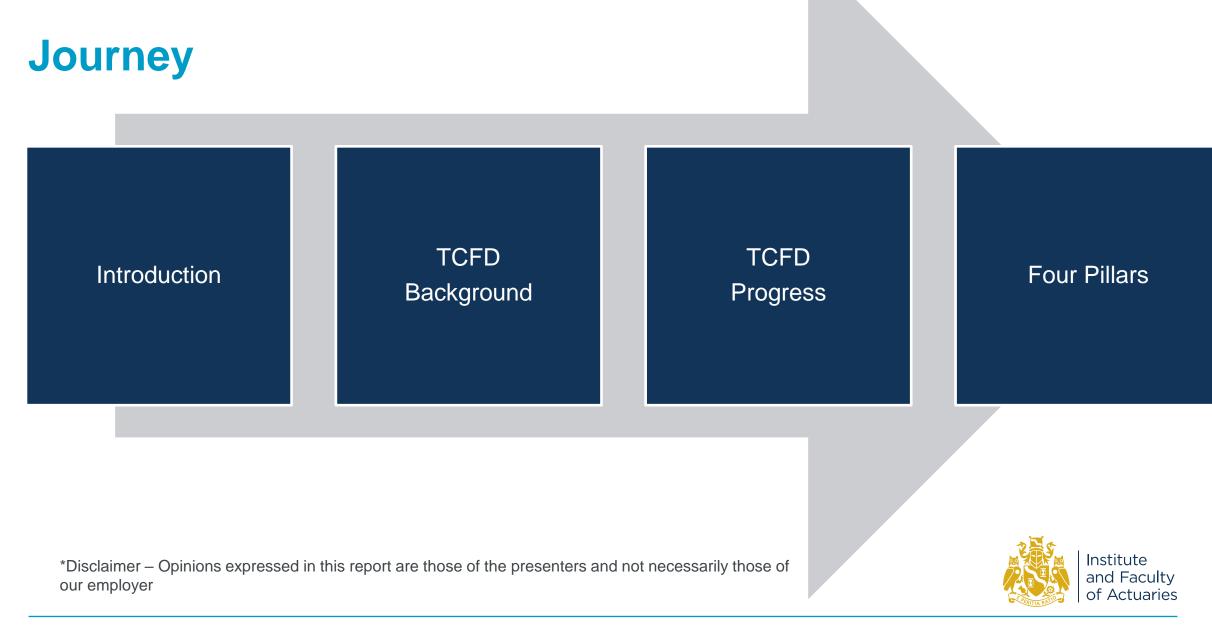


A Journey Through the Task Force on Climate-Related Financial Disclosures (TCFDs)

Zubair Arshed FIA (Grant Thornton) Ellie Hutchinson (Grant Thornton)



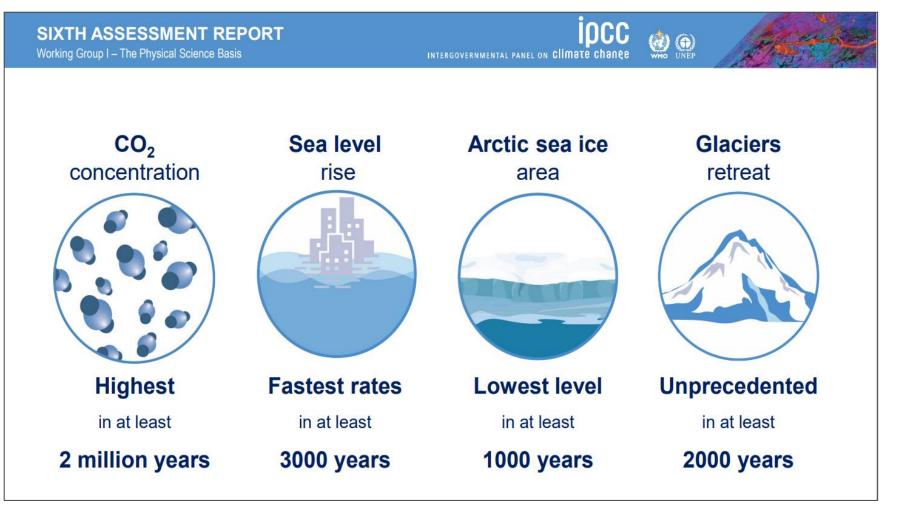




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Introduction

Our impact on the Climate is Unequivocal



Unless there are immediate, rapid, and large-scale reductions in greenhouse gas emissions, limiting warming to 1.5°C will be beyond reach. ~ IPCC



Source: https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf

Why are climate related financial disclosures important?





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TCFD Background

Task Force for climate-related disclosures

Governance	Strategy	Risk Management	Metrics and Targets
Disclose the organization's governance around climate-related risks and opportunities	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	Disclose how the organisation identifies, assesses, and manages climate-related risks	Disclose the metrics and targets used to assess and manage relevant climate- related risks and opportunities where such information is material
 a) Describe the board's oversight of climate-related risks and opportunities b) Describe management's role in assessing and managing climate-related risks and opportunities 	 a) Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term. b) Describe the impact of climate-related risks and opportunities on the company's businesses, strategy, and financial planning c) Describe the resilience of the company's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario 	 a) Describe the organisation's processes for identifying and assessing climate-related risks b) Describe the organisation's processes for managing climate-related risks c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the company's overall risk management 	 a) Disclose the metrics used by the company to assess climate- related risks and opportunities in line with its strategy and risk management process b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and related risks c) Describe the targets used by the company to manage climate- related risks and opportunities and performance against targets



Which companies in the UK does this apply to?

Scope		Enforced from accounting period:	First Required disclosure date
Certain UK	Large UK companies (>500 employees and £500 million in turnover)	on or after 6 April 2022	On or after April 6, 2023
registered publicly quoted	Large UK LLPs not traded or banking (>500 emp, >£500m in t/o)		2023
companies and large private	UK Public Interest Entities (PIEs) and banking or insurance companies		
companies and LLPs	Aim listed (>500 employees)		
	UK registered companies not above (>£500m turnover, >500 emp)		
	Traded and Banking LLPs (>500 emp)		
UK Asset managers	UK-authorised Asset Managers (AUM >£50bn (3 year rolling average)) and Asset Owners (assets >£25bn) incl. Life insurers and FCA regulated pension providers	on or after Jan 2022	Publish by June 2023
	UK-authorised Asset Managers (AUM >£5bn, (3 year rolling average)) and Asset Owners (assets >£5bn)	on or after Jan 2023	Publish by June 2024
UK Pension	occupational pension schemes with more than £5bn of net assets.	Comply from Oct 2021	
schemes	occupational pension schemes with more than £1bn of net assets.	Comply from Oct 2022	
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Out of scope:

Small UK company with less than 500 employees and £500m turnover

• Small Asset Managers <£5 billion (3 year rolling average)

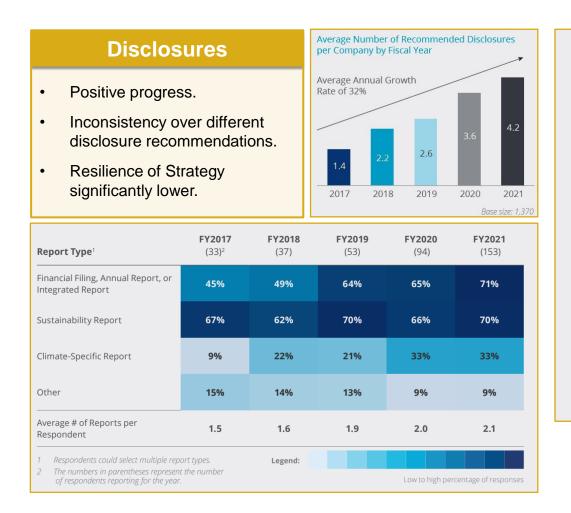
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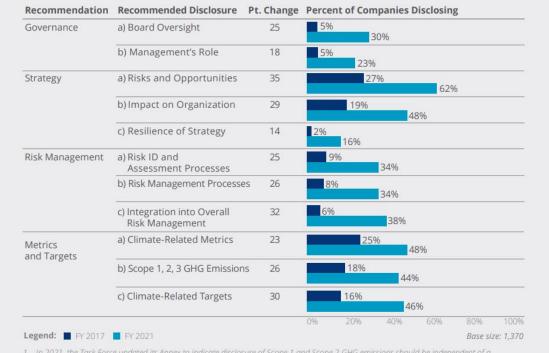


TCFD Progress

TCFD progress:



TCFD-Aligned Disclosures for Fiscal Years 2017 and 2021



1 In 2021, the Task Force updated its Annex to indicate disclosure of Scope 1 and Scope 2 GHG emissions should be independent of a materiality assessment.

Source: Task Force on Climate-related Financial Disclosures - 2022 Status Report.



Current Challenges

Figure B5

Implementation Rating by TCFD Recommendation

Percent of Respondents¹

Recommendation	Recommended Disclosure	Very Easy	Relatively Easy	Somewhat Difficult	Very Difficult
Governance	a) Board Oversight	13%	59%	24%	2%
	b) Management's Role	13%	57%	26%	3%
Strategy	a) Risks and Opportunities	4%	36%	47%	12%
	b) Impact on Organization	2%	12%	51%	32%
	c) Resilience of Strategy	1%	8%	36%	52%
Risk Management	a) Risk ID and Assessment Processes	4%	44%	41%	9%
	b) Risk Management Processes	4%	36%	49%	10%
	c) Integration into Overall Risk Management	3%	34%	43%	17%
Metrics	a) Climate-Related Metrics	5%	36%	39%	18%
and Targets	b) Scope 1, 2, 3 GHG Emissions	15%	49%	28%	7%
	b) Scope 3 GHG Emissions	4%	18%	28%	43%
	c) Climate-Related Targets	4%	23%	43%	26%
The total for each recommended disclosure may be less than 100% because respondents could select "not applicable." Legend:					
				Low to high perce	ntage of response

Source: Task Force on Climate-related Financial Disclosures - 2022 Status Report.

Challenges

- Strategy and Metrics and Targets are the recommendations companies are finding the most challenging to implement.
- Increasing levels of disclosure year on year despite implementation challenges
- · Resilience of strategy seems to be the most difficult
- To be expected as this area is an iterative/ongoing process





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Four Pillar Analysis

Content of reports

Format

- TCFD disclosures commonly included within the annual report and accounts or published as a separate standalone report (either TCFD specific or sustainability/ ESG report).
- Of the companies reviewed, 60% produced a separate standalone report for 2022.

Content

- Most companies have included information on the following:
- Net-zero targets, both operational and for investment portfolio, with interim targets
- Scenario results analysis
- Scope 1, 2 and 3 emissions.
- The granularity of analysis and length of reports varied significantly between companies this is consistent with our review of 2021 reports.

Differences

- 40% of companies changed the style of their TCFD report
- We have not seen any trend in companies taking influence from the leading reports of 2021

30%

Clearly stated any changes made to climate targets.



Clearly demonstrated their progress so far.

46%

Clearly set out path to net-zero.





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Governance

Governance

The set up of how insurance companies have chosen to govern the challenges with climate change and ESG commitments look relatively similar with boards and committees created to focus on certain topics. The most common groups we have seen from the companies reviewed are:



) Group Executive Committee

- Continue to drive sustainability ambition.
- Monitor delivery and plan of ESG goals.



Remuneration Committee

- Engaging with all committees to insure consistent ESG goals and execution.
- Checking climate metric performance is on track

Customer and Sustainability Committee

- Discuss climate related topics
- Review the development of climate ambition goals





- Manage and approve all decisions and operations.
- Including all ESG changes.



- Manage and monitor all aspects of risk management, including Climate-related risks.
- Some companies are starting to introduce climate-specific risk groups.



- Reviewing TCFD
- Checking company reports are compliant with any ESG legislation.



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Governance – Good Practice

Governance

Disclose the organization's governance around climate-related risks and opportunities

- a) Describe the board's oversight of climaterelated risks and opportunities
- b) Describe management's role in assessing and managing climaterelated risks and opportunities

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- Clear organogram is disclosed with a detailed description of the Board's accountability of climaterelated risks and opportunities and the responsibilities of each committee.
- Board and certain team remuneration/scorecards consider climate-targets.
- Climate Risk updates to BRC in Group reports seven times a year, delivered via Group Chief Risk Officer's Reports Quarterly Responsibility for identifying and managing financial risks from climate change sits with the Group Chief Risk Officer (Group CRO). However, there could be a view for a Chief Climate Officer to be appointed and directly answerable to the CEO

Governance body	Choir	Climate-related agenda frequency and inputs	Key purposes and responsibilities related to climate	Climate-related topic 2022
Climate Risk Managament Cornmittee (CRMC)	Group CRO	Three times in 2022. CIM+C commenced in July 2022 and will by 2022 and will by 2022 and will by 2022 and the system of the system of the system of the committee. The Committee the Comm	Overgee development and manual sector of the Constant Bills manual sector of the manual sector of the	Drove delivery of: Common service testing and Common service testing and testing and testing and testing and te
Group Responsibility and Reputational Riak Committee (GRRRC)	Group Head, Conduct, Financial Crime and Compliance	Monthly	Oversee and approve climate- related Position Statements including sector-specific transition criteria and associated risk tolerance thresholds	Reviewed • Exposure to clients that do not comply with enhanced ESS criteria. • Transactions where Position Statements are not fully met. • Transactions with high or very high Reputational Risk with climate change factors.
Sustainability Forum	Group Head, Corporate Affairs Brand & Marketing Uan-Aug); Chief Sustainability Officer (Sep-Dec)	The Forum meets eight times per annum.	 Oversee development and implementation of the Group's sustainability strategy, including climate. Guide a coordinated Group-wide approach to key sustainability themes, including climate change. 	Reviewed: New, existing, and updated Sustainability Appirations. Processes for integration of Climate Risk into Reputational and Sustainability Risk. Approved the approach to the Group's own ESG ratings. Discussed Group-wide climate integration and external mess.

Climate Risk information provided as part of the Risk Information Report, covering key metrics based on the concentration of transition and physical risks in our portfolio Description of assessing and managing climate within the business and across three lines of defence





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Strategy

Strategy		Investment	Structure and Governance
Current common strategies in place:		Influence	Operations
Scenario analysis on climate risk	Investment in carbon reducing technology and infrastructure		sed transparency in Iblished reports
Fund enabling colleagues' input on the greening of products	Influencing customers through product offering		priate governance to nforce strategy
Decarbonisation of investment portfolio	Sustainable investments in renewable energy and green bonds		ng groups to target lual climate-related elements
			Institute and Faculty of Actuarie

Strategy: Net-Zero Actions

A range of actions to become net-zero in own operations have been proposed including:



Updates to travel policies

Electricity from 100% renewable energy sources

Car fleet all electric vehicles

reduce operational waste

Education of employees to

Climate risks incorporated in Risk Management framework

Education of pension customers to encourage choice of Paris aligned funds Purchasing carbon offsets, commonly against estimated home-working emissions

Reduce or eliminate use of paper



Influence

Reward

• Companies have demonstrated influence through the use of sustainable insurance policies, i.e. offering discounts/rewards for making eco-friendly choices like using an electric vehicle.

Partnerships

- By partnering with industry groups, academic institutions, and NGOs, companies demonstrate their commitment to addressing climate change and share knowledge and resources with customers.
- Customer Education and Awareness programmes provide educational resources and tools to enhance customer understanding of climate change and its risks. One of the companies shares insights, research, and practical guidance on climate-related topics through its website, reports, and digital platforms.
- There's a risk, however that industry groups, partnerships and collaborations could be viewed as anti-competitive, contravening current competition regulation

Corporate

- Insurance companies as an asset owner can exert direct influence on companies through voting rights or disinvestment
- Insurance executives could be posted as Non-executive directors to drive the behaviour, output and direction of companies



Investment Portfolio

	Portfolio level	Split by asset class	Split by industry	Split into physical/ transition
Asset holdings	Aviva, L&G, Allianz	Aviva, L&G, Allianz	L&G, Phoenix, Allianz	Phoenix
Aggregate VaR, NPV impacts or similar or asset value impacts	Aviva, L&G, Allianz, AXA	Aviva, L&G, M&G, Phoenix, Allianz	L&G	Aviva, L&G, Phoenix, AXA
Weighted average carbon intensity	Aviva, L&G, LBG*, AXA, M&G	Aviva, Allianz, Phoenix, M&G, AXA	Aviva, L&G, Allianz	



Investment actions

Companies agree that investment portfolios represent a major source of climate risk. A range of actions are outlined (including those listed below) to reduce this risk.

Proxy Voting: Investment firms are leveraging their proxy voting power to influence corporate behaviour on climate-related issues. They vote in favor of climate-friendly resolutions, such as requesting companies to disclose climate-related risks, set emissions reduction targets, or report on sustainability initiatives.

. Carbon offset projects: Some firms are investing in carbon offset projects as part of their climate risk mitigation strategy. These projects aim to reduce greenhouse gas emissions or remove carbon dioxide from the atmosphere, such as reforestation initiatives or investments in carbon capture and storage technologies

Green Bonds and Sustainable Financing: Companies are issuing green bonds and engaging in sustainable financing to raise capital for environmentally friendly projects. These financial instruments are specifically ringfenced for investments in areas such as renewable energy, energy efficiency, and sustainable infrastructure.

Restrictions on new investment in coal and oil, phasing out of existing investment. A number of reports call out thermal coal in particular after the IPCC report recommendations.

ESG linked loans to stakeholders to assist in the financing of further sustainable projects and investments, the issue of these ESG linked loans has also been shown to attract clients with previously reputable ESG profiles.



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Strategy (incl. Scenario analysis) – Good Practice

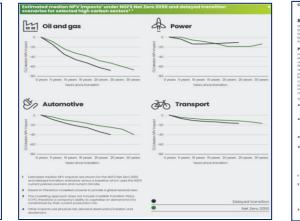
Strategy

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 organization has identified over the short, medium, and long term.
- b) Describe the impact of climate-related risks and opportunities on the company's businesses, strategy, and financial planning
- c) Describe the resilience of the company's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario



- Climate Risks (physical and transition) and opportunities defined and identified across multiple time horizons.
- Describes the approach to identify and assess climate risks using double materiality
- Describes how climate risk is factored into the financial planning process





- The bank uses three climate scenarios and each of these have their own narrative. The key parameters used in the scenario analysis has also been outlined including carbon pricing and power generation
- Different policy approaches have been considered in the scenario analysis and the response required by the bank in each approach. The resilience of the bank has been tested and quantified through the scenario analysis process. Limitations of the methodology and analysis have been included.





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Risk Management

Risk Management

From the reports analysed, companies have established their risk management process as follows:



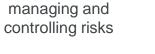
and resources in place

to further educate

around identified risk.

have set up boards and committees specifically for climate risk.

The boards and committees in place meet regularly to discuss new climate risk developments.





Risk Management

•Many firms have integrated climate related risks into the existing risk and governance framework to gain a more accurate assessment of how exposed their overall business model is to climate risks

Risk identification	Impacts on mortality/morbidity assumptions	By asset classes held
Risk measurement	Carbon measurements/ targets	Climate scenario testing
Risk mitigation	Active engagement with stakeholders	Exclusions of certain asset classes



Risk Management – Good Practice

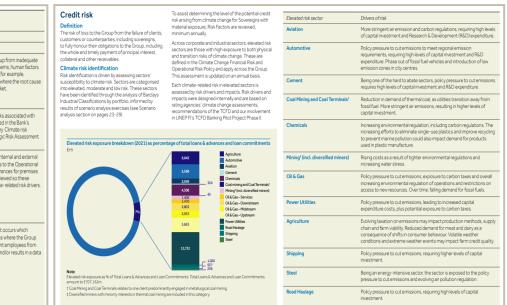
Risk Management

Disclose how the organisation identifies, assesses, and manages climate-related risks

- a) Describe the organisation's processes for identifying and assessing climaterelated risks
- b) Describe the organisation's processes for managing climate-related risks
- c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the company's overall risk management

Climate-related risk management process	Credit risk	Market risk	Treasury and capital risk	Operational risk
Frequency of assessment	Annually	Quarterly	Annually	Annually
Time horizons covered	S,M,L	S,M,L	S,M	S,M
Description	The risk of loss to the Group from the failure of clients, customers or counterparties, including scorerighs, to fully fonour there obligations to the Group, including the whole and timely payment of principal, interest, collateral and other receivables.	The risk of loss arising from potential adverse changes in the value of the Group's assets and liabilities from fluctuation in market variables including, but not limited to, interest rates, foreign exchange, equity prices, commodity prices, credit spreads, implied volatilities and asset correlations.	Treasury and capital risks are impacted by climate-related risks, primaryly in a second order manner and include liquid/tyrisk, capital risk and interest rate risk in the banking book.	The risk of loss to the Group from inadequate or failed processes or systems, human factors or due to external events fild reample, externe weather events) where the root cause is not due to credit or market.
Risk Identification	Identified as part of sovereign, portfolio and obligor credit annual reviews.	Identified by assessing climate-related risk factors across asset classes, sectors and geographies, and aggregating market risk exposures from climate-related risks.	Identified through risk assessment activity across certain industries and asset classes to analyse and assess exposures which may be impacted by climate-related risks.	Confirmed operational risks associated with climate change are included in the Bank's Operational Risk Taxonomy. Climate risk included within the Strategic Risk Assessment process.
Risk Measurement	At Group level measured vis scenario analysis and stress testing.	Measured by using adverse multi-asset stress scenarios applied to individual risk factors	Measured as part of stress testing and key risk indicator monitoring.	Established reporting on internal and extern climate-related risk events to the Operation
	At counterparty level measured using a Credit Risk Materialty Matrix completed for obligor/ obligor groups with leverade deposite to climate change risk. Retail portfolos are monitored through regular reporting of climate metrics and are assessed against mandate triggers where appropriate.	reflecting climate change risks across sectors, countries and regions.		Risk Committee Risk tolerances for premises and resilence risks are reviewed so these adequately capture climate-related risk drivers
Example	A client operating in a carbon intensive sector which does not have an adaptation plan to transition ta alow-carbon economy and becomes subject to high carbon tax payment that negatively affects its cash flow.	Climate change may lead to market risk through a disorderly transition to a low-carbon econory or va bypcis climate events and shifts in supply and demand for financial instruments, which may then impact market prices for susceptible sectors or countries	Adverse market movements resulting from transition risks such as legislative change, or from Government fiscal responses to sudden physical climate change events may impact the Fair Value of the bark's investments such as those in the Liquid Asset Potrfolio. Additionally longer term climate change risks may adversely impact the bark's future revenue through customer behaviour. Datance sheet or strategy changes over the longer term in response to climate change risk factors.	An extreme weather event occurs which impacts locations and sites where the Group operates could also prevent employees from accessing the premises, and/or results in a data centre failing.

- Climate risk is identified as a principal risk that cuts across many risks such as credit, market, operational and treasury and capital risk
- A consistent risk approach is outlined by the ERMF. This includes using the same identification timelines, setting a risk appetite and then implementing risk controls
- Future policies have been taken into consideration when determining the drivers of risks, this has been incorporated into the banks' scenario analysis



The bank has included a third climate risk category in addition to physical and transitional risks called connected risk, this is to ensure that climate risks that affect both transitional and physical risks are also assessed when they have connected variables





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Metrics & Targets

Scope 1, 2 & 3 Emissions



Scope 1 Emissions: Companies have been taking steps to reduce their direct emissions from owned or controlled sources. Many organisations have implemented energy efficiency measures, upgraded equipment, and adopted cleaner technologies to decrease their on-site fuel combustion emissions.



Scope 2 Emissions: Companies have been focusing on reducing their indirect emissions from purchased electricity, heat, or steam. This involves shifting to renewable energy sources, such as solar or wind power, and purchasing renewable energy certificates (RECs) to offset their electricity consumption..



Many companies are now placing increased emphasis on understanding and addressing scope 3 emissions, which can involve measures like sustainable sourcing, transportation efficiency, and product lifecycle analysis..

Scope 1

• Direct GHG emissions, e.g. from facilities and vehicles

Scope 2

Indirect emissions from the purchase of electricity and energy

Scope 3

 Emissions that the company is indirectly responsible for, e.g; through supply chain.



Scope 3 Emissions

Those leading the way in terms of scope 3 implementation and disclosures are:

Setting specific scope 3 goals and targets	Engaging with third parties to develop scope 3 frameworks	Identifying key challenges
Setting up teams to review progress	Making sure they include all covered emissions within their calculations	Setting out a clear approach
Providing emissions training for staff	Building scope 3 into their scenario models	Being honest about where they need to improve
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Based of TCFD reports reviewed:

Very satisfied Satisfied Unsatisfied Very unsatisfied

Company	Rating	Calculate and report their scope 3 emissions	Report on scope 3 management	Set scope 3 targets	Actively trying to reduce scope 3 emissions	Reviewed their progress
Company 1	4					
Company 2	5					
Company 3	2					
Company 4	3					
Company 5	5					
Company 6	5					
Company 7	4					
Company 8	1					
Company 9	3					
Company 10	2					
Company 11	3					



This is our opinion on how well the above companies have reported on scope 3 based of the 2022 TCFD reports read. Looking at how easy it was to find, and the clarity and detail of report scope 3 content.

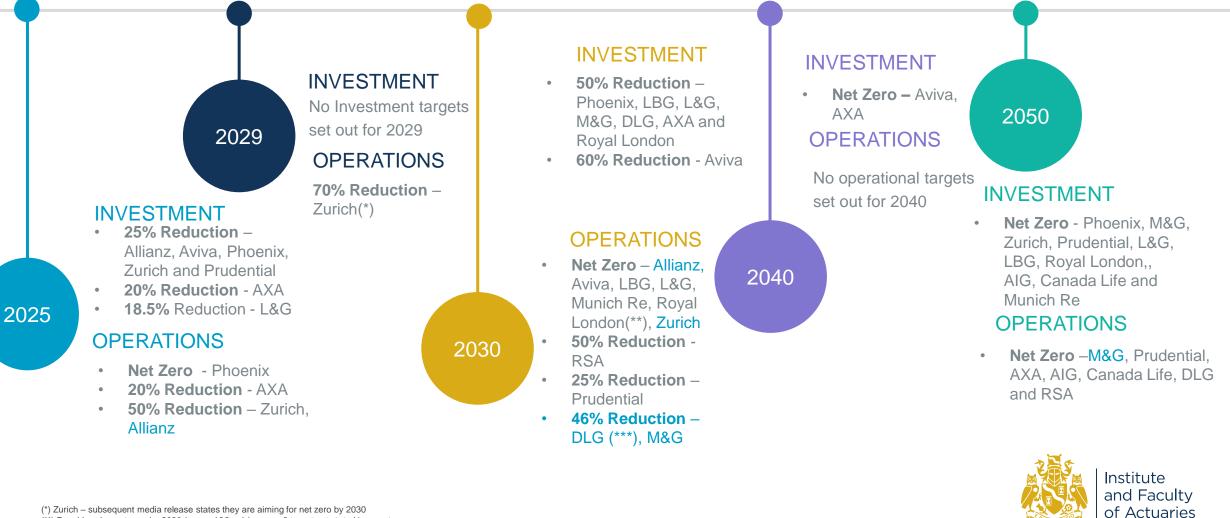
Net Zero Targets 2021

Interim investment targets generally relate to carbon intensity – the exact metrics vary between companies. These targets relate to proprietary assets or a subset of assets where a company has full investment



Net Zero Targets 2022

Interim investment targets generally relate to carbon intensity – the exact metrics vary between companies. These targets relate to proprietary assets or a subset of assets where a company has full investment



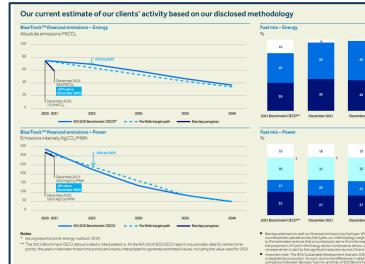
(*) Zurich – subsequent media release states they are aiming for net zero by 2030 (**) Royal London net zero by 2030 (scope 1&2 only), scope 3 target not stated in report (***) DI G 46% Reduction refers to Scope 1 and 2 emissions only

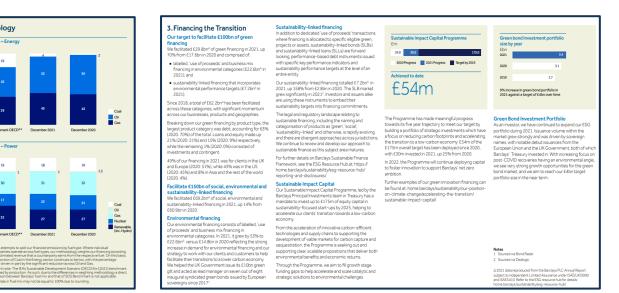
Metrics and Targets – Good Practice

Metrics and Targets

Disclose the metrics and targets used to assess and manage relevant climaterelated risks and opportunities where such information is material

- a) Disclose the metrics used by the company to assess climaterelated risks and opportunities in line with its strategy and risk management process
- b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and related risks
- c) Describe the targets used by the company to manage climaterelated risks and opportunities and performance against targets





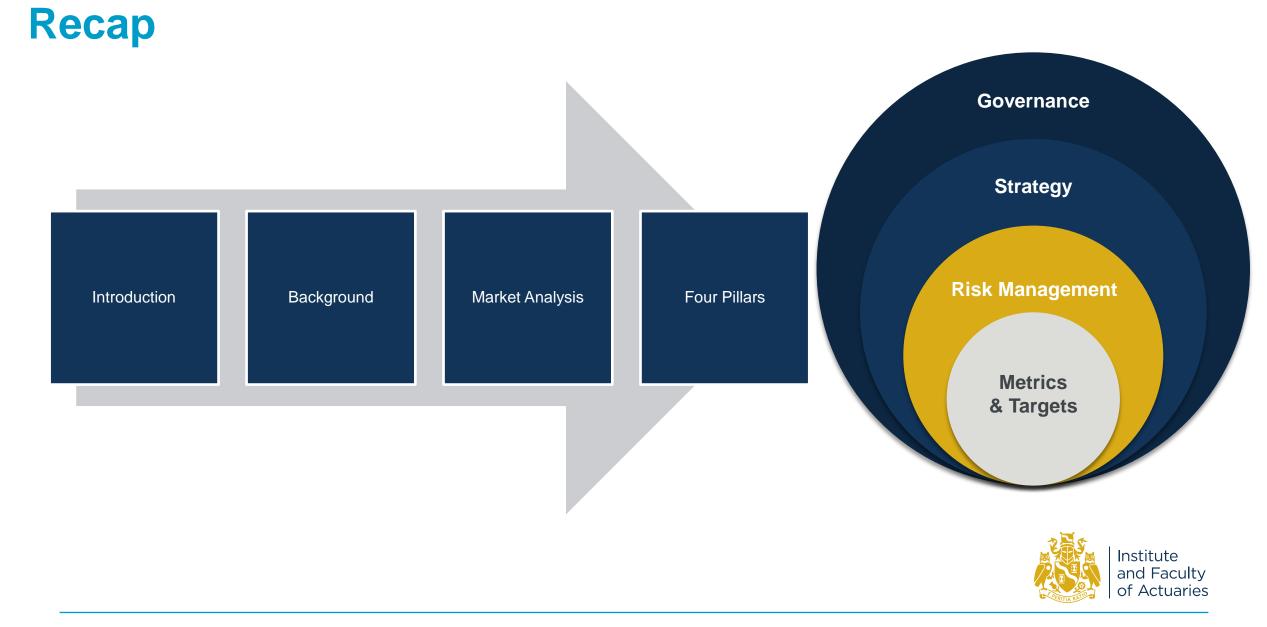
- Scope 1,2 & 3 emissions have been calculated using the GHG Protocol standard. The calculations have also been assured by a third party
- Financed emissions have been highlighted as the material source of emissions by the bank and have this disclosed with clear graphic to show exposures across credit portfolios and capital markets. Metrics have also been introduced across regions and products for the bank and a dashboard is monitoring progress
- The bank has made targets for their Sustainable Impact Capital Programme and introduce interim targets to ensure that the progress is being made





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Recap



Questions

Comments



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Expressions of individual views by members of the Institute and Faculty of Actuaries and its staff are encouraged.



The views expressed in this presentation are those of the presenter.