

Employee engagement

Mandatum

Siqni survey	Target for leaders	Scale	2022
Siqni index*	81–86	0–100	83
eNPS	-	0–100	55
Flame index	-	0–100	80

* When the Siqni index exceeds 80, the company receives the Future Workplaces certificate. The Siqni index consists of the eNPS and the Flame index, which reflects how the most significant factors according to the employee's experience are realised in the workplace.

Sampo plc

In 2022, Sampo plc implemented a new employee engagement survey, which measures the eNPS and 18 statements regarding employees' work life. The survey results indicate that the employees are, in general, satisfied, the work community works well, and the personnel's belief in Sampo plc's future is strong. The feedback culture, on the other hand, was recognised as a development area. The eNPS score was 46. The personnel's response rate was 89 per cent.

The results were discussed within the organisation on a team basis, and team-specific development action plans were created at the end of 2022. In 2023, HR is going to support the organisation with development of the feedback culture.

Number of employees (FTE) by country

Sampo plc

	31 Dec. 2022	% of total	31 Dec. 2021	% of total	31 Dec. 2020	% of total	Change 2022/2021, %
Finland	46	90.2	41	91.1	66	95.7	12.2
Sweden	5	9.8	4	8.9	3	4.3	25.0
Sampo plc	51	100	45	100	69	100	13.3

Employee turnover by country

Sampo plc

%	2022	2021	2020
Finland	4.4	1.7	4.6
Sampo plc, including all countries	4.0	1.6	4.5

Employee engagement

Sampo plc

Signi survey	Scale	2022
eNPS	-100-100	46

Diversity, equity, and inclusion

Materiality

Sampo Group's organisation and business activities should reflect the customers and markets in which the Group companies operate. At Sampo Group, it is believed that companies performing well in diversity, equity, and inclusion also tend to be more innovative and profitable.

Group level approach

The group level guidance document regarding diversity, equity, and inclusion (DEI) is the Sampo Group Code of Conduct, which is reviewed annually and approved by the Board of Directors of Sampo plc. In addition, each Group company has adopted supplementary policies and guidelines for their own purposes.

At Sampo Group, all employees must be treated fairly and equally. Discrimination, bullying, harassment, or any other type of abusive behaviour is prohibited. In addition, discriminatory practices regarding recruitment, job assignment, training and development, promotion, remuneration and other benefits, or general conduct in

the workplace are not tolerated. At the group level, DEI is measured, for example, by age and gender distribution. In addition, the Group companies have company-specific measures and targets in place.

Group goals and ambitions

The Sampo Group companies seek diversity and inclusion among employees and management.

Group actions and results

On 31 December 2022, the binary gender distribution of all employees was at a good level in all Sampo Group companies, but women leaders were underrepresented when looking at all management levels combined. Binary gender distribution at the four highest management levels shows that there is still room for diversity at the very top. However, at the levels immediately below the top management, the balance is more equal. Certain functions are also dominated by men or women, such as IT and HR, respectively.

In 2022, the results show that diversity in terms of binary gender is at a good level in recruitment. In addition, the age distribution within the Group has historically been good, and it remained on track in 2022. The share of employees at different organisational levels remained stable compared to the previous year.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-corporate-culture/diversity-equity-inclusion

Binary gender distribution of all employees (FTE)

	31 Dec. 2022				31 Dec. 2021				31 Dec. 2020			
	Women		Men		Women		Men		Women		Men	
If	4,059	53.2%	3,571	46.8%	3,897	53.5%	3,390	46.5%	3,815	53.6%	3,305	46.4%
Topdanmark	876	40.9%	1,267	59.1%	997	42.0%	1,378	58.0%	1,027	41.8%	1,429	58.2%
Hastings	1,471	48.4%	1,567	51.6%	1,447	48.3%	1,548	51.7%	1,461	49.3%	1,505	50.7%
Mandatum	286	45.4%	343	54.6%	309	48.5%	329	51.5%	281	49.6%	286	50.4%
Sampo plc	26	51.0%	25	49.0%	24	53.3%	21	46.7%	37	53.6%	32	46.4%
Sampo Group	6,717	49.8%	6,773	50.2 %	6,674	50.0%	6,665	50.0%	6,621	50.2%	6,557	49.8%

Binary gender distribution of leaders (all organisational levels) (FTE)

	31 Dec. 2022				31 Dec. 2021				31 Dec. 2020			
	Women		Men		Women		Men		Women		Men	
If	462	47.9%	501	52.1%	445	48.4%	475	51.6%	413	47.0%	465	53.0%
Topdanmark	69	36.4%	120	63.6%	87	40.3%	129	59.7%	85	41.3%	121	58.7%
Hastings	232	42.1%	320	57.9%	210	41.5%	296	58.5%	201	43.0%	267	57.0%
Mandatum	34	35.8%	61	64.2%	29	32.2%	61	67.8%	35	39.0%	55	61.0%
Sampo plc	3	27.3%	8	72.7%	3	27.3%	8	72.7%	4	30.8%	9	69.2%
Sampo Group	800	44.2%	1,011	55.8%	774	44.4%	969	55.6%	738	44.6%	917	55.4%

Binary gender (FTE) by country

Sampo Group, 31 December 2022

	Women	Men	Total
United Kingdom	1,460	1,555	3,015
Denmark	1,150	1,590	2,739
Finland	1,407	1,080	2,486
Sweden	1,216	1,193	2,409
Norway	736	856	1,592
Latvia	211	281	492
Estonia	331	87	418
Lithuania	121	40	161
Other countries	86	93	178
Sampo Group	6,717	6,773	13,490

Share of women leaders at the highest management levels

	Level 1 (the Group CEO)			Level 2 (the CEOs of Sampo plc's subsidiaries)			Level 3 (reporting to any of the CEOs)			Level 4 (reporting to level 3)			Total (levels 1-4)		
	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
If	-	-	-	0.0%	0.0%	0.0%	25.0%	25.0%	20.0%	45.2%	46.3%	47.9%	42.3%	43.2%	44.2%
Topdanmark	-	-	-	0.0%	0.0%	0.0%	28.6%	50.0%	0.0%	30.7%	29.2%	25.0%	29.8%	32.2%	20.8%
Hastings	-	-	-	0.0%	0.0%	0.0%	18.9%	9.1%	10.0%	38.8%	37.2%	35.6%	34.5%	31.4%	31.0%
Mandatum	-	-	-	0.0%	0.0%	0.0%	45.5%	44.4%	44.4%	27.8%	26.5%	25.1%	31.3%	29.5%	28.7%
Sampo plc	0.0%	0.0%	0.0%	-	-	-	25.0%	25.0%	20.0%	33.3%	33.3%	33.3%	27.3%	27.3%	25.0%
Sampo Group	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	29.1%	30.4%	21.6%	37.7%	37.1%	37.7%	35.5%	35.3%	34.3%

Age distribution of employees (FTE)

	31 Dec. 2022						31 Dec. 2021						31 Dec. 2020					
	<30 years		30-50 years		>50 years		<30 years		30-50 years		>50 years		<30 years		30-50 years		>50 years	
If	1,239	16.2%	4,341	56.9%	2,050	26.9%	1,220	16.7%	4,076	55.9%	1,991	27.3%	1,245	17.5%	3,913	55.0%	1,962	27.6%
Topdanmark	320	14.9%	1,121	52.3%	702	32.8%	340	14.3%	1,233	51.9%	802	33.8%	378	15.4%	1,251	50.9%	827	33.7%
Hastings	1,009	33.2%	1,645	54.2%	383	12.6%	1,071	35.7%	1,544	51.6%	380	12.7%	1,391	46.9%	1,244	41.9%	331	11.1%
Mandatum	127	20.1%	353	56.0%	150	23.9%	118	18.5%	359	56.2%	161	25.3%	98	17.2%	330	58.2%	140	24.6%
Sampo plc	5	9.8%	26	51.0%	20	39.2%	6	13.3%	20	44.4%	19	42.2%	11	15.9%	36	52.2%	22	31.9%
Sampo Group	2,699	20.0%	7,486	55.5%	3,305	24.5%	2,755	20.7%	7,231	54.2%	3,353	25.1%	3,123	23.7%	6,774	51.4%	3,281	24.9%

New employees by binary gender

	2022				2021				2020			
	Women		Men		Women		Men		Women		Men	
If	677	49.8%	683	50.2%	574	52.2%	525	47.8%	470	53.6%	407	46.4%
Topdanmark	124	35.5%	225	64.5%	106	37.1%	180	62.9%	112	33.3%	224	66.7%
Hastings	423	48.3%	453	51.7%	467	51.4%	441	48.6%	-	-	-	-
Mandatum	42	36.5%	73	63.5%	38	35.5%	69	64.5%	20	36.4%	35	63.6%
Sampo plc	2	33.3%	4	66.7%	3	50.0%	3	50.0%	6	54.5%	5	45.5%
Sampo Group	1,268	46.9%	1,438	53.1%	1,188	49.4%	1,218	50.6%	608	47.5%	671	52.5%

Number of new employees hired during the year. Only externally hired, monthly paid employees.

New employees by age group

	2022						2021						2020					
	<30 years		30-50 years		>50 years		<30 years		30-50 years		>50 years		<30 years		30-50 years		>50 years	
If	596	43.8%	642	47.2%	122	9.0%	513	46.7%	505	46.0%	81	7.4%	370	42.2%	425	48.5%	82	9.4%
Topdanmark	110	31.5%	196	56.2%	43	12.3%	68	23.8%	167	58.4%	51	17.8%	111	33.0%	181	53.9%	44	13.1%
Hastings	474	54.1%	362	41.3%	40	4.6%	484	53.3%	368	40.5%	56	6.2%	-	-	-	-	-	-
Mandatum	58	50.4%	50	43.5%	7	6.1%	53	49.5%	44	41.1%	10	9.3%	34	61.8%	20	36.4%	1	1.8%
Sampo plc	2	33.3%	4	66.7%	0	0.0%	2	33.3%	3	50.0%	1	16.7%	3	27.3%	8	72.7%	0	0.0%
Sampo Group	1,240	45.8%	1,254	46.3%	212	7.8%	1,120	46.6%	1,087	45.2%	199	8.3%	518	40.5%	634	49.6%	127	9.9%

Share of employees at different organisational levels (FTE)

%	31 Dec. 2022									31 Dec. 2021								
	Senior level			Mid-level			First level			Senior level			Mid-level			First level		
	Women	Men	Total	Women	Men	Total	Women	Men	Total	Women	Men	Total	Women	Men	Total	Women	Men	Total
If	0.7	0.9	1.7	22.1	28.5	50.6	30.4	17.4	47.8	0.7	0.9	1.6	21.5	28.3	49.8	31.3	17.3	48.6
Topdanmark	1.6	2.7	4.3	17.9	39.1	57.0	21.4	17.3	38.7	1.3	1.8	3.1	17.6	40.0	57.6	23.1	16.2	39.3
Hastings	0.9	1.5	2.4	19.3	27.7	47.0	28.3	22.4	50.7	0.9	1.4	2.3	18.2	27.1	45.3	29.2	23.2	52.4
Mandatum	1.4	5.7	7.2	31.7	42.5	74.2	12.3	6.3	18.7	4.1	6.3	10.3	30.7	38.6	69.3	13.7	6.7	20.4
Sampo plc	11.8	17.6	29.4	39.2	27.5	66.7	0.0	3.9	3.9	20.0	22.2	42.2	26.7	22.2	48.9	2.2	6.7	8.9
Sampo Group	1.0	1.6	2.6	21.3	30.7	52.0	27.5	17.9	45.5	1.1	1.5	2.6	20.5	30.6	51.1	28.4	17.9	46.3

If

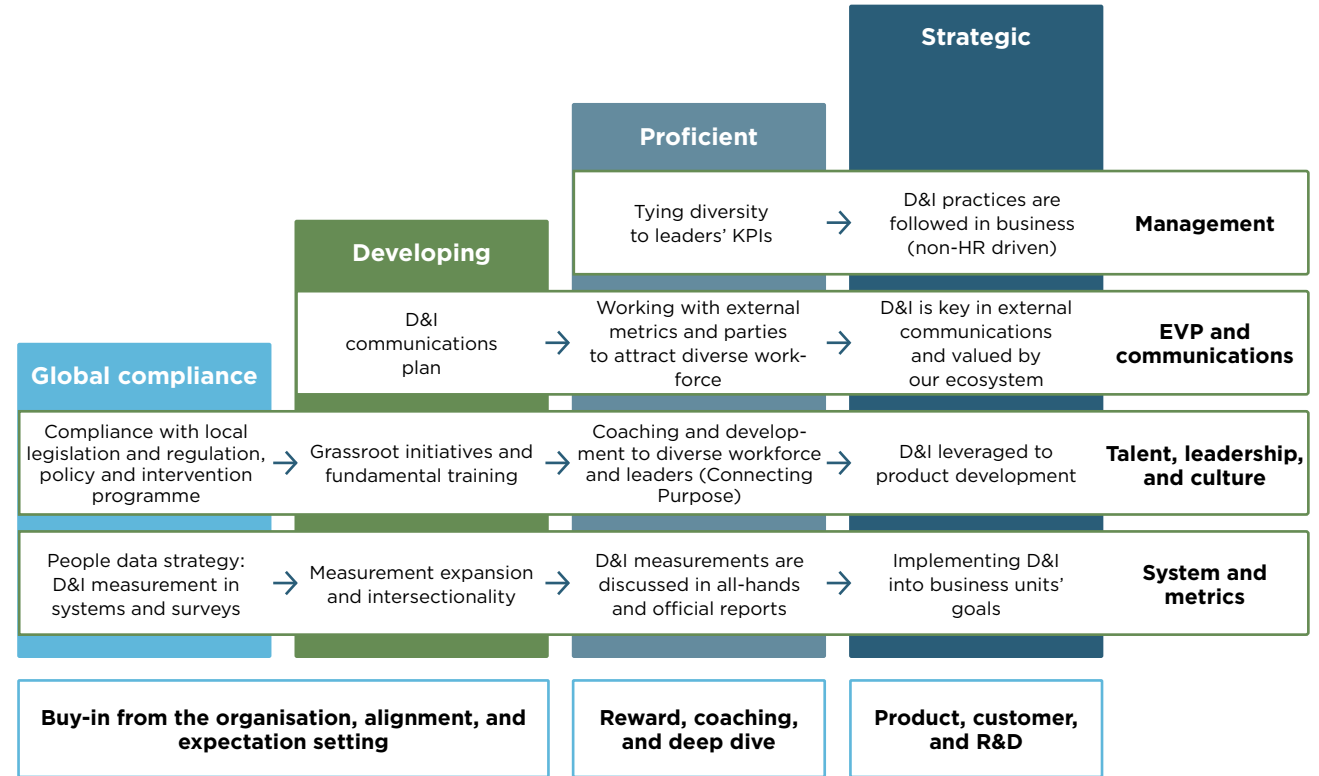
Approach

If has a DEI maturity model created by If's Head of DEI together with the Diversity Board (a steering group comprising senior leaders). The model represents four stages of maturity: Global compliance, Developing, Proficient, and Strategic. The model sets the direction towards systematically implementing DEI into every aspect of the business through internal governance, compliance, work climate, and leadership, and actively working on behavioural change.

In addition, the model has four focus areas: Systems and metrics, strengthening a data-driven approach; Talent, leadership, and culture, providing support and tools to integrate diversity and inclusion into everyday processes; Employer value proposition and communication, ensuring inclusive communication; and Management, tying diversity and inclusion to performance and rewards.

Diversity and inclusion maturity model

If



Goals and ambitions

If has set the following goals to guide its DEI work.

- Reach an outstanding perceived sense of inclusion, defined as at least 85 per cent of employees agreeing or strongly agreeing with the statements related to inclusion in the autumn employee survey.
- Increase diversity in management teams by 30 per cent by 2026, defined as selected under-represented groups, including people of colour and non-binary gender.
- Have equal binary gender representation, meaning that the ratio of men/women should be 50/50 (+/- 5 percentage points) for both employees and leaders.

Actions and results

If measures the perceived sense of DEI among employees through the employee engagement survey HeartBeat. The average score in the autumn 2022 survey was 87 per cent. The results were examined in three demographic groups: men, women, and ISURG (If Specifically Under-represented Group, encompassing employees identifying

as a person of colour, a refugee, and/or LGBTQIA+). Out of the demographic groups, men and women reported the highest average scores, 87 per cent, whereas ISURG reported the lowest average score, 79 per cent. The overall result exceeded the target in all but the following two statements: 'I am able to voice a contrary opinion without fearing consequences', and 'My diversity traits are a barrier to feeling included at If'. The ISURG group overall reported the lowest results among the demographic groups, but met the target for the statement 'I can be my authentic self at work'. If actively works to adjust business processes to address these areas.

In addition to the already established Employee Resource Group Women@If, the group Queer@If was introduced in 2022 to spread awareness and promote an open discussion among If's employees. The group welcomes those who specifically identify as queer, and it operates in a closed Teams group to create a safe space and build an important sense of community. Certain events are open to everyone at If, inviting employees to work together for a positive change within the company.

In 2022, If conducted a linguistic study among several If employees to examine their experiences of working in a linguistically diverse workplace. The study identified various challenges, ranging from ineffective knowledge-sharing and difficulty and discomfort in expressing oneself to social exclusion when colleagues use a language not understood by everyone. As a response to these challenges, the participating employees found themselves engaging in various inclusive language practices such as lowering the threshold to raise language-related issues, as well as encouraging colleagues to use non-native languages despite insecurity. Ultimately, these practices aim to encourage individuals to feel comfortable and safe enough to use non-native languages and find effective solutions together, and to create shared understanding across varying language proficiencies. As a result of the linguistic study, one concrete action in 2022 was the development of a Language Committee, which will act as an advisory forum and work towards setting up principles for when to use English and when to use the local language. The committee will identify relevant collaborators and focus areas across the business and is responsible for communicating the decisions made in this area.

If strives to achieve greater diversity in senior management by 2026, as this is seen to increase the perceived sense of diversity within If as a whole. In support of this, two new initiatives were introduced in 2022. The One final candidate principle implies the top two candidates for an opening in the Business Management Group (BMG) or in the direct reports to BMG must contain at least one candidate who contributes to team diversity in terms of the following: LGBTQIA+, gender identity, or another ethnic group. The other initiative involves providing instructions for succession planning to broaden the perspective on future demands by increasingly considering candidates who would bring new and valuable insights to the business.

During 2022, If initiated a core team with the purpose of improving the products and services offering by introducing a DEI focus to the product development process.

In 2022, If had rather equal binary gender representation, with the share of men being 46.8 per cent and the share of women 53.2 per cent. The distribution of men and women leaders was 52.1 per cent and 47.9 per cent, respectively. If works actively towards incorporating DEI into recruitment efforts, through building a more diverse talent pool and offering trainee and internship programmes. If also works to increase its presence among defined target groups through fairs and networks, such as ODA, Women in Tech in Norway, and Women in Tech in Sweden. The DEI focus is communicated in job advertisements, and the recruitment process is continuously being developed to include one or more types of assessment through, for instance, personality tests and case presentations, structured interview guidelines, and references, as well as a four-eye-principle to avoid unconscious bias and discrimination influencing recruitment decisions.

Share of women at different management levels

If

%	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020*
Level 1: Board of Directors	28	28	13
Level 2: Other Senior Executives	24	24	25
Level 3	46	47	49
Level 4	46	45	44

* Excluding Viking

Calculated using company-specific calculation methods. Cannot be compared to other Group companies or group level figures.

Topdanmark

Approach

For Topdanmark, there are several reasons why it is important to secure a diverse and non-discriminatory culture. Firstly, it is essential to ensure that the employees thrive and are not exposed to discrimination, or any form of abusive or unacceptable behaviour. Secondly, numerous national and international research papers show that companies with a diverse workforce create more growth and are more innovative. Thirdly, Topdanmark wants its workforce to reflect the national demographic and the customers, as well as potential customers.

Topdanmark's HR department is responsible for the company's diversity policy, the human rights policy, and the Code of Conduct. These policies are approved annually by the Board of Directors.

Goals and ambitions

Topdanmark's goals are presented in the table Women in management.

Actions and results

In 2022, the percentage of women in all management positions at Topdanmark decreased. However, during the year, the company decided to focus on gender equality in the leadership pipeline, which should support gender equality in the longer term. In 2022, Topdanmark already saw an increase in the number of women on the succession list and in the leadership

pipeline. However, a stronger focus on how to obtain gender equality in all management positions, as well as management levels 1 and 2, is necessary in the future to reach the ambitious goal of a maximum of 60 per cent of one gender.

Moreover, Topdanmark implemented a new systematic approach to support the job architecture programme during 2022. The aim is that all positions at Topdanmark will be placed in this programme over the coming years, starting with top management. This will allow a closer look at the different job functions, including pay range, benefits, responsibilities, career options, and team structures.

In 2022, Topdanmark introduced a new Diversity Group. The group consists of employees from different areas of the organisation, and it will focus on diversity and inclusion aspects in the organisation through a bottom-up approach.

In 2022, Topdanmark also expanded the company's Code of Conduct and developed an e-learning module focusing on abusive behaviour. The module is expected to be implemented in 2023.

Women in management, goals and results

Topdanmark

Goal	2022	2021	2020
At least two of each gender among the AGM-elected members of the Board of Directors*	2 women 4 men	4 women on the board	4 women on the board
Maximum of 60 per cent of one gender (on average) at all levels of management	36% women 64% men	40% women 60% men	41% women 59% men
Maximum of 60 per cent of one gender in the succession planning**	50% women 50% men	47% women 53% men	29% women 71% men

Calculated using company-specific calculation methods. Cannot be compared to other Group companies or group level figures.

* Due to updated Danish law on the under-represented gender, the goal for diversity on the Board of Directors was changed to a minimum two of each gender among the AGM-elected members of the Board of Directors in 2022. The previous goal was at least three of each gender on the Board of Directors.

** Succession planning, among other things, ensures a chain of qualified and potential employees for level 1 and level 2 management positions.

Share of women at different management levels

Topdanmark

%	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Board of Directors	44	44	44
Level 1: Executive Board	0	0	0
Level 2: Top Management	28	22	25
Level 3	31	41	34
Level 4	38	43	48

Calculated using company-specific calculation methods. Cannot be compared to other Group companies or group level figures.

Hastings

Approach

Hastings has a diversity and inclusion strategy with three focus areas: creating an inclusive culture, building a diverse workforce for the future, and enhancing the company’s reputation internally and externally. Hastings’ approach involves listening to its employees and acting on their feedback, as well as bringing in external expertise when needed.

Diversity and inclusion are positively promoted within Hastings’ customer and employee policies and processes, and the company is working to regularly review its policies and practices in line with its ambitions to be an inclusive employer. Hastings’ Inclusion Council works across the business to promote new ideas and best practices, focusing on eight core areas: gender balance, ethnicity and culture, sexual orientation (LGBTQ+), religion and belief,

disability (visible and invisible), age, social mobility, and careers and family-friendliness. The Inclusion Council is a voluntary employee network group that advocates for change and pushes boundaries. Each member is responsible for leading in a specific area of diversity that they are passionate about, supported by aligned Executive Committee sponsors to achieve goals.

Goals and ambitions

Hastings has goals to attract, develop and progress the careers of employees from a wide range of backgrounds, and it recognises the value that diversity brings to its success. Hastings has committed to:

- Focus on social mobility and neurodiversity in the workplace as priority areas in 2023.
- Continue to participate in the 30% Club, an external mentoring programme for women.
- Maintain the company’s support of the advancement of women in senior roles in the financial services sector through being an ongoing signatory of the Women in Finance Charter.
- Benchmark Hastings against other leading employers by participating in the UK Inclusive Employers survey.

Actions and results

Hastings’ Inclusion Council continued to advocate for positive change for employees with a wide range of backgrounds in 2022. The council, for example, championed a carer’s leave pilot, giving employees 37 hours of paid leave to help with their caring responsibilities. The council is also working with business leads to design an improved reasonable adjustments process for employees with visible or non-visible disabilities.

During the year, Hastings continued to raise awareness on diversity by launching a new Talking Inclusion webinar series. Topics covered included social mobility inclusion, neurodiversity in the workplace, banter at work, intersectionality, and the Black experience. Hastings also celebrated National Inclusion week, raising awareness of the theme: The Power of Now. The company invited a third-party diversity and inclusion expert to discuss how each person can take steps to be more consciously

inclusive. Hastings also had its biggest representation at local Pride events in Leicester and Hastings in 2022.

Hastings' employees with ambitions to be senior leaders are given the opportunity to apply to be part of the 30% Club mentoring programme. The programme allows Hastings' women employees to be mentored by senior leaders from external organisations and, in turn, Hastings' band 6+ leaders provide mentorship to mentees in other organisations taking part in the programme. 13 Hastings employees were supported in taking part in the 30% Club mentoring programme in 2022/23, with an equal

number of 13 senior leaders from the company offering their time to mentor employees from other participating organisations.

Hastings has women in 30 per cent of its senior roles (calculated according to company-specific calculations methods), meeting its Women in Finance signatory target. During 2022, the company attracted senior female leaders into key leadership roles in the Claims, Commercial, and Underwriting departments, which are specialisms that are typically male dominated.

The company continues to work on its long-term goal of improving diversity in its early career pipelines for future leadership roles. Through Hastings' partnership with Generation, a non-profit organisation that specialises in training skilled yet underemployed candidates from diverse backgrounds in data and analytics, the company hired 11 new employees in data roles in 2022. Hastings' commitment to attracting a wide pool of graduates onto its graduate programmes remains, with plans to go to market with the company's largest number of graduate roles in Data Pricing and Analytics, Claims, and Technology roles in Q1/2023.

Hastings was recognised 9th in the Top 50 UK Inclusive Employers list 2022, which is a significant improvement compared to the company's 2021 ranking of 29th.

Share of women at different management levels

Hastings

%	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Band 8 (CEO)	0.0	0.0	0.0
Band 7	20.0	12.5	12.5
Band 6	24.0	15.4	20.3
Band 5	30.9	34.8	30.0
Band 4	36.6	35.1	41.8
Band 3	58.2	55.7	50.9

Calculated using company-specific calculation methods. Cannot be compared to other Group companies or group level figures.

Mandatum

Approach

Diversity and inclusion are included in the core value set of Mandatum and enjoy buy-in from the company's management. The aim is to ensure that the company's policies and processes do not discriminate and that these themes are emphasised in actions. Diversity and inclusion issues are, for example, included in the Mandatum Way guide and in leader training. HR is responsible for diversity and inclusion strategy and actions.

Mandatum strives to promote diversity and inclusion among all employee groups. By tapping into employees' different backgrounds, know-how, and capabilities, Mandatum also aims to create a more innovative, fair, and caring work environment. At Mandatum, diverse teams are seen as more creative and as generating more innovation and better customer orientation by reflecting the diversity of the markets.

Mandatum wants to offer equal opportunities for everyone. When recruiting, training, and promoting, the company strives for clear and objective criteria so that decisions are always based on merit and not influenced by bias. Everyone employed by Mandatum is also encouraged to develop and build on their strengths, to enable employees to develop to their full potential.

An important part of inclusion is Mandatum Experience, a two-day inclusive induction programme where new employees meet Mandatum people and management. The event is organised three times a year.

Goals and ambitions

Mandatum focuses on gender equality at all management levels and has set a goal of a minimum of 40 per cent of men and women, respectively, at all levels of management. The company seeks to achieve the target by encouraging all genders to apply for managerial and executive positions, and it offers support and coaching where needed.

Women in management, goals and results

Mandatum

Goal	2022	2021	2020
Minimum of 40 per cent of women and men at all levels of management	35.8% women 64.2% men	32.2% women 67.8% men	39.0% women 61.0% men

Share of women at different management levels

Mandatum

%	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Board of Directors	22	22	25
Level 1: Executive board	22	29	40
Level 2: Top management	31	31	31
Level 2*	-	-	19
Level 3*	-	-	55

Calculated using company-specific calculation methods. Cannot be compared to other Group companies or group level figures.

** Level 2 and level 3 figures not reported in 2021 and 2022 due to structural changes in the company.*

Actions and results

In November 2022, Mandatum conducted a personnel survey to involve employees in the diversity theme and to evaluate which dimensions of diversity are found to be the most important and worth focusing on in 2023. The top five dimensions recognised were ethnicity, age, gender, skills, and education. Based on the results, during 2023, Mandatum will formulate a diversity policy to be communicated both internally and externally.

Sampo plc

Board of Directors

Sampo plc has a diversity policy for the Board of Directors. The aim of the policy is to ensure that the Board of Directors possesses the requisite knowledge and experience in the social, business, and cultural conditions of the regions and markets in which the main activities of the Group are carried out. In addition, the policy states that when electing the Board of Directors, a broad set of qualities and competencies is sought, and it is recognised that diversity, including age, gender, geographical provenance, and educational and professional background, is an important factor to take into consideration.

Goals and ambitions

Sampo plc's target is that the Board of Directors should always include at least 37.5 per cent of both men and women.

Binary gender distribution of the Board of Directors

Sampo plc

	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Share of women, %	33.3	37.5	37.5

Average tenure of board members

Sampo plc

	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Years	6	6	5

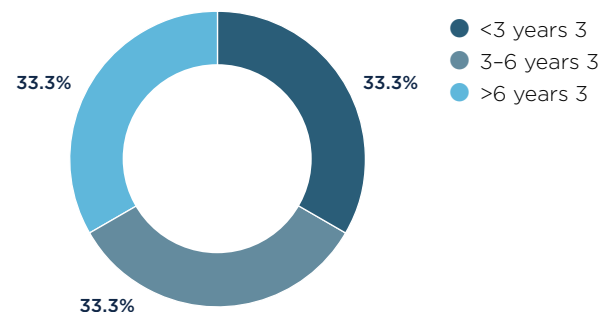
Actions and results

On 31 December 2022, the Board of Directors of Sampo plc consisted of three women and six men. The share of women was 33.3 per cent and, thus, temporarily below the target of 37.5 per cent, as the total number of board members grew by one in 2022. The average tenure of board members was six years.

Diversity Policy of the Board: www.sampo.com/governance/board-of-directors/board-diversity
Board skills matrix: www.sampo.com/governance/board-of-directors/board-skills-matrix
The latest composition of the Board:
www.sampo.com/governance/board-of-directors
The latest composition of the GEC:
www.sampo.com/governance/executive-committee

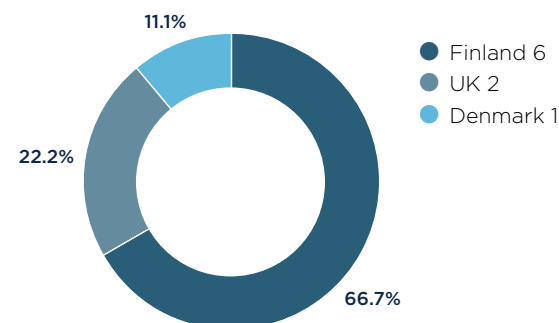
Length of tenure of board members

Sampo plc, 31 December 2022



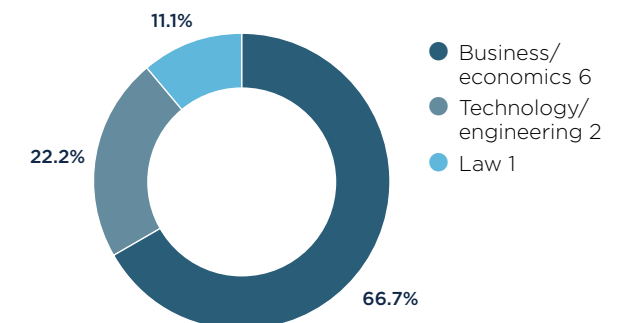
Country of origin of board members

Sampo plc, 31 December 2022



Educational background of board members

Sampo plc, 31 December 2022



Group Executive Committee

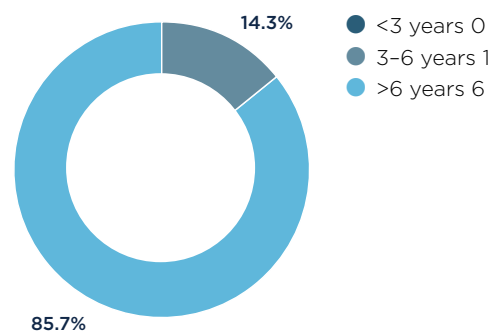
Members of the Group Executive Committee (GEC) are appointed by the Sampo plc Board of Directors. On 31 December 2022, the GEC consisted of seven members, and the share of women was 14.3 per cent. The average tenure of the members in 2022 was 15 years.

Other management levels

In 2022, there were 42.9 per cent of women working at management level 2 at Sampo plc. Due to the small number of employees at Sampo plc in general, even a single change in the managerial positions can have a relatively large impact on the figures.

Length of tenure of Group Executive Committee members

Sampo plc, 31 December 2022



Binary gender distribution of the Group Executive Committee

Sampo plc

	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Share of women, %	14.3	14.3	12.5

Average tenure of Group Executive Committee members

Sampo plc

	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Years	15	14	13

Share of women at different management levels

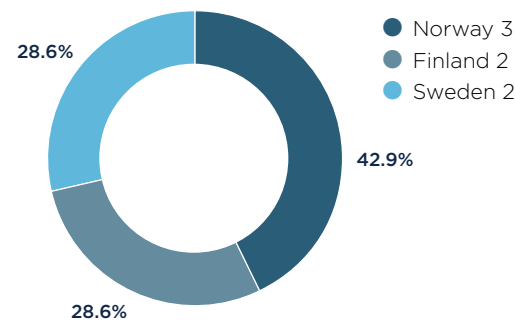
Sampo plc

%	31 Dec. 2022	31 Dec. 2021	31 Dec. 2020
Board of Directors	33.3	37.5	37.5
Level 1: Group Executive Committee	14.3	14.3	12.5
Level 2	42.9	42.9	37.5

Calculated using company-specific calculation methods. Cannot be compared to other Group companies or group level figures.

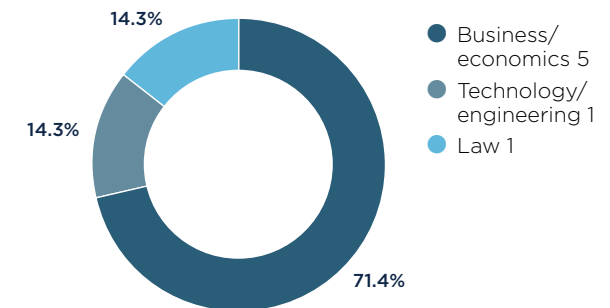
Country of origin of Group Executive Committee members

Sampo plc, 31 December 2022



Educational background of Group Executive Committee members

Sampo plc, 31 December 2022



Health and well-being

Materiality

For the Sampo Group companies, it is important to have employees who are healthy and happy. Placing an emphasis on employee health and well-being can improve general employee engagement and motivation, result in fewer absences due to illness, and eventually contribute to the bottom line.

Group level approach

The group level guidance document on health and well-being is the Sampo Group Code of Conduct. In addition, each Group company has adopted supplementary policies and guidelines for their own commercial purposes.

At Sampo Group, the mental and physical well-being of employees is managed, for example, by implementing preventative measures (e.g., stress counselling, preventative occupational healthcare, good design of offices), focusing on work–life balance (e.g., workplace flexibility, working time reduction, dependent care,

and special leave), offering employees meaningful work assignments, education, and organising team activities and sports programmes (e.g., yoga, sports clubs). In addition, focus is placed on employment security and responsible workforce restructuring according to local legal and factual standards.

At the group level, health and well-being is measured by absence due to illness. In addition, the Group companies measure employee engagement using company-specific measures. More information on employee engagement is available in the section Empowering work environment ([page 65](#)).

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-corporate-culture/health-and-well-being

Group goals and ambitions

The Sampo Group companies aim to achieve a low level of absence due to illness.

Group actions and results

In 2022, absence due to illness at Sampo Group increased slightly. The increase was driven by the increase in absence due to illness at If, Topdanmark, and Mandatum. Both COVID-19 and other infections, which have increased due to the re-opening of society, affected the results.

In 2022, Sampo Group started to report the number of work-related injuries externally. There have been no deaths caused by work-related injuries at the Group during 2020–2022.

Absence due to illness by company

%	2022	2021	2020
If	3.5	3.2	3.0
Topdanmark	3.2	2.4	2.4
Hastings	2.1	3.4	-
Mandatum	2.0	1.1	1.4
Sampo plc	0.7	0.5	0.5
Sampo Group	3.1	3.0	2.7

Absence due to illness by country

Sampo Group

%	2022	2021	2020*
Norway	4.7	3.8	3.6
Sweden	3.8	3.7	3.6
Denmark	2.9	2.5	2.3
Finland	2.9	2.5	2.5
United Kingdom	2.2	3.4	-
Estonia	2.0	1.5	1.1
Latvia	1.4	1.3	0.9
Lithuania	0.8	0.7	1.0
Other countries	6.3	4.9	4.6

* Excluding Hastings

Occupational healthcare coverage by company

%	2022		2021	
	% of employees covered by an occupational healthcare system	% of employees covered by a supplementary occupational healthcare	% of employees covered by an occupational healthcare system	% of employees covered by a supplementary occupational healthcare
If	100.0	98.9	100.0	98.3
Topdanmark	99.3	0.0	100.0	0.0
Hastings	100.0	100.0	100.0	100.0
Mandatum	99.0	99.0	99.5	94.0
Sampo plc	100.0	100.0	100.0	100.0
Sampo Group	99.9	83.5	100.0	81.0

Occupational healthcare coverage by country

Sampo Group

%	2022		2021	
	% of employees covered by an occupational healthcare system	% of employees covered by a supplementary occupational healthcare	% of employees covered by an occupational healthcare system	% of employees covered by a supplementary occupational healthcare
Finland	100.0	100.0	100.0	100.0
Norway	100.0	100.0	100.0	100.0
United Kingdom	100.0	100.0	100.0	100.0
Baltic countries	100.0	100.0	100.0	96.6
Sweden	99.9	96.9	100.0	94.8
Denmark	99.5	21.8	100.0	19.5
Other countries	97.8	94.0	98.2	98.2

Work-related injuries by company

2022

	Number of injuries
If	47
Topdanmark	3
Hastings	10
Mandatum	7
Sampo plc	2
Sampo Group	69
% of FTE average	0.5

Work-related injuries by country

Sampo Group, 2022

	Number of injuries
Finland	33
Sweden	11
United Kingdom	10
Denmark	7
Norway	2
Baltic countries	2
Other countries	4

If

Approach

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, leaders, HR, and union representatives.

If has mandatory national work environment committees, and based on the country's legislation and practice, local work environment committees. The work environment committees have statutory responsibilities, including monitoring the work environment, developing health and safety procedures, and ensuring a high quality of physical and psychosocial well-being at If. The duties of the work environment committee, the election rules, the number of national participants, the mandate and the decision-making procedures are regulated by national work environment law or by country-specific co-determination agreements. Depending on local legislation, the representatives are either appointed by the labour union or elected by the employees. On average, the national committees meet four times a year and the local committees meet more frequently. The mission

and mandate of local work environment committees differ from those of the national committee, and the tasks are of a more practical nature, such as regular safety inspections. If provides the committees with a standardised checklist for the safety inspections. If any immediate danger is detected, the safety representative has the authority to suspend work until the employer has resolved the situation.

To strengthen the focus and effort concerning the promotion of health and well-being, If has a preventive approach in all countries. This includes risk identification where both work-related and non-work-related health risks are considered. In the Nordic countries, dedicated Health Partners work systematically to develop and communicate tools related to well-being both for employees and leaders.

If is obliged by law to systematically plan and manage the work environment to ensure that it is safe for all employees. If sets local work environment plans annually and follows up their implementation regularly. The legal work environment requirements include the duty to continually investigate risks and to take preventive action to mitigate potential risks. Risk assessments are performed at all If offices, and any incidents and risks detected are handled accordingly and reported in the relevant incident reporting tool. The safety

representatives cooperate with the employer and are also involved in risk assessment processes and other matters related to the work environment, such as workplace orientation and emergency procedures. If also has company-specific and company-wide crisis groups with representatives across the business to respond to local or global issues. Along with employee surveys, the risk assessments and incident reports provide valuable indications to further develop the business processes and work environment.

If follows up on absence due to illness monthly in all operating countries. Trends and possible actions are regularly discussed by management teams, leaders, unions, and work environment committees. The ambition is to have a proactive approach to reduce absence due to illness. As part of the process, people analytics are continuously being improved for more detailed monitoring and analysis of illness statistics. The Workday platform has also been developed to issue notifications according to set parameters, in the case of logged overtime or recurring sick leave. Based on the information, If can take relevant measures in support of a healthy workplace by monitoring certain areas more closely, such as meaningful work, role ambiguity, work autonomy, social support, and work-life balance.

Goals and ambitions

If's goal is that absence due to illness should not exceed 3 per cent.

Actions and results

In 2022, If saw a slight increase in absence due to illness in most countries of operations. COVID-19 was still heavily present and with the re-opening of society, the spread of respiratory viruses and influenza also affected the results.

The New Leader in If training includes information on how to detect and act on early signs of health issues. In the autumn of 2022, the training materials were further developed by the Health Partners to allow more time to be allocated to understanding potential work environment issues.

During 2022, questions on psychological safety were introduced in the HeartBeat survey, to better understand what factors may contribute to one's ability to take interpersonal risks without fear of consequences on self-image, career, or status within the workplace. With increased analytical possibilities, If and Health Partners were able to design relevant materials to facilitate the discussion between HR, leaders, and employees in units with low results.

In 2022, If arranged its first well-being weeks in all countries. Employees could listen to expert guest speakers and challenge themselves by trying new healthy habits and routines. The webinar topics covered, for instance, sleep, happiness at work, mindfulness and relaxation, as well as mental health and exercise. In some offices, local activities were arranged, including group walk-and-talk meetings and ergonomic guidance. In certain countries, a four-week well-being challenge was organised, and teams of employees engaged in earning points from physical, mental, and social health activities.

Absence due to illness by country

If

%	2022	2021	2020
Norway	4.7	3.8	3.6
Sweden	3.8	3.7	3.6
Finland	3.3	2.9	2.8
Estonia	2.0	1.5	1.1
Denmark	1.9	2.5	1.9
Latvia	1.4	1.3	0.9
Lithuania	0.8	0.7	1.0
Other countries	7.1	5.4	4.7
If, including all countries	3.5	3.2	3.0

Topdanmark

Approach

Topdanmark has an internal well-being policy that sets the framework for all initiatives within employee well-being. In addition, Topdanmark has an internal health policy with the purpose of promoting health, well-being, and job satisfaction. The overall targets and initiatives are set by the Well-being Committee, which meets quarterly. The Chief HR Officer is responsible for the implementation of the internal policies and concrete initiatives related to them.

At Topdanmark, attention is given to the fact that a fast-changing business environment can cause stress, decrease job-satisfaction and well-being, and create a lack of motivation among employees. Therefore, the company has developed several initiatives to avoid these effects. Topdanmark provides many health-related initiatives, including anonymous stress counselling, educational videos providing an insight into and tools to both prevent and work with stress, such as a massage scheme and sports activities (e.g. online exercise programmes, yoga). Topdanmark also offers help with larger lifestyle changes.

Topdanmark continuously evaluates, for example in the Well-being Committee, the many initiatives and their contribution to a healthier working day and a high level of well-being.

Goals and ambitions

Topdanmark's goal is that absence due to illness should be below the average for the entire insurance industry, as calculated by the Danish Employer's Association for the Financial Sector.

Actions and results

In 2022, absence due to illness calculated according to Sampo Group's calculation principles was 3.2 per cent (2.4), and according to Topdanmark's company-specific calculation method, corresponding to the Danish Employer's Association, 3.2 per cent (2.6). The industry

figure for 2022 was not available at the time this report was completed, but for the year 2021, it was 2.6 per cent. In 2023, absence due to illness will be Topdanmark's focus area.

Topdanmark closely monitors the development of absence due to illness. Based on the anonymised report from the digital health screening conducted every other year (last conducted in 2021), the company considers which health efforts are relevant to focus on to support the health of employees in the best possible way. The latest health screening showed that there were certain areas of concern regarding health, such as obesity and pain issues. However, positive aspects were also identified, most notably a reduction in stressful working hours due to the flexibility that the hybrid workplace offers, and a reduction in noise in the offices due to fewer people being present at the office. In 2023, Topdanmark expects to conduct a new health screening and thus hopes to gain new insights to help reduce absence due to illness.

Absence due to illness by country

Topdanmark

%	2022	2021	2020
Denmark	3.2	2.4	2.4
Topdanmark, including all countries	3.2	2.4	2.4

Hastings

Approach

Hastings has a well-being programme, which focuses on three key principles: awareness, education, and engagement through activity. The programme offers support and information about well-being, whilst promoting a healthy working environment through a variety of activities to support the mental, physical, financial, and social health of employees and their dependants, as well as their well-being.

Hastings has a Well-being Steering Group, which brings together key stakeholders from across the company. The members of the steering group share feedback and insights from their areas and, in this way, inform decisions on goals, strategies, and processes within the well-being programme. In addition, Hastings has Well-Being Champions and Mental Health First Aiders who act as the first point of contact for employees who may have questions or concerns around health and well-being. These employees act as intermediaries whilst promoting preventative healthcare via the tools and resources available within the well-being programme.

Hastings recognises the role that all leaders play in creating a safe space for employees to be open about their well-being. By providing leaders with the training and tools, Hastings is building an engaged and supportive

leadership team that can help employees with managing their well-being.

All Hastings' employees are able to access a vast library of wellness support via a dedicated well-being platform. The platform includes webinars, workshops, talks, and health checks supported by the company's health and well-being providers.

Goals and ambitions

The goal of Hastings' well-being programme is to focus on embedding wellness into Hastings' culture and continuing to raise awareness and deliver educational health and well-being initiatives.

Actions and results

During 2022, Hastings embedded well-being into all induction journeys, giving all new employees an opportunity to understand what health and well-being benefits they are entitled to.

In 2022, Hastings launched a Well-being Champion development programme to support Hastings' Well-being Champions and giving them a clear learning pathway. The programme contains five well-being modules covering menopause, mental health first aid, hybrid working, soft skills training, and financial well-being. The aim of the

programme is to make the Well-being Champion role more desirable to employees through offering personal development and, in turn, increasing well-being related communications within the departments, encouraging peer to peer conversations, and influencing early intervention and higher utilisation of the company's tools and resources.

Hastings also continued to deliver its 1-day mental health workshop for leaders during the year, with 101 leaders attending. The workshop aims to provide leaders with the skills and confidence to proactively support employees' mental well-being, using the tools and resources provided.

Towards the end of the year, the UK experienced inflation in the cost of living, which affected all Hastings' employees. The well-being programme worked with financial well-being partner Nudge to deliver a 'navigating cost of living' series of workshops for all its employees, with a focus on energy, food, and budgeting. A dedicated financial well-being page was also created on the company's intranet, giving employees access to a range of related resources.

Absence due to illness by country

Hastings

%	2022	2021
United Kingdom	2.2	3.4
Gibraltar	0.9	1.0
Hastings, including all countries	2.1	3.4

Mandatum

Approach

At Mandatum, the focus in managing employees' mental and physical health is on preventative measures. The company invests in a motivating and healthy work environment and preventative occupational healthcare. A preventative early intervention model is used to guide employees and especially leaders to notice and identify situations in which preventative measures are needed. Mandatum identifies and measures risks related to mental and physical health in close cooperation with the occupational healthcare service provider, the pension company, and the insurance company.

Mandatum's health, safety and well-being partner has a strong role in improving the work environment, including both physical and mental well-being. Risk identification is also part of the health partner's responsibilities, and both work-related and non-work-related health risks are considered.

The working ability of Mandatum employees is regularly reviewed in the HR team and reported to the management. Twice a year, the steering group, consisting of the

Mandatum health partner and representatives from the occupational pension company, occupational healthcare, and the insurance company, also meets to review the situation together with HR. Absences due to illness are reviewed quarterly, and if necessary, HR is in contact with team leaders. When absences are related to mental health issues, HR immediately contacts the employee's leader. The preventative early intervention model is the most important tool to ensure that employees who are unwell take sick leave or other necessary leave.

Mandatum offers employees and leaders information and support on how to take care of their own physical and mental health. The company trains leaders individually and in groups on health-related topics.

Incidents or injuries that occur at Mandatum offices are reported to the company's Risk Management. Accidents that occur outside working hours are monitored through reports from the insurance company.

Goals and ambitions

Mandatum's goal is to keep its employees' well-being and working ability on a high level throughout their whole career.

Actions and results

During 2022, Mandatum developed a new system for tracking working time, which allows tracking and managing overtime better than before. HR does regular follow-ups of working hours, and in cases of exceeding overtime, HR informs the leader and the employee in question.

At the beginning of 2022, Mandatum started a project called Our Way of Work. The goal was to create a common model and way of working for Mandatum in the hybrid era using technology as an aid. The outcome of the project was launched as Mandatum Space, which is a virtual workspace for Mandatum employees, including guides and tips for utilising programmes, tools, and work methods. The purpose of Mandatum Space is to make the everyday life of employees easier by, among other things, enhancing communication, offering the opportunity to develop skills, and increasing the sense of community through common ways of working.

During autumn 2022, based on the feedback received from workplace surveys that evaluate the company premises, Mandatum started a risk assessment to identify what could cause harm in the workplace and how to prepare for emergency situations at Mandatum's premises. HR, Data Governance, and the facility manager collaboratively described danger and threat situations and drew up operating instructions. The work will continue in 2023, and all danger and threat situations will be documented. In 2023, mandatory online training in physical security will be implemented for all personnel, and it will be part of the existing risk training package.

In addition, Mandatum introduced Safety Weeks in 2022. During the Safety Week, various security-related themes are promoted to raise and improve the awareness and preparedness of Mandatum employees. The purpose is

also to enhance occupational safety and strengthen the occupational safety culture.

During the year, Mandatum started to offer a Mental Health First Aid 1 course to its employees. The course is held two times a year, and the focus is to strengthen the participants' mental health skills and provide tools for preventing mental health issues.

At Mandatum, the share of absences related to mental health was 21 per cent during 2022.

Mandatum will define indicators and targets for reducing and preventing health issues during 2023. A study related to work ability management, which will be completed in 2023, will provide indicators for identifying and managing work ability risks.

Absence due to illness by country

Mandatum

%	2022	2021	2020
Finland	2.0	1.1	1.4
Mandatum, including all countries	2.0	1.1	1.4

Sampo plc

The key indicators of health and well-being at Sampo plc are the results of the employee engagement survey and the absence due to illness rate. The occupational healthcare partner supports employees and leaders in well-being matters, and the early care principle is followed in everyday leadership work.

In 2022, a recreational team was established at Sampo plc to plan and organise cultural, social, and sports activities. The team organised over 10 social activities for the personnel during the year. In addition, Sampo plc launched a bike benefit for its personnel, to encourage healthier and greener commuting.

Absence due to illness at Sampo plc remained low in 2022.

Absence due to illness by country

Sampo plc

%	2022	2021	2020
Finland	0.8	0.5	0.5
Sampo plc, including all countries	0.7	0.5	0.5

Competence development

Materiality

The development of the competencies and professional skills of all employees is a fundamental part of Sampo Group's corporate culture. The Sampo Group companies prioritise competence and professional development of employees, both to ensure employee engagement and to have the right skills in the organisation. Providing employees with opportunities for learning and an understanding of customers' needs are prerequisite for continued competitiveness.

Group level approach

At Sampo Group, the group level guidance document regarding competence development is the Sampo Group Code of Conduct, which is reviewed annually and approved by the Board of Directors of Sampo plc. Together with supplementary company-specific policies, the Code of Conduct outlines how Sampo Group supports

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-corporate-culture/competence-development

and promotes the professional development of its employees and develops leadership practices.

Group goals and ambitions

The aim is that employees' skills and working methods are in line with the company's goals and provide a competitive advantage.

Group actions and results

During 2022, external training offered to employees picked up again after two years hindered by COVID-19. The training costs increased from the previous year in all the Group companies, except for Hastings. At If, all leaders participate in a Leadership Compass programme that was launched in October 2022. There were more than 1,000 leaders participating from all If countries. The costs for the programme have, for now, been booked in Sweden. The figures for Topdanmark include the life and pension business up until 1 December 2022.

Internal training and other initiatives provided by the Group companies form a significant part of employees' competence development. More information on internal training provided is available in the company-specific sections.

Average training costs per employee by company

EUR	2022	2021	2020*
If	942	435	372
Topdanmark	1,187	1,090	1,367
Hastings*	318	454	-
Mandatum	1,074	669	539
Sampo plc	901	577	342
Sampo Group	852	568	617

* Includes costs for both internal and external training investments. For the other Group companies, the figures include mainly costs for external training.

Average training costs per employee by country

Sampo Group

EUR	2022	2021	2020*
Sweden	1,919	618	434
Denmark	1,140	1,018	1,200
Finland	548	379	361
Norway	514	357	390
Lithuania	463	226	225
Latvia	440	304	219
Estonia	428	278	276
United Kingdom	316	454	-
Other countries	267	233	288

* Excluding Hastings

If

Approach

Governance

If's Policy on Professional Requirements for Insurance Distribution aims to ensure that employees involved in insurance distribution meet certain professional requirements relevant for their role. The related Competence and Training Business Instruction sets out the requirements for said training. HR is responsible for ensuring legal compliance, while leaders are responsible for creating the right conditions to meet the requirements. To ensure compliance, the Insurance Distribution Education Committee regularly reviews the professional competence and training process.

If's digital learning platform, Workday Learning, supplies all employees with corporate training and general learning paths, as well as targeted competence development in various fields. Initiatives at corporate level focus on developing culture, providing compliance training, and fulfilling specific competence needs. If assesses the quality of corporate training through, for instance, surveys, comments, and ratings after each training, and the information provides valuable input into the design and development of training materials.

With an increasing need to strengthen customer-centred competence development relating to, for instance, sales techniques, customer communication and legal knowledge, If has dedicated People Development units across the business areas. While these decentralised full-time resources work closely with the business, the global People Development and Culture Specialist has responsibility for driving common Learning and Development initiatives across If.

If encourages leaders and employees to use the competence development tools and supporting materials available on the intranet, to enable a structured dialogue concerning development goals and improvement areas, as well as job satisfaction on an individual level. The general employee perception is also captured through the HeartBeat survey questions 'My job enables me to learn and develop new skills', 'In my work I am always challenged to grow' and 'I see development opportunities within If'.

Educational programmes

If has a company-wide Coming Together onboarding process for all employees. The onboarding also includes summer workers and offers seminars in English to ensure non-native-speaking employees are given the opportunity to participate.

If has a mandatory One Responsible If learning programme. The programme is part of all new employees' onboarding and an annual activity for all existing

employees. It covers If's policies on ethics, social media, sustainability, information security, personal data, conflicts of interest, and AML and CTF.

Approximately one third of If's employees are subject to the training requirements of the Insurance Distribution Directive (IDD). In addition to the IDD training, the business areas run their own customised certification processes. With this, If ensures that the management and the insurance distributors fulfil the professional competence and professional training requirements defined for their respective roles.

Over the years, If has seen organic growth of community-driven competence development opportunities. Employees have engaged in specialist academies, where they create their own learning paths according to their interests and professional competence needs. One of the most recent additions to the If Academy is the Application Programming Interface Academy. Examples of more established academies include the Analytics Academy, which provides competence development within data management and analytics skills, and the Analytics Coaching group, which offers problem-solving and support in analysing data using different analytics tools. The Finance Academy is a training programme available to any employee who is interested in understanding If's key financials, value creation in insurance, and risk management.

If also fosters competence development by offering paid and unpaid study leave. The form of the leave depends on the purpose, the length of the leave, and national regulations.

Leadership development

If has a New Leader in If programme for all new leaders. The new leaders are invited to participate in the programme, which complements all other leadership training within If. The programme consists of several modules and seminars, with the aim of training new leaders in leadership practices, culture, compliance, legal requirements, and HR processes.

Goals and ambitions

If aims to provide structured training initiatives for certain groups of employees, to meet specific business challenges. In addition, the company encourages all employees to take individual ownership of improving operational excellence within their area of responsibility.

Actions and results

In 2022, If's People Development units continued to grow, and If has approximately 100 Business Learning Partners, while several Competence Development Leads are being recruited. During 2022, If initiated a project with the aim of reviewing and developing the people processes concerning performance and career development, as well as reward and recognition, to better support the company's operating model.

During 2022, 651 employees changed positions internally, thereby gaining new skills and competence.

Educational programmes

During 2022, If offered over 1,500 training programmes through Workday Learning, and approximately 54,000 hours were spent on these trainings. Workday Learning was used by 8,800 individual employees during the year. In 2022, If's employees who are subject to the training requirements of the IDD were trained in accordance with the legal requirements of the particular country. In Workday Learning, about 50 per cent of the education is related to the IDD.

In 2022, If offered monthly seminars as part of its Coming Together onboarding process. Seminars were organised both at the office and virtually to enable the onboarding of more than 1,000 new employees who joined If during the year. The mandatory One Responsible If learning programme was completed by 92 per cent of employees in 2022.

Leadership development

During 2022, If arranged six New Leader in If training sessions in Sweden, Norway, Finland, and Denmark. Additionally, an If Leadership conference was held in May 2022 for 180 leaders in top management, on the topics of leadership and technology.

If organised Leader Forums for all Nordic leaders on the topic of flexible work, to support leaders and employees with the transition back to the office. Approximately 300 leaders participated in knowledge sharing and establishing best practice in navigating challenges. Leaders were trained in how to support their teams in living up to If's Flexibility guideline while balancing individual and business needs.

In October 2022, If launched If's Leadership Compass programme. All leaders take part in the programme, and during the year, more than 1,000 leaders participated. The Leadership Compass enables all leaders to support and motivate their teams in a common way, which contributes towards engaging in a common direction and reaching If's vision. The programme was developed through in-depth interviews, focus groups, and workshops with leaders and management at If. All participants will also receive individual coaching, enabling leaders to assess and identify strengths and development areas in partnership with a professional coach outside of If.

In 2022, If launched a Nordic Team Leader programme for team leaders within the Customer Centres in the Nordic countries, to better align the expectations, skills, and leadership competence of the team leader role. During 2023, a similar team leader programme will be developed within the Claims organisation.

Topdanmark

Approach

Governance

Topdanmark offers several training programmes depending on the part of the organisation in which the employee is working. Some trainings are mandatory for all employees. In addition, the company offers voluntary training and training in collaboration with external suppliers, both of which are also aimed at all employees.

At Topdanmark, all insurance-related training and certification is administered centrally by HR in collaboration with the Danish Insurance Academy (Forsikrings Akademiet, FOAK). Each employee has an individual training plan in FOAK's learning management system, which is used by FOAK, the employee, their coach (e.g. an experienced colleague or manager), and their leader for following up and documenting training, exams, and certificates.

Job descriptions and skill requirements are standard parts of Topdanmark's recruitment process. All open positions are posted on Topdanmark's internal jobsite, and the company has an active job bank.

Educational programmes

Topdanmark has an annual cycle of mandatory training that all employees must complete, including Code of Conduct, data privacy, and IT security. The HR Development unit monitors the participation and completion of the mandatory training.

Topdanmark also offers all employees the chance to improve their digital skills through voluntary e-learning programmes. This is to support the hybrid working model in which the company applies a 60/40 work week with 40 per cent work from home.

Leadership development

Topdanmark organises specific training for leaders. Examples include Introduction to Management offered to all new leaders, and the Introduction to leadership pipeline offered to all leaders. Training for the members of the Board of Directors is organised when necessary.

Goals and ambitions

Topdanmark has three overall and ongoing goals for competence development:

- All employees (depending on their tasks) need to meet the standards and required level of individual qualifications and competencies set out by the collective agreements.
- All new leaders must participate in two two-day internal introductory trainings for new leaders.
- All employees must complete the annual cycle of mandatory training.

Actions and results

In 2022, Topdanmark implemented a new learning management system and spent time on establishing the system and ensuring employees know about the many internal and external training programmes offered. Topdanmark also offered different training in management, such as General Management for Personnel Managers and Introduction to Management, the latter being offered to newly hired leaders to understand the management principles at Topdanmark. In 2022, 38 new leaders took the introduction training.

Topdanmark's Organisational Introduction programme, which is mandatory for all new employees, was organised in 2022. During the year, 349 new employees took the training programme. The mandatory training on the Code of Conduct was run for the first time in 2022, with 95 per cent of employees taking and passing it.

Hastings

Approach

Governance

Hastings' competence development strategy is supported by internal policies and is overseen by Hastings Group's HR Director. The company has a comprehensive learning catalogue available to all employees.

Educational programmes

Hastings offers its employees a suite of mandatory and regulatory training. The curriculum consists of a series of modules deployed to all new starters and to existing employees on an annual recurring basis. Depending on role, the average learning time for the curriculum is two hours, and it comprises the following topics: customers in vulnerable circumstances, complaint handling, financial crime, protecting customers' and colleagues' data, DEI, health and safety, training and competence, IDD, and senior managers and the certification regime.

1,038 Hastings employees are required to complete and evidence 15 hours of continuous professional development as part of the IDD. The progress is tracked and reported through Hastings' in-house learning management system, YourCareer.

Hastings also provides graduate, placement, and internship programmes, some through third-party relationships, to build the pipeline of its future talent. These are increasingly being utilised across the business alongside apprenticeship programmes to bolster capability and develop future leaders.

Hastings is a member of Women in Data and has a project group that focuses on developing, designing, and delivering activities designed to support women who are currently working in or have ambitions to work in data. Activities fall under three strands: early careers, career development, and raising awareness.

Leadership development

At Hastings, leadership development is offered, encouraged, and provided in a variety of ways. As leaders join Hastings, or are promoted, the company ensures there is a Leadership Induction covering foundation skills such as performance management and an introduction to coaching.

Hastings' senior managers are required to undertake the same mandatory training modules as all employees in relation to Hastings' regulatory and legal compliance obligations. Senior executive managers and Board members receive regular briefings on specific topics to enable them to develop sufficient knowledge and understanding of matters that potentially present a

significant risk to Hastings, such as cyber and information security and data privacy. Briefings also cover matters such as diversity and inclusion, climate change, and sustainable business practices.

Operational leaders at Hastings continue to be developed and accredited through a dedicated, internal leadership programme. The programme is embedded into everyday leadership practice. This creates consistent principles, tools, and frameworks, enabling leaders to coach and manage their teams effectively.

Goals and ambitions

Hastings' aim is the continuous education and development of its leaders and employees.

Actions and results

In 2022, Hastings made significant investments in learning and development, with a focus on improving core capabilities across the business and growing the digital skills of key business areas, such as underwriting and pricing. The company empowers employees and their business areas to identify their learning needs through a mixture of localised learning matrices, which assist them in creating outcomes and development-oriented learning pathways linked to career paths, competencies, and professional goals.

Hastings has a new role-based progression scheme in Customer Operations. A similar scheme was launched for 511 employees in Claims Operations and Anti-Fraud during 2022. These frameworks support employees in developing through structured learning paths and remuneration progression, along with mapping out next steps in terms of career progression. Similar schemes have been developed in some of Hastings' technical teams, such as Data, Pricing, and Analytics, allowing the company to build greater expertise in the core skills needed for the future.

Hastings has a comprehensive learning catalogue and recognises the need to invest in simplifying access to this whilst continuing to build engagement with employees. An important focus area for 2023 will be enhancing career signposting and learning opportunities.

In 2023, Hastings will focus on several initiatives that support the company's move to a "Digital First" organisation. Among these are the inception of a learning technology and innovation channel, increased focus on the 70-20-10 learning model, building of coaching and mentoring partnerships, capability and skills-based learning and development, learner experience, and learner data analysis.

Educational programmes

At the end of 2022, Hastings' regulatory and mandatory training completion rate was 97 per cent, and the Insurance Distribution Directive adherence rate was 99 per cent.

Hastings continued with its Women in Data membership in 2022, supporting women who are currently working in or have ambitions to work in data. Outcomes for the year included the recruitment of two women interns into data teams for six weeks to help in developing their future careers and provide a talent pipeline, publication of a monthly career blog about women employees who work in data, and a monthly social networking event for all women employees working in data at Hastings.

During 2023, Hastings will deliver an Introduction to Data, a four-week bite-sized development programme supporting employees in frontline services who want to move into a career in data. The company will also deliver an in-person Women in Data Networking event to be attended by both internal colleagues and external guests.

Leadership development

During 2022, Hastings introduced the Leading for Growth development programme series for its whole leadership community. The programme is designed to build greater awareness of the Hastings business model, strategy, and growth ambitions through an aligned Leadership Team. It also seeks to build leadership capability; enabling leaders to realise the potential that employees hold and maximising Hastings' capacity to drive and deliver growth ambitions. It consists of four face-to-face modules, with two of the four being completed in 2022. 503 leaders have completed module one, and 542 leaders completed module two by the end of 2022.

In 2022, 256 leaders attended the internal leadership programme for operational leaders.

Mandatum

Approach

Competence development at Mandatum is based on the 70-20-10 model. According to the 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 programmes.

When it comes to learning at work, Mandatum would like to see learning as a part of the daily lives of employees and not as a separate function. For Mandatum to remain agile and responsive to change, the company needs multi-faceted employees who are not only capable of executing a role but who are also flexible, resourceful, lateral thinkers – skills gained from constant learning and application.

The culture at Mandatum is focused on learning by doing and learning from each other. The aim is, for example, to use internal job rotation to fill temporary open positions, such as parental leave vacancies. Learning at work is encouraged by providing opportunities to take part in development projects and working groups that cross unit boundaries.

For learning through feedback, Mandatum uses a 360-degree evaluation, which is carried out every two to

three years to support leadership development. In the evaluation, feedback is given by team members, colleagues, and the leader's leader. The most recent evaluation was conducted in 2022. The employee satisfaction survey, Signi, is also an important source of feedback and a measure of a leader's success.

Mandatory online training must be done for regulatory reasons, and the company makes sure all employees have completed the necessary training. New employees get an individual training plan during onboarding. Further training needs are monitored by the leader and the employees themselves. Mandatum sends out feedback surveys after each training programme, and programmes are also continuously developed based on feedback received. In more specific training, such as coaching, the effectiveness is continuously followed up and measured during the training.

Educational programmes

New Mandatum employees, including fixed-term and temporary employees, participate in an induction programme called Mandatum Experience during the first months of employment. The programme consists of a two-day orientation event and a set of videos, Mandatum Mandatories, in which Mandatum's different business units are presented by the business unit leaders. During the induction programme, the new employees get to know

Mandatum as a company and employer, and have a chance to interact with the management and other new employees from different parts of the company.

Mandatum has a mentoring programme to support learning through feedback. In the programme, Mandatum pairs senior members of staff as mentors with new talents, and guides them to engage in discussions that benefit both in learning and growing as professionals.

Leadership development

Mandatum Management School is a coaching programme that aims to examine the role and tools of leaders, as well as interaction in situations involving managerial work. The coaching provides a foundation for analysing and developing one's own leadership skills and for managing the team's activities. The goal of the programme is to maintain a consistent leadership culture at Mandatum. All leaders at Mandatum participate in the first part of the programme (Management School I) during their first year of working for the company. The second part (Management School II) is organised for leaders during their first years at Mandatum.

HR organises regular leadership training on activities related to the annual clock, such as target setting, performance management, recruitment, and internal policies.

Goals and ambitions

Mandatum's aim is that every employee is able to develop their personal competence at work and to keep their skills up to date.

Actions and results

In 2022, Mandatum established a learning and competence organisation, with a goal of more structured competence development and learning management and practices. The new Competence Development service is part of Mandatum's HR, and it will be further developed during 2023.

Educational programmes

Mandatum organised the mentoring programme for the eleventh time in 2022. The in-house programme began in November 2022 and is planned to end in June 2023. Altogether, 6 pairs, or 12 employees, are participating in the ongoing programme.

During 2022, Mandatum launched a programme called Mandatum Academy for sharing expertise within the company. The Academy includes short lectures by Mandatum employees on topics requested by Mandatum employees. The lectures are offered digitally, and it is possible to watch them later on the online training platform.

In addition, Mandatum launched Mandatum Space, a common workspace for Mandatum employees. By using the workspace, employees can join weekly online training sessions and find guides and tips for utilising programmes, tools, and work methods.

Leadership development

During 2022, Mandatum Management School was arranged for the twelfth time. More than 95 per cent of the company's leaders have taken part in the programme.

Sampo plc

In 2022, Sampo plc's HR launched an internal training programme to guarantee employees' up-to-date knowledge of internal policies and other general employee skills. During 2022, Sampo plc held nine internal training sessions. In total, employees were trained for 226 hours within the internal training programme. Training was offered, for example, on the Code of Conduct, risk management, internal control, security, first aid skills, feedback culture, self-leadership, IT security, and data privacy.

During 2022, Sampo plc launched a new development discussion process, and employees were encouraged to advance their knowledge of insurance business and improve their English skills by supporting employees' participation in insurance degree studies and virtual English classes. In 2023, Sampo plc aims to continue its professional development initiatives.

Remuneration

Materiality

The Sampo Group companies want to offer attractive total remuneration packages to both current and potential employees in order to recruit and retain the best talent. Motivating remuneration can affect employees' productivity and work performance and lead to employee engagement.

Group level approach

At Sampo Group, the group level guidance principles regarding remuneration and general conditions of work are the Sampo Group Remuneration Principles and the Sampo Group Code of Conduct, respectively. In addition, each Group company has adopted supplementary policies for their own purposes.

The different forms of remuneration used in the Group are fixed and variable compensation, as well as pensions and other benefits. Fixed compensation is the basis of every employee's remuneration package. Variable compensation is used to ensure the competitiveness of the total remuneration package and can be either short-term (short-term incentives, STI) or long-term (long-term incentives, LTI).

Sampo Group mainly uses external remuneration consultants for remuneration benchmarking purposes, and remuneration consultants are always independent of the organisation, its governing bodies, and senior executives. The Board of Directors of the respective Group company oversees the remuneration area and related policies and processes. In major Group companies, a remuneration committee has been appointed to support the Board.

Integration of ESG into remuneration

At Sampo Group both quantitative and qualitative criteria are used for assessing performance. Most employees (including all senior executives), who participate in variable compensation programmes have ESG criteria linked to their variable compensation, thereby supporting the sustainable development of the business. Customer satisfaction metrics are widely used for all employees, and employee satisfaction is often included in the annual goals of leaders and senior executives. ESG targets have also been integrated into the Group CEO's STI programme. The ESG targets are updated every year as part of the annual planning process. In general, to be eligible for payment from a variable compensation programme, participants must also have acted in compliance with internal and external rules for the business. Board members are independent

of the companies and do not participate in variable compensation programmes.

At Sampo Group, remuneration depends on objective criteria, such as work experience, competence, position, and responsibilities. Pay and additional benefits are not based on or affected by gender or any other non-professional aspect. The Group companies have, for example, job title and job position structures to ensure that employees in the same position are employed under the same conditions, and internal and external benchmarks are used in setting the salary ranges. To ensure fair and objective remuneration for employees, all decisions concerning individual remuneration made by a leader must also be approved by the leader's leader (grandparent principle).

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Sampo Group Remuneration Principles:

www.sampo.com/governance/remuneration/remuneration-principles

Sampo Group Remuneration Report for Governing Bodies 2022:

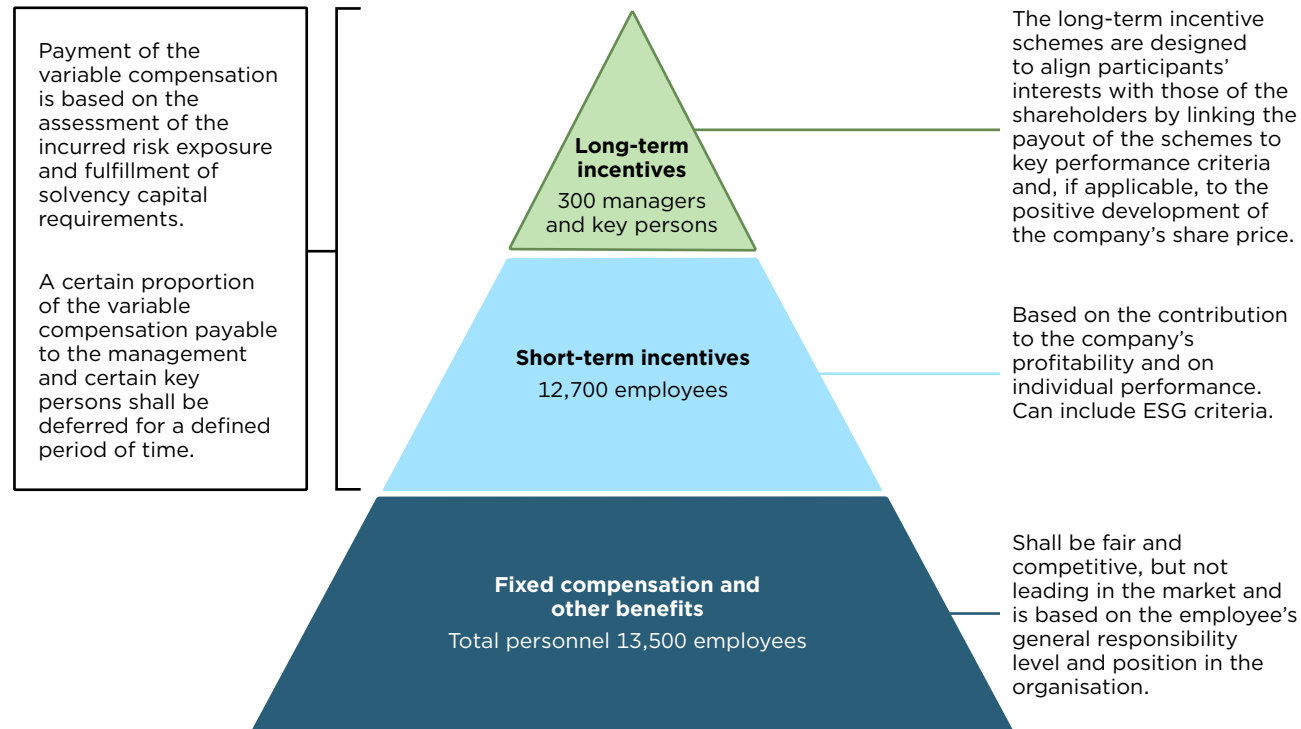
www.sampo.com/year2022

Additional information:

www.sampo.com/governance/remuneration

Remuneration structure

Sampo Group, 2022



Group goals and ambitions

All remuneration systems at Sampo Group should safeguard the long-term financial stability and value creation of the Group and comply with regulatory and ethical standards. They must also be aligned with the risk management framework. Remuneration mechanisms should encourage and stimulate employees to do their best and surpass their targets, and they should be designed to reward fairly for prudent and successful performance. At the same time, to safeguard the interests of other stakeholders, remuneration mechanisms must not generate conflicts of interest, nor entice nor encourage employees to excessive or unwanted risk-taking.

Group actions and results

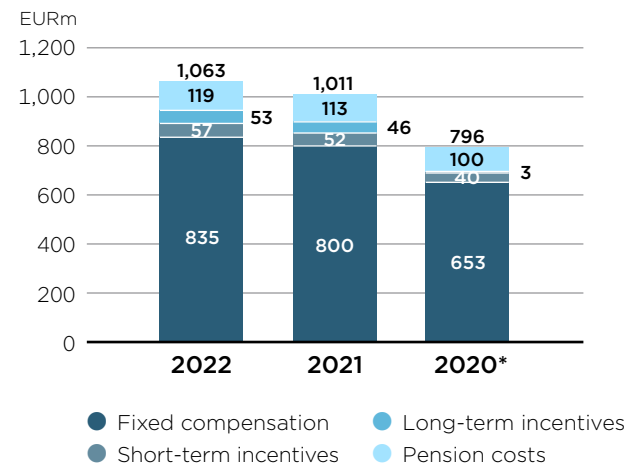
The gender pay gap describes the difference in actual paid out compensation between men and women. The difference in pay can be explained by factors such as position in the company, job tasks, responsibilities, and leave of absence. At Sampo Group, the main reasons for the pay gap are the lack of women at the highest levels of management and the fact that certain functions, such as IT, tech, and HR, are dominated by men or women.

In 2022, Sampo Group hired extensively IT and tech specialists, who are predominantly men with a higher fixed salary and higher variable compensation. This is one of the factors contributing to the small increase in the pay gap during the year. For these functions, the main goal is to make sure that the available talent pool, when recruiting, becomes more diverse. Other initiatives to close the pay gap include encouraging more women to apply for top-level positions and including more women in succession planning.

The Group CEO pay ratio is followed up on a regular basis to compare the development of CEO remuneration with the average remuneration of Sampo Group employees. In 2021, Hastings became a fully owned subsidiary of Sampo plc, resulting in a temporary decrease in the Sampo Group average employee remuneration. The variation in the CEO pay ratio is mainly a result of fluctuations in the variable compensation paid to the Group CEO. In 2020, there was no pay-out from the long-term incentive scheme in force, since Sampo plc's share price was below the starting price of the scheme. This led to a substantial decrease in the Group CEO's paid remuneration, as variable compensation forms a significant share of the Group CEO's total remuneration. The pay-out levels of short-term incentive programmes and long-term incentive schemes have a major impact on the Group CEO pay ratio figure.

In 2022, Sampo Group started to report externally the average employee remuneration by country. To enable comparison, 2021 figures are also provided. The average total remuneration of employees increased in all countries from 2021. The main reasons for the increase are salary raises and higher variable compensation pay-outs.

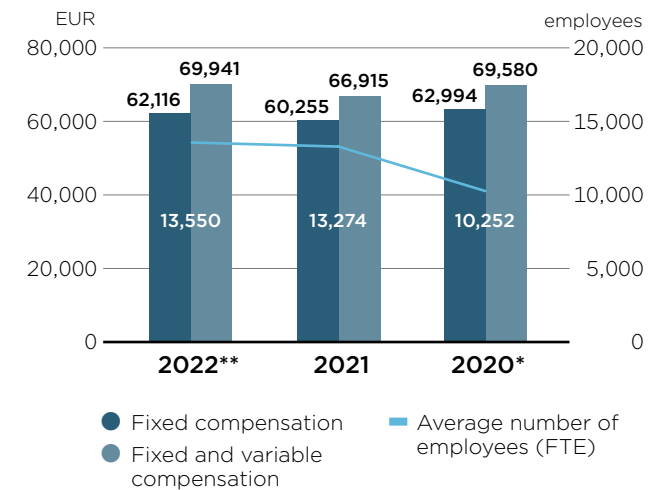
Remuneration Sampo Group



* Excluding Hastings

The average employee remuneration varies between countries, for example, due to differences in the general market salary levels and in occupational pension systems. In addition, currency rate fluctuations impact the reported numbers. The highest average remuneration of employees, in terms of both fixed and total remuneration, is in Denmark and Norway, while the lowest is in the Baltic countries and the UK. The figure for Other countries is rather volatile due to the relatively small number of employees.

Average employee remuneration Sampo Group



* Excluding Hastings

** Topdanmark's life business and Luxembourg are included in the figures for the period 1 Jan.-30 Nov. 2022.

Average remuneration by binary gender

Sampo Group

EUR	2022*				2021				2020**			
	Women	Men	Pay gap (ratio)	Pay gap (%)	Women	Men	Pay gap (ratio)	Pay gap (%)	Women	Men	Pay gap (ratio)	Pay gap (%)
Fixed remuneration	54,352	69,860	0.78	22.2	52,735	67,755	0.78	22.2	55,251	71,052	0.78	22.2
Fixed and variable remuneration	58,535	81,316	0.72	28.0	56,361	77,513	0.73	27.3	58,663	80,924	0.72	27.5

* Topdanmark's pension and life insurance business is included in the figures for the period 1 Jan. –30 Nov. 2022.

** Excluding Hastings

The 2021 and 2020 figures have been adjusted in 2022 due to reporting error at If.

Excluding the remuneration of the Group CEO.

Average employee remuneration vs. Group CEO remuneration

Sampo Group

	2022	2021	2020
Average employee remuneration, EUR*	69,941	66,915	69,580
Group CEO remuneration, EUR**	3,327,858	2,511,459	1,313,694
Pay ratio	48:1	38:1	19:1

* Hastings is included in the calculations as of 2021.

** There was no payment from LTI 2017:1 in 2020.

Average employee remuneration by country

Sampo Group

EUR	2022		2021	
	Fixed remuneration	Fixed and variable remuneration	Fixed remuneration	Fixed and variable remuneration
Denmark	95,649	104,286	91,826	100,327
Norway	71,692	78,617	68,306	74,691
Finland	60,820	70,854	59,939	68,916
Sweden	56,001	62,968	56,080	61,327
United Kingdom	40,514	48,293	39,216	44,813
Baltic countries	32,426	36,027	30,483	33,932
Other countries	50,378	58,815	43,250	48,555

If

Approach

Integration of ESG into remuneration

At If, all employees, including top management, who participate in variable compensation programmes have ESG criteria linked to their STIs. In addition, to be eligible for payment from a variable compensation programme, the employee must have acted in compliance with internal and external rules for the business.

Equal pay analysis

If has a model for annual Nordic-level equal pay analysis. The purpose of the model is to identify, handle and prevent unwarranted pay differences that may be derived from gender. The model is designed to fulfil the local regulation of each included country. It is anchored with If's union representatives and enables a standardised analysis, leveraging insights to further strengthen the ability to ensure fair and competitive remuneration at If. In the equal pay analysis, If investigates pay differences between men and women who perform equal work or work of equal value. The analysis contains an action plan to adjust for any unwarranted individual pay gaps.

Actions and results

In 2022, one common ESG metric used in If's STI programmes for employees who participate in variable compensation programmes was customer retention.

In 2022, If's joint objective for goal setting in the short-term variable compensation programme for managers and key specialists (VCPM) was to continue to strengthen the One If Strategy Framework. The objective provided a common direction when setting team/individual goals. Both quantitative and qualitative criteria were used for assessing performance, in which quantitative criteria include financial measures and qualitative criteria include non-financial measures, such as sustainability, quality, and efficiency. A significant portion of employees participating in VCPM also had eNPS metrics in their annual goals during the year.

During 2022, If continued to refine the model for Nordic equal pay analysis and related processes. HR business partners and leaders were offered training in equal pay methodology, gender bias, and the If job structure, which is the underlying framework used for identifying equal jobs and jobs of equal value in an objective and structured manner. Furthermore, If continued to monitor the requirements of the European Commission's Directive on Pay Transparency and prepared to include the Baltic countries in the If-wide equal pay analysis during 2023.

Topdanmark

Approach

Integration of ESG into remuneration

Topdanmark's remuneration policy for executive and senior management ensures the integration of sustainability into the business. This means that the result criteria for the cash- and share-based STI programme include sustainability initiatives, which derive from Topdanmark's sustainability programme. In the context of remuneration, the initiatives are assessed based on their strategic significance and the extent they have been implemented.

Actions and results

In 2022, Topdanmark's executive and senior management were awarded based on 34 financial and non-financial initiatives. Examples of the non-financial initiatives are the ESG programme for suppliers and customers, a new business model to increase the percentage of used spare parts, the human rights policy, and the results of the employee engagement survey.

In 2023, Topdanmark aims to further develop the connection between the STI programme and the company's strategic sustainability targets.

Hastings

Approach

Integration of ESG into remuneration

Hastings' STI and LTI programmes take into account performance against the company's 4Cs (colleagues, customers, company, and community) goals, which include measures on employee engagement, customer experience, progression in Hastings' ESG and diversity and inclusion agendas, and the embedding of strong governance.

Equal pay analysis

Hastings produces a Gender Pay Gap Report annually, in accordance with UK legislation. The company seeks to address any issues by ensuring equal pay for equivalent roles, and by improving the gender balance across all levels in the organisation.

Actions and results

During 2022 and into 2023, the UK experienced a rise in the cost of living. This impacted Hastings' employees, and the company supported its workforce through the following:

- Employees earning up to and including GBP 45,000 per year benefited from an immediate, minimum 5 per cent pay rise and a GBP 500 bonus included in their October pay.
- Pay reviews for employees earning over GBP 45,000 were brought forward.
- Employees were able to access free meals in Hastings' Bexhill and Leicester offices from October to December.
- The company reintroduced a GBP 200,000 Colleague Hardship Fund, supporting employees experiencing financial difficulties with confidential, financial help.

Additionally, Hastings continues to pay a real living wage, offer a range of savings across retailers through its Discounts app, and offer a tech scheme assisting employees with saving money on electrical goods through spreading the cost over 12 months, interest free.

Hastings' latest Gender Pay Gap Report is available on the company website.

Mandatum

Approach

Integration of ESG into remuneration

When setting the variable compensation criteria, Mandatum considers how the chosen criteria and achievement of the targets support the company values

and objectives, including the sustainability objectives. At Mandatum, customer satisfaction has been included in all employees' target metrics, including those of top management, for several years. Furthermore, business units can have their own ESG criteria suitable for the business.

The remuneration structure at Mandatum also includes measures to ensure that the integration of sustainability risks and adverse sustainability impacts are considered in remuneration. For example, employees working in investment management can have STI targets related to the Responsible Investment Policy and portfolio activities.

Equal pay analysis

Mandatum produces a Gender Equality Report annually, which indicates the average earnings by gender, according to the grade or function of the employee. The report is available for the personnel on the company's intranet.

Actions and results

In 2022, Mandatum continued updating the company's job grading system.

Corporate culture

Objective: Sampo Group provides a non-discriminatory corporate culture promoting employee well-being, diversity and inclusion, and professional development.

Sampo Group's corporate culture and employer image attract and retain talent.

Material topics	Main goals	Indicators monitored at the group level
Empowering working environment	<p>Sampo Group</p> <ul style="list-style-type: none"> To ensure that employee turnover is at a healthy level <p>If</p> <ul style="list-style-type: none"> To have employee turnover below 12% To have eNPS at 50 or above <p>Topdanmark</p> <ul style="list-style-type: none"> To have employee turnover at industry level (Denmark) or below To maintain at least 79 points in the employee engagement survey until 2025 <p>Hastings</p> <ul style="list-style-type: none"> To maintain at least 73% in the full-year Your Voice survey <p>Mandatum</p> <ul style="list-style-type: none"> To have a Sigqi index of 81–86 for leaders 	<p>Sampo Group</p> <ul style="list-style-type: none"> Employee turnover by company, binary gender, age group, and country <p>If</p> <ul style="list-style-type: none"> eNPS <p>Topdanmark</p> <ul style="list-style-type: none"> Results of the employee engagement survey <p>Hastings</p> <ul style="list-style-type: none"> Results of the Your Voice survey <p>Mandatum</p> <ul style="list-style-type: none"> Sigqi-index
Diversity, equity, and inclusion	<p>Sampo Group</p> <ul style="list-style-type: none"> To seek diversity and inclusion among employees and management <p>If</p> <ul style="list-style-type: none"> At least 85% of employees agreeing with the statements related to inclusion in the employee survey To increase diversity in management teams by 30% by 2026 To have binary gender representation of 50/50 (+/- 5 percentage points) for both employees and leaders <p>Topdanmark</p> <ul style="list-style-type: none"> At least two of each gender among the AGM-elected members of the Board of Directors On average, a maximum of 60% of one gender at all management levels A maximum of 60% of one gender in succession planning <p>Hastings</p> <ul style="list-style-type: none"> To be recognised in the Inclusive Top 50 UK Employers list <p>Mandatum</p> <ul style="list-style-type: none"> To have a minimum of 40% of both women and men at all levels of management <p>Sampo plc</p> <ul style="list-style-type: none"> To have at least 37.5% of both women and men in the Board of Directors 	<p>If</p> <ul style="list-style-type: none"> The share of employees agreeing with the statements related to inclusion in the employee survey The increase of diversity in management teams The ratio of women/men for employees and leaders <p>Topdanmark</p> <ul style="list-style-type: none"> The share of different genders at the Board of Directors The share of different genders at all levels of management The share of different genders in succession planning <p>Hastings</p> <ul style="list-style-type: none"> Company ranking in the Inclusive Top 50 UK Employers list <p>Mandatum</p> <ul style="list-style-type: none"> The share of women and men at all levels of management <p>Sampo plc</p> <ul style="list-style-type: none"> The share of women and men in the Board of Directors
Health and well-being	<p>Sampo Group</p> <ul style="list-style-type: none"> To achieve a low level of absence due to illness <p>If</p> <ul style="list-style-type: none"> Absence due to illness at or below 3% <p>Topdanmark</p> <ul style="list-style-type: none"> Absence due to illness below the average for the insurance industry (Denmark) 	<p>Sampo Group</p> <ul style="list-style-type: none"> Absence due to illness by company and country
Competence development	<p>Sampo Group</p> <ul style="list-style-type: none"> To have employees' skills and behaviours in line with the company's goals and provide a competitive advantage 	<p>Sampo Group</p> <ul style="list-style-type: none"> Average training costs per employee by company and country
Remuneration	<p>Sampo Group</p> <ul style="list-style-type: none"> To safeguard the long-term financial stability and value creation of Sampo Group and comply with regulatory and ethical standards 	<p>Sampo Group</p> <ul style="list-style-type: none"> Average employee remuneration Average remuneration by binary gender and country Average employee remuneration vs. Group CEO remuneration

Sustainable investment management and operations

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Investment management at If, Mandatum, and Sampo plc

Commitment to responsible investment

If, Mandatum, and Sampo plc's responsible investment practices reflect Sampo Group's commitment to the UN Principles for Responsible Investment (PRI) and the UN Global Compact. The companies also support the Paris Climate Agreement, and If has committed to the SBTi.

MAM manages Mandatum's proprietary balance sheet and cooperates with If's investment management and operations. The ESG team at MAM provides support on responsible investment-related matters and coordinates the group level reporting on investments.

If Responsible Investment Policy:

www.sampo.com/sustainability/sustainable-investment-management-and-operations/if
Mandatum Responsible Investment Policy and Engagement Principles:
www.sampo.com/sustainability/sustainable-investment-management-and-operations/mandatum

Investment allocation by company and asset class

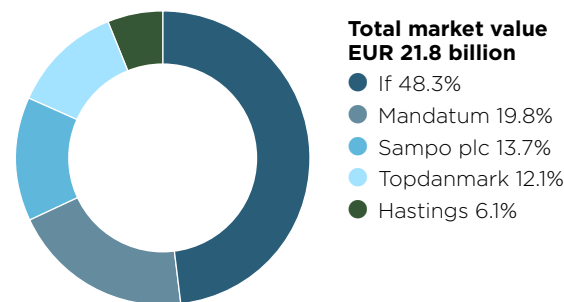
Sampo Group, 31 December 2022

	If	Topdanmark	Hastings	Mandatum*	Sampo plc
Public sector	10%	3%	5%	0%	0%
Money market	1%	20%	18%	9%	76%
Other fixed income	54%	1%	74%	53%	4%
Covered bonds	24%	65%	0%	0%	0%
Equities	11%	4%	0%	20%	13%
Private equity	0%	1%	0%	7%	7%
Real estate	0%	4%	0%	4%	0%
Other	0%	2%	2%	7%	0%
Total, EUR billion	10.5	2.6	1.3	3.6	3.1

* Excluding Mandatum's segregated assets of EUR 0.7 billion

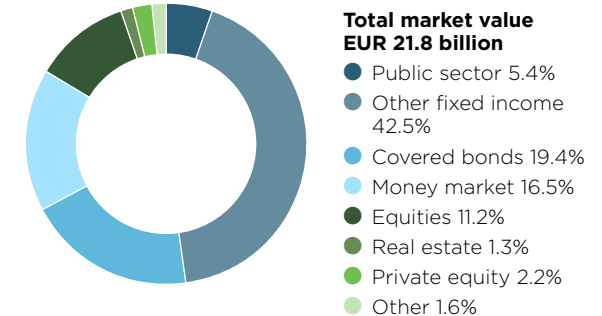
Investments by company

Sampo Group, 31 December 2022



Investments by asset class

Sampo Group, 31 December 2022



The portfolio managers at If and MAM are responsible for managing investments in accordance with If and Mandatum's responsible investment policies. The policies are updated annually and approved by the companies' boards of directors. Sampo plc does not have an ESG policy similar to those of its subsidiaries due to the nature of its investment portfolio and its more strategic investments.

ESG integration

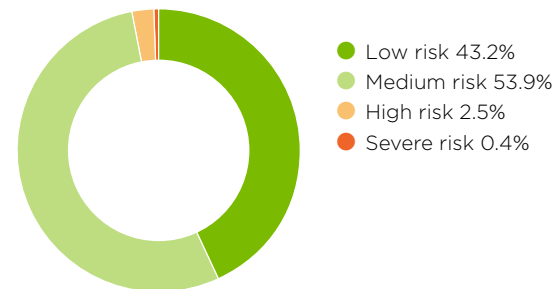
If, Mandatum, and Sampo plc integrate ESG criteria systematically into investment decision-making and analysis. Risks arising from ESG criteria are evaluated using an internal ESG traffic-light model, which is based on ESG risk ratings provided by an external data provider. The risk ratings measure companies' exposure to ESG-related risks, including climate change, and management of material ESG issues. Based on the risk ratings, issuers are classified into internally defined risk categories: low risk, medium risk, high risk, and severe risk. Possible actions depend on the risk category and a thorough analysis of the ESG risks and their consequences for the investee company.

Actions and results

On 31 December 2022, 0.4 per cent (0.2) of the investments included in the traffic-light model were invested in companies in the severe ESG risk category. This consisted of investments in three (3) companies.

Investment allocation according to the ESG risk categories

If, Mandatum, and Sampo plc
31 December 2022



Sector-based screening

Certain industry sectors are considered to carry more ESG-related risks than others. Such risks include reputational risks, environmental risks, climate risks, and regulatory risks. Investments in these sensitive sectors are monitored closely, both for direct and indirect involvement. Sector involvement information is based on data provided by an external data provider. The responsible investment policies of If and Mandatum are reviewed annually, which means that the list of sensitive sectors and the internally defined tolerance thresholds can change and develop over time. In some sectors (e.g. coal, oil), exemptions to the tolerance thresholds can be made for companies that have a credible plan for transitioning to a more sustainable business model.

Actions and results

In 2022, If and Mandatum updated the lists of sensitive sectors during the annual review of their responsible investment policies. The sensitive sectors are controversial weapons (including biological, chemical, nuclear, and cluster weapons), adult entertainment, coal, gambling, military equipment, oil, and tobacco. The coal and oil screenings enable If, Mandatum, and Sampo plc to better monitor and manage risks arising from fossil fuels during the transition to a low-carbon economy, as companies exceeding the limits established for sensitive sectors are carefully evaluated based on an internal set of criteria. This set of criteria includes, for example, the target company's energy mix and proportion of renewable energy sources, plans to grow the renewable energy business, and emissions reduction targets.

On 31 December 2022, one per cent of If, Mandatum, and Sampo plc's total investments were in sensitive sectors. This means that in total, including both direct and indirect involvement, the companies had invested in six companies operating in sensitive sectors.

Sensitive sectors

If, Mandatum, and Sampo plc, 31 December 2022

Sector	Potential reasons for sensitivity	Number of companies invested in on 31 Dec. 2022	Analysis
Controversial weapons	<ul style="list-style-type: none"> • Reputational risk • Regulatory risks • Human rights risks 	Direct involvement: 0	-
Adult entertainment	<ul style="list-style-type: none"> • Reputational risk • Labour rights risks • Human rights risks 	Direct involvement: 0 Indirect involvement: 0	-
Coal	<ul style="list-style-type: none"> • Reputational risk • Technology risks • Transition risks • Regulatory risks 	Direct involvement: 1 Indirect involvement: 0	-
Gambling	<ul style="list-style-type: none"> • Reputational risk • Governance risks 	Direct involvement: 0 Indirect involvement: 0	-
Military equipment	<ul style="list-style-type: none"> • Reputational risk • Regulatory risks 	Direct involvement: 1 Indirect involvement: 1	One company with both direct and indirect involvement.
Oil	<ul style="list-style-type: none"> • Reputational risk • Technology risks • Transition risks • Regulatory risks 	Direct involvement: 3 Indirect involvement: 2	Two companies with both direct and indirect involvement.
Tobacco	<ul style="list-style-type: none"> • Reputational risk • Regulatory risks • Human rights risks 	Direct involvement: 1 Indirect involvement: 0	-

Norms-based screening

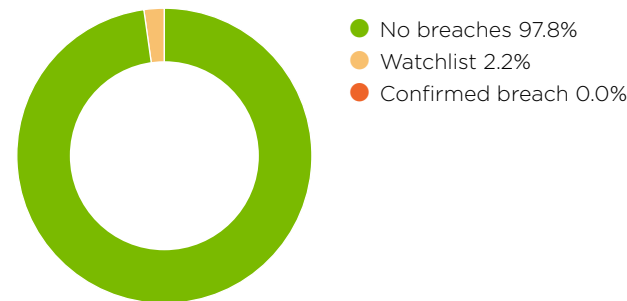
If, Mandatum, and Sampo plc screen their current and potential investments for possible violations of international norms and standards using research provided by an external data provider. The international conventions considered in this context include the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the Guiding Principles on Business and Human Rights, and the Paris Climate Agreement. If a violation is detected among the current holdings, depending on the severity, nature, and extent of the breach, portfolio management measures may consist of direct dialogue with the company's executive management or an engagement action. As a measure of last resort, the investment can be sold if the investee company does not take corrective action within a reasonable timeframe.

Actions and results

On 31 December 2022, If, Mandatum, and Sampo plc had zero (0) investments in companies with confirmed norms violations. The information is based on data provided by the external data provider.

Norms-based screening

If, Mandatum, and Sampo plc
31 December 2022



Active ownership

As active owners, If, Mandatum, and Sampo plc strive to ensure that their investee companies take sustainability aspects into account in their operations. The key issues on which the companies engage with investees include

international standards, governance and compliance-related matters, sustainable business operations, and environmental aspects and climate change.

Active ownership practices include internal staff engagement, voting at AGMs, and pooled engagement with other investors. In general, If, Mandatum, and Sampo plc only engage with companies in which they have invested. Additional criteria considered before engaging are, for example, the materiality of the ESG issue, the size of the investment, actions already taken by the investee company, and geographical location.

Actions and results

During 2022, If, Mandatum, and Sampo plc took part in one (1) pooled engagement and attended 41 (35) AGMs.

Participation in AGMs

If, Mandatum, and Sampo plc

	2022	2021	2020
Number of AGMs attended	41	35	21
Voting for the Board's proposal	41	34	21
Abstained from voting	0	1	-

Pooled engagement

If, Mandatum, and Sampo plc

	The number of potential pooled engagements reviewed internally	The number of pooled engagements participated in	Reasons for the engagement	Status of the engagement on 31 Dec. 2022
				Engagement suspended to monitor efficacy of the company-initiated mitigation and remediation measures.
Q1/2022	3	1	Human rights	
Q2/2022	1	0	-	-
Q3/2022	1	0	-	-
Q4/2022	3	0	-	-
Total	8	1	-	-

Direct real estate investments

The direct real estate investments of Mandatum are managed by MAM. If and Sampo plc do not have any direct real estate investments. In addition to Mandatum's properties, MAM is responsible for the direct real estate investments of Mandatum Life Vuokratontit I Ky, Kaleva Mutual Insurance Company, Erikoissijoitusrahasto Mandatum AM Suomi Kiinteistöt II, and Mandatum AM Hiilinielukiinteistöt I Ky, which are not part of Sampo Group.

In direct real estate investment management, MAM focuses on energy efficiency, curbing climate change,

water efficiency, recycling, and reducing the amount of waste, as well as providing sustainable, healthy, and safe properties for tenants. MAM has also set medium- and long-term sustainability targets for the investments. The targets are presented in the table Sustainability targets of direct real estate investments.

Actions and results

On 31 December 2022, the number of built properties owned by Mandatum was 18 (18). In addition, Mandatum owns empty plots and some minority shares in other properties.

In 2022, the total electricity consumption of the direct real estate investments of Mandatum decreased by 3.4 per cent (-4.4) compared to the previous year. The consumption of normalised district heating increased by 1.1 per cent (0.6), and water consumption by 4.2 per cent (4.9). In 2022, due to the energy crisis in Europe, MAM made some additional setting changes to the properties, such as optimising working hours of air ventilation machines and lowering room temperatures. These changes resulted in a decrease in electricity consumption. After the COVID-19 pandemic, employees returned to workplaces, lunch restaurants, and other services, which caused water consumption to increase in the properties. District heating increased despite the setting changes because of the increased heated area after major renovations on two properties.

In 2022, MAM continued to improve the energy efficiency of the properties under its management. Energy savings came from updating the lights to LED lights, improving building automation systems and heating networks, and changing heating and cooling systems to air-water heat pumps, for example. Since 2020, 100 per cent certified renewable electricity has been purchased for all properties. In 2022, MAM purchased renewable district heating for 13 properties, and now 81 per cent of the total energy is from renewable sources.

In 2022, Mandatum participated again in the GRESB Real Estate Assessment, maintaining its rating and meeting its target of four stars out of five. Mandatum's score for its direct real estate investments was 85 (84) points out of 100. That is the third best result in Mandatum's peer group in Europe, with Mandatum's results surpassing its peer group average in every question category. The average peer score for the entire assessment was 74 (67) points.

In 2021, a climate risk assessment was conducted for direct real estate investments managed by MAM. The assessment was updated in December 2022. Electricity supply sufficiency due to the energy crisis in Europe was added as a new risk. It was also noted that the likelihood of heatwaves and precipitation, respectively, has increased since 2021.

At the end of 2022, three of Mandatum's properties had international environmental certification, BREEAM®. This is 16 (28) per cent of all the fully owned properties of Mandatum.

Sustainability targets of direct real estate investments

Mandatum

Target	Baseline year	Target year	Progress by 31 Dec. 2022
Reduce water consumption by 10 per cent	2018	2022	Water consumption reduced by 25.4 (26.3) per cent compared to the baseline.
Achieve carbon neutrality regarding the properties' own energy consumption (electricity and heating/cooling)	2019	2025	Carbon footprint (Scope 1 and 2 GHG emissions): 1,638.8 (2,599.2) tCO ₂ e.
Reach a recycling rate of 55 per cent	2020	2025	The recycling rate was 47 (49*) per cent and data coverage 100 (99) per cent.
Reduce energy consumption by 20 per cent (calculated energy efficiency) in accordance with the Energy Efficiency Agreement**	2015	2025	Energy consumption has reduced by 13 (19) per cent. Saka Hallikiinteistöt Ky was sold on 1 July 2022, which impacted the 2022 results. In 2023, due to the changes, the target was updated to a reduction of 15 per cent.
Maintain four stars in GRESB reporting	2020	2025	Four stars in 2022.

* The 2021 figure was revised. One rented property was excluded from the calculations, as the tenant has its own waste management contract, which Mandatum cannot influence.

** The Energy Efficiency Agreement and the figures related to it include the properties of Mandatum Life Vuokratontit I Ky and Keskinäinen Vakuutusyhtiö Kaleva in 2022.

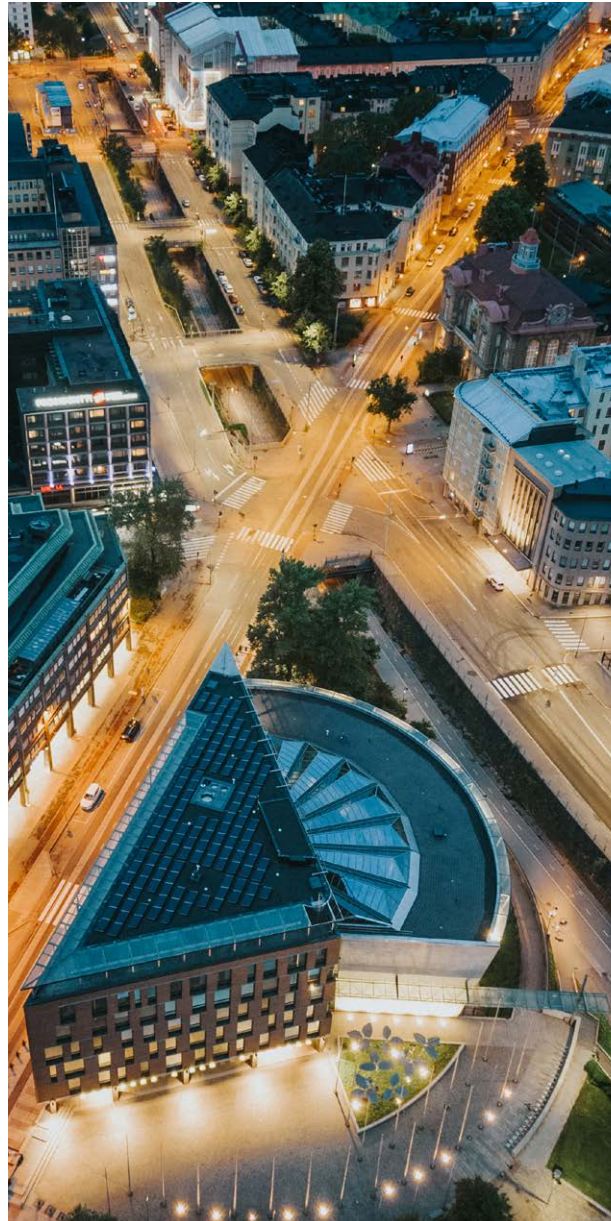
Carbon footprint of direct real estate investments

Mandatum

tCO ₂ e	2022	2021	2020	Change 2022/2021, %
Scope 1: Direct GHG emissions	0.0	0.0	0.0	0
Scope 2: Indirect GHG emissions	1,638.8	2,599.2	3,105.6	-37.0
Scope 3: Other indirect GHG emissions	139.1	261.6	248.0	-46.8
Scope 1-3 GHG emissions, total	1,777.9	2,860.8	3,353.5	-37.9

Assets managed by external investment managers

If, Mandatum, and Sampo plc have investments in funds (e.g. equity, private equity, bond, exchange-traded, and alternative), bank accounts, and derivatives. All fund investments are managed by external fund managers. External fund managers are encouraged to support initiatives such as the UN PRI and UN Global Compact and to adopt responsible investment policies. During the due diligence process when selecting new external fund managers, the portfolio managers establish relevant ESG aspects such as the extent of sustainability reporting and identified sustainability risks and opportunities, as well as the fund manager's commitment to responsible investment.



Actions and results

On 31 December 2022, 97.6 per cent (97.1) of If, Mandatum, and Sampo plc's investments in equity funds and exchange-traded funds (ETFs) were managed by asset managers who had signed the UN PRI. In addition, 75.8 per cent (61.2) of the equity funds and ETFs were managed by asset managers who had signed the UN Global Compact. For private equity investments, 36.9 per cent (34.5) of the fund management companies had signed the PRI and should therefore have integrated ESG criteria in their investments processes. This information is obtained directly from the private equity fund managers.

Investment management at Topdanmark

Topdanmark Liv Holding A/S was divested in 2022, which caused a change in Topdanmark's investment management and investment portfolio as of mid-November 2022. Going forward, investment management will focus more on a top-down approach by, among other things, investing in ETFs and using an external asset manager to manage some of the investments. However, the overall policy and approach to responsible investment remained unchanged. During 2023, Topdanmark continues to structure its responsible investment practices as a pure non-life insurance company.

Commitment to responsible investing

Topdanmark has policies for responsible investment and active ownership, and the company's Board of Directors bears the ultimate responsibility for both. Topdanmark's investment team (front office) is responsible for the implementation of the policies in the investment strategies, and the middle office is responsible for

ensuring that the investments continue to meet the policy requirements.

Topdanmark's responsible investment framework applies to all asset classes. However, the proportional benefit of analysing different asset classes is assessed to ensure that attention is directed at the areas where the perceived ESG risk is the greatest.

In 2022, Topdanmark joined the SBTi and its Net-Zero Standard. This means that the company will define a plan for investments to become carbon neutral by 2050. In 2023, Topdanmark will define short-term and long-term targets that will be submitted to the SBTi for external validation no later than June 2024.

Topdanmark's policies within sustainability:
www.topdanmark.com/en/sustainability/sustainability-in-topdanmark/policies

ESG integration

Topdanmark conducts quarterly ESG risk analysis of the company's holdings, based on ESG data purchased from an external service provider. Besides the quarterly analysis, investments are regularly evaluated according to their ESG risk, both at company level and at an aggregate level through the service provider. While Topdanmark does not have a stated goal for the ESG risk rating, it is evaluated and monitored to avoid unnecessary risk and to understand company exposure.

Actions and results

On 31 December 2022, Topdanmark's total ESG risk rating for the investment portfolio was 20.5 against a benchmark (MSCI ACWI) rating of 21.5. The result indicates that the investments of Topdanmark had a lower ESG risk than the benchmark.

Sector-based screening

Certain sectors are controversial by nature and entail excessive costs for society. According to Topdanmark's approach, this applies to the sectors listed in the table Controversial sectors. Topdanmark does not exclude companies that have only limited exposure to controversial sectors. Instead, to monitor exposure, Topdanmark has set thresholds for the share of investee companies' revenue arising from controversial business activities.

Controversial sectors

Topdanmark

Sector	Threshold (percentage of revenue)
Production of fuel based on tar sands	Maximum 5 per cent
Production of thermal coal	Maximum 5 per cent
Production of smoking tobacco	Maximum 1 per cent
Production of controversial weapons	Maximum 1 per cent

Actions and results

Topdanmark screens its investment portfolio quarterly. As at 31 December 2022, Topdanmark's investments did not violate any of the set thresholds.

Norms-based screening

Topdanmark wants to exclude investee companies with breaches against the principles of the UN Global Compact.

Actions and results

In 2022, Topdanmark selected ETFs managed by the external asset manager, and as part of the process, the principles of the UN Global Compact were considered. Going forward, the monitoring of breaches of the UN Global Compact will be conducted by Topdanmark's external asset manager.

Active ownership

Topdanmark wants to support the long-term value creation of the companies in which it invests. Topdanmark exercises active ownership through its external asset manager, who votes at investee companies' AGMs and engages with investees in the event of a verified or potential breach of the UN Global Compact principles. If the dialogue does not lead to a change in conduct, it can lead to divestment.

Actions and results

In 2022, the external asset manager exercised active ownership on behalf of Topdanmark, for example by voting at AGMs.

Carbon footprint analysis

In 2022, Topdanmark conducted a carbon footprint analysis of its investment portfolio. The results of the analysis are available in Topdanmark's Sustainability Report 2022.

Investment management at Hastings

Commitment to responsible investment

At Hastings, investment management is undertaken by Advantage Insurance Company Limited (Advantage), the insurance subsidiary of Hastings. Quarterly reporting to the insurance subsidiary's Investment Committee includes ESG ratings and any exposure to excluded or sensitive sectors. The committee also facilitates reviews of guidelines and may report to Hastings' Board of Directors when changes to the ESG framework have been recommended or any breaches arise.

Hastings views responsible investment as a process of continuous development. In 2022, Advantage became a signatory of the UN PRI, and will complete the initial PRI assessment in 2023, which will provide a baseline for possible future targets. The commitment to the PRI further supports integration of ESG considerations into investment processes in future years.

Hastings is committed to reducing the environmental impact of the investment portfolio and has pledged to reduce carbon intensity in the core investment portfolio by 50 per cent by 2030 and to be net-zero by 2050. The company's Investment Committee oversees and reviews progress against these targets on a regular basis. During 2022, the carbon intensity of Hastings' portfolio exceeded the targeted 6 per cent annual reduction in line with the company's 2030 50 per cent reduction target.

In addition, Hastings committed to the SBTi in 2022. The current climate targets for investments will be reviewed according to SBTi-approved methodology in 2023.

Hastings Responsible Investment Policy:
www.sampo.com/sustainability/sustainable-investment-management-and-operations/hastings

ESG integration

Hastings works with its investment managers to integrate ESG criteria into its investment process without negatively impacting returns, diversification, or the overall quality of the portfolio. Hastings is committed to maintaining an average ESG rating of "A" on its fixed income portfolio, based on MSCI ratings (scale CCC–AAA).

Actions and results

During 2022, Hastings' fixed income portfolio's average MSCI ESG rating was maintained above target at "AA".

Sector-based screening and norms-based screening

At Hastings, sector-based screening focuses on three sectors: tobacco, controversial weapons, and coal. These sectors have been excluded from the investment portfolio. In addition, Hastings undertakes regular reviews to identify exposure to other sensitive industries.

Norms-based screening is also undertaken, and there is quarterly reporting to the Investment Committee on companies that do not meet the principles of the UN Global Compact. The Investment Committee then makes decisions on further actions, together with investment managers.

Actions and results

In 2022, no new investments were made in the excluded sectors. The current portfolio exposure to these sectors is due to investments made prior to implementing the company's ESG strategy. On 31 December 2022, Hastings' portfolio retained exposure to two companies that produce tobacco, one company that derives less than three per cent of its revenue from tobacco, and two companies that derive some revenue from thermal coal extraction. Hastings will not make further investments in these industries when the positions mature.

Active ownership and external investment manager selection

Hastings does not have any direct equity investments and, as such, does not partake in voting activities. UN PRI status and ESG practices are included as part of external investment manager selection. All of Hastings' current external investment managers are signatories to the UN PRI and have responsible investment policies and active engagement policies.

Actions and results

In 2023, Hastings will review the practices regarding the requirements and monitoring of the active ownership and engagement policies of the external investment managers.

Carbon footprint of investments

Sampo plc measured the carbon footprint of the Group's direct equity and fixed income investments again in 2022. The analysis included If, Topdanmark, Hastings, Mandatum, and Sampo plc's investments at the end of 2022.

The carbon footprint calculations included 94.8 per cent of Sampo Group's total direct equity investments and 76.7 per cent of direct fixed income investments as at 31 December 2022. The equity and fixed income portfolios included in the carbon footprint report had market values of EUR 1,181 million and EUR 10,803 million, respectively. That means that the carbon footprint analysis covered approximately 55 per cent of all Sampo Group's investments at the end of 2022.

Global ETFs were used as benchmarks: the iShares MSCI World ETF for the equity portfolio, and the Xtrackers iBoxx EUR Corporate Bond Yield Plus UCITS ETF for the fixed income portfolio. The benchmarks aim to provide a general baseline for analysis and should only be considered as suggestive. The used ETFs do not directly reflect Sampo Group's equity or fixed income portfolios.

Equity investments

The carbon footprint (Scopes 1 and 2) of Sampo Group's direct equity investments was 92,059 tCO₂e at the end of 2022 ([page 128](#)). This corresponds to a weighted average carbon intensity of 98.20 tCO₂e for each million euros of revenue. The carbon footprint was 48.8 per cent above the benchmark index, and the weighted average carbon intensity was 37.1 per cent below the benchmark.

Fixed income investments

The carbon footprint (Scopes 1 and 2) of Sampo Group's direct fixed income investments was 378,840 tCO₂e at the end of 2022 ([page 129](#)). This corresponds to a weighted average carbon intensity of 51.11 tCO₂e for each million euros of revenue. The carbon footprint was 58.0 per cent below the benchmark index, and the weighted average carbon intensity was 64.5 per cent below the benchmark.

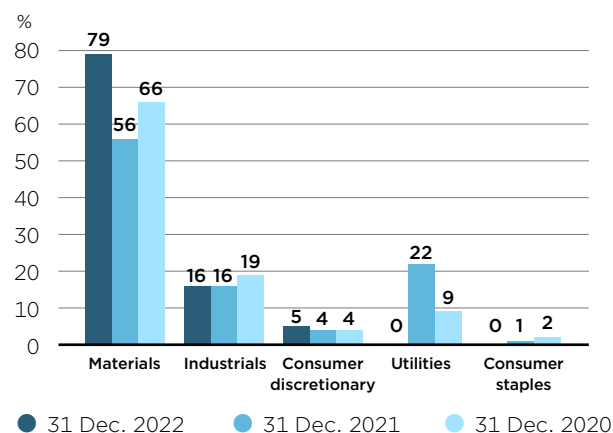
Carbon footprint of direct equity investments

Sampo Group

	31 Dec. 2022			31 Dec. 2021			31 Dec. 2020		
	Equity investments	Benchmark	Net performance (equity investments vs. benchmark), %	Equity investments	Benchmark	Net performance (equity investments vs. benchmark), %	Equity investments	Benchmark	Net performance (equity investments vs. benchmark), %
Financed Scope 1 and 2 emissions (tCO ₂ e)	92,059	61,850	48.8	150,791	112,015	34.6	172,505	144,010	19.8
Financed emissions incl. Scope 3 (tCO ₂ e)	2,061,710	617,040	234.1	2,339,007	962,172	143.1	497,076	611,660	-18.7
Relative carbon footprint (tCO ₂ e/invested)	77.92	52.35	48.8	61.82	45.92	34.6	76.27	63.67	19.8
Carbon intensity (tCO ₂ e/EURm revenue)	92.72	157.31	-41.1	117.97	173.54	-32.0	133.12	182.72	-27.1
Weighted average carbon intensity (tCO ₂ e/EURm revenue)	98.20	156.15	-37.1	105.74	159.17	-33.6	134.68	169.54	-20.6

Direct equity investments, sector contribution to emissions

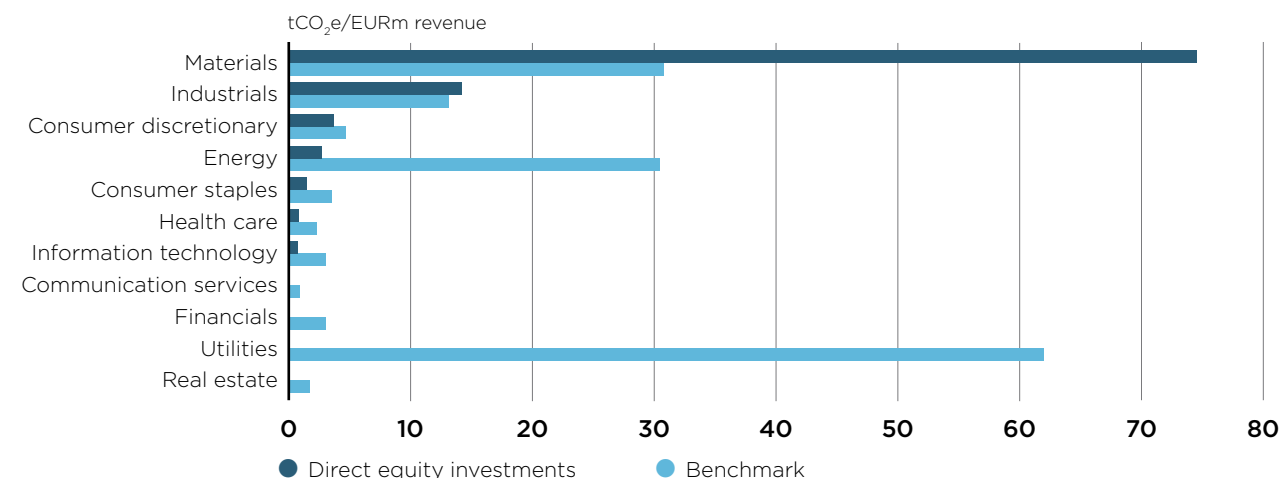
Sampo Group



Emission contribution for all other portfolio sectors is less than one per cent for each sector.

Direct equity investments, weighted average carbon intensity per sector

Sampo Group, 31 December 2022



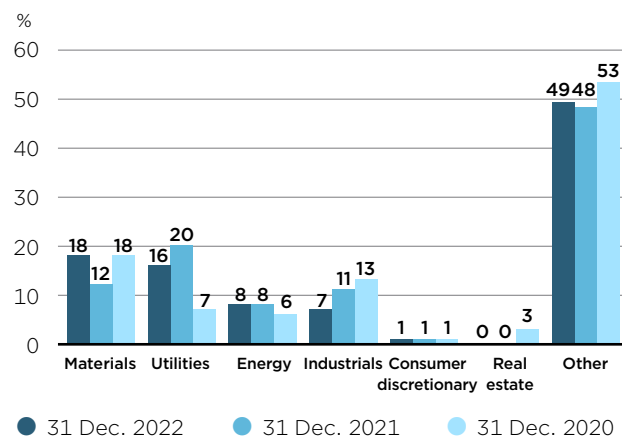
Carbon footprint of direct fixed income investments

Sampo Group

	31. Dec. 2022			31 Dec. 2021			30 Dec. 2020		
	Fixed income investments	Benchmark	Net performance (fixed income investments vs. benchmark), %	Fixed Income Investments	Benchmark	Net performance (fixed income investments vs. benchmark), %	Fixed income investments	Benchmark	Net performance (fixed income investments vs. benchmark), %
Financed Scope 1 and 2 emissions (tCO ₂ e)	378,840	901,059	-58.0	450,478	1,286,662	-65.0	652,206	2,058,618	-68.3
Financed emissions incl. Scope 3 (tCO ₂ e)	4,963,145	6,262,119	-20.7	3,950,191	8,366,788	-52.8	2,042,254	9,381,340	-78.2
Relative carbon footprint (tCO ₂ e/invested)	35.07	83.40	-58.0	35.89	102.52	-65.0	44.47	140.38	-68.3
Carbon intensity (tCO ₂ e/EURm revenue)	140.38	180.04	-22.0	167.48	240.51	-30.4	193.23	221.22	-12.7
Weighted average carbon intensity (tCO ₂ e/EURm revenue)	51.11	143.90	-64.5	55.06	196.85	-72.0	57.84	179.35	-67.7

Direct fixed income investments, sector contribution to emissions

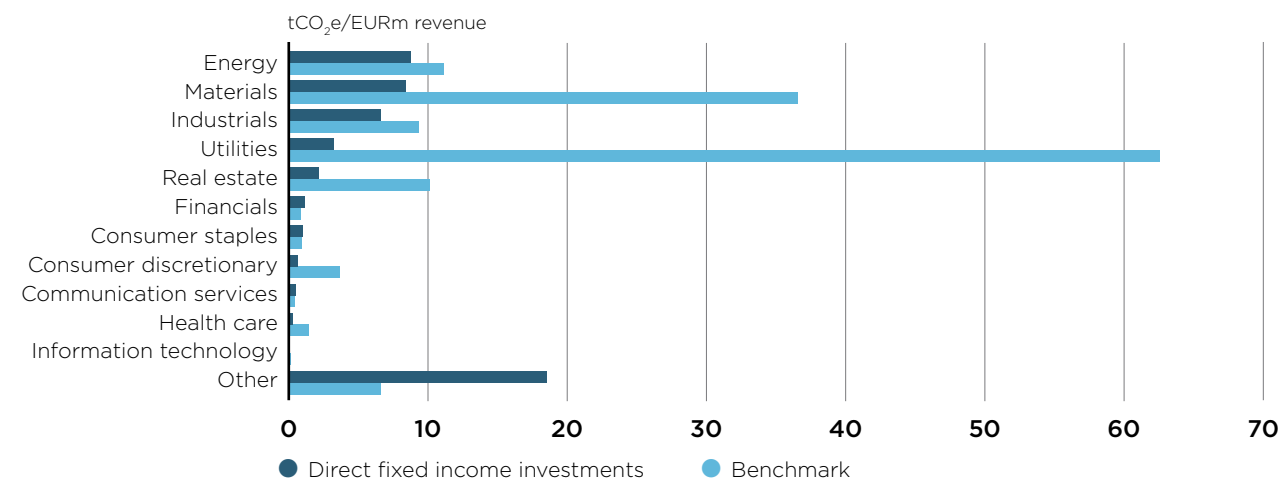
Sampo Group



Emission contribution for all other portfolio sectors is less than one per cent for each sector.

Direct fixed income investments, weighted average carbon intensity per sector

Sampo Group, 31 December 2022



Climate impact assessment of investments

Sampo plc conducted a climate impact assessment of Sampo Group's direct equity and fixed income investments in 2022. The assessment included If, Topdanmark, Hastings, Mandatum, and Sampo plc's investments as at 31 December 2022, and it was conducted by an external service provider. The calculations included 94.8 per cent of Sampo Group's total direct equity investments and 76.7 per cent of direct fixed income investments as at 31 December 2022. The equity and fixed income portfolios included in the assessment had market values of EUR 1,181 million and EUR 10,803 million, respectively. That means that the climate impact assessment covered approximately 55 per cent of Sampo Group's investments at the end of 2022.

Climate scenario analysis

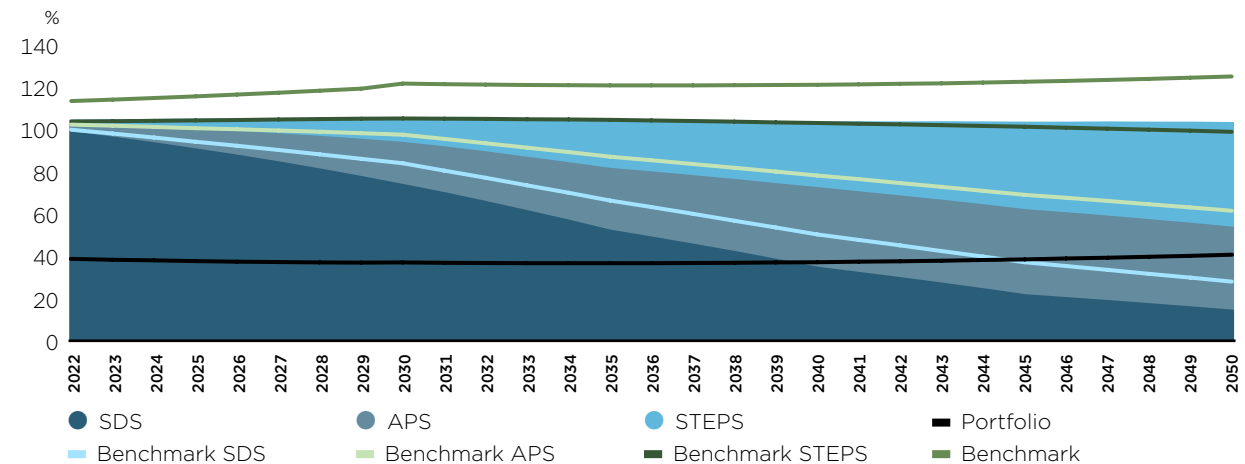
Part of the climate impact assessment was an analysis of whether Sampo Group's direct equity and fixed income investments are aligned with the International Energy Agency's (IEA) scenarios. The scenario alignment analysis compares current and future portfolio GHG emissions with the carbon budgets for the IEA Sustainable Development Scenario (SDS), Announced Pledges

Portfolio and benchmark comparison to Sustainable Development Scenario (SDS) budget Sampo Group

	2022	2030	2040	2050
Sampo Group portfolio	-61.12%	-50.62%	+5.37%	+176.93%
Benchmark (iShares MSCI World ETF)	+13.02%	+44.62%	+140.81%	+347.66%

Red equals overshoot.

Portfolio emission pathway vs. climate scenarios Sampo Group, 31 December 2022



Scenario (APS), and Stated Policies Scenario (STEPS). Performance is shown as the percentage of the assigned budget used by the portfolio and the benchmark.

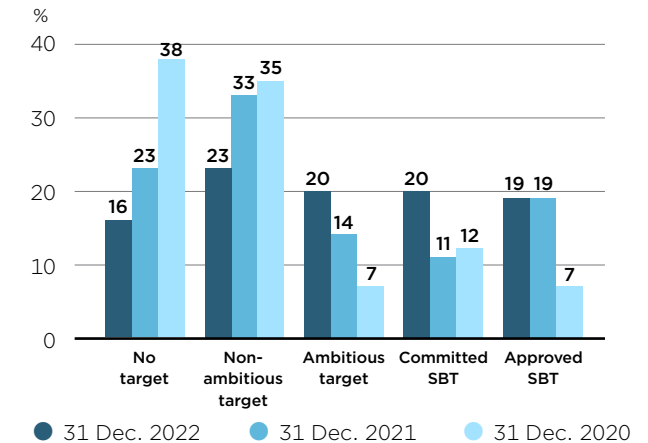
According to the service provider's analysis, Sampo Group's direct equity and fixed income investments in their current state are misaligned with the SDS scenario, meaning the 1.5°C scenario, by 2050. The portfolio exceeds its SDS budget in 2040, and it is associated with a potential temperature increase of 1.9°C by 2050, whereas the benchmark (iShares MSCI World ETF) has a potential temperature increase of 2.8°C. In a similar analysis conducted in 2021, the portfolio exceeded the SDS budget in 2042, and it was associated with a potential temperature increase of 1.7°C by 2050. Regardless, the Sampo Group companies' investments are still aligned with the below 2.0°C trajectory.

Climate targets analysis

In order to transition to a low-carbon world, investee companies need to commit to alignment with international climate goals and demonstrate future progress. According to a climate targets analysis conducted as a part of the climate impact assessment, 59 per cent (44) of Sampo Group's direct equity and fixed income investment value as at 31 December 2022 was committed to such a goal. This includes ambitious targets set by the investee companies, as well as committed and approved science-based targets. There is a clear improvement of the results compared to a similar analysis completed in 2021. The Sampo Group companies continue to follow the climate actions taken by their investee companies to manage climate risk.

Climate target assessment (% of portfolio weight)

Sampo Group



Investment management and operations

Objective: Sampo Group integrates ESG criteria (including climate change) into its investment management and operations across asset classes.

Material topics	Main goals	Indicators monitored at the group level
Responsible investment strategies across asset classes	<p>Sampo Group</p> <ul style="list-style-type: none"> To ensure suitable responsible investment strategies and approaches for the Group companies' purposes <p>Hastings</p> <ul style="list-style-type: none"> To maintain an average ESG rating of A on its fixed income portfolio, based on MSCI ratings (scale CCC-AAA) <p>Mandatum (direct real estate investments)</p> <ul style="list-style-type: none"> Reduce water consumption by 10% (2018-2022) Achieve carbon neutrality regarding the properties' own energy consumption (2019-2025) Reach a recycling rate of 55% (2020-2025) Reduce energy consumption by 20% (2015-2025) Maintain four stars in GRESB reporting (2020-2025) 	<p>If, Mandatum, and Sampo plc</p> <ul style="list-style-type: none"> Investments according to the ESG risk categories Investments in sensitive sectors Investments in companies with norms violations The number of pooled engagements The number of AGMs participated in External asset managers that have signed the PRI and are members of the UN Global Compact <p>Topdanmark</p> <ul style="list-style-type: none"> ESG risk rating (average weighted ESG risk rating based on the service provider's analysis) Investments in controversial sectors <p>Hastings</p> <ul style="list-style-type: none"> Average MSCI ESG rating Investments in sensitive sectors Investments in companies with norms violations External asset managers that have signed the PRI <p>Mandatum (direct real estate investments)</p> <ul style="list-style-type: none"> Decrease in water and energy consumption GHG emissions of properties' own energy consumption Recycling rate The number of GRESB stars
Carbon footprint and climate impact of investments	<p>Sampo Group</p> <ul style="list-style-type: none"> To support limiting temperature rises to well below 2°C (the Paris Climate Agreement) <p>If</p> <ul style="list-style-type: none"> To set science-based climate targets for investments approved by the SBTi by October 2023 <p>Topdanmark</p> <ul style="list-style-type: none"> To set science-based climate targets for investments approved by the SBTi by June 2024 <p>Hastings</p> <ul style="list-style-type: none"> To set science-based climate targets for investments approved by the SBTi by September 2024 To reduce the carbon intensity of the investment portfolio by 50% by 2030 and to have a net-zero portfolio by 2050 	<p>Sampo Group</p> <ul style="list-style-type: none"> Carbon footprint of direct equity and fixed income investments Climate impact assessment of direct equity and fixed income investments <p>Hastings</p> <ul style="list-style-type: none"> Carbon intensity of the investment portfolio

Products and services

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Sustainable product and service offering

Materiality

To be able to offer products and services that customers need and want, ESG considerations, including climate change, need to be taken into account. These matters can also create opportunities for the Sampo Group companies in the form of new products and services.

Group level approach

The Sampo Group Code of Conduct sets the group level guidelines for a sustainable product and service offering at Sampo Group. The Code of Conduct states that the Group companies should aim to take ESG considerations into account in product and service development and insurance underwriting. In addition to the Code of Conduct, each Group company has adopted supplementary and more detailed policies, guidelines, and processes for their own purposes.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-insurance-operations/sustainable-underwriting

Group goals and ambitions

The Sampo Group companies aim both to offer products and services that customers need and want, and to take ESG considerations into account in the product and service offering and insurance underwriting.

If

Approach

Sustainability is an integral part of If's core business, and it is integrated into the company's strategy. If's strategy framework, One If, consists of four strategic foundations: Customer, Risk, People & Culture, and Sustainability. Furthermore, the strategic foundation Sustainability is built on three commitments: Commitment to customers, Commitment to employees, and Commitment to society.

The commitment to customers means, for example, that If provides loss prevention services that reduce risk and economic cost, increase safety, and decrease the environmental impact; If makes sure claims are handled in a sustainable way; and If expects its corporate clients to respect international norms and standards.

Loss prevention services regarding properties

If has approximately 1,200 major corporate clients (companies with more than 500 employees) with business operations all over the world. These clients are offered advanced risk management services, in which a comprehensive approach is taken to understand their specific insurance and risk management requirements. If has approximately 45 of its own property risk engineers and access to an external risk engineering network. Within a normal year, If's property risk engineers spend more than 1,300 days providing risk management services on site to the company's corporate customers.

In addition, If has approximately 360,000 SME clients, of which 25 per cent own buildings that are insured with If. If's priority is to make sure that as many customers as possible have fire alarms and sprinklers installed. To help its customers to avoid claims, If not only focuses on the fire-prone segments but also provides loss prevention services that can prevent several different types of damage.

Together with its partner Anticimex, If offers house assessments to private customers who own their own house and have insurance policies with top coverage. The house assessment provides the customer with a report that helps them both plan the maintenance of the property and minimise the risk of unpleasant surprises. Customers can get a house assessment done every fourth year.

Sustainable underwriting

If has integrated sustainability directly into its underwriting standards and into the customer due diligence process for corporate clients. If's Underwriting Policy includes expectations for corporate clients to respect international norms and standards on human rights, labour rights, the environment, and anti-corruption, as defined by the UN Global Compact.

If uses research and grading from an external service provider to assess whether corporate clients respect the UN Global Compact. If the grading does not meet If's internally set threshold, a referral is made to If's internal ESG assessment team. The team will make an assessment and decision based on the service provider's research and other relevant data. The ESG assessment team can grant permission to insure the client but put the company under observation; grant conditional approval for insurance but require the company to take action; or decide not to offer insurance for the client or renew an already existing insurance contract.

Product and service development

If's Underwriting Policy states that sustainable products shall be developed in accordance with relevant legal requirements and internal sustainability requirements.

Actions and results

Loss prevention services regarding properties

In 2022, If completed around 30,000 house assessments in the Nordic countries, which is an increase of around 15 per cent compared to the year before. If expects this development to continue as a result of the increased focus on this offering in customer communication. If's target is to conduct 35,000 house assessments in 2023.

In 2022, If started to offer the If Building Check for SME clients that own residential buildings in Norway. Following a physical inspection, If helps clients in identifying where maintenance and fire safety measures are most needed. Both customers receiving the If Building Check and larger SME customers receive hands-on advice on risks, including climate-related risks, and suggestions for mitigating actions. The If Building Check is offered once every five years.

During 2021 and 2022, all If's employees working directly with SME clients were provided with expert-led training for risk advisers (e.g. training on digital risk inspection tool and mobile platform).

Going forward, If strives to improve the digital risk management work for those customers the company

does not meet or have dialogue with. If does this by using digital channels and leveraging logged-in solutions to reach customers with tips about how to avoid claims, as well as informing them of the positive environmental effects of changing their behaviour.

Sustainable underwriting

Since the implementation of sustainability standards in underwriting in June 2021 and up until December 2022, If has assessed a total of 677 corporate clients. In total, 19 cases were sent for referral and assessed by the ESG assessment team. All clients that were assessed by the ESG assessment team were contacted and informed that If has been notified of the alleged breaches and will therefore monitor the actions taken in response to the breaches. During the year, five clients improved their ESG rating and are therefore no longer referral cases.

Among the referral cases, If has had cases in which additional actions have been taken. One potential client, which was accused of several compliance breaches, was given a conditional approval. This means that If required additional information and action from the client in order to offer them insurance. Another case concerned two clients with global ultimate parent companies involved in the same joint venture, which have yet to adequately rectify past environmental damage. Based on the

confirmed inaction from the companies, If decided that the clients will be declined insurance at the next renewal, unless their ESG ratings improve.

Product and service development

If works to integrate sustainability and the EU Taxonomy Regulation into its business strategy and product design processes. In 2022, If initiated a project to assess whether, and to what extent, If's Taxonomy-eligible underwriting and investment activities meet the technical criteria for i) substantial contribution, ii) do no significant harm, and iii) meet the minimum social safeguards, and to prepare for Taxonomy alignment reporting.

Topdanmark

Approach

Sustainability is part of Topdanmark's core business, and the company's programme for a more sustainable Topdanmark is integrated into the business strategy. The programme consists of three themes: Green transformation, Health and well-being in everyday life, and Responsible foundation. The programme includes all aspects of the value chain, including product and service development, loss prevention, claims handling, intake of new customers as well as existing customers, and investments.

Sustainable underwriting

Topdanmark has around 61,500 commercial customers (mainly SMEs) and 58,000 agricultural customers in Denmark. The company has tied sustainability directly to the relations with customers through its ESG programme. The programme is based on the principles of the UN Global Compact, which Topdanmark has integrated into the due diligence process for commercial customers. This means that existing customers are screened for compliance with the principles by an external service provider, based on publicly available information. In the case of a verified violation of the principles, Topdanmark

enters into dialogue with the customer for the purpose of improvements. If the customer does not take any corrective actions, Topdanmark will consider additional steps, including termination of the customer relationship.

Topdanmark's chief commercial officer of the Commercial and Agriculture division is responsible for the ESG programme, and the head of underwriting is responsible for the dialogue with the customer, as well as for deciding on a possible termination of a customer relationship. Based on information provided by the service provider, Topdanmark's sustainability team assesses whether a case can be classified as a violation of the UN Global Compact principles.

Topdanmark also excludes the same industries in its insurance underwriting as in its investment activities, namely, the production of coal, tar sands, controversial weapons, and tobacco.

Product and service development

Climate change and the related extreme weather conditions are challenges that push Topdanmark to continuously develop new products and services. Topdanmark's goal for 2025 is to have five new products, areas of insurance coverage, or services that support customers in GHG reduction and other sustainable choices. This applies both to private and commercial customers.

Topdanmark's Sustainability team carries out an assessment of whether the product meets the minimum requirements, while the competence group for the implementation of the EU Taxonomy carries out an assessment of whether the product meets the requirements of the Taxonomy. The final approval of whether a product, coverage, or service can be regarded as sustainable lies with the Product and Services department.

Actions and results

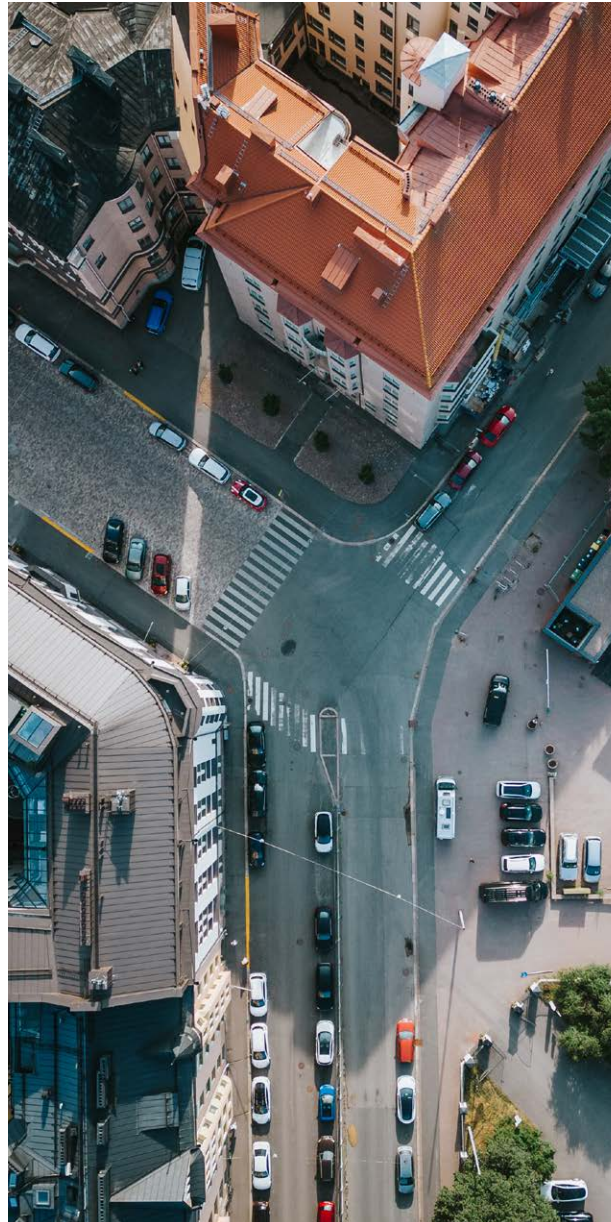
Sustainable underwriting

In 2022, Topdanmark established internal procedures for ESG screenings of commercial and agricultural customers, and the first screening was conducted in December 2022. Based on the screening, approximately 200 companies with minor ESG incidents in the last two years were identified. None of the incidents were an actual violation of the UN Global Compact principles. In the beginning of 2023, Topdanmark will analyse the incidents in detail to consider whether there is a need to place some of the companies on an internal watchlist.

Product and service development

In 2022, Topdanmark defined minimum requirements for a product, coverage, or service to be considered sustainable. The requirements are based on the Danish consumer ombudsman's guidelines on marketing a product as a green product:

- The product, coverage, or service should have a significant positive impact on the climate and/or the environment.
- The positive impact on the climate or the environment must be documented, and the documentation must be verified by independent agencies with recognised professional knowledge.
- The positive impact on the climate and/or the environment should not be significantly reduced by other aspects of the product/service.
- The product or service cannot be typical of or similar to products on the market when launched.



One of Topdanmark's areas of insurance coverage, launched in 2021, complies with the criteria. The coverage provides reimbursement if the customer chooses a repair solution that is more climate and environmentally friendly than an ordinary damage repair. One example is using an energy pane instead of an ordinary pane following glass damage, which reduces energy consumption for heating and thus reduces GHG emissions. Another example is using recycled or recyclable building materials. Topdanmark aims to create an incentive for choosing the climate and environmentally friendly solution.

The customer must document the climate and environmental benefit and, if necessary, it should be verified by a third-party. Topdanmark covers up to 20 per cent of the expenses of a more climate and environmentally friendly solution, and the company also covers the fee related to third-party assessment.

Going forward, Topdanmark will strive towards products, coverage, and services in compliance with the EU Taxonomy.

Hastings

Approach

Sustainable underwriting

Hastings has Underwriting Principles with an operating structure that ensures decisions are grounded in data, and the company is able to react quickly to changes in the market. Hastings has an active focus on changing customer demands and attitudes, and the company explores propositions that support changes in vehicle fuel types, as well as changes in usage. Hastings also uses key data sources that identify the flood risk of each property, providing the ability to consider the implications of temperature rise in underwriting rules in the longer term.

Sustainable claims handling

Hastings' Claims department focuses on providing customers with the support they need and removing barriers that might prevent a customer from making a claim quickly. Hastings has dedicated case handlers available to support customers and proactive communication provided to customers throughout the journey. When making a claim, Hastings wants customers to have a positive experience in which they are treated fairly and the process is as straightforward as possible.

Actions and results

Sustainable claims handling

Throughout 2022, Hastings' Claims department focused on ensuring that customers receive the service and support they need at all points during their claim, whether that is reporting claims digitally or phoning the company's call centre. During 2023, Hastings will implement new digital capabilities, which will provide customers with additional communication channels and facilities to get updates on their claim.

2022 saw Hastings deliver a new total loss process, which provides customers with a clearer, quicker, and more straightforward journey. The review of company's other customer journeys and processes is underway, with further enhancements and improvements planned for 2023.

During the year, Hastings created a workstream to review customer communications across all claims journeys. This will assess the information provided to customers at each stage of their claim and focus on improvements. The aim is to ensure that customers always have the right level of information to make the right choice.

Mandatum

Approach

Mandatum combines special expertise in money and life. Its business is based on asset management and wealth management, risk preparation services (e.g. personal insurance), corporate customers (e.g. reward and compensation services), and investment and savings services.

Asset management and wealth management

All Mandatum's investments are managed in accordance with the Responsible Investment Policy, which is updated annually and approved by the Board of Directors of both Mandatum Life and MAM. MAM and Mandatum Life's management groups oversee the practical implementation of responsible investment and are responsible for compliance with the Responsible Investment Policy.

Mandatum has a Senior ESG Manager who has overall responsibility for coordinating responsible investment across Mandatum. The ESG Committee, headed by the Senior ESG Manager, has overall responsibility for developing Mandatum's ESG approach. The ESG Committee is an expert body responsible for coordinating

responsible investment, developing tools, and cascading operating methods throughout the organisation. The ESG Committee prepares the responsible investment approach, supports the portfolio managers in issues related to responsible investment, and reports on the implementation of responsible investment to MAM and Mandatum Life's management groups.

In addition, Mandatum has a dedicated ESG team whose primary responsibility is to support investment functions in matters related to responsible investment. The team also monitors adherence to the Responsible Investment Policy and assists in portfolio management when required. The monitoring is supported by risk management and reporting teams at MAM.

Mandatum Responsible Investment Policy:

www.sampo.com/sustainability/sustainable-investment-management-and-operations/mandatum

UN PRI reporting of Mandatum and Sampo Group:

www.unpri.org/signatories/reporting-and-assessment/public-signatory-reports

Carbon footprint of Mandatum's unit-linked investments:

www.mandatumlife.fi/en/Releases/carbon-footprint-of-mandatums-investments-shrunk-again-in-2021

Rewards and compensation services

Mandatum helps its corporate customers align their total compensation with strategy and make it fair and effective. Mandatum designs, implements, and provides consulting services for base pay systems, variable pay, retention, and reward systems that include sustainability metrics. Sustainable remuneration means that the reward and pay schemes are well designed, in line with the organisation's strategy and values, non-discriminative, and openly communicated to all employees. When remuneration is sustainable, employees feel their pay is fair, which increases work motivation, satisfaction, and productivity.

Mandatum offers companies different kinds of pay surveys, which help organisations to plan and audit their pay and reward schemes. These surveys include a pay survey as part of the organisation's equality plan, which is mandatory for all employers in Finland, if the number of employees is above 30.

Mandatum's reward solutions include personnel funds for the entire personnel of a customer company, as well as pension and personal insurance. Personnel funds established by Mandatum enable customer companies' personnel to invest their bonuses in a long-term strategy and enhance the economic security of the personnel. Professional wealth management ensures that funds are invested reliably and responsibly, while increasing the general wealth of the Finnish employed population.

Actions and results

Asset management and wealth management

The first MAM-managed fund that has a sustainable investment objective according to the Sustainable Finance Disclosure Regulation (SFDR) article 9 was launched in 2022. The Mandatum Global Investment Fund SCSp SICAV-RAIF - UI-Mandatum AM Senior Secured Loan Fund invests across the European leveraged buyout space with a focus on European and Nordic syndicated as well as club-style leveraged loans, and targets a positive net impact on society.

In the 2022 update of the Responsible Investment Policy, Mandatum renewed its climate policy and set a target of phasing out coal from its direct equity, bond, and loan investments by 2030 and oil by 2040.

Mandatum is committed to measuring and disclosing the carbon footprint of its investments annually. The target is to reduce the carbon intensity of investments over time to manage climate risks in the best interest of customers. The 2022 carbon footprint of Mandatum's unit-linked investments was not available at the time this report was written. The 2021 results are available on Mandatum's website.



Rewards and compensation services

During 2022, Mandatum helped several corporate clients in determining appropriate ESG performance measures for their short- and long-term incentive schemes for key employees, as well as the entire personnel. In variable pay plans, typical ESG performance measures relate to environmental issues, such as saving energy or reducing emissions, customer satisfaction, diversity, and employee well-being.

In 2022, Mandatum managed roughly 230 personnel funds used for rewarding customer companies' entire personnel, and these covered a total of 76,978 employees or members. In 2022, a record number of 52 new personnel funds were established, and the total number of members grew by 14,873. Personnel funds require responsible bonus systems and KPIs, which are annually reviewed by the Finnish Ministry of Economic Affairs and Employment.

In 2022, Mandatum highlighted responsible rewarding at several internal and external events. Examples include webinars organised by HENRY, FIBS, Director's Institute Finland, and MPS Enterprises. In 2022, Mandatum also collected data related to sustainable remuneration, for example from the perspective of the performance bonus targets of the management and personnel of Finnish companies in the Compensation 2022 study (Palkitsemistutkimus 2022), and on the sustainability indicators used in the remuneration of the management of listed companies.

Sustainable supply chain management

Materiality

Supply chains are a crucial part of the sustainability of products and services, and the Sampo Group companies emphasise sustainability factors when working with suppliers. Sustainability issues can carry significant reputational and operational risks if not managed correctly. The Sampo Group companies are major procurers of goods and services, especially in claims handling, and therefore have an impact on the economy, the environment, and people.

Group level approach

The Sampo Group Code of Conduct provides the group level guidance principles regarding sustainable supply chain management. According to the Code of Conduct, the Group companies expect their suppliers and other business partners to comply with the principles of the Code of Conduct throughout their own operations and supply chains. Moreover, the Sampo Group companies should aim to take ESG considerations, including climate change, into account in supply chain management. In addition to the Code of Conduct, each Sampo Group company has its own supplementary policies, guidelines, and processes.

The types of activities related to the Sampo Group companies' products and services that are carried out by suppliers include property, vehicle and content repairs, health and hospital services, and travel services. The Group companies also make purchases, such as external consultancy, office supplies, and IT equipment, to secure the companies' own operations.

The nature of the business relationships with suppliers varies with respect to the type of product or service purchased and can be long-term or short-term, contractual or non-contractual, project-based or event-based. The Sampo Group companies can, for example, offer networks of repair shops that have a long-term contractual relationship with the Group companies. On the other hand, certain suppliers, such as external consultants, are typically hired on a project basis and can be either long-term and short-term.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-insurance-operations/sustainable-supply-chain

The Sampo Group companies' suppliers can have sector-specific characteristics, but they vary with respect to the type of product and service purchased. For example, re-building tends to be highly labour intensive. Content claims are capital intensive when items are replaced but labour intensive if items are repaired.

Group goals and ambitions

The Sampo Group companies aim to drive high standards across supply chains.

If

Approach

If is committed to encouraging and supporting the company's suppliers and partners in their efforts to use more sustainable methods in their operations. By actively requesting innovative solutions, resource efficiency, transparency, and responsibility from suppliers, If aims to minimise its negative impact and stimulate sustainable production and consumption. Strict requirements, in combination with close cooperation with suppliers and partners, enable If to develop its business while also contributing to more sustainable development. If and its suppliers and business partners always strive to minimise the consumption of energy, water, and raw materials in operations, and to reuse and recycle as much as possible. Reducing material use often goes hand in hand with savings in both money and time.

Supplier Code of Conduct

If has a Supplier Code of Conduct that defines the minimum requirements that If asks suppliers to comply with. The code covers the areas of human rights, labour rights, the environment including climate change, and anti-corruption, and it is based on the ten principles of

the UN Global Compact and its underlying conventions and declarations. If's claims handling contractors, such as vehicle or property repair contractors, are required to comply with If's Supplier Code of Conduct. They must, for example, ensure the fair and equal treatment of all employees, take appropriate measures to protect privacy rights and secrecy, promote the development and use of environmentally friendly technologies, and compete in a fair and honest way.

All employees who purchase products or services within the areas of office procurements, claims handling, and claims settlement must incorporate the Supplier Code of Conduct as part of the contract. This applies both to new agreements and to agreements that are to be renewed. The code applies to suppliers with whom If conducts business, including subsidiaries and sub-suppliers. It also applies to all the suppliers' employees, whether permanent or temporary.

Sector-specific requirements

If's property and vehicle repair contractors are not only required to comply with If's Supplier Code of Conduct, but they must also comply with If's sector-specific Additional Environmental Requirements (AER), which are incorporated into the purchasing agreements. The additional requirements cover transportation, energy

usage, material usage, water usage, handling of chemicals and hazardous substances, and waste handling. If's priority is to ensure that waste and materials from repair processes are managed in the best possible way, and If encourages its contractors to minimise their consumption of resources and materials, and to reuse and recycle as much as possible.

Supplier risk assessments and audits

If has close cooperation with its suppliers, and the company performs regular monitoring, using reporting and physical meetings. If assesses all new and large existing suppliers and performs random checks to ensure compliance with If's policies (e.g. Supplier Code of Conduct). If non-compliance is detected, a supplier audit is one possible action that can be taken. The first step to remediate non-compliance is to verify what has happened and investigate the reasons leading to it. Depending on the findings, corrective actions taken can be, for example, improvement of processes, correction of mistakes (e.g. errors in invoicing), or refunds. If the error or contract breach is major, it may result in termination of the contract.

Goals and ambitions

If's suppliers must comply with If's Supplier Code of Conduct. In addition, If's property and vehicle repair contractors must comply with If's sector-specific additional environmental requirements. If has also set expected levels of plastic repairs, as well as used parts, for individual contractors.

Actions and results

During 2022, If procured products and services as part of claims handling worth more than SEK 16 billion. Together with its partners and suppliers, If handled 685,000 cases of vehicle damage, 496,000 cases of property damage, and 617,000 cases of personal injury claims.

Supplier Code of Conduct

In 2022, If developed a self-assessment questionnaire (SAQ) for suppliers. The SAQ is part of If's approach to assessing a supplier's compliance with If's Supplier Code of Conduct. In spring 2022, the SAQ was provided to 919 property and vehicle repair contractors. In total, 461 contractors completed the whole survey, which corresponds to a response rate of 50 per cent. An additional 115 contractors completed parts of the survey.

A majority of contractors provided satisfactory answers in the survey. As a next step, If will contact contractors who

provided unsatisfactory answers and ask them to provide complementary information. If the information provided remains unsatisfactory, If will follow up by conducting site visits. In the event of any identified deviations from If's Supplier Code of Conduct, the supplier will be asked to provide a corrective action plan for If to approve. If reserves the right to terminate contracts with the supplier in the event of material breaches of the responsibilities outlined in the Code.

At the end of 2022, approximately 97 per cent of If's suppliers within claims had signed the Supplier Code of Conduct.

Suppliers that have signed the Supplier Code of Conduct

If

	2022	2021	2020
Share of suppliers	97%	87%	40%

Sector-specific requirements

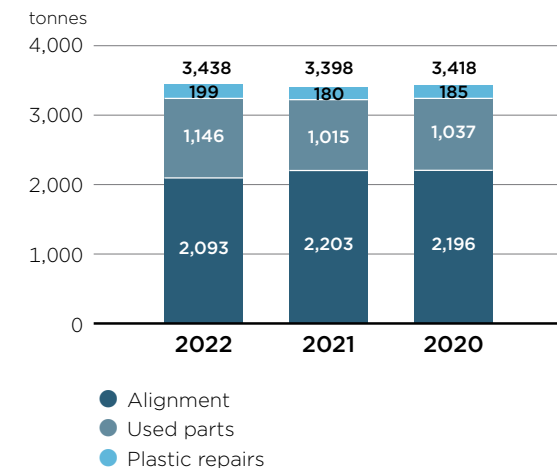
If is continuously seeking new ways to reduce material use, increase reuse and recycling, and minimise waste. In 2022, If recycled more than 10,000 tonnes of waste from damaged properties in the Nordic countries, and If's vehicle repair contractors reused 3,438 tonnes of metal and plastic. If has set expected levels of plastic repairs and used parts, and these are monitored and reported regularly.

During 2022, If conducted almost 53,000 photo inspections in Sweden, instead of inspections at vehicle repair shops. As a result, an estimated 2.1 million km of driving was avoided.

If has two mobile tools, In4mo and MEPS, to make it possible for property repair contractors to digitally report and calculate property damage claims on site. During 2023, If's aim is to end up with one common Nordic-level tool, and to link this even more to sustainability measuring and reporting.

Reuse of materials in vehicle repairs

If



Supplier risk assessments and audits

During 2022, If further developed its processes related to supplier risk assessments and audits. To avoid and address possible adverse impacts on human rights, labour rights, environment, and anti-corruption associated with If's operations, supply chains, and business partners, the company developed a due diligence process in accordance with the OECD Guidelines for Multinational Enterprises. The due diligence process will be incorporated into If's purchasing processes. It consists of four main steps: procurement, requirements, follow-up, and development of suppliers. If started the work in Norway on 1 July 2022, due to the Norwegian Transparency Act, and the development of more detailed instructions for the due diligence process continues in 2023. If held two internal training sessions during autumn 2022, and further education is planned for 2023. During July–December 2022, a total of 182 purchasing agreements were subjected to the due diligence process. Implementation of the due diligence process will be monitored through quarterly internal reporting.

Topdanmark

Approach

Over 95 per cent of Topdanmark's suppliers are located in Denmark, with the rest, mainly IT software suppliers, based across the globe. Topdanmark maps Tier 1 suppliers (direct suppliers) according to service/product category and expenditure. In certain contracts with additional legal precautions or regulations (e.g. outsourcing), Tier 2 suppliers handling personal data or similar have also been mapped.

Topdanmark assesses suppliers against the UN Global Compact principles. Non-compliance with the principles of the UN Global Compact is not only incompatible with Topdanmark's sustainability policy, but it could also damage the company's reputation and consequently revenues.

Topdanmark receives feedback from suppliers during tender processes and in contract negotiations (e.g. regarding the Supplier Code of Conduct). Topdanmark's Supplier Code of Conduct also applies to third parties.

Supply chain programme

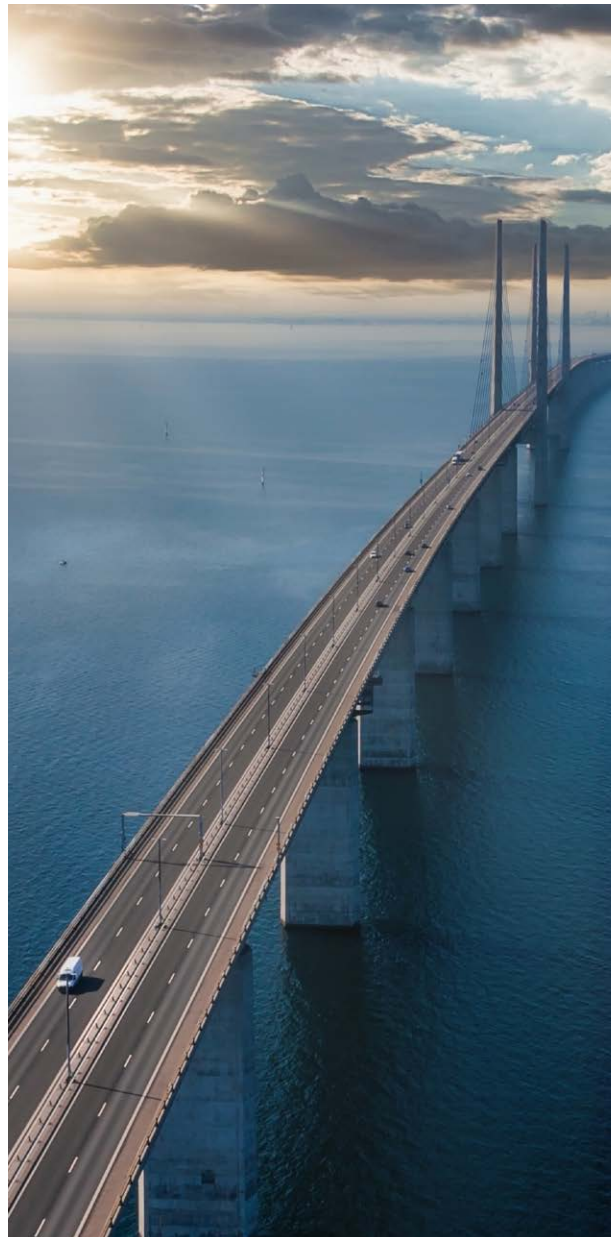
Topdanmark has a supply chain programme, which consists of the following:

- Supplier Code of Conduct, which sets minimum requirements for suppliers who supply goods and services to Topdanmark via a contractual relationship, and which must be integrated into new contracts and renegotiated into existing ones.
- Additional contractual requirements (e.g. reduction of GHG emissions, circular economy) for selected suppliers, where it is considered relevant based on an overall analysis.
- An ESG focus group of suppliers drawn from several supplier categories.
- Auditing of selected suppliers with specific contractual ESG requirements.
- Steering procurement of office supplies (e.g. pens, paper, materials for fairs) to more sustainable options.

Supplier risk assessments and audits

Topdanmark has an ESG focus group of suppliers consisting of several supplier categories that have been selected based on criteria such as sector-specific ESG risks, geography, supply chain, market dynamics, expenditure, and size. For the suppliers in the focus group, Topdanmark performs an ESG screening consisting of a questionnaire. The questionnaire includes screening of environmental and human rights performance and labour practices. All suppliers are scored based on the responses to the questionnaire, and the score is communicated to the supplier. If necessary, Topdanmark can have a dialogue with the supplier. The ESG screening is integrated into the supplier selection process.

Topdanmark has not identified any Tier 1 suppliers involving a particularly high risk of forced labour, modern slavery, or human trafficking. Risks could potentially exist on Tier 2 or Tier 3 levels (e.g. production of spare parts and electronics). Topdanmark does not have any direct relations with Tier 2 and 3 suppliers.



Goals and ambitions

Topdanmark has set goals for its supply chain management and for recycling and repair in claims handling, as presented in the tables Sustainable supply chain and Recycling and repair in claims handling (page 147).

In June 2022, Topdanmark joined the SBTi and its Net-Zero Standard. Inspired by the commitment, Topdanmark is planning to set voluntary climate targets also for its supply chain.

Actions and results

In 2022, Topdanmark continued to focus on integrating sustainability into the sourcing processes and the supply chain. The company carried out ESG screenings in seven tender processes with suppliers in the ESG focus group. This is equal to 100 per cent of all tender processes within the scope.

Topdanmark integrated the company's Supplier Code of Conduct or the supplier's own Code of Conduct into 66 per cent of new contracts in 2022. The contracts for which the company has so far not succeeded in integrating the Code of Conduct are typically global IT and software partners, as well as independent consultants.

In 2022, Topdanmark started a process of changing stock goods to products with recognised ecolabels (e.g. EU Ecolabel, Rainforest Alliance, Cradle to Cradle, TCO Certified, and OCS 100). This means that new purchases will be ecolabelled to the extent possible. However, all existing products will be in circulation until replacement is needed. At the end of 2022, 53 per cent of stock goods within the scope were ecolabelled.

Topdanmark did not identify any breaches related to its Supplier Code of Conduct during the reporting year.

Sustainable supply chain, goals and results

Topdanmark

Goal 2025	Unit	Baseline	2022	2021
All suppliers in the ESG focus group with which Topdanmark signs a contract have been screened for ESG risks, compliance, and sustainability in the tender process	%	2021	100	-
A Code of Conduct is integrated into all new supplier contracts (either Topdanmark's Supplier Code of Conduct or the supplier's own Code of Conduct)*	%	2021	66	<5
70 per cent of all stock goods are labelled with a recognised ecolabel**	%	2021	53	-

* The figure covers contracts made by Topdanmark's procurement department.

** The calculation is based on spend.

Recycling and repair in claims handling (cars), goals and results

Topdanmark

Goal 2025	Unit	Baseline	2022	2021
Increase the percentage of bumper repairs	%	2021	31.9	28.0
Increase the percentage of windscreen repairs to 45 per cent	%	2021	39.9	40.9
Increase the percentage of used spare parts to 4 per cent	%	2021	2.53	2.05

Recycling and repair in claims handling (electronics), goals and results

Topdanmark

Goal 2025	Unit	Baseline	2022	2021
Maintain the percentage of repairs of phones, computers, and tablets at 72 per cent*	%	2021	66	72

* The percentage of damaged units sent to Topdanmark's main collaboration partner.

Hastings

Approach

Hastings works with its suppliers to highlight the importance of sustainability within the supply chain. By communicating the company's values and principles to suppliers, Hastings' intention is to align the supplier's own sustainability strategies with those of Hastings to ensure that the company is able to provide the best service, products, and pricing to its customers.

Supplier risk assessments and audits

Hastings conducts due diligence assessments on all suppliers in accordance with the company's Procurement and Supplier Relationship Management Policy. Due diligence carried out on individual suppliers is proportionate to the size and potential impact on Hastings' business operations. Sustainability is a key part of Hastings' due diligence process. Critical suppliers are subject to ongoing reviews throughout the year, on a monthly and quarterly basis.

Goals and ambitions

Hastings' aim is to implement a sustainable supply chain strategy and to create a Supplier Code of Conduct in 2023, supporting the company's longer-term net-zero goals.

Actions and results

In 2022, Hastings added ESG to the formal quarterly business review for all critical and strategic suppliers. This ensures that Hastings can communicate its ESG agenda in a consistent manner, whilst also being able to use this time to discuss in the supply chain where companies feel improvements can be made to their own ESG policies.

During 2022, Hastings introduced an ESG due diligence questionnaire for all new and existing suppliers. The questionnaire is now included with all new requests for proposals (RFPs) going out to market, allowing the company to set expectations with suppliers by bringing sustainability into the conversation from the start. Hastings also implemented this across its existing supply chain, with ESG due diligence for the relevant suppliers being undertaken during the suppliers' annual reviews,

which will form part of the mandatory annual review processes year on year.

ESG due diligence will be completed on 100 per cent of suppliers in H1/2023, providing Hastings with a baseline view of suppliers ESG scores, with plans to work with suppliers whose scores fall below the acceptable benchmark. Hastings takes a supportive approach to working with suppliers on a continuous improvement approach to their own ESG journeys, offering support and guidance where appropriate. As a result of this focus, the company has seen positive changes being made in its supply chain, such as a service provider replacing their company car fleet with 100 per cent electric vehicles and signing up to the Real Living Wage Foundation.

Hastings intends to implement a procurement platform partner to aid the management of its supply chain and improve on operational efficiencies throughout 2023. A key requirement of this is its ability to manage ESG-related due diligence in an automated fashion and to promote the use of stakeholder dashboards providing real-time views of their supply chain's commitment to sustainability.

Mandatum

Approach

Most of Mandatum's suppliers provide services as Tier 1 suppliers, some of which rely on globally operating Tier 2 suppliers. Approximately 50 per cent of all procurements consist of acquiring ICT consultation services and licences. Other procurements include marketing, HR, legal consultation, and premises-related services. Approximately 30 per cent of the contracts are fixed-term contracts. Long-term relationships have been established with partners providing critical ICT services and financial services providers.

Mandatum has outsourcing and procurement policies with which employees in charge of outsourcing and procurement must comply. Mandatum follows the regulatory requirements concerning supply chain management and updates the company policies accordingly.

Supplier risk assessments and audits

Mandatum carries out an initial risk assessment and due diligence for all suppliers. In addition, prior to agreeing on cooperation, partners who are involved in business-critical activities undergo a thorough review process. As part of the review, different factors are considered, such as financial and solvency resilience, operational resilience and business continuity, legal risks (including sanction screening), compliance issues, data security, reputational risks, and conflicts of interests. All suppliers are requested to state their adherence to the principles of the Sampo Group Code of Conduct.

In addition, Mandatum conducts supplier audits based on the initial risk assessment. The company uses both off-site and on-site audits. For the off-site audits, Mandatum uses questionnaires. The off-site audits may also include a review of documentation and interviews. The on-site audits include interviews, walkthroughs, and review of documentation.

The audit frequency depends on the initial risk assessment and/or the results of the latest audit. If the results indicate deficiencies, the scope and depth of the audit can be expanded. Mandatum does not start collaboration if the supplier is deemed non-compliant. If a supplier is found to be non-compliant during collaboration, the supplier is given a chance to take corrective actions. If the faults are not corrected, Mandatum will replace the supplier.

Actions and results

In 2022, Mandatum assigned the management of the procurement process to Management Accounting. During 2023, the aim is to establish a clear path to cover all aspects of responsible procurement. In addition, web-based procurement training will become mandatory for all employees involved in procurement in 2023.

Sustainable sales and marketing practices

Materiality

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 the Sampo Group companies' integrity is the foundation of the companies' positive reputation.

Paying attention to the risks associated with sales and marketing is important to the Sampo Group companies. Such risks include inappropriate customer advice and product sales; lack of clarity in terms, prices, and fees; errors in claims handling; and errors in the complaint process. To minimise the risks and increase value for the customer, the Group companies continuously work to develop and improve customer service, and sales and marketing practices.

Group level approach

The Sampo Group Code of Conduct sets the group level requirements for responsible sales and marketing practices. In addition, each Group company has adopted supplementary and more detailed policies, guidelines, and processes for their own purposes.

To ensure compliance with laws, regulations, and internal policies, the Sampo Group companies have continuous training programmes 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 provide feedback on the products and services, and to complain if they are dissatisfied.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Additional information:

www.sampo.com/sustainability/sustainable-business-management-and-practices/sustainable-sales-and-marketing-practices

The Sampo Group companies aim to clearly inform customers of their complaint options, as well as to ensure a fair and transparent complaint process. In the case of a complaint, the Group companies' priority is to discuss with the customer to find a solution that is satisfactory to both parties. If a consensus cannot be achieved, the customer is entitled to appeal to external complaints boards (ECBs) or similar, according to local practices in each operating country. In addition, as required by law, certain Sampo Group companies have internal customer representative functions that the customer can contact to submit a complaint. Regardless of the outcome of appeal cases, the Sampo Group companies always analyse how they can improve their sales and marketing practices.

Group goals and ambitions

The Sampo Group companies' goal is to act in the best interests of the customers using sustainable sales and marketing practices.

If

Approach

If's sales and marketing practices focus on meeting the demands and needs of customers and providing customers with the information necessary to make well-informed decisions. If's Distribution Policy includes instructions on responsible sales and marketing practices. According to the policy, If and its distributors shall always act honestly, fairly, and professionally, with due care, and in accordance with the best interests of customers.

Actions and results

In 2022, If continued to proactively contact customers to ensure that they are correctly insured.

The total number of complaints to external complaint boards decreased in 2021, compared to the previous year. In Finland, there was a small increase in the number of complaints. If's share of the total number of cases at external complaint boards remained stable. There was also a decrease in the number of complaints made to the internal Customer Ombudsman in 2021.

Number of complaints to internal customer ombudsman

If

	2022	2021	2020
Sweden	1,444	1,301	1,412
Norway	1,053	1,022	1,306
Finland	1,067	878	956
Denmark	217	178	268

Cases at external complaint boards

If

	The number of cases concerning If handled at the ECBs, 2021	The number of cases concerning If handled at the ECBs, 2020	If's share of the total number of cases handled at the ECBs, 2021	If's share of the total number of cases handled at the ECBs, 2020	The percentage of cases concerning If that were ruled in If's favour, 2021	The percentage of cases concerning If that were ruled in If's favour, 2020
If, Sweden	69	122	8%	10%	99%	98%
If, Finland	124	116	19%	17%	85%	72%
If, Norway	414	497	12%	12%	82%	79%
If, Denmark	30	35	2%	3%	80%	69%

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 2022 was not available when the report was written. In Norway and Denmark, there is only one public external board in each country, and in Sweden and Finland, there are several public external boards, each with a somewhat different status. Therefore, comparing the numbers and trends in each respective country is more relevant than comparing one country to another.

Topdanmark

Approach

Topdanmark wants its customers to have the right coverage to match their needs and wishes. The company is aware that this requires good and correct customer advice in sales and consulting situations from competent employees.

Topdanmark has one central and several local compliance departments, ensuring that sales personnel meet quality requirements and follow agreed business procedures and applicable laws and regulations. There is a reporting system in place, which ensures that inappropriate situations are evaluated to improve customer service and avoid errors in the future.

Topdanmark provides customers with easily accessible information on products, price, and coverage. Therefore, customers can get an overview of what can be expected from the insurance policy. Furthermore, all text used in customer communications is always checked to ensure that the content is understandable to the average customer. Topdanmark improves product information continuously, based on customer feedback.

Actions and results

In 2022, Topdanmark focused more on proactive and relevant customer communication compared to previous years. For the agricultural and SME segment, Topdanmark visited all large customers, and gave all small customers a call. The company had the same proactive approach to its private customers and called nearly 230,000 customers in 2022. The purpose of the dialogue is to ensure that the customers have the right coverage for their requirements. In addition, the customers are informed about additional services that Topdanmark provides.

In 2022, due to the war in Ukraine, Topdanmark extended coverage and offered crisis counselling for Ukrainians and their relatives who are settled in Denmark and employed by Topdanmark's customers in the agricultural, construction, and tradesperson segments. The coverage

also includes relatives and friends who came to Denmark because of the war and who are staying with the employed persons. In addition, Topdanmark extended its home contents and liability insurance to include Ukrainian refugees if they are staying with Topdanmark home contents insurance customers.

In 2022, Topdanmark developed several self-service solutions. For instance, it is now possible to terminate insurance using digital self-service. The company also created a tailor-made insurance package for self-employed persons so that they immediately get information on price and coverage.

The number of cases concerning Topdanmark handled at the ECB, and the percentage of cases ruled in the company's favour, remained stable in 2022.

Cases at the external complaints board

Topdanmark

	The number of cases concerning Topdanmark handled at the ECB, 2022	The number of cases concerning Topdanmark handled at the ECB, 2021	The number of cases concerning Topdanmark handled at the ECB, 2020	The percentage of cases ruled in Topdanmark's favour, 2022	The percentage of cases ruled in Topdanmark's favour, 2021	The percentage of cases ruled in Topdanmark's favour, 2020
Topdanmark	108	111	127	86%	86%	86%

Source: Insurance Complaints Board in Denmark

Hastings

Approach

Hastings’ customers can purchase their products digitally or via the contact centre. Regardless of the channel, customers are provided with clear and transparent information prior to purchasing a policy, with full disclosure provided on product coverage, coverage limitations, exclusions, excess levels, and any fees connected to the ongoing management of their insurance policy.

At Hastings, the existing sustainable sales and marketing conduct framework is based on the Financial Conduct Authority’s (FCA) six best interest outcomes. The company also assesses each product at least annually to ensure it remains appropriate.

Hastings has robust controls in place to ensure that information provided to customers is clearly accessible, relevant, and timely before a customer commits to any purchase, and that the company satisfies all regulatory and conduct obligations. The associated controls and measures are regularly assessed and reported to Hastings’ executive and board committees. This includes outcomes, experience, and value measures.

For those customers in vulnerable circumstances, Hastings has a well adopted user experience and user

interface design process. Design principles are used to deliberately avoid using dark patterns (a digital term whereby designs are used on websites and in apps that make users do things they did not mean to, like buying or signing up for something). This eliminates any risk or intent to deceive customers.

Actions and results

In 2022, Hastings’ priority was implementing a new customer marketing platform. The platform facilitates better customer communications, supports this at each stage of the customer lifecycle, and enables increased marketing activity in 2023.

Following the launch of Hastings’ new Quote and Buy journey for its car insurance in 2021, Hastings launched new websites for its bike and van insurance products, as well as its Insure Pink and People’s Choice brands in 2022. Feedback from customers on these new journeys remains broadly positive, with customers rating the car insurance buying experience 4.3 out of 5 for ease of use.

Hastings focuses on meeting level AA of the Web Content Accessibility Guidelines (WCAG 2.1). To maintain high standards, in 2022, Hastings introduced annual accessibility audits across all customer-facing digital platforms. This ensures the company stays up to date with the latest WCAG guidelines and identifies any potential accessibility risks. Furthermore, Hastings developed a set of

project guidelines to help maintain accessibility standards from a project’s inception, right through to delivery.

The Financial Ombudsman Service (FOS) is the resolution service for customers who remain unhappy after their complaints have been closed by Hastings. The number of Hastings’ cases referred to the FOS increased in 2022 due to higher claims volumes associated with the post-pandemic return to normal driving levels.

In 2023, Hastings will enhance its sales and marketing conduct framework by aligning it to the FCA’s new Consumer Duty. This requires Hastings to act to deliver good outcomes for retail customers and centres around three rules: Act in good faith towards retail customers, Avoid foreseeable harm to retail customers, and Enable and support retail customers to pursue their financial objectives.

Cases at the Financial Ombudsman Service (FOS)

Hastings	2022	2021
The number of Hastings’ cases referred to the FOS	1,305	778
The percentage of cases ruled in Hastings’ favour	68.9%	72.6%

Source: Financial Ombudsman Service

Mandatum

Approach

In accordance with the Sampo Group Code of Conduct and the company’s internal guidelines, Mandatum is committed to transparent, understandable, and not-misleading communication in both sales and marketing. The company is also committed to offering customers comprehensive and accurate product information, as well as information on costs, conditions, and product risks. Mandatum has internal instructions for marketing and customer communications, and specified groups of customers to whom certain products or campaigns may not be marketed.

Mandatum has an extensive permission structure to handle individual permissions related to marketing and customer communications, and GDPR processes embedded into marketing processes (e.g. personal data deletion). Mandatum’s marketing and customer communications follow regulations and key principles and are reviewed by the company’s Legal department before publication.

When offering investment products, Mandatum always evaluates the customer’s risk profile. The risk profile is based on answers given in the investor profile survey. The survey gathers information on the customer’s investment experience, risk tolerance, and grounds and goals for investing. The offered investment product is always related to the customer’s risk profile, so it is certain that the customer can choose a product that suits their needs.

Actions and results

In 2022, the volume of Mandatum’s customer communications increased significantly so that customers would receive up-to-date information about the volatile

market situation. Mandatum sent out weekly or bi-weekly market reviews to a large group of customers throughout 2022. In addition, customers had the opportunity to go through all their potential worries and questions with Mandatum’s investment specialists and wealth managers. Customers were very satisfied with Mandatum’s quick response to the geopolitical situation.

During the year, Mandatum held a total of 112 events, of which 41 were webinars. 16 events were also open to everyone. Events are an important way for Mandatum to reach customers and to provide them with insights into current trends and the market situation, as well as to inspire and enable dialogue.

Cases at the external complaints board

Mandatum

	2022	2021	2020
The number of resolved cases concerning Mandatum handled at the FINE	4	9	7
The percentage of cases concerning Mandatum that were settled in reconciliation	25%	11%	57%
The percentage of cases concerning Mandatum that were ruled in Mandatum's favour	75%	78%	29%

Source: The Finnish Financial Ombudsman Bureau (FINE)

Customer satisfaction

Materiality

Satisfied customers are the cornerstone of the Sampo Group companies' business, as they are more loyal and prone to recommend products and services. Through systematic measurement of customer satisfaction, the Sampo Group companies want to both identify the factors that are valued by the company's customers and recognise the parts of the customer journey that should be improved.

Group level approach

In accordance with the Sampo Group Code of Conduct, the Sampo Group companies strive to act in the best interests of their customers. This means that they should provide products and services that are fair, comprehensible, and designed to help meet the evolving needs of customers. To track how well the Group companies accomplish this, they collect customer feedback continuously. Both positive and negative feedback is carefully analysed and used to further develop products and services.

All Group companies use the Net Promoter Score (NPS) to measure customer satisfaction. The NPS is an index ranging from -100 to 100 that measures the willingness of customers to recommend a company's products or services to others. It is used as a proxy for gauging the customer's overall satisfaction with a company's product

or service, and the customer's loyalty to the brand. The transactional NPS (tNPS) assesses the customer's opinion on a certain business transaction. The score shows whether customers want to recommend the company to others after they have been in contact with the company. It is calculated as the net result of the share of promoters (who replied 9–10) minus the share of detractors (who replied 0–6) on the question of to what extent they would recommend the company to others.

In addition to the NPS and tNPS, individual Group companies use other supplementary measurements of customer satisfaction.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Group goals and ambitions

The key objective for the Sampo Group companies is to deliver an excellent customer experience.

Group actions and results

During 2022, customer satisfaction remained on a good level in all Sampo Group companies. If and Hastings saw a slight increase in their surveys and the result of

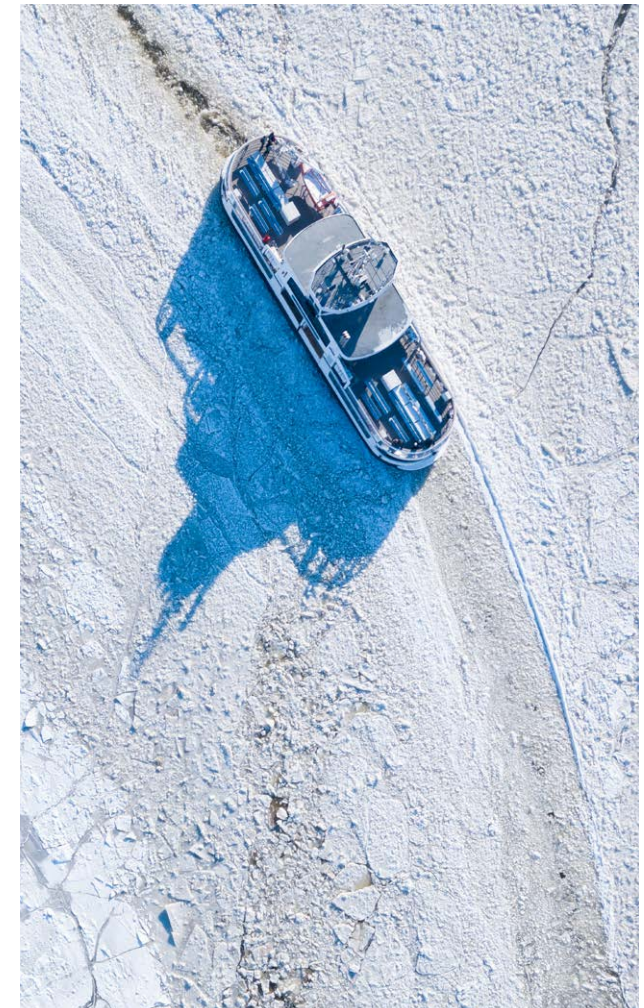
Topdanmark was stable. Mandatum has developed the measurement of customer satisfaction during the past three years. Therefore, the figures are not comparable. The 2020 result is based on a transactional customer satisfaction survey. In 2021 and 2022, the result is a combination of transactional customer satisfaction and overall customer satisfaction surveys (customership), but the weight of the customership is higher in the 2022 survey than in the 2021 survey.

Customer satisfaction, goals and results

Sampo Group

Group company and surveys used	Goal	Scale	2022	2021	2020
If					
tNPS, Business Area Private	2022: 62 2023: 62	-100-100	62	61	60
Topdanmark					
tNPS	2025: 70	-100-100	56.4	56.4	55.4
Hastings					
NPS	2022: 55 2024: 58	-100-100	55	54	-
Mandatum					
NPS (combination of transactional and overall customer satisfaction surveys)	2022: 65-70 2023: 65-67	-100-100	65.6	71.9*	72.5

* Corrected in this report. There was a typing error in the 2021 report.



If

Approach

If has a customer experience programme that is spread across the organisation and the different customer touchpoints. The programme enables If to both collect data and follow the results. The data collected and the results received are used to improve the customer experience.

Equally important is quality assurance, which follows customer feedback. If follows up the customer's journey to look for root causes of feedback, and to repair the customer relationship, if needed. The insight gained is utilised in training and in improving products, processes, and the overall customer journey.

If uses the NPS to internally measure customer satisfaction and to rate If's performance across most of its business areas. Objectives are set on a transactional level by different business units, and key results are followed through the customer experience programme using the tNPS. In addition, If uses an external, annually published Extended Performance Satisfaction Index (EPSI) to benchmark the performance of customer satisfaction against the industry as a whole in all Nordic countries.

All customer satisfaction results are reported to If's top management, and they are part of business follow-up meetings, where key metrics, results, initiatives, and improvements are discussed. The results are also integrated into the management compensation structure.

Goals and ambitions

If's goal is to be known as the most caring company. To measure this, If Private is using the tNPS. For 2022, If's tNPS target for Private business was 62, and it will remain the same for 2023.

Actions and results

In 2022, If's positive trend in the tNPS continued for business area Private. The tNPS includes both feedback from claims handling and calls to If's contact centre. The EPSI confirmed both in the Commercial and in the Private market that If kept a strong position or improved in most markets relative to the industry averages during the year.

During 2022, If's management continued to develop the agile organisational structure to enable quick responses to changing customer needs, to be the most caring insurance company, and to have the most satisfied customers. Going forward, If focuses on customer orientation through excellent customer experience, organisational culture, and partnerships.

EPSI results, Private (B2C)

If

	2022	Industry average, 2022	2021	Industry average, 2021	2020	Industry average, 2020
If, Sweden	71.1	71.2	72.9	73.0	71.1	72.8
If, Norway	74.5	72.7	73.3	71.4	73.9	72.8
If, Finland	73.3	72.1	74.5	72.9	70.3	70.1
If, Denmark	78.1	77.5	76.6	76.4	75.8	75.7

Source: EPSI

EPSI results, Commercial (B2B)

If

	2022	Industry average, 2022	2021	Industry average, 2021	2020	Industry average, 2020
If, Sweden	69.0	68.1	68.8	68.8	66.8	70.2
If, Norway	72.1	69.7	69.5	69.1	71.3	69.7
If, Finland	68.2	69.4	69.3	69.1	62.6	66.2
If, Denmark	72.8	69.5	70.9	70.8	-	70.3

Source: EPSI

Topdanmark

Approach

Topdanmark measures customer satisfaction using internal and external customer satisfaction surveys. The internal surveys in use are the tNPS (in the context of phone and digital self-service) and Top Promise. The tNPS is monitored on an ongoing basis, and the monthly result is reported to Topdanmark’s Board of Directors. The tNPS is also included as part of the senior management’s short-term incentive programme and remuneration. Top Promise refers to a customer satisfaction survey in which Topdanmark, on an ongoing basis, asks customers with whom the company has been in contact one question: “Think about Topdanmark in general – how helpful do you think we are?” In addition, Topdanmark uses two external surveys to measure customer satisfaction: EPSI and Trustpilot. Trustpilot is a website that publishes customer reviews of businesses. Topdanmark monitors the results of all the customer satisfaction surveys closely, with the aim of learning and improving the company’s service.

Goals and ambitions

Topdanmark’s aim is for customers to be so satisfied with the company’s products and services that they want to recommend the company to others. Topdanmark measures this using the tNPS. Topdanmark’s goal for 2025 is to achieve a tNPS score of 70.

EPSI results

Topdanmark

Survey	Scale	2022	2021	2020
EPSI, private customers, Topdanmark	0-100	76.7	74.6	73.7
EPSI, commercial customers, Topdanmark	0-100	70.9	70.8	70.3

Top Promise

Topdanmark

Question to the customer	Channel	Scale	Unit	2022	2021	2020
“Think about Topdanmark in general – how helpful do you think we are?”	Phone	1-5	% of customers that gave top marks, i.e. 5	70%	71%	69%
	Digital self-service	1-5	% of customers that gave top marks, i.e. 5	60%	59%	58%

Actions and results

In 2022, the tNPS remained the same as in 2021. Even though the overall result is at a satisfactory level, it does not fully live up to Topdanmark’s ambitions to continually improve the tNPS.

The results of the other customer satisfaction surveys, both internal and external, show either an increase or the status quo compared to the 2021 results. Regarding the EPSI survey of private customers, Topdanmark moved into the category of very satisfied customers with 76.7 points.

TrustScore*

Topdanmark

Survey	Scale	2022	2021	2020
Trustpilot, overall score	1-5	4.2	4.2	4.4

** TrustScore is a measure of customer satisfaction based on the customer reviews collected on Trustpilot.*

In 2023 and forward, Topdanmark continues to strengthen its ongoing efforts to make it as easy as possible to be a customer of Topdanmark. Hereby, the company will work on creating more time and capacity to take care of customers who are impacted by critical situations in life. This will be done by continuing and intensifying the automation of simple and straightforward claim inquiries. Thus, the company not only provides a quick clarification of the claims and compensation process for those customers but will also enable them to use the resources for more complex claims that require personal attention, such as severe personal injuries, stress, or large fires.

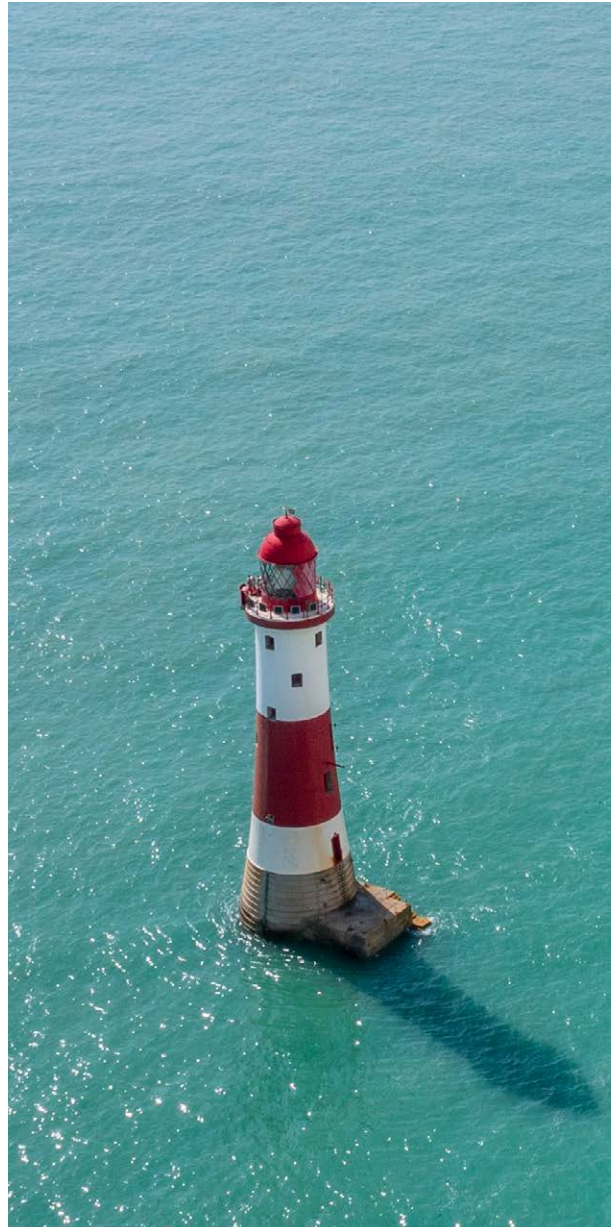
Hastings

Approach

Hastings measures customer satisfaction and outcomes continually to assess performance against goals and to identify areas for improvement. Hastings' Voice of the Customer programme utilises a range of different feedback streams, including actively seeking feedback from customers to measure NPS and Customer Satisfaction (CSAT) following the completion of key customer journeys.

Hastings' Quality Assurance framework measures both customer outcomes and experience. Results are utilised to support individual employee development and to identify systemic themes that can improve customer journeys, products, and processes. Root cause analysis is also undertaken with focused deep dives on the end-to-end holistic customer journey, enabling a review of all steps in the customer lifecycle to identify key friction points.

Defined customer measures, including CSAT, NPS, quality assurance and complaints, are produced and assessed by a dedicated customer insight team. This team ensures all areas across the organisation, from customer-facing employees to the Executive Committee and Board, understand these results.



Hastings also participates in external benchmarking to complement the internal data and feedback. This assists in assessing performance against peers and competitors.

Goals and ambitions

Hastings sets yearly NPS and CSAT targets approved by the Board. In 2022, the targets were an NPS over 55 and CSAT 90 per cent. Hastings' new target is to achieve an NPS of 58 by 2024.

Actions and results

Hastings exceeded its 2022 CSAT target with an end-of-year result of 92 per cent. The NPS was on target at 55. This showed an improvement in both from 2021, with an increase of +1 for the NPS and 2 per cent on CSAT.

Throughout 2023, Hastings plans to further develop the Voice of the Customer programme and quality assurance provision through automation.

Mandatum

Approach

At Mandatum, customer satisfaction is measured using the NPS, which is one of the company's KPIs and linked to the compensation of personnel, including top management. The NPS at Mandatum is a combination of transactional customer satisfaction and overall customer satisfaction (customership) surveys. Customer satisfaction is measured, for example, in the context of customer meetings, phone calls, web messaging, and events. The status and development of customer satisfaction is reviewed weekly at individual and unit levels, and reported monthly to the top management and quarterly to the Board of Directors.

Goals and ambitions

Mandatum's NPS target was 65.0–70.0 by the end of 2022. The new target set for 2023 is 65.0–67.0.

Actions and results

In 2022, customer satisfaction at Mandatum remained at a good level. The NPS covering both the transactional customer satisfaction survey and the overall customer satisfaction survey (customership) was 65.6. In 2022, Mandatum ambitiously decided to raise the weight of the overall customership survey in the NPS calculation to 20 per cent (10 per cent in 2021), emphasising the importance of overall customer satisfaction for Mandatum. As a result, the NPS of 2021 is not fully comparable with the 2022 result.

Mandatum sought to ensure an adequate amount of customer feedback by introducing a possibility to answer the customer satisfaction survey by SMS in 2022. Going forward, the customer can choose between an email and an SMS questionnaire.

In 2022, Mandatum conducted an interview survey to understand customer expectations towards the company. A similar survey was also completed in 2019. Although the new SMS channel has increased the number of responses to customer satisfaction surveys, especially answers from corporate customers remain few. Hence, Mandatum will evaluate the possibility to conduct interviews continuously for that customer segment in 2023.

To transform customer feedback into actual development work more consistently, in 2021, Mandatum built a customer experience (CX) team consisting of specialists across the company. The CX team prepares proposals for the CX Steering Group, which was launched in 2022. The steering group consists of decision-makers from Customer Care, Business Development, and Business Units. Both the CX team and the steering group meet quarterly.

During 2022, Mandatum's customer experience analysis was extended to cover customer satisfaction regarding insurance products. The change was partly based on a legal obligation to ensure the suitability and adequacy of life insurance companies' products for the clientele. From now on, the Business Development unit of Mandatum will take customer feedback into account when renewing and enhancing the company's life insurance products. Furthermore, the customer satisfaction linked to the products enhances the company's broader understanding of customer needs when developing new products and services.

Products and services

Objective: Sampo Group integrates ESG criteria (including climate change) into its insurance underwriting and supply chain management.

Material topics	Main goals	Indicators monitored at the group level
Sustainable underwriting	Sampo Group <ul style="list-style-type: none"> To integrate ESG criteria into product and service offering and insurance underwriting Topdanmark <ul style="list-style-type: none"> To introduce five new products, insurance coverages, or services that support customers in GHG reduction and other sustainable choices by 2025 	If <ul style="list-style-type: none"> Corporate clients assessed for ESG reasons Cases sent to the internal ESG team for referral Topdanmark <ul style="list-style-type: none"> Corporate clients with ESG issues or violations of the UN Global Compact Corporate clients on internal ESG watchlist
Sustainable supply chain management	Sampo Group <ul style="list-style-type: none"> To ensure high standards across supply chains If <ul style="list-style-type: none"> To reach expected levels of plastic repairs and used parts Topdanmark <ul style="list-style-type: none"> To screen all critical suppliers for ESG risks, compliance, and sustainability by 2025 To integrate Code of Conduct into all new supplier contracts by 2025 To increase the share of bumper repairs by 2025 To increase the share of repair of windscreens to 45% by 2025 To increase the share of used spare parts to 4% by 2025 To maintain the share of repair of phones, computers, and tablets at 72% by 2025 	If <ul style="list-style-type: none"> Suppliers that have signed the Supplier Code of Conduct Materials reused in vehicle repairs Topdanmark <ul style="list-style-type: none"> Suppliers that are screened for ESG Contracts with an integrated Code of Conduct Bumpers and windscreens that are repaired Used spare parts Phones, computers, and tablets that are repaired
Sustainable sales and marketing practices	Sampo Group <ul style="list-style-type: none"> To act in the best interests of customers using sustainable sales and marketing practices 	If <ul style="list-style-type: none"> Complaints to the internal customer ombudsman Cases at the external complaint boards Topdanmark <ul style="list-style-type: none"> Cases at the external complaints board Hastings <ul style="list-style-type: none"> Cases at the external complaints board Mandatum <ul style="list-style-type: none"> Cases at the external complaints board
Customer satisfaction	Sampo Group <ul style="list-style-type: none"> To deliver an excellent customer experience If <ul style="list-style-type: none"> To have tNPS (BA Private) 62 in 2022 and 2023 Topdanmark <ul style="list-style-type: none"> To have tNPS 70 in 2025 Hastings <ul style="list-style-type: none"> To have NPS 55 in 2022 and 58 in 2024 Mandatum <ul style="list-style-type: none"> To have NPS 65–70 in 2022 and 65–67 in 2023 	If <ul style="list-style-type: none"> tNPS Topdanmark <ul style="list-style-type: none"> tNPS Hastings <ul style="list-style-type: none"> NPS Mandatum <ul style="list-style-type: none"> NPS

Sustainable communities

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Stakeholder engagement and dialogue

Materiality

Stakeholder engagement helps the Sampo Group companies to proactively consider the needs and wishes of their stakeholders. By focusing on stakeholder engagement and dialogue, the Group companies can mitigate potential risks, including the uncertainty and dissatisfaction of its key stakeholder groups. Stakeholder engagement can help the Sampo Group companies foster their reputation, trust, and buy-in for the companies' key initiatives.

In addition, the Group companies consider stakeholder engagement and dialogue to be a valuable source of information. The different stakeholders are experts in their own fields and can offer knowledge and expertise for the purposes of the Group. When relevant, the Group companies can also offer their time and expertise to support the stakeholders.

Group level approach

Sampo Group's primary stakeholder groups are investors, customers, employees, suppliers and other business partners, and local communities. Each primary stakeholder group has several subcategories.

The Group companies engage with their stakeholders on multiple topics. The intention is to engage in activities and dialogue that are best aligned with the purposes of each individual Group company and its stakeholders. The Sampo Group companies seek to ensure meaningful engagement with stakeholders, for example, by identifying relevant stakeholders, ensuring continuous and regular communication, and providing multiple forums for dialogue.

Group goals and ambitions

The purpose of stakeholder engagement is to build trust between the Group companies and their stakeholders and to seek common benefits.

Group actions and results

Every year, the Sampo Group companies engage in dialogue with key stakeholder groups. The table Stakeholder engagement and dialogue ([page 164](#)) lists some of the main forums for dialogue, as well as some examples of discussion topics during 2022.

As a result of stakeholder engagement, the Group companies aim to develop their operations. Examples of actions taken during the year include improved external communications, customer service, and internal reporting.

Stakeholder engagement and dialogue

Sampo Group, 2022

Stakeholder group	Forum for dialogue and frequency of discussions	Examples of discussion topics in 2022
Investors (current and potential shareholders and debt investors)	<ul style="list-style-type: none"> • Annual General Meeting (AGM) (annual) • Capital Markets Day (CMD) (annual) • Roadshows (quarterly) • Seminars (quarterly) • Virtual and face-to-face meetings (weekly) 	<ul style="list-style-type: none"> • Financial performance • Strategy • Regulatory development • Climate targets • Executive remuneration • Ambition in sustainability
Customers	<ul style="list-style-type: none"> • Regular customer contact points, e.g. website, chat, contact centre (24/7 or daily) • Customer feedback channels (24/7) • Customer satisfaction surveys (24/7 or daily) • Virtual and face-to-face meetings (daily) • Consumer ombudsman (daily) • Events (varying) • Company publications, e.g. magazines (varying) 	<ul style="list-style-type: none"> • Product and service quality • Loss prevention and claims handling • Ambition in sustainability • Market situation in general • Responsible investment • Personal risk insurance • Reward and compensation services and products
Employees	<ul style="list-style-type: none"> • Employee engagement surveys (bi-annual or annual) • Performance appraisals and dialogue with leaders (varying) • Work environment councils (varying) • Meetings with union and employee representatives (varying) • Employee representation and consultation forums (varying) • Employee roadshows (on a needs basis) • Social events (varying) 	<ul style="list-style-type: none"> • Financial performance • Non-discrimination • Diversity and inclusion • Change in Group structure • Personnel surveys • Performance and development plans
Suppliers and other business partners (e.g. analysts, rating agencies)	<ul style="list-style-type: none"> • Virtual and face-to-face meetings (daily) • Events (varying) • Company publications, e.g. magazines (varying) 	<ul style="list-style-type: none"> • Financial performance • Supply chain management (e.g. targets, performance) • Change in Group structure • Future plans • Products and services
Local communities (e.g. regulators, supervisors, industry associations, educational institutions, NGOs, the general public, the media)	<ul style="list-style-type: none"> • Virtual and face-to-face meetings (weekly) • Events (varying) • Company publications, e.g. magazines (varying) 	<ul style="list-style-type: none"> • Financial performance • Regulatory development • Ambition in sustainability • Climate change • Responsible investment • Rewards and responsible remuneration

If

Some examples of If's stakeholder engagement work during 2022 are listed next.

Research project SUPER

Together with the Research Council of Norway, If supported SUPER, a five-year research project, which was conducted by climate researchers at CICERO and the University of Leeds. The project studied the development of extreme precipitation by applying knowledge about aerosols and the urban heat island effect, in combination with climate models and weather observations. The goal was to quantify the human influence on short-duration extreme precipitation in highly populated areas, and to understand how important this may become in the future, leading up to the year 2100. The project was completed in 2022.

Research project SafeBESS

In 2022, If joined a four-year research project in Norway entitled SafeBESS. The objective of the research is to establish theoretical and practical knowledge for safe implementation of large-scale Li-ion battery systems in buildings. Other research partners in the project include SINTEF Energy, SINTEF Community, RISE Fire Research, and NTNU Department of Civil and Environmental Engineering.

Cooperation with ICEYE

In 2022, If became part of a one-year pilot, which investigates how satellite data from a company called ICEYE can be utilised in claims situations. The aim of the project is to learn whether If could be more proactive by improving abilities to predict potential floods, and to have more communication and cooperation with its customers when an event is potentially approaching.

Cooperation with SAFER

In Sweden, If is a partner of SAFER, which is a competence centre where partners from the Swedish automotive industry, academia and the authorities cooperate to create a centre of excellence for traffic safety research and safe mobility.

In one of the ongoing projects, both physical and virtual verification methods are being developed for vehicle safety systems that prevent collisions when a car overtakes a cyclist. If's contribution to this project is the fundamental knowledge about collision circumstances. Such information is collected and analysed in If's unique car-to-cyclist and car-to-pedestrian collision databases. These databases are also used in several commitments as part of the national programme Action plan for safe road traffic 2022–2025, which is led by the Swedish Transport Administration.

As part of the cooperation, usage and acceptance studies are performed to support the development of safety equipment. One example is the Child Safety in Cars study, which is an annual study of Swedish parents' knowledge about child safety in vehicles. The study examines how child seats and boosters are used and accepted by drivers. In 2022, the 12th edition of the study was published.

If is also engaged in a project in Sweden that encourages safe and environmentally friendly travel to school. A nationwide survey among principals in May 2022 identified potential areas for improvement in the traffic situation around schools.

Cooperation with the Estonian Hunters' Association

Every day, there are about 15 accidents involving wild animals, such as roe deer, elk, and wild boar on the roads of Estonia. Therefore, If has begun cooperation with the Estonian Hunters' Association to investigate whether and to what extent the installation of light barrier reflectors on roads could help to prevent and reduce accidents involving wild animals. During the project, test sections have been installed on roads all over Estonia, in areas with a particularly high risk. To investigate the effectiveness of the reflectors, some parts of the roads have been covered with reflectors and some not. The study is being conducted by the Estonian University of Life Sciences, and it will last for three years. The project started in 2021, and it has already shown very good results. Throughout Estonia, only very few accidents have occurred in the areas covered with light barrier reflectors.

Topdanmark

Some examples of Topdanmark's stakeholder engagement work during 2022 are listed next.

Supporting education in the insurance industry

Topdanmark wants to support education in the insurance industry. Therefore, the company annually employs finance trainees on a two-year training programme and offers internships for students pursuing an AP in Financial Management or a Bachelor of Financial Management and Services degree.

The trainees receive a structured education programme, including training in theory and practice. With this, Topdanmark wants to ensure that all trainees complete the education with good results and that they are well equipped for the requirements of the insurance industry. Topdanmark also organises special events focusing on the well-being and personal development of the trainees, in order to support them in their education. The company has a long tradition of trainee programmes, and many of the company's current employees have been trainees themselves.

Of all the finance trainees that completed their education with Topdanmark in 2022, 14 were permanently employed upon completion of their education.

Education in the insurance industry, targets and results

Topdanmark

Target	2022	2021	2020
Contribute to education in the insurance industry by employing a minimum of 20 finance trainees annually – in addition to finance internships	Finance trainees: 17 Financial economists: 20 Finance Bachelors in internship: 3	Finance trainees: 16 Financial economists: 28 Finance Bachelors in internship: 11	Finance trainees: 23 Financial economists: 29 Finance Bachelors in internship: 8

Hastings

Some examples of Hastings' stakeholder engagement work during 2022 are listed next.

Futuready education programme

Throughout 2022, Hastings continued to support students from local schools in Bexhill and Leicester via its educational Futuready programme. Delivered across three diverse days, the programme sees Hastings employees act as business mentors to support 13- to 14-year-old students in making better life choices, through a blend of coaching, mentoring, and facilitation. Business mentors share their own personal journeys, successes, and failures with the students, bringing the real world of employment directly into the lives of the young people. 2022 saw 72 Hastings employees support 213 students. In 2023, Hastings intends to continue with the Futuready programme and has plans to work with subject matter experts across the business to develop and deliver workshops for local schools.

Cooperation with Women in Data

Hastings values the expertise of its data professionals and is playing its part in promoting gender balance across the industry through partnering with organisations such as Women in Data. As part of this partnership in 2022, Hastings developed and delivered a Careers in Data workshop to a group of 12- to 13-year-old female students in a school local to the company's Bexhill office, introducing them to the world of data and potential career options.

Supporting The Source

During 2022, Hastings supported The Source, a global community for women working in cybersecurity. The Source community supports women by mentoring, networking, and providing resources to inspire and empower them at all stages of their careers. The vision is to make women the standard in cybersecurity, not the exception. Hastings is working with The Source to make roles in cybersecurity accessible and approachable for women not just at Hastings but across the wider industry.

Cooperation through the Insurance Sector Cyber Co-ordination Group

In 2022, Hastings continued to contribute to the wider financial industry through its ongoing chairing of the Insurance Sector Cyber Co-ordination Group (ISCCG). This group is sponsored by the Financial Conduct Authority (FCA), and Hastings' participation in the ISCCG contributes to the FCA's CCG insights report, which is shared at a broader level for use across the financial services industry. The ISCCG is also affiliated with the Cross Market Operational Resiliency Group (CMORG) and sees members collaborating to share knowledge, identify risks, develop solutions, and improve the cyber resilience of the financial sector.

Mandatum

Some examples of Mandatum's stakeholder engagement work during 2022 are listed next.

Cooperation with Aalto University

In 2022, MAM and Aalto University School of Business conducted a study on the development of diversity in the financial sector. The goals of the project were to find out: i) the decision-making principles of students when it comes to choosing a major for a Bachelor's programme, ii) whether the principles differ between male and female students, and iii) what kinds of students tend to choose finance as their major.

The most decisive factor for choosing a major was found to be a personal interest in the subject. This did not differ between binary genders or across different majors. However, the study showed that fewer women than men choose finance as their major and pursue a career within it. Additionally, the finance industry was described negatively by students of all genders and majors. Students wanted a better work-life balance and more diverse examples and ambassadors from the companies in the sector. Based on the research, recommendations were given both to Mandatum and to the finance industry at large. Based on these findings, Mandatum will seek ways to increase the attractiveness of the finance sector especially among women.

Cooperation with the Directors' Institute Finland

Mandatum collaborates with the Directors' Institute Finland to increase knowledge of responsible reward practices. Together, the organisations improve Finnish directors' and board members' awareness of how responsible management and rewards affect employee satisfaction and productivity, and how sustainability matters can be advanced by linking related targets to executive pay schemes. In 2022, Mandatum organised several events on sustainable remuneration that were aimed at directors and board professionals.

Cooperation with the Finnish Ministry of Social Affairs and Health

Mandatum was responsible for the research project Work of equal value, which was financed by the Ministry of Social Affairs and Health and carried out in 2021–2022. The aim of the project was to study and develop an assessment of the complexity of work from the perspective of equal pay. Mandatum's Reward and Compensation Services was responsible for the research project as a whole, alongside its partners Haaga-Helia University of Applied Sciences and Työelämän sopimus- ja lakipalvelu Sopla Ky. The final report, published in December 2022, presents recommendations for measures to be taken at individual workplaces. The report also investigated the matter from the perspective of legislation

and collective agreements. The results were also launched in a public webinar organised by the Ministry of Social Affairs and Health.

Cooperation with WWF Finland

Mandatum has worked with WWF Finland since 2017. The aim of the cooperation is to steer the investment sector to adjust its operations to the 1.5–2°C temperature goal agreed on in the Paris Climate Agreement. In 2022, WWF Finland and Mandatum published an article about biodiversity, targeted at investors and companies. In November 2022, Mandatum took part in WWF Finland's 50-year anniversary seminar to comment on and discuss climate change and biodiversity loss.

Sampo plc

During 2022, the focus of Sampo plc's stakeholder engagement was on the financial performance and strategy of the Group, as well as on changes in the Group structure. From a sustainability point of view, climate targets, executive remuneration, and regulatory development are examples of discussion topics that were in focus during the year. In 2022, Sampo plc also organised a governance roadshow for investors. The aim of the roadshow was to receive feedback, for example, regarding responsible remuneration practices.

Donations and other humanitarian efforts

Materiality

The Sampo Group companies want to make donations to and take part in humanitarian efforts to support the communities the companies and their employees are part of. At the same time, donations can, for example, offer reputational benefits for the Group companies, help attract and retain employees, and provide possibilities to engage with current or prospective customers.

Group level approach

Sampo Group has a group level community engagement framework. The framework has three themes, which guide the Group's donations and other humanitarian efforts. With donations and other humanitarian efforts, Sampo Group also wants to support the Group's selected SDGs.

Additional information:

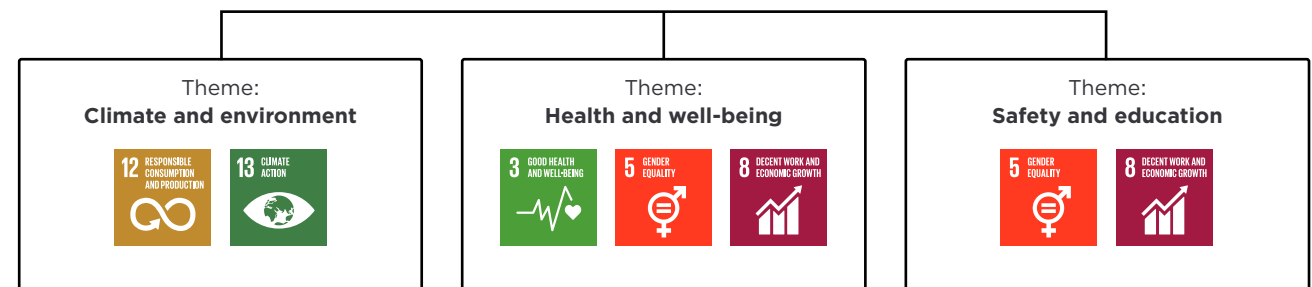
www.sampo.com/sustainability/communities/donations-and-other-humanitarian-efforts

Every year, the Sampo Group companies each independently decide which initiatives they wish to support and what types of humanitarian efforts they want to engage in. The collaborations can range from one-off activities (e.g. donations, disaster relief) to long-term projects (e.g. multiyear partnerships). In addition, some of the Group companies offer employee engagement initiatives, such as matched donations and employee volunteering.

The Sampo Group companies support a range of charitable and civil society organisations both locally and internationally. The monitoring and evaluation of donations and other humanitarian efforts is done on a subsidiary level. Each activity and partnership is evaluated on a case-by-case basis, with criteria depending on the nature and scope of the cooperation.

Community engagement framework

Sampo Group



Group goals and ambitions

The Sampo Group companies' primary aim is to make donations and take part in humanitarian efforts that aim to make a change in society. The Group companies are committed to further improving the work year on year, for example, by developing reporting and measurements, creating new initiatives, and increasing employee participation.

Donations by company

EUR	2022	2021	2020
If*	298,327	65,020	5,000
Topdanmark	118,061	60,506	55,845
Hastings	114,313	169,400	-
Mandatum**	126,870	56,789	33,366
Sampo plc	76,800	69,000	68,366
Sampo Group	734,372	420,715	162,577

* Previously, If booked both sponsorship and donation costs under sponsorship. In 2020, If set up new accounts for donations, and therefore, sponsorship and donation costs are now separated in the bookings. During 2020, some donations were still booked under sponsorship, which explains the figure.

** 2020 and 2021 figures include Kaleva, as Mandatum and Kaleva made some donations together (e.g. Christmas donation).

Group actions and results

During 2022, the Sampo Group companies made donations worth EUR 734,372. This amount is up 75.6 per cent compared to the previous year. The figure was affected by the Group companies' donations to Ukraine, for example.

If

Some examples of If's donations and other humanitarian efforts during 2022 are listed next.

Long-term commitments and other partnerships

Yellow Cap initiative

According to If's survey, Finns believe that the most important ways to ensure safe school travel are good examples of safe traffic behaviour set by parents, increased provision of pedestrian and cycle paths and underpasses, and the use of reflectors and reflective materials.

In Finland, If supports the Yellow Cap initiative, and has donated reflective yellow caps to all first graders annually since 2006. The aim is to improve children's traffic safety, and over the course of 17 years, more than a million Finnish children have received their own yellow cap. In 2022, 57,000 children began their first year of school, and almost 55,000 yellow caps were sent to schools.

The Swedish Heart-Lung Foundation

In Sweden, If collaborates with the Swedish Heart-Lung Foundation to set up a crowdfunding platform to provide defibrillators in residential areas. Defibrillators substantially increase the likelihood of surviving cardiac arrest, but as it is so important to have access to a defibrillator within the first five minutes, and most cardiac arrests happen at home, the defibrillators need to be available in residential areas. The platform was launched in September 2022, and by the end of the year, more than SEK 600,000 had been raised from 1,300 donors.

Youth organisations

If Sweden contributes SEK 360,000 annually towards organisations or events supporting sports and athletics for children and youth. Each month, three If employees are selected in a lottery awarding them SEK 10,000 in support of an organisation of their choice.

The Norwegian fire safety organisation

In Norway, If has for many years cooperated with the Norwegian fire safety organisation concerning fire safety in private homes, with a particular focus on families. Together, If and the organisation have educated hundreds

of thousands of Norwegians in how to prevent fires, and every year a fire safety week has been organised. In 2022, there were digital activities in social media channels on teaching people how to charge their digital devices, home appliances, and e-scooters in a safe way at home to prevent fires.

At If's course and competence centre in Hobøl, Norway, If and the Norwegian fire safety organisation offer courses and exercises in risk prevention, primarily aimed at fire prevention, industrial safety, and first aid. The target group is primarily companies with requirements for industrial safety, requirements for certifications within various safety schemes, and documented competence, as well as training facilities for police and fire brigades. Between 3,000 and 3,500 participants take courses at the safety centre annually.

If and the Norwegian fire safety organisation also work together with the Norwegian Council for Road Safety to improve safety for children in cars in Norway.

Support for Ukraine

As an insurance company, If is affected by the war in Ukraine. If, for example, insures customers with operations in Ukraine. The war also affects If's employees in the Baltic and Nordic countries. Against this background, If launched a donation matching programme in 2022 to support Ukraine.

Donation matching means that If matches the donations made by its employees. If chose to channel help through several humanitarian civil society organisations who are operating in or close to Ukraine. In addition, all employees had an option to make a donation instead of receiving a Christmas gift. The total sum of the Christmas donations was also matched by If. During 2022, a total of approximately SEK 4.1 million was donated to Ukraine through different humanitarian organisations, and the programme continues in 2023.

Employee volunteering

Community day programme

In some of If's operating countries, employees can do volunteer work during working hours in support of a cause of their own choosing. Working hours can be donated in support of social and humanitarian causes such as the Red Cross, Caritas, Food Bank, and local organisations within mental health, integration, and elderly care, for instance. The initiatives are employee-driven and locally coordinated between HR and leaders in each applicable country.

Other employee volunteering activities

If has several collaborations and sponsorships in place, and certain activities are arranged annually by the company, while others are initiated and driven by the employees themselves. If employees actively contribute to charities by choosing to donate their Christmas gift or birthday gift, where applicable, to a preferred charity selected by the company each year. In 2022, many of the contributions went towards aid to Ukraine.

Aside from company-driven activities, employees have taken their own initiative and, in some cases, volunteered their working hours in support of Ukraine. Activities included collecting amenities and funds through bake sales and food runs, and delivering items to the Red Cross and immigration detention centres, for instance.

Topdanmark

Some examples of Topdanmark's donations and other humanitarian efforts during 2022 are listed next.

Long-term commitments and other partnerships

Danish Cancer Society

In 2022, Topdanmark participated in the Danish Cancer Society's Fight Cancer campaign for the ninth consecutive time. The campaign has become an integral part of Topdanmark's corporate culture, and in 2022, the campaign had more employees attending than ever before. 923 employees participated in different exercise activities, such as dancing, walking, running, and biking, to raise money and support the campaign. In 2022, Topdanmark, its employees and partners raised a total of DKK 625,307, which is an all-time high. The money collected for the campaign is used by the Danish Cancer Society for cancer research.

Doctors Without Borders

Topdanmark has been cooperating with Doctors Without Borders since 1996. The company has chosen Doctors Without Borders because it trusts that the contribution is spent in a responsible manner in the world's hotspots. Furthermore, Doctors Without Borders works with health and prevention, especially in areas where access to medical assistance and healthcare is limited.

On a voluntary basis, the employees of Topdanmark can contribute to Doctors Without Borders from their salary, and Topdanmark will donate an equivalent amount. In addition, in 2022, the Christmas gift that Topdanmark gave its employees included a DKK 100 donation to Doctors Without Borders. The employees also had the opportunity to donate the entire sum used for their Christmas gift to the organisation. In 2022, a total of DKK 414,060 was donated to Doctors Without Borders by Topdanmark and its employees.

Donations to the Danish Cancer Society and Doctors Without Borders

Topdanmark, 2022

	Donations made by Topdanmark (DKK)	Donations made by Topdanmark employees (DKK)	Number of employees participating	Expenses for administration (DKK)
Danish Cancer Society	179,167	446,140	923	200,553
Doctors Without Borders	330,030	84,030	64	0

Blood Bank

Since 1963, the employees at Topdanmark's headquarters have been able to donate blood to the Danish Blood Bank during paid working hours. This is an activity that is closely related to Topdanmark's efforts in prevention. In 2022, 239 batches of blood were donated by Topdanmark employees.

Buddha Bikes

Topdanmark has a partnership with Buddha Bikes, a small company that refurbishes old bikes and donates them to people in need, for example, to refugees, and families with low income. When a claim has been made on a stolen bike, which is then returned, the bike is the property of Topdanmark. These bikes are donated to Buddha Bikes. This partnership has been running since 2019. In 2022, Topdanmark donated 109 bikes to Buddha Bikes.

One-off activities

In 2022, Topdanmark collaborated with the Danish Red Cross on collecting funds for the people of Ukraine. Both the company and its employees made donations. The funds collected were used for educational support, foodstuffs, medical emergency packages, and other safety-related emergency help.

Hastings

Some examples of Hastings' donations and other humanitarian efforts during 2022 are listed next.

Long-term commitments and other partnerships

Community grants

Hastings has a community grants scheme, enabling local good causes, charities, and communities to access support provided by the company. The support given ranges from professional skills or practical hands-on help to financial support. Grants can be applied for by anyone from the local community, including employees who are able to submit a request on the intended recipient's behalf.

During 2022, Hastings continued to support its local charities and community groups through the grants scheme, and this included humanitarian support of national and local groups assisting Ukrainian refugees. In 2022, the scheme provided 85 grants totalling GBP 97,000 in financial support.

Hastings also supported local communities in Bexhill and Leicester with GBP 40,000 of sponsorship for local events, including Pride in Hastings and Leicester and funding to help its local hospices.

During 2022, Hastings continued to focus on environmental support, working with the local councils in Bexhill and Leicester in the form of beach adoption, beach cleaning, tree planting, and local park improvements.

National fundraising days

In 2022, Hastings supported two national fundraising days, Comic Relief and Macmillan Cancer Support, raising a total of GBP 7,000. The company also held its second Hastings Golf Day and raised GBP 9,000 for the Pink Ribbon Foundation.

The company's employees raised over GBP 27,500 in 2022. Following employee feedback, a change in approach for future fundraising will see less focus on national events and more on Hastings' local charities, good causes, and communities.

Employee volunteering

Community day programme

Hastings has a programme for employee volunteering called Colleague community days. Every year, employees are given at least one paid working day to offer their services in the community. This can be done as a team event or individually. 2022 saw Hastings employees serve its local communities, with over 1,300 colleagues providing over 10,000 hours of practical support through the community day programme. Activities included mentoring with schools, tree planting, sponsored walks for charities, and beach cleaning.

Through 2023, Hastings plans to enhance the number of employees taking part in community days with the aim of including more professional volunteering opportunities. In addition, Hastings intends to continue to build on its environmental and sustainability-based community days with plans to partner with charitable organisations delivering environmental educational programmes, thus providing support in embedding sustainability into school curriculums.

Mandatum

Some examples of Mandatum's donations and other humanitarian efforts during 2022 are listed next.

Long-term commitments and other partnerships

UNICEF and Finnish Red Cross

In 2022, Mandatum launched an internal donation campaign to support humanitarian aid in Ukraine. As part of the campaign, Mandatum made a donation worth EUR 116,870, which was divided between UNICEF and the Finnish Red Cross Disaster Relief Fund.

In addition, Mandatum made an annual Christmas donation of EUR 10,000 to Ukraine through UNICEF. UNICEF helps Ukrainian children and families by delivering aid and providing access to health services, clean water, education, and critical support services.

Tukikummit Foundation

To prevent the marginalisation of youth at risk of exclusion, Mandatum is cooperating with the Tukikummit Foundation and donating accident insurance policies to children in need. The assistance granted by Tukikummit supports children in disadvantaged families in Finland who are in danger of being marginalised for financial reasons.

By insuring oneself using Mandatum's products, one can help secure the life of a disadvantaged child or adolescent in case of injury. For each new life insurance policy sold, Mandatum donates up to 1 per cent of the first year's insurance premiums towards arranging accident insurance. The accident insurance is issued for two years at a time until the child reaches the age of 18.

The cooperation started in 2014 and, to date, almost 4,000 children have benefited from donated accident insurance policies.

Employee volunteering

Community day programme

In 2022, everyone at Mandatum had the opportunity to volunteer for a charity of their choice. Volunteering was done during working hours, for a maximum of eight hours during the year. Employees could use the hours either for providing professional skills or other types of assistance towards a cause they considered important. During the year, volunteering was done, for example, at Hope charity, Sekaisin-chat, and Nyyti ry. In addition, a group of three employees spent a day collecting over 200 litres of trash from the coastline in Helsinki and Espoo, Finland.

Other employee volunteering activities

In spring 2022, Mandatum organised a donation campaign to support Ukraine and challenged all Mandatum employees to join the effort and increase the total donation. In addition to a base donation of EUR 100,000, Mandatum pledged to double all donations made by Mandatum employees. The total donation amounted to EUR 133,740. The donations made by Mandatum employees contributed to humanitarian aid work through various organisations.

Sampo plc

Some examples of Sampo plc's donations and other humanitarian efforts during 2022 are listed next.

Long-term commitments and other partnerships

UNICEF

In 2022, Sampo plc made an annual Christmas donation of EUR 50,000 to UNICEF, the United Nations Children's Fund. The donation was directed to the global fund for children, which supports children where help is needed the most. According to UNICEF, 40 million children have had to flee their homes due to war, conflict, or climate extremes. With the help of donations, UNICEF can bring health, safety, and schooling opportunities to children.

Finnish Association of People with Physical Disabilities

In 2022, Sampo plc donated EUR 10,000 to the Finnish Association of People with Physical Disabilities. The association engages in advocacy and service provision for people with physical disabilities or functional impairments. This was the seventh consecutive year when Sampo plc made a donation to the association.

Korpikuusikon hunaja

In 2022, Sampo plc partnered with a honey producer, Korpikuusikon hunaja, and bought two beehives that the beekeepers of Korpikuusikon hunaja take care of. The beehives were placed in Nuuksio National Park, Finland, and the approximately 100,000 bees that inhabit the beehives maintain the biodiversity in the area. At the end of the year, the employees of Sampo plc were all given a jar of honey produced by Sampo plc's own bees. The cooperation between Sampo plc and Korpikuusikon hunaja started in 2021.

Employee volunteering

The employees of Sampo plc have taken part in the Joulupuu charity since 2016. The aim of the charity is to provide Christmas gifts to children and adolescents in deprived families who might not otherwise receive any gifts. In 2022, the employees of Sampo plc had the possibility to donate money directly to the charity. The charity was promoted on Sampo plc's intranet with instructions on how to donate. This opportunity to take part in the Joulupuu charity is highly appreciated among employees. It is also a concrete way for employees to support the local community.

Tax footprint

Materiality

The Sampo Group companies are significant and responsible taxpayers, and tax compliance is viewed as an important part of the Group companies' business and sustainability. The taxes the Sampo Group companies pay also have a wider economic and social impact and play an important role in the development of the countries in which the Group companies operate.

The Group companies act transparently and responsibly in all tax matters and work closely with the tax authorities to ensure all tax payments are fair and follow legislation. Sampo Group can face reputational risks, operational risks, and business risks if it fails to pay its taxes effectively and accurately.

Group level approach

The Sampo Group companies are committed to compliance with the spirit as well as the letter of the tax laws and regulations in the countries in which they have operations. The Sampo Group Code of Conduct provides the group level guidance principles regarding taxes. The Code of Conduct is reviewed annually and approved by Sampo plc's Board of Directors.

Tax matters are embedded in the finance function and are, therefore, within the responsibility of the Group CFO. The Group CFO informs the Board of key strategic tax topics when necessary. The day-to-day responsibility for tax-related matters is upheld by the individual Group companies and their finance and tax specialists. Furthermore, internal governance models, mandatory legal and regulatory requirements, and supervision carried out by the financial supervisory authorities ensure that the Sampo Group companies maintain a high level of tax compliance.

Sampo Group's approach to tax risk management is consistent with and embedded in overall risk management. Sampo Group actively identifies, assesses, monitors, and manages tax risks to ensure that they remain in line with the business and strategic objectives, taking into account the Group companies' appetite towards tax risks.

Sampo Group supports the work at national and international level for a better and fairer tax system, in order to improve the balance between the various

interests of society, politics, and business. Sampo plc and its subsidiaries are members of various industry associations (e.g. Finance Finland, Insurance Sweden, Finance Norway, Insurance and Pension Denmark, and the Confederation of Finnish Industries). The companies seek to influence policy and legislation and engage in dialogue regarding taxes primarily through active participation in the work of industry associations.

Group actions and results

In 2022, the taxes payable and collected by Sampo Group totalled EUR 2,162.1 million. It represents 50.7 per cent (45.1), Topdanmark 14.8 per cent (28.7), Hastings 11.0 per cent (9.7), and Mandatum 7.3 per cent (8.9) of the total. The parent company Sampo plc's share was 16.1 per cent (7.7), which is mainly due to taxes withheld on dividends, as the parent company does not usually conduct other significant taxable operations.

The effective tax rates of Topdanmark and Sampo Group were impacted by the result of the sale of Topdanmark's life insurance business in 2022.

During 2022, the Sampo Group companies did not receive any financial assistance (e.g. grants or tax relief) from governments of individual countries.

Sampo Group Code of Conduct:

www.sampo.com/governance/code-of-conduct

Taxes payable and collected

Sampo Group

EURm	2022	2021	2020*
Taxes paid by the Group			
Corporate income tax	326.4	365.4	286.8
Employment taxes	172.6	146.1	118.7
Other taxes	6.0	5.2	10.5
Total	505.0	516.7	416.0
Taxes collected by the Group			
VAT	57.5	54.4	43.8
Insurance premium tax	643.8	594.0	430.0
Other taxes and charges	573.3	832.9	716.7
Withholding tax	382.5	181.1	124.3
Total	1,657.0	1,662.3	1,314.8
Total tax contribution	2,162.1	2,179.1	1,730.8

* Excluding Hastings

Taxes payable and collected by company

EURm	If		Topdanmark		Hastings		Mandatum		Sampo plc	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Taxes paid										
Corporate income tax	267.1	214.3	32.6	81.2	7.6	15.8	18.9	53.0	0.3	1.2
Employment taxes	114.0	90.3	38.2	39.0	17.5	13.9	0.7	1.1	2.2	1.7
Other taxes	3.7	3.1	0	0	0.8	0.7	1.5	1.4	0	0
Total	384.8	307.7	70.7	120.2	25.8	30.5	21.2	55.5	2.5	2.9
Taxes collected										
VAT	39.7	39.0	4.8	5.3	6.0	5.0	3.7	1.4	3.2	3.7
Insurance premium tax	464.6	438.2	12.6	12.6	166.6	143.1	0	0	0	0
Other taxes and charges	207.9	198.2	183.7	460.3	39.4	31.7	134.0	136.3	8.2	6.3
Withholding tax	0	0	48.5	27.2	0	0	0	0	334.0	153.9
Total	712.2	675.3	249.6	505.5	212.0	179.9	137.7	137.8	345.4	163.9
Total tax contribution	1,097.0	983.0	320.4	625.7	237.8	210.3	158.9	193.2	348.0	166.8

Taxes payable and collected by country

Sampo Group

EURm	Finland		Denmark		Norway		Sweden		United Kingdom		Other countries	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Taxes paid												
Corporate income tax	139.5	97.4	32.1	92.3	57.0	71.3	84.4	83.9	-1.3	4.7	14.8	15.7
Employment taxes	2.3	2.4	47.3	48.4	27.5	26.5	68.3	45.9	17.5	13.9	9.7	8.9
Other taxes	4.5	4.1	0.1	-0.1	0.1	0.0	0.0	0.0	0.8	0.8	0.4	0.3
Total	146.2	103.9	79.5	140.7	84.6	97.8	152.8	129.9	17.0	19.5	24.9	25.0
Taxes collected												
VAT	17.3	14.7	8.8	9.1	6.1	5.5	18.4	18.8	6.2	5.2	0.6	1.2
Insurance premium tax	185.7	178.1	39.2	36.4	193.1	177.7	49.6	50.4	168.2	144.5	7.9	6.9
Other taxes and charges	207.5	205.6	210.7	486.4	41.5	39.2	62.7	59.0	38.5	31.1	12.4	11.6
Withholding tax	334.0	153.9	48.5	27.2	0	0	0	0	0	0	0	0
Total	744.5	552.3	307.3	559.1	240.7	222.5	130.8	128.2	212.9	180.7	20.9	19.6
Total tax contribution	890.8	656.1	386.8	699.8	325.3	320.4	283.5	258.1	229.9	200.2	45.7	44.6

Effective tax rate

%	2022	2021	2020
If	21.0	21.0	21.6
Topdanmark	10.0	27.9	22.7
Hastings	14.1	29.5	-
Mandatum	21.3	20.6	23.9
Sampo Group*	17.0	23.7	24.5

* Group effective tax rate excluding the share of associates

Corporate tax rate in the largest operating countries

Sampo Group

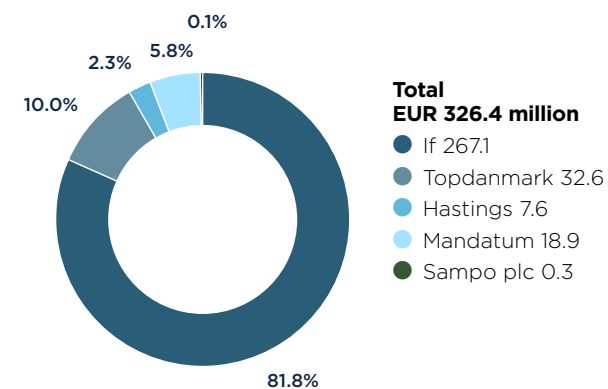
%	2022	2021	2020*
Denmark	22.0	22.0	22.0
Norway**	25.0/22.0	25.0/22.0	25.0/22.0
Sweden	20.6	20.6	21.4
Finland	20.0	20.0	20.0
United Kingdom	19.0	19.0	-

* Excluding Hastings

** Employers within insurance industries are subject to a higher tax rate.

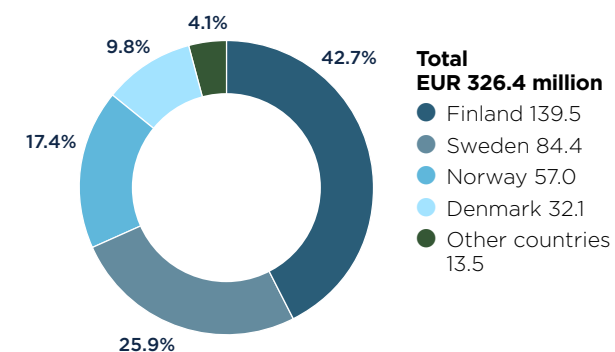
Corporate income tax by company

Sampo Group, 2022



Corporate income tax by country

Sampo Group, 2022



Communities

Objective: Sampo Group provides safety, well-being, and financial security in society.

Material topics	Main goals	Indicators monitored at the group level
Stakeholder engagement	Sampo Group <ul style="list-style-type: none"> To engage with stakeholders 	Sampo Group <ul style="list-style-type: none"> Forums for dialogue and discussion topics
Donations and other humanitarian efforts	Sampo Group <ul style="list-style-type: none"> To take part in humanitarian efforts 	Sampo Group <ul style="list-style-type: none"> The amount of donations
Tax footprint	Sampo Group <ul style="list-style-type: none"> To be a responsible taxpayer 	Sampo Group <ul style="list-style-type: none"> Taxes payable and collected by company and country and tax rates

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Appendix 1: Calculation principles

The report refers to the period from 1 January to 31 December 2022, unless otherwise stated. The report is only available in digital format.

Scope and structure of the report

The reporting scope covers the entire Sampo Group, meaning the parent company Sampo plc and its subsidiaries If, Topdanmark, Hastings, and Mandatum. The report provides group level information, with some exceptions depending on the availability of comparable data between the Group companies or the nature of the Group and the Group companies.

The report is structured around Sampo Group's five strategic sustainability themes: Sustainable business management and practices, Sustainable corporate culture, Sustainable investment management and operations, Sustainable products and services, and Sustainable communities. Under each theme, the Group's most material sustainability topics are discussed.

There are no changes to material topics or topic boundaries compared to the previous reporting year. However, compared to previous reports, data availability improved (e.g. GHG emissions), new KPIs were introduced (e.g. contingent workers by company; non-guaranteed hours employees by company, country, and binary gender; voluntary and involuntary turnover by company and country; binary gender by country; work-related injuries; cases of non-compliance; and fines paid).

Approach used for consolidation

The consolidation principles used in sustainability reporting follow those used in Sampo Group's financial reporting. The consolidated sustainability report combines sustainability information from Sampo plc and all its subsidiaries. The definition of a subsidiary derives from the Group's financial reporting.

Group level calculation principles have been applied to calculate most of the key figures and, therefore, the

statistics may deviate from locally published company-specific figures.

In financial reporting, investments in associates are treated using the equity method of accounting. In Sampo Group's sustainability reporting, associates are excluded from the scope.

No adjustments to information for minority interests have been made in 2022.

When it comes to mergers, acquisitions, and the disposal of entities or parts of entities, the approach is considered on a case-by-case basis. It depends, for example, on timing, size, and the impact of the transaction in question. Hastings is only included in the 2020 figures, which are calculated according to year-end figures, as Hastings became Sampo plc's subsidiary only in November 2020. In July 2022, Mandatum completed the sales of its Baltic life insurance operations. Due to the transaction, Mandatum's Baltic operations are not part of the Sustainability Report 2022. The transaction was completed well before the year end, and the Baltic

life insurance operations were also excluded from the Group's financial reporting. In addition, Topdanmark sold its life and pension business in December 2022. As the transaction was finalised towards year end, life business is included in the average figures, if not stated otherwise, but not in data or text describing the situation at year end.

To enable comparison, figures from previous years are provided, when available and considered material. Due to rounding, numbers presented throughout this report may not add up precisely to the totals indicated, and percentages may not precisely reflect the absolute figures for the same reason. Exchange rates used in sustainability reporting are the same as those used in Sampo Group's financial reporting.

If the consolidation approach differs from the one presented here, this has been mentioned in the calculation principles and/or in the context of each material topic and its related indicators.

A summary of Sampo Group's significant accounting policies is available in the **Board of Directors' Report and Financial Statements**.

Reporting frameworks

The report has been prepared to meet the regulatory requirements for non-financial information, in accordance with Chapter 3a, Section 5 of the Finnish Accounting Act. According to the regulation, Sampo plc publishes the sustainability report of the Group on an annual basis, as soon as possible after the publication of the Board of Directors' Report and Financial Statements, but no later than 30 June. The report also meets the reporting requirements of the EU Taxonomy.

The report has been prepared in accordance with the GRI Standards. The GRI content index is presented in Appendix 3. The report also references the Task Force on Climate-related Financial Disclosures (TCFD) and Sustainability Accounting Standards Board (SASB) frameworks. TCFD and SASB content indices are available in Appendix 4 and Appendix 5, respectively. In addition, the report meets the requirements of the UN Global Compact and communicates Sampo Group's performance regarding the UN Sustainable Development Goals.

Sampo Group will integrate the Group's sustainability reporting into the Board of Directors' report according to the requirements of the Corporate Sustainability Reporting Directive (CSRD) in 2025, covering the reporting year 2024.

Assurance

The Sustainability Report 2022 was assured by an independent third-party assurance provider with a level of limited assurance.

EU Taxonomy

EU Taxonomy eligibility indicators for investments produced by Upright were either: (1) based directly on the companies' reporting of Taxonomy metrics or (2) estimated by Upright based on other available information. Data sources used for producing Taxonomy eligibility estimates included companies' annual reports, sustainability reports, reporting to the US Securities and Exchange Commission (SEC), company websites, market statistics, and other market research. Additionally, some companies disclosed supporting information directly to Upright.

In the EU Taxonomy metrics produced by Upright, the relative sizes of different activities are determined based on the amount of revenue that is attributable to each activity. This necessitates the classification of each company's activities in line with the classification defined in the technical screening criteria of the EU Taxonomy regulation, and determination of the revenue shares relating to each activity. Most companies report their revenue only with a coarse subdivision (or no subdivision at all) that is insufficiently granular to allow for direct determination of revenue shares related to each EU Taxonomy activity. Upright produces estimated revenue breakdowns by activity, using the revenue subdivisions reported by the company as a starting point and refining them based on market statistics, other market research, and quantitative metrics produced from company publications (websites, annual reports, regulatory filings) that correlate with the revenue shares being estimated.

Upright determines the NFRD status of a company considering both EU-wide baseline criteria and national rules.

Upright's EU Taxonomy methodology:
<https://docs.uprightplatform.com/methodology/eu-taxonomy>

Sustainable business management and practices

Anti-corruption and bribery

Reported corruption and bribery incidents are severe incidents that are reported to Sampo plc by the Group companies as part of sustainability and compliance and/or risk reporting.

Anti-money laundering and counter terrorist financing

Money laundering and terrorist financing suspicions reported to the authorities are suspicions related to customer transactions.

Human rights and labour practices

The number of internally reported human rights incidents includes any severe violations of human rights and labour rights legislation. The number of incidents of discrimination and harassment includes incidents of discrimination as defined in the Sampo Group Code of Conduct and incidents of harassment that have led to formal consequences (e.g. warning or dismissal).

Environmental impacts of group operations

The section on Environmental impacts of group operations includes a summary of the GHG emissions from Sampo Group's operations. The calculations include If (Nordic and Baltic offices), Topdanmark (all offices), Hastings (all offices), Mandatum (all Finnish offices), and Sampo plc (Finnish office). The GHG emissions and related data are reported at both Group and company level. Group level calculation principles are used, and an external data provider, South Pole, conducted the calculations based on data provided by the Group companies.

The GHG accounting and reporting procedure is based on the Greenhouse Gas Protocol. Under the GHG Protocol, emissions are divided into direct and indirect emissions. The direct and indirect emissions are further divided into three scopes: Scope 1 (direct emissions), Scope 2 (indirect emissions), and Scope 3 (other indirect emissions).

If reported Scope 1 data on fuel consumption in company-owned and leased vehicles, and Scope 2 data on electricity, heating, and cooling. All electricity used in If's major offices in the Nordic countries comes from renewable sources. Scope 3 data sources include business travel (flights, staff car reimbursements, travel by train, bus, taxi, and rental car, and accommodation), IT devices

(all devices) and cloud services, paper consumption, printed and marketing material, water consumption, employee commuting, waste, and fuel- and energy-related activities. Calculations on employee commuting are based on a survey conducted by Deedster.

Topdanmark reported Scope 1 data on fuels used for stationary combustion and mobile combustion for all its offices, and Scope 2 data on electricity and heating. Electricity, heating, waste, and water consumption for the smaller offices, Herning, Odense, Vejle, Næstved, Ringsted, and Aalborg, were either based on average consumption per FTE or square metre of office area. Scope 3 data sources include business travel (flights, staff car reimbursements, and taxi rides), water consumption, paper, IT equipment (IT devices purchased during the year as well as resold IT devices) and cloud services, employee commuting, waste, and fuel- and energy-related activities. Data on employee commuting was collected through a survey. The survey had a 39 per cent response rate and the results were extrapolated to represent all employees.

Hastings reported Scope 1 data on fuel consumption in stationary machinery and refrigerants, and Scope 2 data on electricity consumption. Scope 3 data sources included

business travel (flights, staff car reimbursements, train travel, and accommodation), water consumption, paper, IT devices (all IT devices) and cloud services, remote working, waste, and fuel- and energy-related activities.

Mandatum reported Scope 1 data on fuel consumption by leased vehicles, and Scope 2 data on electricity and heating. Scope 3 data sources included business travel (flights, staff car reimbursements, taxi rides, train travel, and accommodation), IT devices (IT devices purchased during the year) and cloud services, water consumption, paper, food services, other purchased goods and services, employee commuting and remote working, and fuel- and energy-related activities. Electricity was provided for all offices except Vantaa, for which electricity consumption was extrapolated. All offices except Vantaa use electricity from renewable sources. Other electricity consumption derives from charging electric vehicles. Data for district heating and water consumption was provided only for the Helsinki office. No extrapolation on heating was done for the other offices, as they are heated by electricity. Water consumption was extrapolated based on the Helsinki office's consumption and number of employees. Data on employee commuting and remote working were collected through a survey. The response rate was 34 per cent and the results were extrapolated to represent all employees.

Sampo plc reported Scope 1 data on fuel consumption by company-owned and leased vehicles, and Scope 2 data on electricity, heating, and cooling. Scope 3 data sources include business travel (flights, staff car reimbursements, taxi rides, and accommodation), paper use, water consumption, food services, IT devices (IT devices purchased during the year) and cloud services, money spent on printing and publishing, other purchased goods and services, employee commuting and remote working, waste, and fuel- and energy-related activities. Data on employee commuting and remote working was collected through a survey. The response rate was 70 per cent and the results were extrapolated to represent all employees.

Overall, the data inventory, emission factors, and assumptions were based on the GHG Protocol. The selection of assumptions and emission factors followed a conservative approach. Where activity data for the inventory was lacking, extrapolations and estimations were made. Further information on consumption data and emissions is available in Appendix 2: GHG emissions.

Compliance with laws and regulations

In the context of sustainability reporting, the instances of non-compliance are considered significant if they, for example, result in fines or relate to restrictions imposed by governments, regulatory authorities, or public agencies on the Group companies' activities or operations (e.g. withdrawal of trading licences or licences to operate). They can also include the corrective powers of supervisory authorities and directives to cease or remediate an unlawful activity.

Sustainable corporate culture

Full-time equivalents (FTE) are used to report personnel figures, except for contingent workers, non-guaranteed hours employees, employee turnover (external, voluntary and involuntary turnover), new employees, and employees on collective bargaining agreements, which are calculated according to headcount. Mostly, year-end figures are used, except for employee turnover (external, voluntary and involuntary turnover), absence due to illness, new employees, work-related injuries and deaths, and training costs, which are calculated using averages. Remuneration-related figures are also calculated using

the FTE average. Exchange rates have an impact on the remuneration figures presented in the report.

Most Sampo Group employees work in Finland, Sweden, Norway, Denmark, the UK, Estonia, Latvia, and Lithuania. In addition, a small number of employees work in what is called in Group reporting 'Other countries'. These countries have been combined in reporting due to the size of operations in these countries and the number of Sampo Group employees working there. These other countries include Spain, Gibraltar, France, Germany, the Netherlands, Luxembourg, and the United States.

The share of women at different management levels in each individual Group company has been calculated according to company-specific calculation methods reflecting each company's organisational structure. Employee engagement is also measured and reported using company-specific metrics. As all the Group companies have their own reporting structures, these figures are not comparable.

The occupational healthcare system refers to healthcare services that the employer offers to employees. It can be either statutory or voluntarily offered. Supplementary occupational healthcare, in turn, covers only the healthcare services that the employer offers voluntarily without any statutory requirement.

Sustainable investment management and operations

Investment management at If, Mandatum, and Sampo plc

The investments of If, Mandatum, and Sampo plc are reported together, as the companies have a common infrastructure for investment management and share responsible investment practices. Data for ESG integration, sector-based screening, norms-based screening, active ownership, and assets managed by external investment managers is prepared by MAM, based on data obtained from external data providers and investment managers.

An external service provider, Colliers International Finland, supports MAM in the management of fully owned direct real estate investments. Colliers is also in charge of producing the numerical data presented in the report regarding the topic. There are no identified Scope 1 emissions in the carbon footprint calculations of the direct real estate investments. The Scope 2 calculations include electricity, heating, and cooling. The Scope 3 emissions include electricity purchased by tenants. The calculations are market-based.

This section on investments does not cover investments related to Mandatum's unit-linked businesses. Mandatum does not carry the investment risk for those investments, and the investments are made according to customer preferences.

Investment management at Topdanmark and Hastings

Topdanmark and Hastings manage their investments independently of the other Group companies. The data presented in these sections of the report are prepared based on information received from Topdanmark and Hastings. Reporting on Topdanmark's investments is in the new portfolio as at 31 December 2022.

Carbon footprint of investments

The carbon footprint of investments includes the direct equity and direct fixed income investments of If, Topdanmark, Hastings, Mandatum, and Sampo plc. The unit-linked investments of Mandatum are not included in the calculations. In addition, sovereigns were excluded. The carbon footprint analysis was conducted by ISS ESG.

The methodology of ISS ESG is based on two pillars: (1) ISS ESG collects self-reported GHG data from all available sources, including sustainability reports, the CDP, Bloomberg, investor relations and other company communications. Once self-reported emissions data from all available sources is collected, the data is then tested for trustworthiness. (2) For all non-reporting companies, ISS ESG has developed an approach for modelling such data.

The financed emissions measure the carbon footprint of a portfolio taking Scope 1, 2 and 3 emissions into account. The relative carbon footprint is a normalised measure, defined as the total carbon emissions of the portfolio for each million euros of revenue. Carbon intensity is a metric that applies the ownership approach to also determine an investor's share of revenue, subsequently dividing one by the other. By linking to revenue, the metric is intended to describe the carbon efficiency of the underlying holdings. The weighted average carbon intensity is derived directly from the TCFD recommendations, in which GHG emissions are allocated based on portfolio weights rather than the ownership approach.

Climate impact assessment of investments

The climate impact assessment of investments includes the direct equity and direct fixed income investments of If, Topdanmark, Hastings, Mandatum, and Sampo plc. The unit-linked investments of Mandatum are not included in the calculations. In addition, sovereigns were excluded. The climate impact assessment was conducted by ISS ESG.

Climate scenario analysis

The report presents three climate scenarios provided by the International Energy Agency (IEA) in their report World Energy Outlook 2021. These are the Sustainable Development Scenario (SDS), the Announced Pledges Scenario (APS), and the Stated Policy Scenario (STEPS). Each scenario expects a certain level of temperature increase by 2100 and is thus tied to a carbon budget.

A carbon budget specifies the cumulative amount of carbon dioxide emissions permitted if the temperature is to remain within a certain limit by the end of the century. For example, to remain within the limits of the SDS, less carbon can be combusted compared to the scenarios that expect a significant temperature increase, that is, the STEPS.

The ISS ESG scenario analysis combines the IEA scenarios with the Sectoral Decarbonization Approach (SDA) by allocating a carbon budget to a company based on its market share and the expected emissions trajectory associated with that sector. For most sectors, this analysis is based on direct and indirect emission intensity in relation to revenue. For certain sectors, such as utilities and fossil fuel producers, sector-specific approaches are implemented.

The Portfolio emission pathway vs. climate scenarios graph plots the alignment on a portfolio and benchmark level per year, while the shaded areas illustrate the emission budgets per year according to the respective

scenarios. The slope of the portfolio line is influenced by the portfolio composition and the ownership ratio in each company. Emission reduction targets are also taken into consideration, and the expected trajectories of companies are adjusted downwards if companies set either ambitious targets, or committed or approved science-based targets.

Climate targets analysis

The climate targets analysis gives an indication of how well companies are aligning with international climate goals. Issuers are grouped into five categories, distinguishing between No target, Non-ambitious target, Ambitious target, Committed science-based target, and Approved science-based target. Non-ambitious and ambitious targets are analysed as part of the ISS ESG ratings factor GHG emission reduction targets and action plans. This factor identifies companies that have set climate targets outside the SBTi.

Sustainable products and services

Information on products and services, supply chain management, sales and marketing practices, and customer satisfaction is reported at company level. Metrics and calculation methods used in these sections of the report are not comparable from one Group company to another. The reporting is adjusted for each subsidiary and its specific needs.

Sustainability in communities

Tax footprint and donations are reported at Group and company levels using common group-wide calculation principles. The tax figures are unaudited and based on advance information.

Appendix 2: GHG emissions

GHG emissions

Sampo Group

	2022 emissions (tCO ₂ e)	2021 emissions (tCO ₂ e)	Change 2021-2022
Scope 1: Direct GHG emissions	1,188.0	1,867.9	-36.4%
Stationary combustion	801.4	1,302.7	-38.5%
Natural gas	800.1	1,301.6	-38.5%
Gas oil	1.3	1.0	26.2%
Mobile combustion	383.9	562.3	-31.7%
Diesel	281.1	423.4	-33.6%
Petrol	102.8	139.0	-26.1%
Refrigerants	2.7	2.8	-1.9%
Scope 2: Indirect GHG emissions	4,066.1	2,458.5	65.4%
Electricity	2,996.5	1,995.3	50.2%
Renewable	0.0	0.0	-
Grid	2,996.5	1,995.3	50.2%
Heating and cooling	1,069.6	463.2	130.9%
District heating	992.4	458.3	116.5%
District cooling	0.7	4.9	-85.1%
District heating/cooling	76.4	0.0	-
Scope 3: Other indirect emissions	15,586.0	6,314.9	146.8%
Business travel	5,945.1	2,743.2	116.7%
Flights	3,437.7	893.9	284.6%
Staff car	2,187.0	1,763.7	24.0%
Rental car	20.5	9.4	118.7%
Taxi	45.1	13.6	231.2%
Taxi	18.6	0.0	-
Train	46.4	15.1	207.6%
Bus	1.9	0.0	-
Accommodation	187.8	47.5	295.4%

	2022 emissions (tCO ₂ e)	2021 emissions (tCO ₂ e)	Change 2021-2022
Purchased goods and services	2,102.4	2,348.0	-10.5%
Water supply and treatment	23.7	14.2	67.5%
Paper	80.0	93.6	-14.5%
Food services	74.6	24.7	202.4%
Cloud services	102.0	96.5	5.7%
Other purchased goods and services	28.5	2.2	1,191.6%
IT equipment	1,793.6	2,116.9	-15.3%
Capital goods	248.5	0.0	-
IT equipment	204.5	0.0	-
Other	44.0	0.0	-
Employee commuting and remote working	5,521.1	11.9	46,289.5%
Employee commuting	5,024.0	2.8	177,841.4%
Walk or bike	0.0	0.0	-
E-bike, moped or motorcycle	8.3	0.0	-
Public transport	456.3	1.1	40,747.7%
Taxi	0.0	0.1	-100.0%
Car	4,547.4	1.7	275,501.2%
Plane	12.0	0.0	-
Remote working	497.1	9.1	5,376.0%
Waste generated in operations	281.0	80.2	250.3%
End-of-life sold products	0.1	0.0	-
Fuel and energy-related activities	1,487.7	1,131.5	31.5%
Natural gas	136.3	222.8	-38.8%
Gas oil	0.3	0.3	19.3%
Diesel	54.7	99.1	-44.8%
Petrol	11.0	18.5	-40.8%
Renewable electricity	288.3	302.6	-4.7%
Grid electricity	773.4	324.5	138.3%
District heating	199.5	160.2	24.5%
District cooling	8.3	3.7	121.6%
District heating/cooling	16.0	0.0	-
Total	20,840.1	10,641.3	95.8%

GHG emissions

Sampo Group, 2022

	Consumption	Unit	Emissions (tCO ₂ e)	Share of total emissions
Scope 1: Direct GHG emissions			1,188.0	5.7%
Stationary combustion			801.4	3.8%
Natural gas	4,383,737	kWh	800.1	3.8%
Gas oil	473	litres	1.3	0.0%
Mobile combustion	197,244	litres	383.9	1.8%
Diesel	150,552	litres	281.1	1.3%
Petrol	46,692	litres	102.8	0.5%
Refrigerants	1	kg	2.7	0.0%
Scope 2: Indirect GHG emissions			4,066.1	19.5%
Electricity	21,832,089	kWh	2,996.5	14.4%
Renewable	15,943,984	kWh	0.0	0.0%
Grid	5,888,105	kWh	2,996.5	14.4%
Heating and cooling	13,752,236	kWh	1,069.6	5.1%
District heating	11,448,465	kWh	992.4	4.8%
District cooling	1,798,264	kWh	0.7	0.0%
District heating/cooling	505,507	kWh	76.4	0.4%
Scope 3: Other indirect emissions			15,586.0	74.8%
Business travel	30,960,062	(p)km	5,945.1	28.5%
Flights	15,438,419	pkm	3,437.7	16.5%
Staff car	11,476,970	km	2,187.0	10.5%
Rental car	133,000	pkm	20.5	0.1%
Taxi	307,439	pkm	45.1	0.2%
Taxi	50,802	EUR	18.6	0.1%
Train	3,581,902	pkm	46.4	0.2%
Bus	22,332	km	1.9	0.0%
Accommodation	15,861	Number of guest nights	187.8	0.9%

	Consumption	Unit	Emissions (tCO ₂ e)	Share of total emissions
Purchased goods and services			2,102.4	10.1%
Water supply and treatment	56,394	m ³	23.7	0.1%
Paper	200	tonnes	80.0	0.4%
Food services	366,950	EUR	74.6	0.4%
Cloud services	50,939	Number of users	102.0	0.5%
Other purchased goods and services	67,686	EUR	28.5	0.1%
IT equipment	31,445	Number of devices	1,793.6	8.6%
Capital goods			248.5	1.2%
IT equipment	1,912	Number of devices	204.5	1.0%
Other	161,800	EUR	44.0	0.2%
Employee commuting and remote working			5,521.1	26.5%
Employee commuting	45,864,032	pkm	5,024.0	24.1%
Walk or bike	2,565,023	pkm	0.0	0.0%
E-bike, moped or motorcycle	445,465	pkm	8.3	0.0%
Public transport	12,594,514	pkm	456.3	2.2%
Taxi	0	pkm	0.0	0.0%
Car	30,215,030	pkm	4,547.4	21.8%
Plane	44,000	pkm	12.0	0.1%
Remote working	710,787	Days WFH	497.1	2.4%
Waste generated in operations	1,083	tonnes	281.0	1.3%
End-of-life sold products	4	tonnes	0.1	0.0%
Fuel- and energy-related activities			1,487.7	7.1%
Natural gas	4,383,737	kWh	136.3	0.7%
Gas oil	473	litres	0.3	0.0%
Diesel	150,552	litres	54.7	0.3%
Petrol	46,692	litres	11.0	0.1%
Renewable electricity	15,943,984	kWh	288.3	1.4%
Grid electricity	5,888,105	kWh	773.4	3.7%
District heating	11,448,465	kWh	199.5	1.0%
District cooling	1,798,264	kWh	8.3	0.0%
District heating/cooling	505,507	kWh	16.0	0.1%
Total			20,840.1	100.0%

GHG emissions by company

Sampo Group

tCO ₂ e	Sampo Group		If	Topdanmark	Hastings		Mandatum		Sampo plc			
	2022	2021			2022	2021	2022	2021	2022	2021	2022	2021
Scope 1: Direct GHG emissions	1,188.0	1,867.9	65.9	77.2	886.5	1,458.3	185.9	253.8	42.5	70.4	7.3	8.2
Stationary combustion	801.4	1,302.7	0.0	0.0	618.3	1,051.6	183.2	251.1	0.0	0.0	0.0	0.0
Natural gas	800.1	1,301.6			618.3	1,051.6	181.9	250.0				
Gas oil	1.3	1.0					1.3	1.0				
Mobile combustion	383.9	562.3	65.9	77.2	268.2	406.6	0.00	0.0	42.5	70.4	7.3	8.2
Diesel	281.1	423.4	23.5	27.4	240.7	386.2			15.0	4.9	2.0	4.9
Petrol	102.8	139.0	42.4	49.8	27.5	20.4			27.5	65.5	5.3	3.2
Refrigerants	2.7	2.8					2.7	2.8				
Scope 2: Indirect GHG emissions	4,066.1	2,458.5	1,174.2	281.9	2,637.5	2,019.8	118.7	25.1	109.8	124.8	25.8	6.9
Electricity	2,996.5	1,995.3	334.5	14.8	2,533.5	1,924.1	118.7	25.1	9.8	31.2	0.0	0.1
Renewable	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Grid	2,996.5	1,995.3	334.5	14.8	2,533.5	1,924.1	118.7	25.1	9.8	31.2		0.1
Heating and cooling	1,069.6	463.2	839.7	267.1	104.0	95.8	0.0	0.0	100.0	93.6	25.8	6.8
District heating	992.4	458.3	763.1	262.5	104.0	95.8			100.0	93.6	25.2	6.5
District cooling	0.7	4.9	0.1	4.6							0.6	0.3
District heating/cooling	76.4	0.0	76.4									
Scope 3: Other indirect emissions	15,586.0	6,314.9	9,069.9	3,278.9	4,188.2	1,993.4	1,478.0	664.9	696.3	313.6	153.7	64.2
Business travel	5,945.1	2,743.2	3,635.6	1,327.6	1,677.7	1,252.5	294.8	67.4	255.3	74.8	81.7	20.9
Flights	3,437.7	893.9	2,748.3	793.8	321.5	19.9	113.1	24.8	176.5	37.4	78.3	18.1
Staff car	2,187.0	1,763.7	676.8	474.8	1,349.9	1,232.6	104.8	20.0	55.5	35.1	0.0	1.3
Rental car	20.5	9.4	20.5	9.4								
Taxi	45.1	13.6	42.7	13.1	0.7						1.8	0.6
Taxi	18.6	0.0							18.6			
Train	46.4	15.1	20.5	0.7			25.5	14.3	0.4	0.1		
Bus	1.9	0.0	1.9									
Accommodation	187.8	47.5	125.0	35.8	5.5		51.5	8.3	4.3	2.3	1.6	1.0

tCO ₂ e	Sampo Group		If		Topdanmark		Hastings		Mandatum		Sampo plc	
	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021	2022	2021
Purchased goods and services	2,102.4	2,348.0	1,362.4	1,670.8	14.0	3.1	610.7	459.3	83.4	189.8	31.9	25.0
Water supply and treatment	23.7	14.2	16.5	8.4	4.0	3.1	2.4	2.3	0.6	0.4	0.1	0.1
Paper	80.0	93.6	64.4	70.6	8.5		0.5	1.2	6.4	21.4	0.2	0.4
Food services	74.6	24.7							57.5	24.7	17.1	
Cloud services	102.0	96.5	33.2	31.3	1.5		62.5	61.0	2.0	4.0	2.8	0.2
Other purchased goods and services	28.5	2.2							16.8		11.7	2.2
IT equipment	1,793.6	2,116.9	1,248.3	1,560.5			545.3	394.9		139.4		22.1
Capital goods	248.5	0.0	0.0	0.0	110.7	0.0	0.0	0.0	124.5	0.0	13.3	0.0
IT equipment	204.5	0.0			110.7				80.8		13.0	
Other	44.0	0.0							43.7		0.3	
Employee commuting and remote working	5,521.1	11.9	3,454.6		1,445.3		418.7		185.4		17.1	11.9
Employee commuting	5,024.0	2.8	3,454.6	0.0	1,445.3	0.0	0.0	0.0	112.0	0.0	12.1	2.8
Walk or bike	0.0	0.0	0.0		0.0				0.0		0.0	0.0
E-bike, moped or motorcycle	8.3	0.0	7.8		0.4				0.0		0.0	0.0
Public transport	456.3	1.1	374.2		40.6				37.3		4.3	1.1
Taxi	0.0	0.1										0.1
Car	4,547.4	1.7	3,072.6		1,392.3				74.7		7.8	1.7
Plane	12.0	0.0			12.0							
Remote working	497.1	9.1					418.7		73.4		4.9	9.1
Waste generated in operations	281.0	80.2	193.9	15.9	66.1	49.2	20.1	15.1			1.0	
End-of-life sold products	0.1	0.0			0.1							
Fuel- and energy-related activities	1,487.7	1,131.5	423.4	264.6	874.3	688.6	133.6	123.1	47.6	48.9	8.7	6.4
Natural gas	136.3	222.8			105.3	180.0	31.0	42.8				
Gas oil	0.3	0.3					0.3	0.3				
Diesel	54.7	99.1	4.6	3.5	46.8	93.8			2.9	0.6	0.4	1.2
Petrol	11.0	18.5	4.5	5.1	2.9	5.7			2.9	6.8	0.6	0.9
Renewable electricity	288.3	302.6	153.4	149.1	48.8	58.9	63.5	77.2	19.7	14.6	2.9	2.7
Grid electricity	773.4	324.5	78.6	2.2	653.2	315.0	38.9	2.8	2.7	4.6		0.0
District heating	199.5	160.2	158.0	101.0	17.3	35.3			19.3	22.4	4.9	1.5
District cooling	8.3	3.7	8.3	3.7							0.0	0.0
District heating/cooling	16.0	0.0	16.0									
Total	20,840.1	10,641.3	10,310.0	3,638.0	7,712.2	5,471.5	1,782.6	943.8	848.7	508.7	186.7	79.2

Offices included in the GHG emission accounting

Sampo Group, 2022

Location	Country	Group company
Stockholm	Sweden	If
Göteborg	Sweden	If
Sundsvall	Sweden	If
Other offices	Sweden	If
Turku	Finland	If
Espoo	Finland	If
Other offices	Finland	If
Stamholmen	Denmark	If
Other offices	Denmark	If
Vækerø	Norway	If
Other offices	Norway	If
Tallinn	Estonia	If
Riga	Latvia	If
Vilnius	Lithuania	If
Ballerup	Denmark	Topdanmark
Viby	Denmark	Topdanmark
Herning	Denmark	Topdanmark
Vejle	Denmark	Topdanmark
Odense	Denmark	Topdanmark
Næstved	Denmark	Topdanmark
Ringsted	Denmark	Topdanmark
Aalborg	Denmark	Topdanmark
Employees not connected to a location	-	Topdanmark

Location	Country	Group company
Leicester	United Kingdom	Hastings
Bexhill-on-Sea	United Kingdom	Hastings
Gibraltar	United Kingdom	Hastings
London	United Kingdom	Hastings
Cardiff	United Kingdom	Hastings
Employees not connected to a location	-	Hastings
Helsinki	Finland	Mandatum
Oulu	Finland	Mandatum
Turku	Finland	Mandatum
Tampere	Finland	Mandatum
Jyväskylä	Finland	Mandatum
Vantaa	Finland	Mandatum
Other offices	Finland	Mandatum
Helsinki	Finland	Sampo plc

Emission factors

Sampo Group, 2022

Activity	Emission factor reference
Stationary combustion	Bilan Carbone v.8.8; French Environment and Energy Management Agency, 2022; UK Department for Business, Energy & Industrial Strategy, 2022
Mobile combustion	Swedish Energy Agency, 2021; Swedish Environmental Protection Agency, 2021
Refrigerants	UK Department for Business, Energy & Industrial Strategy, 2022
Electricity	Association of Issuing Bodies, 2022; Bilan Carbone v.8.8; Ecoinvent v.3.9.1; French Environment and Energy Management Agency, 2022; If P&C Insurance, 2023; International Energy Agency, 2022; IPCC, 2014; Swedenergy, 2021; Swedish Energy Markets Inspectorate, 2022
District heating	Euroheat & Power, 2017; Finnish Energy Statistics, 2021; International Energy Agency; Swedish Environmental Protection Agency, 2022; UK Department for Business, Energy & Industrial Strategy, 2022
District cooling	Helen, 2018, 2020 & 2021; Swedish district cooling suppliers; Turku Energia, 2017
Business travel	Comprehensive Environmental Data Archive, 2019; Cornell Hotel Sustainability Benchmarking Index, 2019; NTM Method, 2015; Swedish Environmental Protection Agency, 2021; Swedish Transport Administration, 2019; Statistics Norway, 2020; UK Department for Business, Energy & Industrial Strategy, 2021 & 2022
Employee commuting and remote working	Anthesis, 2020; Ecoinvent v.3.9.1; European Union; International Energy Agency, 2022; South Pole database, 2023; Swedish Energy Markets Inspectorate, 2022; Swedish Environmental Protection Agency, 2021; Swedish Transport Administration, 2019; UK Department for Business, Energy & Industrial Strategy, 2022
Waste	Ecoinvent v.3.9; UK Department for Business, Energy & Industrial Strategy, 2021
Purchased goods and services	Amazon, 2021; Apple 2016–2022; Comprehensive Environmental Data Archive, 2019; Dell, 2014 & 2021; Ecoinvent v.3.9.1 & v.3.3.8; Google, 2012 & 2017–2022; HP, 2021–2022; Huawei, 2019; IPCC, 2014; Lenovo, 2021; Microsoft, 2021–2022; Ortviken, 2021; Salesforce, 2021; Samsung, 2020; South Pole database, 2023; Staples; Swedish Energy Markets Inspectorate, 2022; UK Department for Business, Energy & Industrial Strategy, 2021 & 2022
Fuel- and energy-related activities	Association of Issuing Bodies, 2022; Bilan Carbone v.8.8; Ecoinvent v.3.9.1; Euroheat & Power, 2017; Finnish Energy Statistics, 2021; French Environment and Energy Management Agency, 2022; International Energy Agency, 2022; Swedish Energy Markets Inspectorate, 2022; Swedish Energy Agency, 2022; Swedish Environmental Protection Agency, 2022; Swedish district cooling suppliers; UK Department for Business, Energy & Industrial Strategy, 2022; Värmeforsk, 2011
Capital goods	Apple, 2016–2022; Casio, 2006; Comprehensive Environmental Data Archive, 2019; Dell 2014 & 2018–2022, 2018–2022; HP, 2022; Konica Minolta, 2018; Lenovo, 2015–2020 & 2021; Samsung, 2020; Seagate, 2013–2020; South Pole database, 2023; UK Department for Business, Energy & Industrial Strategy, 2022
End-of-life of sold products	UK Department for Business, Energy & Industrial Strategy, 2021

Appendix 3: GRI content index

Statement of use	Sampo Group has reported in accordance with the GRI Standards for the period 1.1.2022–31.12.2022.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	N/A

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
General Disclosures					
GRI 2: General Disclosures 2021	2-1 Organisational details	pp. 7-8			
	2-2 Entities included in the organisation's sustainability reporting	pp. 181-182			
	2-3 Reporting period, frequency and contact point	The report was published on 10 May 2023, and it refers to the period from 1 January to 31 December 2022, unless otherwise stated. Sampo Group publishes the sustainability report on an annual basis. p. 207			
	2-4 Restatements of information	No major restatements of information from previous reporting periods.			
	2-5 External assurance	External assurance has been performed (limited assurance). pp. 204-205			
	2-6 Activities, value chain and other business relationships	pp. 7-10, 24, 44-50, 142-149 pp. 35, 44-45 in Sampo Group's Board of Directors' Report and Financial Statements: www.sampo.com/year2022			
	2-7 Employees	pp. 65-71			
	2-8 Workers who are not employees	pp. 66, 69			
	2-9 Governance structure and composition	pp. 11-13 and 90-91 pp. 3-4 and 7-12 in Sampo Group's Corporate Governance Statement: www.sampo.com/year2022	Parts of 2-9-c	Not applicable	Sampo Group does not collect data on racial or ethnic identities.
	2-10 Nomination and selection of the highest governance body	pp. 90-91 pp. 8 in Sampo Group's Corporate Governance Statement: www.sampo.com/year2022 Sampo Group's diversity policy for the Board of Directors: www.sampo.com/governance/board-of-directors/board-diversity			
	2-11 Chair of the highest governance body	pp. 7-12 in Sampo Group's Corporate Governance Statement: www.sampo.com/year2022			
	2-12 Role of the highest governance body in overseeing the management of impacts	pp. 11-18, 163-164			
	2-13 Delegation of responsibility for managing impacts	pp. 11-13, 163-164			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-14 Role of the highest governance body in sustainability reporting	pp. 11-13			
	2-15 Conflicts of interest	Sampo Group Code of Conduct: www.sampo.com/governance/code-of-conduct Sampo Group's Managers' transactions: www.sampo.com/media/releases/?s=transactions-release			
	2-16 Communication of critical concerns	pp. 13, 24, 28-29, 32-33, 38, 44-45			
	2-17 Collective knowledge of the highest governance body	pp. 11-13 Board skills matrix: www.sampo.com/governance/board-of-directors/board-skills-matrix			
	2-18 Evaluation of the performance of the highest governance body	p. 11 pp. 7-14 in Sampo Group's Corporate Governance Statement: www.sampo.com/year2022			
	2-19 Remuneration policies	pp. 108-113 Sampo Group Remuneration principles: www.sampo.com/governance/remuneration/remuneration-principles Sampo Group Remuneration Report for Governing Bodies: www.sampo.com/year2022 Group CEO: www.sampo.com/governance/remuneration/group-ceo Group Executive Committee: www.sampo.com/governance/remuneration/group-executive-committee	Parts of 2-19-a	Confidentiality constraints	Staff remuneration policy is not public.
	2-20 Process to determine remuneration	pp. 108-110 p. 14 in Sampo Group's Corporate Governance Statement: www.sampo.com/year2022 Remuneration: www.sampo.com/governance/remuneration			
	2-21 Annual total compensation ratio	p. 111			
	2-22 Statement on sustainable development strategy	pp. 5-6			
	2-23 Policy commitments	p. 9 Sampo Group Code of Conduct: www.sampo.com/governance/code-of-conduct			
	2-24 Embedding policy commitments	pp. 24, 28, 32, 38, 44, 51 Sampo Group Code of Conduct: www.sampo.com/governance/code-of-conduct			
	2-25 Processes to remediate negative impacts	p. 13			
	2-26 Mechanisms for seeking advice and raising concerns	pp. 24-31			
	2-27 Compliance with laws and regulations	p. 62			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-28 Membership associations	Sampo Group political involvement and lobbying: www.sampo.com/sustainability/sustainable-business-management-and-practices/political-involvement			
	2-29 Approach to stakeholder engagement	pp. 11-13, 163-164			
	2-30 Collective bargaining agreements	pp. 44-45			
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	pp. 11-14			
	3-2 List of material topics	p. 14			
Economic performance					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13 Sampo Group Board's of Directors' Report and Financial Statements: www.sampo.com/year2022			
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	p. 43 in Sampo Group's Board of Directors' Report and Financial Statements: www.sampo.com/year2022			
	201-2 Financial implications and other risks and opportunities due to climate change	pp. 15-18, 51-61, 116-126, 130-131			
	201-3 Defined benefit plan obligations and other retirement plans		201-3	Not applicable	
	201-4 Financial assistance received from government	Sampo Group did not receive any financial assistance from any government in 2022.			
Anti-corruption					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 24			
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	pp. 15-18, 24-27			
	205-2 Communication and training about anti-corruption policies and procedures	pp. 24-27	205-2 d-e	Information unavailable/incomplete	The aim is to improve disclosure on employees who have received training on anti-corruption.
	205-3 Confirmed incidents of corruption and actions taken	p. 24, no confirmed incidents			
Anti-competitive behavior					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13 Sampo Group Code of Conduct: www.sampo.com/governance/code-of-conduct			
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	No legal actions during the reporting year.			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Emissions					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 51-52, 116, 123, 125			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	pp. 51-61, 120-121, 127-129, 183-193			
	305-2 Energy indirect (Scope 2) GHG emissions	pp. 51-61, 120-121, 127-129, 183-193			
	305-3 Other indirect (Scope 3) GHG emissions	pp. 51-61, 120-121, 128-129, 183-193			
	305-4 GHG emissions intensity	pp. 126-129			
	305-5 Reduction of GHG emissions	pp. 51-61, 121			
	305-6 Emissions of ozone-depleting substances (ODS)		305-6	Not applicable	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions		305-7	Not applicable	
Occupational health and safety					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 92			
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	pp. 92-99			
	403-2 Hazard identification, risk assessment, and incident investigation	pp. 15-18, 92-99			
	403-3 Occupational health services	pp. 15-18, 92-99			
	403-4 Worker participation, consultation, and communication on occupational health and safety	pp. 92-99			
	403-5 Worker training on occupational health and safety	pp. 92-99			
	403-6 Promotion of worker health	pp. 92-99			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	pp. 92-99			
	403-8 Workers covered by an occupational health and safety management system	p. 93	Parts of 403-8-a	Information unavailable/incomplete	Information on workers who are not employees is currently not available.
	403-9 Work-related injuries	p. 92-93	403-9-b	Information unavailable/incomplete	Information on workers who are not employees is currently not available.
	403-10 Work-related ill health		403-10	Not applicable	

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Training and education					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 100			
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee		404-1	Information unavailable/incomplete	Information on training hours per year per employee is currently not collected. Training costs per employee are reported instead.
	404-2 Programmes for upgrading employee skills and transition assistance programs	pp. 100-107, no transition assistance programmes			
	404-3 Percentage of employees receiving regular performance and career development reviews		404-3	Information unavailable/incomplete	Information is currently not collected.
Diversity and equal opportunity					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 79			
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	pp. 79-91			
	405-2 Ratio of basic salary and remuneration of women to men	pp. 109-111			
Non-discrimination					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 44			
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	pp. 44-45			
Freedom of association and collective bargaining					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 44			
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	pp. 44-50 Sampo Group Code of Conduct: www.sampo.com/governance/code-of-conduct			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Child labor					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 44			
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	pp. 44-50 Sampo Group Code of Conduct: www.sampo.com/governance/code-of-conduct			
Forced or compulsory labor					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 44			
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	pp. 44-50 Sampo Group Code of Conduct: www.sampo.com/governance/code-of-conduct			
Customer privacy					
GRI 3: Material Topics 2021	3-3 Management of material topics	pp. 11-13, 32, 38			
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	pp. 33, 38			

Appendix 4: TCFD content index

The following table presents page and URL references in this report and the website where group level disclosures aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) are presented. Additional information on individual Group companies' TCFD disclosures is available in the companies' respective reporting.

TCFD disclosure focus area	TCFD recommended disclosures	Location for Sampo Group level disclosure in this report	Location for Sampo Group level disclosure on the website	Other relevant Sampo Group level reporting
Governance Disclose the organisation's governance around climate-related risks and opportunities.	a) Describe the board's oversight of climate-related risks and opportunities.	pp. 11-13, 15-16	www.sampo.com/sustainability/climate-and-environment/governance	Sampo Group Risk Management Report: www.sampo.com/year2022
	b) Describe management's role in assessing and managing climate-related risks and opportunities.	pp. 11-13, 15-18	www.sampo.com/sustainability/climate-and-environment/governance	Sampo Group Risk Management Report: www.sampo.com/year2022
Strategy Disclose the actual and potential impacts of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning where such information is material.	a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	pp. 15-18	www.sampo.com/sustainability/climate-and-environment/strategy	Sampo Group Risk Management Report: www.sampo.com/year2022
	b) Describe the impact of climate related risks and opportunities on the organisation's businesses, strategy, and financial planning.	pp. 14, 16-18, 116-131, 134-141, 163-168, 203	www.sampo.com/sustainability/sustainability-management ; www.sampo.com/sustainability/climate-and-environment/strategy	Sampo Group Risk Management Report: www.sampo.com/year2022
	c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	pp. 16-18, 130-131	www.sampo.com/sustainability/climate-and-environment/strategy	Sampo Group Risk Management Report: www.sampo.com/year2022
Risk management Disclose how the organisation identifies, assesses, and manages climate-related risks.	a) Describe the organisation's processes for identifying and assessing climate-related risks.	pp. 15-18	www.sampo.com/sustainability/climate-and-environment/risk-management	Sampo Group Risk Management Report: www.sampo.com/year2022
	b) Describe the organisation's processes for managing climate-related risks.	pp. 15-18, 116-126, 130-131	www.sampo.com/sustainability/climate-and-environment/risk-management	Sampo Group Risk Management Report: www.sampo.com/year2022
	c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.	pp. 15-18	www.sampo.com/sustainability/climate-and-environment/risk-management	Sampo Group Risk Management Report: www.sampo.com/year2022
Metrics and targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process.	pp. 51-61, 127-131, 188-193	www.sampo.com/sustainability/climate-and-environment/metrics-and-targets	-
	b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	pp. 51-61, 127-129, 188-193	www.sampo.com/sustainability/climate-and-environment/metrics-and-targets	-
	c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	pp. 14, 51-61, 63, 120-121, 125, 132	www.sampo.com/sustainability/climate-and-environment/metrics-and-targets	-

Appendix 5: SASB content index

The table below presents page references in this report or to other reports mentioned and/or URL locations related to metrics applied in the Sustainability Accounting Standards Boards (SASB) industry-specific standards for the Asset Management & Custody Activities Sustainability Accounting Standard and the Insurance Sustainability Accounting Standard.

Topic	Accounting metric	Code	Location for Sampo Group level disclosure in this report	Location for Sampo Group level disclosure on the website
Asset Management & Custody Activities Sustainability Accounting Standard				
Transparent information and fair advice for customers	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers	FN-AC-270a.2	p. 62	Sampo Group's Board of Directors' Report and Financial Statements 2022 pp. 124-125: www.sampo.com/year2022 . The estimate is that there will be no significant losses.
Transparent information and fair advice for customers	Description of approach to informing customers about products and services	FN-AC-270a.3	pp. 150-154	www.sampo.com/sustainability/sustainable-business-management-and-practices/sustainable-sales-and-marketing-practices
Employee diversity and inclusion	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	FN-AC-330a.1	pp. 79-91, but Sampo Group does not disclose information on racial/ethnic group representation. Information for not disclosed/available gender is not available.	-
Incorporation of ESG factors in investment management and advisory	Description of approach to incorporation of ESG factors in investment and/or wealth management processes and strategies	FN-AC-410a.2	pp. 116-131, 140-141	www.sampo.com/sustainability/sustainable-investment-management-and-operations
Incorporation of ESG factors in investment management and advisory	Description of proxy voting and investee engagement policies and procedures	FN-AC-410a.3	pp. 119-120, 124, 126	www.sampo.com/sustainability/sustainable-investment-management-and-operations
Business ethics	Description of whistleblower policies and procedures	FN-AC-510a.2	p. 13	www.sampo.com/sustainability/sustainable-business-management-and-practices/whistleblowing
Insurance Sustainability Accounting Standard				
Transparent information and fair advice for customers	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of insurance product-related information to new and returning customers	FN-IN-270a.1	p. 62	Sampo Group's Board of Directors' Report and Financial Statements 2022 pp. 124-125: www.sampo.com/year2022 . The estimate is that there will be no significant losses.
Transparent information and fair advice for customers	Complaints-to-claims ratio	FN-IN-270a.2	pp. 150-154	www.sampo.com/sustainability/sustainable-business-management-and-practices/sustainable-sales-and-marketing-practices
Transparent information and fair advice for customers	Description of approach to informing customers about products	FN-IN-270a.4	pp. 150-154	www.sampo.com/sustainability/sustainable-business-management-and-practices/sustainable-sales-and-marketing-practices
Incorporation of ESG factors in investment management	Total invested assets, by industry and asset class	FN-IN-410a.1	p. 116	Sampo Group's Board of Directors' Report and Financial Statements 2022 pp. 95, 130 and Sampo Group's Risk Management Report 2022 pp. 17-125: www.sampo.com/year2022
Incorporation of ESG factors in investment management	Description of approach to incorporation of ESG factors in investment management processes and strategies	FN-IN-410a.2	pp. 116-131	www.sampo.com/sustainability/sustainable-investment-management-and-operations

Appendix 6: The UN Sustainable Development Goals

Sampo plc has assessed the UN SDGs and the underlying targets to identify the SDGs to which the Sampo Group companies can contribute the most. All 17 SDGs and 169 underlying targets were evaluated in relation to the Group companies' businesses and the Group's sustainability themes.

According to the assessment, Sampo Group has a strong impact on SDGs 3, 5, 8, 12, and 13. Therefore, Sampo Group has chosen to focus on these goals. The Group

companies aim to contribute to the SDGs positively, among other things, by improving their own operations, by being active in their respective communities, and by engaging with their value chains.

In addition to the group level SDGs, Sampo plc's subsidiaries have identified the SDGs that are most relevant for them. More information on If, Topdanmark, Hastings, and Mandatum's work towards the SDGs is available in the companies' own reporting.

Reporting of the Group companies:

www.sampo.com/year2022

Additional information:

www.sampo.com/sustainability/initiatives-and-commitments/un-sustainable-development-goals

**Strategic
sustainability
themes**

Link to the SDGs

Relevant SDG sub-targets

**Business
management
and practices**



- (8.8) Provide a decent and attractive work environment that supports labour rights
- The Group companies promote safe and secure working environments for all workers.
- (12.5) Reduce waste generation through prevention, reduction, recycling, and reuse
- The Group companies have set, e.g., requirements and targets for their own operations.
- (12.6) Encourage companies to adopt sustainable practices and to integrate sustainability information into their reporting cycle
- The Group companies publish sustainability reporting.
- (13.2) Integrate climate change measures into policies, strategies, and planning
- The Group's non-life insurers have made commitments to the SBTi and work on setting science-based climate targets.

**Corporate
culture**



- (3.4) Promote mental health and well-being
- The Group companies promote health and well-being to their employees and offer prevention and treatment services.
- (5.1) End all forms of discrimination against all women and girls everywhere
- The Group companies work against all forms of discrimination.
- (5.5) Ensure women's equal opportunities in leadership at all levels of decision-making
- The Group companies promote equal opportunities for all.
- (8.5) Achieve full and productive employment and decent work for all, including for young people and persons with disabilities, and equal pay for work of equal value
- The Group companies work against all forms of discrimination and are committed to equal pay for work of equal value.
- (8.6) Substantially reduce the proportion of youth not in employment, education, or training
- The Group companies offer education, competence development, and traineeships within the industry.
- (8.8) Provide a decent and attractive work environment that supports labour rights
- The Group companies promote safe and secure work environments for all workers.

**Investment
management
and operations**



- (8.8) Provide a decent and attractive work environment that supports labour rights
- The Group companies' investee companies must respect human rights, labour rights, the environment, and anti-corruption.
- (12.6) Encourage companies to adopt sustainable practices and to integrate sustainability information into their reporting cycle
- The Group companies engage with their investee companies where applicable.
- (13.2) Integrate climate change measures into policies, strategies, and planning
- The Group companies screen their investments and have made commitments to the SBTi and work on setting science-based climate targets.

**Products and
services**



- (3.4) Promote mental health and well-being
- The Group companies, e.g., develop preventive services within physical and mental health.
- (8.8) Provide a decent and attractive work environment that supports labour rights
- The Group companies' corporate clients and suppliers must respect human rights, labour rights, the environment, and anti-corruption.
- (12.5) Reduce waste generation through prevention, reduction, recycling, and reuse
- The Group companies have set, e.g., requirements and targets for their suppliers and the overall supply chain management.
- (12.6) Encourage companies to adopt sustainable practices and to integrate sustainability information into their reporting cycle
- The Group companies have set, e.g., requirements and targets for their suppliers and the overall supply chain management.
- (13.1) Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries
- The Group companies develop, e.g., risk management services and preventative measures that increase resilience and climate change adaptation.
- (13.3) Improve education, awareness raising, and human and institutional capacity for climate change mitigation, adaptation, impact reduction, and early warning
- The Group companies have set, e.g., requirements and targets for their suppliers and the overall supply chain management.

Communities



- (3.4) Promote mental health and well-being
- The Group companies make donations and contribute through other humanitarian efforts.
- (13.3) Improve education, awareness raising, and human and institutional capacity for climate change mitigation, adaptation, impact reduction, and early warning
- The Group companies, e.g., finance research, raise awareness, and engage in dialogue with stakeholders on climate change.

Independent accountant's assurance report

(Translated from the original report in Finnish language.)

To the management of Sampo plc

Scope

We have been engaged by Sampo plc (hereafter Sampo) to perform a 'limited assurance engagement,' as defined by International Standards on Assurance Engagements, hereafter referred to as the engagement, to report on corporate responsibility information in Sampo Group's Sustainability Report 2022 (the "Subject Matter") for the period 1 January –31 December 2022.

Criteria applied by Sampo

In preparing the corporate responsibility information in the Sustainability Report 2022, Sampo applied the Global Reporting Initiative (GRI) Sustainability Reporting Standards, Task Force on Climate-related Financial Disclosure (TCFD), and Sustainability Accounting Standards Board (SASB) reporting frameworks, and Sampo's own internal reporting principles (Criteria). As a result, the subject matter information may not be suitable for another purpose.

Sampo's responsibilities

Sampo's management is responsible for selecting the Criteria, and for presenting the sustainability information in Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Subject Matter, such that it is free from material misstatement, whether due to fraud or error.

Ernst & Young's responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ('ISAE 3000'), and the terms of reference for this engagement as agreed with Sampo on 16.6.2022. Those standards require that we plan and perform our engagement to obtain limited assurance about whether, in all material respects, the Subject Matter is presented

in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgement, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our independence and quality control

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, and have the required competencies and experience to conduct this assurance engagement.

Ernst & Young also applies International Standard on Quality Control 1, Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, and accordingly maintains a comprehensive system of quality control including documented policies and procedures

regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the sustainability information and related information, and applying analytical and other appropriate procedures.

Our procedures included:

- a) an update of our knowledge and understanding of Sampo's material sustainability topics, organisation and activities,
- b) interviews with senior management to understand Sampo's sustainability management,
- c) interviews with personnel responsible for gathering and consolidation of the sustainability information to understand the systems, processes and controls related to gathering and consolidating the information,
- d) assessing sustainability data from internal and external sources and checking the data to reporting information on a sample basis to check the accuracy of the data,
- e) performing recalculation of reported information and evaluating the correctness of underlying data and narrative disclosures.

We also performed such other procedures as we considered necessary in the circumstances.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the sustainability information for the period 1 January–31 December 2022, in order for it to be in accordance with the Criteria.

Helsinki, 10 May 2023

Ernst & Young Oy
Authorized Public Accountant Firm

Terhi Mäkinen
Authorized Public Accountant

Signatures to the Sustainability Report

Helsinki, 10 May 2023

Sampo plc

Board of Directors

Björn Wahlroos
Chair

Jannica Fagerholm
Vice Chairperson

Torbjörn Magnusson
Group CEO

Christian Clausen

Fiona Clutterbuck

Georg Ehrnrooth

Johanna Lamminen

Steve Langan

Risto Murto

Markus Rauramo

Contacts

Sampo plc

Fabianinkatu 27

00100 Helsinki

Finland

Business ID

0142213-3

Registered domicile

Helsinki

Phone

+358 10 516 0100

E-mail

firstname.lastname@sampo.fi

Internetwww.sampo.com

For any questions or feedback on
the report please contact

Johanna Tynkkynen

Head of Sustainability

Sampo plc

johanna.tynkkynen@sampo.fi

+358 10 516 0067

2022

SAMPO  GROUP

Sampo plc, Fabianinkatu 27, 00100 Helsinki, Finland
Phone: +358 10 516 0100 | Business ID: 0142213-3
www.sampo.com

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