

**CO. Introduction**

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**CO.1**

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(C0.1) Give a general description and introduction to your organization.

Old Mutual Limited (OML) is a pan-African investment, savings, insurance, and banking group. It is listed on the Johannesburg Stock Exchange, Zimbabwe, Namibia and Botswana Stock Exchanges.

As part of that Managed Separation, it was agreed that Old Mutual Emerging Markets (rebranded as Old Mutual Limited) would strengthen its focus on Africa and move its primary listing to Africa. As Old Mutual Limited (OML), our primary listing is now on the Johannesburg Stock Exchange. We also have a standard listing on the London Stock Exchange and secondary listings on three other stock exchanges in Africa: Namibia, Malawi and Zimbabwe.

Our purpose is to help our customers thrive by enabling them to achieve their lifetime financial goals, while investing their funds in ways that will create a positive future for them, their families, their communities and broader society.

OML's carbon footprint for FY2020 is focused only on its South African operations, which account for 82% of group revenue, the rest coming from its Rest of Africa operations.

**CO.2**

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(C0.2) State the start and end date of the year for which you are reporting data.

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2020	December 31 2020	No	<Not Applicable>

**CO.3**

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(C0.3) Select the countries/areas for which you will be supplying data.

South Africa

**CO.4**

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(C0.4) Select the currency used for all financial information disclosed throughout your response.

ZAR

**CO.5**

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

**Operational control**

## C-FS0.7

S0.7) Which organizational activities does your organization undertake?

**Bank lending (Bank)**

**Investing (Asset manager)**

**Investing (Asset owner)**

**Insurance underwriting (Insurance company)**

## C1. Governance

### C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

**Yes**

#### C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Board-level committee	The OML Risk Committee and OML Responsible Business Committee of the Board are formally accountable for climate-related issues. During the year, the Responsible Business Committee reviewed and approved the responsible investment policy and monitored compliance with the UN Principles for Responsible Investment (UNPRI) and committed OML to report in accordance with the TCFD recommendations in 2022. The Committees, in conjunction with the OML executive team, set the OML strategic direction and position on climate change, taking into consideration existing approaches within the investment, general insurance, environmental and responsible business units.

#### C1.1b

(C1.1b) Provide further details on the board's oversight of climate-related issues.

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
<p><b>Scheduled – all meetings</b></p>	<p><b>Reviewing and guiding:</b>  <b>Strategy, major plans of action, risk management policies, annual budgets, business plans</b>  <b>Setting performance objectives</b>  <b>Monitoring implementation and performance of objectives</b>  <b>Monitoring and overseeing progress against goals and targets for addressing climate-related issues</b></p>	<p><b>Climate-related risks and opportunities</b></p>	<p><b>The OML Board, via the Board Responsible Business Committee and the Board Risk Committee set the OML direction, strategy and position on Climate Change in conjunction with the OML executive team, taking into account existing approaches within the investment, general insurance, environmental and responsible business units. These Committees, collectively, established the OML Climate Change Task Force to facilitate a coordinated and structured response to the identification, assessment and mitigation of climate-related risks and opportunities in OML, and set the mandate for the task force. Oversight is provided via quarterly reviews of OML's progress on climate change.</b></p>

**C1.2**

(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
<b>Chief Risks Officer (CRO)</b> <i>The Chief Risk Officer sits on the Executive Committee of OML.</i>	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our bank lending activities Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	Quarterly
<b>Other, please specify (Group Marketing, Public Affairs and Sustainability Director)</b> <i>The Group Marketing, Public Affairs and Sustainability Director is the equivalent of a Group Sustainability Director and sits on the Executive Committee of OML.</i>	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our bank lending activities Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	Quarterly
<b>Chief Operating Officer (COO)</b>	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our bank lending activities Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	Quarterly
<b>Other C-Suite Officer, please specify (Customer Solutions Director)</b>	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our bank lending activities Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	Quarterly
<b>Other committee, please specify (Climate Change Task Force)</b>	Risk - CRO reporting line	Assessing climate-related risks and opportunities	Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	More frequently than quarterly
<b>Chief Executive Officer (CEO)</b>	Reports to the board directly	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our bank lending activities Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	Please select

**G1.2a**

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).

The executive team includes the:

- Chief Risk Officer, responsible for overall accountability for managing financial and non-financial risks within the organisation (including climate change);
- Group Marketing, Public Affairs and Sustainability Director, responsible for ensuring climate change directional alignment with our Responsible Business Strategy;
- Chief Operating Officer, with oversight of group operational issues including our office facilities; and
- Customer Solutions Director, responsible for the development of new products and services that we might launch in response to climate change.

The Board Committees and executive team manage the Climate Change Task Force whose responsibilities include: coordinating and overseeing work stream activities; ensuring regulatory and TCFD disclosure requirements, coordinating reporting for the executive team and Board committees.

Functional areas of the Task Force include: Group Strategy (ensuring Climate Change directional alignment with OML Group strategy), Responsible Business, Responsible Investment, Group Risk Compliance Business Unit Representation (Segment Strategy) and External Reporting (ensuring disclosure requirements are met).

## C1.3

(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	Certain defined ESG metrics have already been added to the relevant scorecards of senior managers, with the development of an overall ESG metric for our variable pay scheme developed in 2020.

## C1.3a

(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Chief Operating Officer (COO)	Monetary reward	Emissions reduction project Energy reduction project Efficiency project	Certain defined ESG metrics including emissions reduction projects, energy reduction projects, and efficiency projects have been added to the scorecard of the COO, with the development of an overall ESG metric for our variable pay scheme developed in 2020.
Chief Risk Officer (CRO)	Monetary reward	Emissions reduction project Energy reduction project Efficiency project	Certain defined ESG metrics including emissions reduction projects, energy reduction projects, and efficiency projects have been added to the scorecard of the CRO, with the development of an overall ESG metric for our variable pay scheme developed in 2020.
Chief Sustainability Officer (CSO)	Monetary reward	Emissions reduction project Energy reduction project Efficiency project	Certain defined ESG metrics including emissions reduction projects, energy reduction projects, and efficiency projects have been added to the scorecard of the Marketing, Public Affairs and Sustainability Director, with the development of an overall ESG metric for our variable pay scheme developed in 2020.
Chief Investment Officer (CIO)	Monetary reward	Efficiency project Portfolio/fund alignment to climate-related objectives	Certain defined ESG metrics including efficiency projects and portfolio/fund alignment to climate-related objectives have been added to the scorecard of the CIO, with the development of an overall ESG metric for our variable pay scheme developed in 2020.
Facilities manager	Monetary reward	Emissions reduction project	Building and facilities managers have energy management and reduction targets within their individual performance targets.

## C-FS1.4

S1.4) Does your organization offer its employees an employment-based retirement scheme that incorporates ESG principles, including climate change?

	We offer an employment-based retirement scheme that incorporates ESG principles, including climate change.	Comment
Row 1	No, but we plan to do so in the next two years	OML's employee benefit strategy will look to consolidate existing best practice within the Group and establish a group strategy for offering employees an employment-based retirement scheme that incorporates ESG principles, including climate change.

## C2. Risks and opportunities

### C2.1

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(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?

**Yes**

### **C2.1a**

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(C2.1a) How does your organization define short-, medium- and long-term time horizons?

	From (years)	To (years)	Comment
Short-term	0	1	Current year.
Medium-term	1	5	Business plan cycle. Our business strategy is updated on a rolling basis and revalidated on a 3-year rolling basis.
Long-term	5		Five years and beyond.

### **C2.1b**

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(C2.1b) How does your organization define substantive financial or strategic impact on your business?

**We define substantive financial or strategic impact based on the impact that a potential climate-related risk would have on the following (if it materializes):**

- **Financial - significant impact = over R500 million impact on operating profit over 1 year. The R500m scale is applied to an OML Group level risk assessment. Iterations of this scale at lower impact levels are applied as relevant to the respective business units in order to assist with prioritisation and materiality of risks.**
- **Reputation**
- **License to Operate**
- **Business Resilience & Sustainability**

### **C2.2**

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(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.

**Value chain stage(s) covered**

**Direct operations**

**Upstream**

**Downstream**

**Risk management process**

**Integrated into a multi-disciplinary company-wide risk management process**

**Frequency of assessment**

**More than once a year**

**Time horizon(s) covered**

**Short-term Medium-**

**term Long-term**

**Description of process**

**Climate Change presents the organisation with broad-ranging strategic, financial and operational risks as well as unique risks not previously encountered. These all ultimately impact the sustainability of the entity and the communities and countries in which we operate. Because of the extensive scale of impact, climate change is incorporated into the OML Risk Management System at multiple levels, to drive prioritisation and response. Climate Risk is integrated into the Old Mutual Risk Classification Framework as an External Risk (Level 1), and allows for evaluation of both physical and transition risks (Level 2). In addition, climate risks are also assessed across all other risk categories by evaluating external causal factors (incorporating climate change) to these risks. The standard OML risk methodology is applied in identifying, measuring, monitoring and reporting on climate risks. A climate change risk appetite statement has been defined, with ambition levels. The associated targets and metrics will be developed in 2021 through the group climate change programme.**

**A detailed Climate Risk Impact and Vulnerability Assessment across all the Group's businesses will be undertaken this year and will include modelling and quantification of exposures to climate change. Five of the top 10 global risks in terms of likelihood include climate action failure, extreme weather, natural disasters, biodiversity loss and human-made environmental disasters. Extreme weather events are already a more frequent feature in some of the countries in which we operate. Other risks are transitional in nature, including changing legislation, customer preferences and reputational considerations.**

**When considering our investments, our ESG risk screening may identify climate change risk as a concern to a particular company. In this case, we will undertake deep-dive research on how the issue may impact the company's core financial metrics and competitive positioning. This may translate to an adjustment of our base case and/or bull-bear case analysis. Under our Group-wide Climate Change Task Force, the first workstream focusses on our fossil fuel risk exposure and reporting, in which a coal strategy is being prepared for all our businesses (with Old Mutual Investment Group, OMLACSA and Old Mutual Insure being most impacted). This strategy will be validated by a climate-related value at risk (VAR) analysis of our investment portfolios. This is being done by a contracted third-party. OM Insure engages with the South African Insurance Association (SAIA) on climate-related risks, and these interactions feed into the OML risk processes via the climate change working group at OM Insure. This includes, for example, trends regarding weather-related claims in South Africa. In addition, OM Insure is addressing exposure to fire and flood claims by, among other initiatives, identifying concentration risk through geo-coding, increasing customer awareness and increasing public-private initiatives with municipalities. From an operational perspective, the drought in the Western Cape in 2018 highlighted the risk of increasing frequency of adverse climate change-related weather events (floods, drought, cyclones, etc.) that may keep employees from physically and remotely accessing their workplaces, resulting in reduced employee productivity and threats to business reliability. Vulnerability to utility-related disruptions have been integrated into the ongoing work of our Capability Cluster and resulted in, for example, the decision to take No 1 Mutual Place (Sandton, Johannesburg Head Office) off-grid from a water perspective. With respect to transition risk, as an example, the OML Responsible Investment Team undertook work during 2019 to initiate a process to help OML formulate a principle-based stand on a preliminary set of material ESG issues as it pertains to policyholder and shareholder investments. This included the following process steps: 1) Materiality screening of a long list of ESG issues to establish a short list of material ESG issues; 2) Assessing dimension risk in respect of business, client, investment exposure of the most material ESG issues; 3) Proposing an in-principle position on the ESG issues identified.**

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**C2.2a**

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(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Our different businesses identify material risks caused by current climate-related regulation via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Risks are quantified and assessed in line with risk appetites and assigned owners are responsible for regular review of the risk and management action. Significant risks are escalated to the business and to Group if required. During 2019, the Carbon Tax came into effect in its first phase. A second phase of the Carbon Tax comes into effect in 2022, this has been identified as a direct risk to the fuel and electricity we use in our owned properties, but also an indirect risk on the companies in which we invest. For example, there remains some uncertainty regarding the impacts on the mining sector in South Africa.
Emerging regulation	Relevant, always included	Businesses identify material risks caused by emerging climate-related regulation via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Risks are quantified and assessed in line with risk appetites and assigned owners are responsible for regular review of the risk and management action. Significant risks are escalated to the business and to Group if required. An example of emerging regulation is the second phase of the carbon tax, the finalisation of the Climate Change Act, and amendment to schedule 2 of the Electricity Regulation Act, which allows for expanded self-generation of electricity. The extent to which the second phase of the Carbon Tax will affect OML (e.g. through the pass through of the tax in the electricity price) and the relationship between the tax and the measures included in the Act (e.g. carbon budgets) is being monitored and considered within OML's risk assessment processes.
Technology	Relevant, sometimes included	Businesses identify material risks caused by emerging climate-related regulation via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Risks are quantified and assessed in line with risk appetites and assigned owners are responsible for regular review of the risk and management action. Significant risks are escalated to the business and to Group if required. For example, OM Alternative Investments considers technology risk in its due diligence processes and turned down a deal as the addition of stranded asset risk tipped the deal over the risk threshold.
Legal	Relevant, always included	Businesses identify material risks caused by climate-related litigation claims via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Risks are quantified and assessed in line with risk appetites and assigned owners are responsible for regular review of the risk and management action. Significant risks are escalated to the business and to Group if required. Climate Change presents a direct risk, in the form of potential climate-related litigation claims associated with, for example, investments in carbon intensive assets or industries. It also presents a risk in the form of increased claims associated with our insurance clients facing increasing climate-related litigation claims.
Market	Relevant, always included	Businesses identify material risks caused by climate-related market shifts in supply and demand for certain commodities, products, and services via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Risks are quantified and assessed in line with risk appetites and assigned owners are responsible for regular review of the risk and management action. Significant risks are escalated to the business and to Group if required. OML is considering changing demands for investments in low carbon sectors or in companies and products with the potential to benefit from climate transition opportunities (e.g. products that offer low-carbon alternatives such as electric vehicles). OM Insure considers changing physical climate impacts and how these will change the demand for insurance products. Changing demands for products given both climate transition and physical risks and opportunities will be considered as part of the current process to develop a consolidated and coordinated climate change strategy.
Reputation	Relevant, always included	Businesses identify material risks caused by reputational changes via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Reputational changes are defined as changing customer or community perceptions of an organisation's contribution to or detraction from the transition to a lower-carbon economy, and must be taken into account so that OML can maintain its market position as a leader in responsible investment. Lack of a visible Responsible Business strategy and reporting on our carbon exposure may impact OML's reputation as a leader in responsible business. For example, certain South African financial service institutions are already being targeted by shareholder activists for lack of action relating to Climate Change. OML is monitoring this risk and evaluating options to respond as part of the current process to develop a consolidated and coordinated climate change strategy.
Acute physical	Relevant, always included	Businesses identify material risks caused by climate-related acute physical factors via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Risks are quantified and assessed in line with risk appetites and assigned owners are responsible for regular review of the risk and management action. Significant risks are escalated to the business and to Group if required. Extreme weather events are seen as both an emerging and existing risk. For example, on the back of the floods in South Africa's neighbouring countries (Mozambique, Zimbabwe and Malawi) and the continuation of the severe drought across South Africa in 2020, a national emergency was declared. The latter had a direct impact on our general insurance business due to increased claims from the agricultural sector.
Chronic physical	Relevant, always included	Businesses identify material risks caused by climate-related chronic physical factors via their Risk Control Self-Assessment (RCSA) process overseen by their Risk Committees. Risks are quantified and assessed in line with risk appetites and assigned owners are responsible for regular review of the risk and management action. Significant risks are escalated to the business and to Group if required. The chronic physical impacts of climate change are considered, as part of OML's risk processes, given the potential impact on mortality and morbidity assumptions and increasing insurance claims. For example, we are assessing the potential of physical climate impacts such as drought and extreme weather in the Rest of Africa, and how these impacts will affect our operations in these countries.

C-FS2.2b

(C-FS2.2b) Do you assess your portfolio's exposure to climate-related risks and opportunities?

	We assess the portfolio's exposure	Please explain
Bank lending (Bank)	No, but we plan to do so in the next two years	While ESG is a factor in our investment assessment, there is no formal climate change policy as yet. Our exposure to climate-related risks and opportunities will be considered as part of the work of the Group Climate Change Task Force, and the current process to develop a consolidated and coordinated climate change strategy. This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy with climate-related issues. With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks, and this will inform our approach to assessing exposure through our bank lending practices. The OM Finance business in South Africa (primarily an unsecured lender) plays an important role in contributing to the resilience of communities to climate change but has, to date, not included a focus on assessing climate related risks. OM Finance offers credit to businesses. Climate change has not been considered a material risk in this portfolio. Informally, our investment strategy is heavily weighted towards renewable energy. There are limited coal players in our portfolio, and we are progressing towards amortising this to be a negligible number.
Investing (Asset manager)	Yes	As an asset consultant, we actively promote Responsible Investment (RI) as an approach to investments, while recognising that the ultimate decisions lie with our client. When selecting and appointing asset managers, we consider the extent to which RI is embedded in their investment and ownership practices. As asset managers, we have a publicly available RI policy and report which considers risks and opportunities in investment decisions. We are active owners of the assets we manage - mitigating climate-related risks. Our approach to ESG integration is a structured and repeatable process led by our portfolio managers and investment analysts in conjunction with our dedicated specialist ESG research unit and our Responsible Investment office. The first step involves screening our investment universe with a proprietary ESG quantitative tool developed by our specialist ESG team. For example, ESG risk screening may identify climate change risk as a concern to a company – we will then undertake deep-dive research on how the issue may impact the company's core financial metrics and competitive positioning – this may translate to an adjustment of base case and/or bull-bear case analysis. In each case, the analysts on the company prepare a detailed note on how material ESG issues have been considered in the overall company valuation and buy/hold/sell recommendation. Late in 2019, OM Alternative Investments (OMAI) initiated a review of the TCFD framework and how this can be implemented, including a review of climate risk considerations in the investment lifecycle – as asset managers from a governance perspective within OMAI (in 2020). We are currently measuring the carbon footprint of some of our portfolios, and the carbon offset generated by our renewable energy investment – driving a transition to a sustainable, 1.5°C world energy mix. In July 2020, an initial briefing was presented to OML Exco on the "ESG/Responsible Investment Proposed Roadmap for Coal", which explores the risk attached with OML exposure to coal and our broader approach to fossil fuel investment. This response will be finalised in 2021.
Investing (Asset owner)	No, but we plan to do so in the next two years	We have initiated the process of assessing our portfolios' exposure to climate-related risk and opportunities and will commission a climate-related Value at Risk (VaR) exercise of our portfolio. This forms part of the work of the broader OML Climate Change Task Force and the OML Climate Change Strategy. We are currently performing a detailed fossil fuel analysis of the Group's assets to provide a baseline view of exposure and carbon intensity of listed holdings. We are also furthering our efforts to analyse our carbon investment exposure to track mitigation measures and inform investment decision-making. In July 2020 an initial briefing related to OML's investment exposure to coal and our broader investment approach towards fossil fuels was presented to OML Exco for consideration. The leadership structures within OML, including the Exco and relevant Board Committees are provided with updates in relation to progress of this workflow.
Insurance underwriting (Insurance company)	Yes	Extreme weather due to climate change causes damage to infrastructure, disruption of utility services, damage to property and customer assets, and disruption of supply chains, the loss of life and disabilities. The OM Insure Risk Committee works with the underwriting and product development teams to manage climate-related risks, in addition to all other risks. This risk is managed through appropriate reinsurance and underwriting structures, in line with stated risk appetite limits. This caters for volatility in claims experience, for example through aiming to ensure that exposures do not exceed limits set per specific geographical areas. In July 2020 an initial briefing was presented to OML Exco on the "ESG/Responsible Investment Proposed Roadmap for Coal" which explores the risk attached with OML exposure to coal and our broader approach to fossil fuel investment, including where our significant insurance clients are active in the coal sector and its value chain. This response will be finalised in 2021. As an asset owner, OM Insure is working in collaboration across the OML Group to ensure that necessary expertise is developed in this area.
Other products and services, please specify	Not applicable	

C-FS2.2c

(C-FS2.2c) Describe how you assess your portfolio's exposure to climate-related risks and opportunities.

	Portfolio coverage	Assessment type	Description
Bank lending (Bank)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset manager)	Majority of the portfolio	Qualitative and quantitative	"Majority of our portfolio" relates to more than 50% of our portfolio in terms of assets under management. Our approach to climate-related risks and opportunities is a structured and repeatable process led by our portfolio managers and investment analysts in conjunction with our dedicated specialist ESG research unit and our Responsible Investment office. The first step involves screening our investment universe with a proprietary ESG quantitative tool, which is inclusive of climate-related risks and opportunities. This tool was developed by our specialist ESG team. For example, ESG risk screening may identify climate change risk as a concern to an investee company – we will then undertake deep-dive research on how the issue may impact the company's core financial metrics and competitive positioning – this may translate to an adjustment of base case and/or bull-bear case analysis. In each case, the analysts prepares a detailed note on how material ESG issues have been considered in the overall company valuation and buy/hold/sell recommendation. We are currently measuring the carbon footprint of some of our portfolios, and the carbon offset generated by our renewable energy investment – driving a transition to a sustainable, 1.5°C world energy mix.
Investing (Asset owner)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	Majority of the portfolio	Qualitative and quantitative	OM Insure is continuously improving its underwriting and risk selection processes in order to ensure better management of climate-related risks. This is based on actual emerging claims experience, emerging industry trends and actuarial analyses. In addition, actual events such as the Knysna fires, flooding events, etc. are used to improve our risk surveying and underwriting capacities. External climate risk assessment tools and data are used to inform risk selection, particularly for large risk exposures. We are also considering innovative solutions such as piloting the use of drones for claims underwriting (for example following floods/fires) and underwriting surveys.
Other products and services, please specify	<Not Applicable>	<Not Applicable>	<Not Applicable>

C-FS2.2d

(C-FS2.2d) Do you assess your portfolio's exposure to water-related risks and opportunities?

	We assess the portfolio's exposure	Portfolio coverage	Please explain
Bank lending (Bank)	No, but we plan to do so in the next two years	<Not Applicable>	Exposure to water-related risks and opportunities will be considered as part of the current process to develop a consolidated and coordinated climate change strategy. This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy with urgent sustainability measures. With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risk and this will inform our approach to assessing exposure through our bank lending practices. We will be reporting in accordance with the TCFD recommendations for our 2021 annual reporting requirements. The OM Finance business in South Africa, primarily an unsecured lender, plays an important role in contributing to the resilience of communities to climate change but has, to date, not included a focus on assessing climate related risks. Similarly, OML's involvement in banking offerings in the rest of Africa contribute to customer resilience but bank lending has not considered climate change risks specifically. OML invests significantly in financial education to try and ensure that money is not only used for consumptive purposes, further contributing to community resilience in the face of climate change risks. OM Finance offers credit to businesses. Climate change has not been considered a material risk in this portfolio.
Investing (Asset manager)	Yes	Minority of the portfolio	OMAI started collecting water use statistics (water use and use of recycled water) in 2019 for a portion of the portfolio targeting investments that likely face material water risks. This was the first time that it was done and lessons are being learned including the need to normalise the data (e.g. consider water use / impact per dollar invested) and to explore how best to utilise the information to better assess and manage water-related risks in the portfolio. We are considering linking a water risk analysis to climate change. Exposure to water-related risks and opportunities is considered as part of the current process to develop a consolidated and coordinated climate change strategy. With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risk and this will inform our approach to assessing exposure as an asset manager.
Investing (Asset owner)	No, but we plan to do so in the next two years	<Not Applicable>	We plan to assess a majority of the portfolio, applying a materiality lens to determine the areas which most require attention. Appropriate frameworks will be determined in line with the overall OML Climate Change Strategy and where water-related risks are most material.
Insurance underwriting (Insurance company)	Yes	Majority of the portfolio	We assess the exposure of our insurance underwriting portfolio to flood risk. This is done using actual emerging claims experience to improve underwriting and risk selection processes.
Other products and services, please specify	Not applicable	<Not Applicable>	

C-FS2.2e

(C-FS2.2e) Do you assess your portfolio's exposure to forests-related risks and opportunities?

	We assess the portfolio's exposure	Portfolio coverage	Please explain
Bank lending (Bank)	No, we don't assess this	<Not Applicable>	Exposure to forest-related risks and opportunities through our bank lending activities has not been assessed, as we do not consider it material to our bank lending activities.
Investing (Asset manager)	No, we don't assess this	<Not Applicable>	Exposure to forest-related risks and opportunities will be considered as part of the current process to develop a consolidated and coordinated climate change strategy. This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy with urgent sustainability measures. With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact and where we face the greatest climate risk, which will inform our approach to assessing exposure as an asset manager. OM Alternative Investments has not yet identified an asset where there may be a significant forestry-related risk.
Investing (Asset owner)	No, but we plan to do so in the next two years	<Not Applicable>	We plan to assess the majority of the portfolio by applying a materiality lens to determine the areas which most required attention. Appropriate frameworks will be determined in line with the overall OML Climate Change Strategy.
Insurance underwriting (Insurance company)	No, we don't assess this	<Not Applicable>	Historically, OML has driven climate change-related responses in a decentralised way based on clear business cases for particular businesses or products (e.g. through OM Insure and OM Responsible Investment). In the last reporting year, we have recognised the need to bring the climate change strategies of each business together in a coordinated and centralised way. We are in the process of understanding where we have the greatest climate impact and where we face the greatest climate risks, which will inform the new centralised process at OML. This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy with urgent sustainability measures. OML's strategy will look to consolidate existing best practice within the Group and establish a group strategy for the assessment of insurance underwriting's exposure to forest-related risks and opportunities.
Other products and services, please specify	Not applicable	<Not Applicable>	

C-FS2.2f

(C-FS2.2f) Do you request climate-related information from your clients/investees as part of your due diligence and/or risk assessment practices?

	We request climate-related information	Please explain
Bank lending (Bank)	No, and we don't plan on requesting climate-related information	Following the current process to develop a consolidated and coordinated climate change strategy, we will assess the materiality of climate-related risks and opportunities in our bank lending portfolio and will determine whether it is appropriate and necessary to request climate-related information from these clients.
Investing (Asset manager)	Yes	Requesting climate-related information from investees as part of our due diligence is considered as part of the current process to develop a consolidated and coordinated climate change strategy. This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy, with urgent sustainability measures. With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact and where we face the greatest climate risks, which will inform our approach as an asset manager. For example, at OM Alternative Investments (OMAI), we have developed and implemented an integrated Environmental and Social Management System (ESMS) – providing a robust and embedded system that addresses environmental and social management requirements across all our fund portfolios. It is also a mechanism for efficient and transparent ESG reporting to our stakeholders. The system enables us to integrate ESG (including climate change) issues directly into investment decision-making processes; set clear requirements for portfolio companies to develop and implement ESG systems to ensure they meet OMAI's ESG standards; provide a framework for reporting and disclosure on ESG aspects to OMAI by portfolio companies. We work in partnership with portfolio companies to help them identify and implement ESG opportunities and create sustainable value-add that enhances their overall financial performance. OMAI investment professionals use this information to produce better outcomes in their portfolio companies. For example, at the start of the BBOX Capital deal, ESG screening was undertaken to identify key risks and opportunities. OMAI also ensured the deal was aligned with the ANF3 mandate, identifying the standards and guidelines to be applied. We then defined the scope of the due diligence phase and the skills and experience required by advisers undertaking it. We appointed Ibis ESG Consulting to conduct the environmental and social due diligence (ESDD) for the transaction. Within our listed equity asset management activities, specific ESG quantitative and qualitative information is received from portfolio companies as part of the asset management/monitoring phase of the investment cycle. This includes information related to climate change risks and performance. This allows us to measure and track ESG performance against key performance indicators (KPIs) for the portfolio company while driving positive outcomes benchmarked against United Nations Sustainable Development Goals.
Investing (Asset owner)	Yes	OML has initiated a strategic process to develop a consolidated climate change strategy. Historically, OML has driven climate change-related responses in a decentralised way based on clear business cases for particular businesses or products (e.g. through OM Insure and OM Responsible Investment). In the last reporting year, we have recognised the need to bring the climate change strategies of each business together in a coordinated and centralised way. We are in the process of understanding where we have the greatest climate impact and where we face the greatest climate risks which will inform the new centralised process at OML. This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy with urgent sustainability measures. OML's strategy will look to consolidate existing best practice within the Group and establish a group strategy with regards to requesting climate-related information from our investees as part of our due diligence process. As an asset owner, we do so indirectly through our appointed asset managers as detailed above.
Insurance underwriting (Insurance company)	Yes	Climate-related information is requested as part of our standard underwriting processes when insuring clients' risks.
Other products and services, please specify	Not applicable	

## C2.3

(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?

Yes

### C2.3a

(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.

Identifier

**Risk 1**

Where in the value chain does the risk driver occur?

**Direct operations**

Risk type & Primary climate-related risk driver

Current regulation	Carbon pricing mechanisms
--------------------	---------------------------

Primary potential financial impact

**Increased indirect (operating) costs**

Climate risk type mapped to traditional financial services industry risk classification

**Operational risk**

Company-specific description

The South African Carbon Tax Bill was passed in Parliament on 19 February 2019 and came into effect in June 2019. The Bill includes a R120 per tonne carbon tax for primary greenhouse gas emitters, a carbon tax on liquid fuels, economic incentives for energy efficiency and the use of carbon offsets as a means of reducing the tax burden. What is envisaged is a phased approach, with the first phase extending from June 2019 to December 2021, escalated at 2% above CPI annually. With the implementation of the national carbon tax, we expect that the climate change debate in South Africa will gain further traction and expect greater investor focus on costs, disruption and transition risks. The risk affects all of our facilities in South Africa but also indirectly affects our investments and customers in South Africa who face higher operating costs as a result.

Time horizon

**Short-term**

Likelihood

Virtually certain

Magnitude of impact  
Low

Are you able to provide a potential financial impact figure?  
Yes, a single figure estimate

Potential financial impact figure (currency)  
119872

Potential financial impact figure – minimum (currency)  
<Not Applicable>

Potential financial impact figure – maximum (currency)  
<Not Applicable>

Explanation of financial impact figure

While the first phase of the carbon tax (2019-2022) will be relatively low, it is expected that the second phase beyond 2022 will be far more punitive with regards the price of the tax and the range of activities that it might cover, including being added to electricity consumption where most of our GHG emissions occur. For the first phase calculations, we have calculated the carbon tax liability by including the tax of 7c/litre on petrol used in our offices and for business travel, and 8c/litre for our offices and business travel during 2020. Petrol and diesel consumption - (1 132 945)\*(0,07) + (507 070)\*(0,08) = R119 872

Cost of response to risk  
29184880

Description of response and explanation of cost calculation

When it comes to our work environment and carbon footprint, it is important that we lead by example. We continuously work to minimise our impact on the environment and to improve our working environment. In addition to driving responsible consumption of resources, we are increasing our solar energy production, recycling and minimising waste across our offices. We have installed light sensors and LED light panels to reduce energy demand at most of our offices. During 2020 we started implementation on the second solar energy installation at our Mutualpark offices in Cape Town - creating carbon emissions reductions of 3 201 tCO<sub>2</sub>e. (This, combined with the first installation, implemented in December 2016, accounts for some 5 606tCO<sub>2</sub>e savings each year.) The cost of the second installation is R28.3 million, with a payback period of 20 years. Mutualpark has achieved a 6 star green building rating. Old Mutual Property (OMP) continued to engage with Eskom on its demand-side reduction initiatives and continues to monitor the impact the carbon tax will have on the business and our tenants. In 2020, OML spent approximately R844 880 on carbon reduction initiatives including upgrading lighting facilities to LED lighting in three of our owned properties and reducing our carbon emissions by 522tCO<sub>2</sub>e. The payback period for these projects is between 1-5 years.

Comment

Costs associated with the carbon tax do not exceed our current costs for monitoring legislation and operating as a business.

Identifier

Risk 2

Where in the value chain does the risk driver occur?

Downstream

Risk type & Primary climate-related risk driver

Chronic physical	Changes in precipitation patterns and extreme variability in weather patterns
------------------	-------------------------------------------------------------------------------

Primary potential financial impact  
Increased insurance claims liability

Climate risk type mapped to traditional financial services industry risk classification  
Systemic risk

Company-specific description

Extreme weather could cost our insurance business heavily through increased claims, for example against building and crop insurance policies. Our property and casualty insurance arm, Old Mutual Insurance, sees large increases in claims on their crop insurance policies following dramatic changes in weather conditions. In 2017-18, Cape Town had a 1-in-a-100-year drought, which affected both our own operational costs and those of our clients. On the back of floods in South Africa's neighbouring countries in December 2020 (Mozambique, Zimbabwe and Malawi) and the continuation of severe drought across the country in 2020, the South African government was forced into a redeclaration of a national emergency in March 2020. Both of these events have had a direct impact on our general insurance business. Dramatic changes and variability in weather conditions led to large crop losses as a result of frost in October 2019. This led OM Insure to decide to exit the crop line of business during 2020, as the losses could no longer be sustained within our set risk appetite limits. Where historically weather conditions were poor for agriculture in one out of every eight years, now farming conditions are poor in one in every six years in South Africa, meaning our agriculture customers make an increased number of claims. More frequent extreme changes in weather patterns could have an effect on our insurance business, resulting in increased frequency of pay-outs with an effect on our actuary tables. Most current climate change models are in agreement that the western part of South Africa will progressively get drier. Receiving progressively less rain and other forms of precipitation is a physical chronic risk that adversely impacts agricultural businesses/endeavours.

Time horizon

Medium-term

Likelihood

Likely

Magnitude of impact

Medium-low

Are you able to provide a potential financial impact figure?  
Yes, a single figure estimate

Potential financial impact figure (currency)  
331000000

Potential financial impact figure – minimum (currency)  
<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

**Explanation of financial impact figure**

During 2020, some R331 million in weather-related claims were paid out. Increased weather-related natural catastrophes impact on Old Mutual's profit margins and capital requirements. These impacts are assessed using internal capital and pricing models. However, it is difficult to develop models to assess the risk of catastrophic events and price insurance products appropriately. Although historical data is available, significant climate science research and expert judgement is required to capture the possible future impacts of climate change. Currently, high-level adjustments are made in the capital model and pricing models to allow for increasing weather-related claims and trends. The business is also implementing and testing alternative reinsurance structures in the market to reduce the impact of increased weather claims volatility.

Cost of response to risk

4000000

**Description of response and explanation of cost calculation**

During 2020, we supported our climate risk work with dedicated internal staff, and also support to our Municipalities Collaboration Working Group on climate change. Together these incurred a cost to Old Mutual Insure of R4 million. The Risk Committees of our businesses work with product development teams to manage this risk. Old Mutual Insure uses a conservative reinsurance and underwriting structure, in line with risk appetites, to cater for the volatility of crop insurance, ensuring exposures do not exceed limits set per area and crop. We ensure farmers use the right techniques, look at history and set individual rates and underwriting terms thus reducing our exposure to the risk of claims. Our product diversification policy ensures we are not over-exposed to risk in asset classes. High-risk crops are excluded from cover completely. In 2020 Old Mutual Insure retained its membership of AGBIZ, helping create an environment in which agribusinesses of all sizes can thrive. AGBIZ aims to build resilient and sustainable agri-food ecosystems. Risk exposures are monitored through focused underwriting, actuarial reports and models, which in turn inform business decisions on risk appetite. Old Mutual Insure remained on the board of the South African Insurance Association (SAIA) where we engage on innovative ways of mitigating climate change risks.

**Comment**

The identification and monitoring of this risk is a core part of the risk management strategy and, as such, the financial costs for climate change specific activities do not represent a material additional cost and are not measured separately to Old Mutual's wider risk management costs.

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**Identifier**

Risk 3

Where in the value chain does the risk driver occur?

Direct operations

Risk type & Primary climate-related risk driver

Technology	Transitioning to lower emissions technology
------------	---------------------------------------------

**Primary potential financial impact**

Other, please specify (Capital investments in technology development)

Climate risk type mapped to traditional financial services industry risk classification

Operational risk

**Company-specific description**

Old Mutual offices and Property business: In response to the carbon-intensive nature of South Africa's national electricity supply and, also, to secure supply in times of electricity load shedding, we have invested in renewable electricity technologies at our Cape Town primary office, Mutualpark green building retrofit, and also in our Green Building head office in Johannesburg (No 1 Mutual Place).

Time horizon

Short-term

Likelihood

Virtually certain

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

3519122

Potential financial impact figure – minimum (currency)

<Not Applicable>

Potential financial impact figure – maximum (currency)

<Not Applicable>

**Explanation of financial impact figure**

The first phase of the solar plant at Mutualpark has resulted in a 1 981 595 kWh saving per annum which would translate into an annual monetary saving of R1,651,858. Additionally, the projected per annum savings for the second phase will be 2 240 000 kWh, which translates into a R1,867,264 annual monetary saving. Thus, the potential financial impact would be R3,519,122 in total if these technologies were not in place.

Cost of response to risk

51800000

**Description of response and explanation of cost calculation**

We have produced 2.1 million kWh of renewable energy at the solar plant at Mutualpark, which is currently being expanded to increase capacity to 3800kW. The first phase of this project cost R23,500,000, and the second phase started in 2020 and will cost approximately R28,300,000. Thus, in total we end up with a cost of R51,800,000.

**Comment**

The management of our-owned offices lies with our National Technical Management department, which is mandated with full operational control of these facilities and, as such, manages any technology change relating to the due diligence and adoption of renewable electricity installations. Management costs are inherent within day-to-day salary costs of the Old Mutual National Technical Department.

Identifier

**Risk 4**

Where in the value chain does the risk driver occur?

**Downstream**

Risk type & Primary climate-related risk driver

Market	Uncertainty in market signals
--------	-------------------------------

Primary potential financial impact

**Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets**

Climate risk type mapped to traditional financial services industry risk classification

**Market risk**

Company-specific description

**Old Mutual Investment Group and Old Mutual (OMLACSA): As an asset manager and asset owner, Old Mutual manages over R700bn on behalf of our policy holders, shareholders and third-party clients. Climate risks relate to being invested in stranded assets (unanticipated write-downs, devaluations or liabilities as a result of climate change, resource depletion, climate regulations, consumer behaviour and litigation); missing green economic growth opportunities; and/or reputational risk. We view climate change as having a "multiplier" effect, further exacerbating these critical issues facing our investment decision-making. Placing an emphasis on ESG assessment of companies alongside our asset diversification policy helps to reduce and manage the exposure we have to carbon intensive investments.**

Time horizon

**Medium-term**

Likelihood

**More likely than not**

Magnitude of impact

**Medium-low**

Are you able to provide a potential financial impact figure?

**Yes, an estimated range**

Potential financial impact figure (currency)

**<Not Applicable>**

Potential financial impact figure – minimum (currency)

**0**

Potential financial impact figure – maximum (currency)

**9301769835**

Explanation of financial impact figure

**We currently have assets under management to the value of R9.3 billion that we consider to be "fossil fuel assets", which could be at risk of decreased asset value. This financial figure would be the maximum that could be at risk should all these assets be devalued completely. If well managed and the assets are exited at the right time, this risk will be mitigated and the potential financial impact will be zero.**

Cost of response to risk

**8099980**

Description of response and explanation of cost calculation

**Within the Old Mutual Alternative investment business, costs for membership to the UN Principles of Responsible Investment, annual salaries of ESG-focused staff and scenario modelling for fossil fuel investment exposure came to over R8 million. Old Mutual Investment Group is guided by a publicly available Responsible Investment policy that commits us to integrate ESG, including climate issues, across all of our investment and ownership capabilities. It has a dedicated ESG specialist unit. We use this framework to identify and respond to instances of policy change among our clients and/or investors in OML as a listed entity. In 2019 we went through a process of policy revision. Our revised policy draws on the principles of the Code for Responsible Investing in South Africa and other focused policies and legislation in South Africa, as well as the United Nations-backed Principles for Responsible Investment. By the end of 2020, we had responsibly invested R141 billion in socially inclusive, low carbon and resource efficient investments, representing 20% of assets under management. During 2020 OML started a strategic assessment of its exposure and response to businesses in the coal value chain. This "Coal Roadmap" has included assets that we own, assets under our management, our lending practices and, also, clients that we insure. The outcome of the assessment will be finalised in 2021, following input from all businesses. Costs include memberships to UN Principle for Responsible Investment and CDP, salaries of ESG specialists within Old Mutual Investment Group and development of proprietary ESG analysis tools and development of new ESG Index products and their launch.**

Comment

## C2.4

(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?

**Yes**

### C2.4a

(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.

Identifier

**Opp1**

Where in the value chain does the opportunity occur?

**Direct operations**

Opportunity type  
**Resource efficiency**

Primary climate-related opportunity driver  
**Move to more efficient buildings**

Primary potential financial impact  
**Reduced indirect (operating) costs**

Company-specific description  
Green building technologies enable us to reduce costs, mitigate risks associated with security of electricity and water supply and to provide more productive spaces. The technologies available also enable us to live up to our ethos "Old Mutual Cares" and play a leadership role in driving a positive response to the climate challenge. Our new head office in Sandton, Johannesburg (No 1 Mutual Place) is a new "as-built" 5-star rated building by the Green Building Council of South Africa. Our Cape Town office space, Mutualpark, has achieved a 6-star green building rating.

Time horizon  
**Short-term**

Likelihood  
**Virtually certain**

Magnitude of impact  
**Medium-low**

Are you able to provide a potential financial impact figure?  
**Yes, a single figure estimate**

Potential financial impact figure (currency)  
**9239122**

Potential financial impact figure – minimum (currency)  
**<Not Applicable>**

Potential financial impact figure – maximum (currency)  
**<Not Applicable>**

Explanation of financial impact figure

The financial impact figure is the estimated savings generated through the resource efficiencies realised as a result of meeting the various green building criteria of the GBGSA. This figure amounts to approximately R9,239,122, which as a percentage of our total operating costs is deemed to be a medium-low impact. The first phase of the solar plant at Mutualpark has resulted in a 1 981 595 kWh saving per annum, which would translate into an annual monetary saving of R 1,651,858. Additionally, the per annum savings for the second phase is 2 240 000 kWh, which translates into a R1,867,264 annual monetary saving. Thus, the potential financial impact for this would be R3,519,122 in total. Adding to this, the LED initiatives implemented have an overall saving of R3,600,000 per year, and the water plant at Mutualpark saves R2,120,000 annually based on the 99 823 kilolitres of water saved per annum.

Cost to realize opportunity  
**94689785**

Strategy to realize opportunity and explanation of cost calculation

When it comes to our work environment and carbon footprint, it is important that we lead by example. We continuously work to minimise our impact on the environment and to improve our working environment. In addition to driving responsible consumption of resources, we are increasing our solar energy production, recycling and minimising waste across our offices. In this regard, capital is allocated to investments in green building technology across our property portfolio and operations. For example, OML is exploring the potential of, and implementing where appropriate, self-sufficient water sources, investment in renewable energy, recycling and Reverse Vending Machines (RVMs). We have produced 133 million litres of recycled drinking water from our water filtration plant at Mutualpark since August 2018, which represents 90% of our required water usage. We have increased rainwater harvesting for irrigation and toilet flushing at No 1 Mutual Place, in Johannesburg. Water efficient fittings are now in place in our offices, including a 9-step filter system from basins and showers used to flush toilets at Wanooka Place. We have installed light sensors and LED light panels to reduce energy demand in most of our offices, costing approximately R5 million. We have produced 2.1 million kWh of renewable energy at the solar plant at Mutualpark, which is currently being expanded to increase capacity to 3800kW. The first phase of this project cost R23,500,000 and the second phase implemented in 2020, cost approximately R28,300,000. Thus, the total cost is R56,800,000. Overall, 11.4% of OML South Africa's energy needs were met by self-generated renewable energy in 2020. Furthermore, we have diverted 52% of our waste from landfill, up from 38% in 2018. In addition, the water plant implemented in 2018 at Mutualpark cost R37 889 785.

Comment

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Identifier  
**Opp2**

Where in the value chain does the opportunity occur?  
**Direct operations**

Opportunity type  
**Energy source**

Primary climate-related opportunity driver  
**Use of lower-emission sources of energy**

Primary potential financial impact  
**Returns on investment in low-emission technology**

Company-specific description  
**Various renewable energy and resource-efficient initiatives implemented across OM Property's property portfolio and our main office parks.**

Time horizon  
**Short-term**

Likelihood  
**Virtually certain**

Magnitude of impact  
**Medium-low**

Are you able to provide a potential financial impact figure?

**Yes, an estimated range**

Potential financial impact figure (currency)

**<Not Applicable>**

Potential financial impact figure – minimum (currency)

**3600000**

Potential financial impact figure – maximum (currency)

**12000000**

Explanation of financial impact figure

**These financial savings are the sum of annual savings generated through efficiency initiatives within Old Mutual Property's portfolio, as well as those implemented within our own office environment.**

Cost to realize opportunity

**55000000**

Strategy to realize opportunity and explanation of cost calculation

**Costs are capital expenditure to deploy new, cleaner sources of energy across our property portfolio and owned/occupied office space. Within OML Property, a continuous process of resource efficiency analysis takes place to ensure that we are able to provide best value for our tenants. As a minimum, we abide by all national and local legislation and building standards and analyse the cost-benefit ratios for Green Building Council of South Africa ratings for any new build that we are involved with. This includes the installation of internal LED lighting and parking LED lighting at Bedford Centre as well as installation of LED lighting at Khulani Business Park, Jet Park Speculative and The Zone @ Rosebank. Additionally, we have installed light sensors and LED light panels to reduce energy demand at most of our offices. Our solar plant at Mutualpark is being expanded by 2700kW to increase capacity to 3800kW (We generated 2.1 million kWh of energy from our 1 100kW solar panels, contributing to monthly diesel savings). In 2020, 11.4% of OML South Africa's energy needs were met by self-generated renewable energy. As a responsible business committed to reducing our impact on the environment, we are on a journey to reduce the amount of waste we send to landfills, and our use of single-use plastics. Mutualpark banned the use of plastic bags and straws, allowing only the use of certified compostable "green" packaging to be sold by vendors. This has led to the reduction of waste transported to landfills, subsequently contributing to the reduction of our carbon footprint. At No 1 Mutual Place, the introduction of bio bins and the supply of fresh milk in reusable glass bottles, instead of plastic or box cartons, has positively contributed to the amount of waste we diverted from entering the waste stream. We have also piloted the use of Reverse Vending Machines (RVMS) to maximise our recycling initiatives. The machines allow users to deposit bar-coded plastic bottles, glass bottles, aluminium cans and tetrapak (milk and juice cartons) into the machines for recycling to earn rewards such as airtime. At Wanooka Place, efforts to maximise recycling and reduce waste contamination include the installation of recycling bins throughout the building and the appointment of an onsite supplier that separates waste for recycling and facilitates the conversion of food waste into compost.**

Comment

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Identifier

**Opp3**

Where in the value chain does the opportunity occur?

**Downstream**

Opportunity type

**Products and services**

Primary climate-related opportunity driver

**Development and/or expansion of low emission goods and services**

Primary potential financial impact

**Other, please specify (Better competitive position to reflect shifting consumer preferences, resulting in increased revenues)**

Company-specific description

**OML is driving investments in green growth, which represent an increasing opportunity for the business. Green growth comprises socially-inclusive, low-carbon and resource-efficient investments. Investment in green growth is aligned with our core objective to deliver risk-adjusted returns to our policy holders, shareholders and third-party customers while supporting sustainable social and economic development. For example, across Old Mutual Alternative Investments (OMAI), Old Mutual Specialised Finance and Futuregrowth – all part of Old Mutual Investment Group – we manage approximately R122 billion of our clients' capital in green economy investments, both debt and equity. These businesses are a constructive voice across a range of national interest issues such as renewable energy, land reform and governance at State-owned entities. OM Alternative Investments has contributed to R28 billion invested in clean energy, over 3.7 million tonnes of reduction in carbon emissions, and 1.07 million homes powered by clean energy. When it comes to our work environment and carbon footprint, it is important that we lead by example. We continuously work to minimize our impact on the environment and to improve our working environment. In addition to driving responsible consumption of resources, we are increasing our solar energy production, recycling and minimising waste across our offices. Mutualpark has achieved a 6-star green building rating, and 11% of OML South Africa's energy needs were met by self-generated renewable energy in 2019. In 2018, Old Mutual Investment Group launched an ESG Index fund range of investment products for retail investors. These products, which include a consideration of climate-related performance, are increasingly being shown to deliver better returns. As an example, the MSCI Emerging Market ESG Leaders Index, which focuses on companies with higher sustainability performance than their peers in their sector, outperformed the MSCI's standard emerging markets index on a total return basis by 103% during the past decade. We are working on a capability to develop a low-carbon themed fund.**

Time horizon

**Short-term**

Likelihood

**Virtually certain**

Magnitude of impact

**Low**

Are you able to provide a potential financial impact figure?

**Yes, a single figure estimate**

Potential financial impact figure (currency)

**6808490000**

Potential financial impact figure – minimum (currency)

**<Not Applicable>**

Potential financial impact figure – maximum (currency)

**<Not Applicable>**

Explanation of financial impact figure

The Old Mutual Infrastructural, Development and Environmental Assets Managed (IDEAS) Fund has invested nearly R6.8 billion in renewable energy assets as of December 2020. Prior to the launch of the Index Fund products in 2018, Old Mutual Investment Group managed R10 billion of clients' capital in ESG index products. New funds have been added to this and the amount in our ESG index range is now R30 billion, which is just under 4% of the total R766.5 billion of assets currently under OML management.

Cost to realize opportunity

8067168

Strategy to realize opportunity and explanation of cost calculation

Renewable energy deals for 2020 cost just over R8million. Financial products have been specifically designed to offer investors the opportunity to achieve market-related returns by investing in research and specific companies that are measurably better for the planet from an ESG perspective. OMAI's Ideas Managed Fund is the largest private equity investor in renewable energy in South Africa. It is committed to tackling the climate crisis, having invested in 28 renewable energy facilities, including 10 wind farms, 15 solar PV farms, one hydropower station and two solar off-grid companies. The fund has achieved an installed capacity of 1.45 GW and produced 3,401 GWh of renewable energy in 2020. This clean energy production created a carbon offset of 3.6 million tons of CO2 equivalent. Within OMAI, African Infrastructure Investment Fund 3 (AIIF3) is AIIM's flagship Pan-African infrastructure fund is continuing the mandate and strategy executed for the AIIF2 fund. The USD399 million fund targets core and core-plus infrastructure investments in the power, transport, digital infrastructure and midstream energy sectors across sub-Saharan Africa. Low-carbon power generation in 2020 has been delivered by BBoXX off-grid solar (Rwanda, DRC, Kenya) and StarSight (a distributed efficiency business combining solar photovoltaic and diesel power generation (Nigeria)). The fund's investments produced 7.99 GWh of clean energy in 2020.

Comment

Embedded within day-to-day operational costs of Old Mutual Investment Group's Responsible Investment team.

C3. Business Strategy

C3.1

(C3.1) Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning?

Yes

C3.1b

(C3.1b) Does your organization intend to publish a low-carbon transition plan in the next two years?

	Intention to publish a low-carbon transition plan	Intention to include the transition plan as a scheduled resolution item at Annual General Meetings (AGMs)	Comment
Row 1	Yes, in the next two years	Yes, we intend to include it as a scheduled AGM resolution item	Part of the OML Responsible Business Strategy is the intention to report according to the TCFD recommendations in our next financial reporting period (FY2021), which will be inclusive of our low-carbon transition strategy plan.

C3.2

(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?

No, but we anticipate using qualitative and/or quantitative analysis in the next two years

C3.2b

**(C3.2b) Why does your organization not use climate-related scenario analysis to inform its strategy?**

Following the separate listing of OML on the JSE in 2018, OML has initiated a strategic process to develop a consolidated climate change strategy. Historically, OML has driven climate change-related responses in a decentralised way based on clear business cases (for example, OM Insure has experienced direct impacts from climate change and thus developed a mature response). This decentralised approach failed to sensitise the different businesses to climate-related scenario analysis and why such approaches should be adopted. Hence, scenario analysis has not been used to inform our business strategy to date.

However, in the last reporting year, we have recognised the need to bring the climate change strategies of each business together in a coordinated, centralised way. Our Responsible Business Strategy, a component of OML's strategic pillar "Old Mutual Cares", is our mechanism to coordinate our approach to climate change, to leverage the successes of the businesses with mature responses and to develop explicit strategies in our other businesses and products.

With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks, which will inform the new centralised process at OML. This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy with urgent sustainability measures, including climate change and climate scenario analysis. This process will be led by the OML Climate Change Task Force under the Risk and Responsible Business Committees of the Board and the scenario analysis work will be commissioned during FY2021.

However, prior to this exercise, various parts of OML have been exploring the implications of, and taking steps towards implementing, the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) to assess the resilience of OML's strategy to physical and transition risks associated with different climate futures. Late in 2019, OML initiated a review of the TCFD framework and how this can be implemented. This included a review of climate risk considerations in the investment lifecycle, as asset managers of existing portfolios and from a governance perspective within OML, which will be implemented in 2020. Likewise, OM Insure conducted a similar exercise in 2020 with the purpose of beginning to understand and report on climate-related risks and opportunities under different scenarios.

**C3.3**

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	With the rise in carbon taxes, it is predicted that demand for renewable energy will increase, as will the need for businesses to be less carbon intensive. Our investment teams are aware of the opportunity carbon taxes present to create carbon-efficient products for customers and integrate the development of these into usual practice. In 2016, for example, Old Mutual Investment Group (OMIG) launched the first responsible investment equity index fund for institutional investors in South Africa, which invests in companies that have high sustainability measures. In 2020, this was augmented by an additional ESG fund that is South African-specific in terms of the underlying investee companies. Controlling carbon emissions requires a global effort, which has resulted in proposals for a global cap and trade system in which the developing world would come to the fore. Old Mutual will monitor how the extension of CAT schemes globally affects opportunities for investment, e.g. motivating selling of green funds. Extreme weather could cost our insurance business heavily through increased claims, for example, from against building and crop insurance policies. The Risk Committees work with product development teams to manage this risk. Old Mutual Insure uses a conservative reinsurance and underwriting structure, in line with risk appetites, to cater for the volatility of crop insurance, ensuring exposures do not exceed limits set per area and crop. Climate change and environmental degradation pose threats to the global economy and the wellbeing of citizens in every country. This has the potential to undermine development investments and recent gains in poverty alleviation, food and water etc, particularly in vulnerable developing countries. Since Old Mutual invests funds in ways that create a positive future for our customers and their communities, this is a risk to Old Mutual and so operating responsibly is a priority. Unstable economic and social situations caused by severe climate change impacts could reduce the ability or demand of potential customers to take advantage of our products (Risk 6). To counter this, Old Mutual offers products to suit different customer needs even in challenging market conditions, for example, those caused by climate.
Supply chain and/or value chain	Evaluation in progress	In addition to individual OM businesses evaluating climate risks and opportunities in their own strategies, the centralised climate change strategy, which is part of the Responsible Business Strategy, and the work of the OML Climate Change Task Force, which reports to the Responsible Business and Risk sub-committees of the Board, is currently evaluating climate-related risks and opportunities. This is being done as part of the climate scenario analysis and risk and opportunity analysis that inform our TCFD reporting requirements. This work will be completed in time for the reporting of our FY2021 in early 2022.
Investment in R&D	Evaluation in progress	The climate scenario and risk and opportunity analysis that is being driven by the OML Climate Change Task Force, and that will inform our TCFD reporting requirements for FY2021 is inclusive of analysis and required investment in product R&D. This will be completed by early 2022. Individual OM businesses also conduct their own R&D investment in response to how climate risks and opportunities affect their businesses.
Operations	Yes	In 2019, OML undertook the process of improving the overall alignment of the OML Responsible Business strategy with urgent sustainability measures and continued to do so throughout 2020. Included in this process is the generation of a series of ESG indicators, so as to monitor the progress and overall performance in meeting these sustainability objectives. Climate change features most directly in the impact area 'reduced greenhouse gases' and the carbon that is saved in this respect can be used as a measure of achievement. Additional impact areas are being explored with an indirect link to climate change and the role of OML in contributing to societal resilience in the face of physical and transition climate risks. These include contributions to localised economic growth, reduced interest payments for society, increased lifetime earnings for members of society and avoided government benefit payments. A subsequent task will be to value the impact of the strategy. Our strategic focus is thus on carbon saving from the reduction in GHG emissions, in terms of all OML operations (investments, buildings, branches, etc) as a result of policy and investment decisions. To reduce our operational impact and mitigate climate related risks to our operations, OML is exploring the potential of self-sufficient water sources, investment in renewable energy, recycling and reverse vending machines. For example, we have produced 133 million litres of recycled drinking water from our water filtration plant at Mutualpark since August 2018, which represents 90% of our required water usage. We have produced 2.1 million kWh of renewable energy by the solar plant at Mutualpark, with 11% of OML South Africa's energy needs being met by self-generated renewable energy in 2019. Additionally, we have diverted 52% of our waste from landfill, up from 38% in 2018. We will continue to explore ways in which our operations can be more resilient to climate risks and can maximise on climate-related opportunities.

**C3.4**

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence

<b>Row 1</b>	<b>Direct costs Capital expenditures</b>	<b>Five-year budgets now include provision for green building investments, such as rooftop solar PV, water filtration plants, light sensors and LED light panels, etc. OML has invested R52 million in renewable energy generation since 2018. During 2020, OM Properties invested in various energy efficiency initiatives to the cost of R1 million that have a seven-year payback period. OMAI has adopted an ESG and Impact Management Framework system to achieve our vision of continual improvement in ESG performance and this informs financial planning at the business.</b>
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### C3.4a

(C3.4a) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).

### C-FS3.6

(C-FS3.6) Are climate-related issues considered in the policy framework of your organization?

**Yes, climate-related issues are integrated into our general policy framework that relates to our financing activities**

### C-FS3.6a

(C-FS3.6a) In which policies are climate-related issues integrated?

	Type of policy	Portfolio coverage of policy	Description
Bank lending (Bank)	Please select	Please select	
Investing (Asset manager)	Sustainable/Responsible Investment Policy	All of the portfolio	Within OM Investment Group (OMIG), we maintain a publicly available Responsible Investment policy which draws on the principles of the Code for Responsible Investing in South Africa (CRISA) and other RI focused policies and legislation, both in South Africa (including Regulation 28 of the Pension Funds Act, the Financial Sector Charter (FSC) and the King IV Code on Corporate Governance (Principle 17)) and globally in terms of the United Nations backed Principles for Responsible Investment (UNPRI). Our RI policy commits us to: 1. The consideration of material ESG issues when making investment and ownership decisions; 2. Responsible stewardship of clients' assets by engaging with investee companies on their ESG practices and voting at company meetings; 3. Supporting industry RI initiatives and contributing to RI thought leadership across the financial services sector; 4. Public disclosure on our RI policies and practices. This policy applies across the full portfolio of OMIG
Investing (Asset owner)	Please select	Please select	
Insurance underwriting (Insurance company)	Please select	Please select	
Other products and services, please specify	Please select	Please select	

### C-FS3.7

(C-FS3.7) Are climate-related issues factored into your external asset manager selection process?

**Yes, for some assets managed externally**

### C-FS3.7a

(C-FS3.7a) How are climate-related issues factored into your external asset manager selection process?

	Process for factoring climate-related issues into external asset management selection	Comment
Row 1	Review asset manager's climate-related policies	As part of our Responsible Investment Policy, we expect our external managers to be signatories to the United Nations Principles of Responsible Investment (UNPRI) and the Codes of Responsible Investing in South Africa (CRISA), which require due diligence and reporting by asset managers on, among other things, their incorporation of climate change issues in their investment decision-making.

## C4. Targets and performance

### C4.1

(C4.1) Did you have an emissions target that was active in the reporting year?

**No target**

### C4.1c

(C4.1c) Explain why you did not have an emissions target, and forecast how your emissions will change over the next five years.

	Primary reason	Five-year forecast	Please explain
Row 1	We are planning to introduce a target in the next two years	We expect our Scope 1 & 2 emissions to decrease over the next five years as we set reduction targets and implement various energy-efficient initiatives across our offices and building properties. We are unable to give a quantitative indication of the decrease at this stage.	Following the separate listing of OML on the JSE in 2018, OML has initiated a strategic process to develop a consolidated climate-change strategy. Historically, OML has driven climate change-related responses in a decentralised way based on clear business cases (for example OM Insure has experienced direct impacts from climate change). In the last reporting year, we have recognised the need to bring the climate change strategies of each business together in a coordinated, centralised way. With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks, which will inform the new centralised process at OML. As part of this process, early aspirational targets have been proposed by parts of the business and work is currently underway to confirm accurate baseline figures. As part of our TCFD process, we are reviewing the practicality of setting a science-based target.

## C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?

**No other climate-related targets**

## C4.3

(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

**Yes**

### C4.3a

(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	0	0
To be implemented*	0	0
Implementation commenced*	1	3201
Implemented*	1	2105
Not to be implemented	0	0

### C4.3b

(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.

Initiative category & Initiative type

Low-carbon energy generation	Solar PV
------------------------------	----------

Estimated annual CO2e savings (metric tonnes CO2e)  
**2105**

Scope(s)  
**Scope 1**  
**Scope 2 (market-based)**

Voluntary/Mandatory  
**Voluntary**

Annual monetary savings (unit currency – as specified in C0.4)  
**854930**

Investment required (unit currency – as specified in C0.4)  
**22500000**

Payback period  
**16-20 years**

Estimated lifetime of the initiative  
**21-30 years**

Comment  
**Solar phase 1 project of PV installation at Mutual Park implemented in December 2016. Monetary savings are increasing over time as the electricity tariff-imposed increases.**

Initiative category & Initiative type

Low-carbon energy generation	Solar PV
------------------------------	----------

Estimated annual CO2e savings (metric tonnes CO2e)  
**3201**

Scope(s)  
**Scope 1**  
**Scope 2 (market-based)**

Voluntary/Mandatory  
**Voluntary**

Annual monetary savings (unit currency – as specified in C0.4)  
**1511684**

Investment required (unit currency – as specified in C0.4)  
**28300000**

Payback period  
**16-20 years**

Estimated lifetime of the initiative  
**21-30 years**

Comment  
**Solar phase 2 project of PV installation at Mutual Park. Monetary savings are increasing over time as the electricity tariff-imposed increases.**

### C4.3c

(C4.3c) What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Compliance with regulatory requirements/standards	OML governance and risk management procedures ensure that appropriate investments are made to comply with all regulatory requirements, including climate change-related ones.
Dedicated budget for other emissions reduction activities	Following the separate listing of OML on the JSE in 2018, OML has initiated a strategic process to develop a consolidated climate change strategy. Historically, OML has driven climate change-related responses in a decentralised way based on clear business cases for particular businesses or products (e.g. through OM Insure and OM Responsible Investment). In the last reporting year, we have recognised the need to bring the climate change strategies of each business together in a coordinated, centralised way. With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks, which will inform the new centralised methods used to drive emissions reduction activities.
Employee engagement	Engaging our employees in environmental efforts is an important part of delivering change across our businesses. We promote a culture of efficiency where employees are given license to think green and are continually looking for opportunities to reduce resource use. Much of this work has been conducted at individual business level.
Internal incentives/recognition programs	Monetary incentives are linked to climate change-related objectives for employees within the Responsible Business function, with targets set across a range of areas including climate change awareness of employees, environmental management plans and GHG target reductions. Building and facilities managers have energy management and reduction targets within their individual performance targets. Certain defined ESG metrics including emissions reduction projects, energy reduction projects, efficiency projects, and portfolio/fund alignment to climate-related objectives have been added to the relevant scorecards of senior managers already (COO, CRO, CSO, and CIO), with the development of an overall ESG metric for our variable pay scheme developed in 2020.
Dedicated budget for energy efficiency	At Old Mutual, reducing our impact on the environment is a strategic imperative. As such, dedicated budgets are available to realise this imperative. Old Mutual Property uses budget within operational expenditure to choose energy efficient options (e.g. light fittings) whilst ensuring we remain within budget and specification. Upgrades to emissions reduction activities (e.g. Solar and Water Treatment projects) are submitted to our Executive Committee as a full Business Case where the ROI and IRR projections are scrutinised for consideration. Old Mutual Property allocates capital expenditure budget to replace all end-of-life assets with sustainable solutions.

**C4.5**

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?

Yes

**C4.5a**

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.

Level of aggregation

Group of products

Description of product/Group of products

**Across Old Mutual Alternative Investments (OMAI), Old Mutual Specialised Finance and Futuregrowth – all part of Old Mutual Investment Group – we manage approximately R141 billion of our clients' capital in green economy investments, both debt and equity. These businesses are a constructive voice across a range of national interest issues such as renewable energy.**

Are these low-carbon product(s) or do they enable avoided emissions?

**Low-carbon product and avoided emissions**

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

**Other, please specify (Own Approach)**

% revenue from low carbon product(s) in the reporting year

% of total portfolio value

Asset classes/ product types

Please select

Comment

**OMAI's Impact Investing division has been a leader in generating positive social and environmental impact alongside financial returns since 2007, identifying assets and regions where gaps or backlogs in social infrastructure have been identified. We seek to create commercially sustainable investments that provide large scale positive impacts which benefit mainly lower to middle income communities, focused particularly on affordable housing and quality education. Environmental, social and governance (ESG) factors are at the forefront of our investments decisions. This is especially evident in our housing and schools portfolio where the green building certification system EDGE (Excellence in Design for Greater Efficiencies) plays an important role in water conservation and efficient use of energy in our housing units and school buildings. The renewable energy projects we have invested in help us avoid approximately 3 million tonnes of carbon dioxide from the environment every year.**

Level of aggregation

Product

Description of product/Group of products

**OMAI's Ideas Managed Fund enables deployment of renewable energy**

Are these low-carbon product(s) or do they enable avoided emissions?

**Low-carbon product**

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

**Other, please specify (Own approach)**

% revenue from low carbon product(s) in the reporting year

% of total portfolio value

Asset classes/ product types

Investing	Private Equity
-----------	----------------

**Comment**

**OMA's Ideas Managed Fund is the largest private equity investor in renewable energy in South Africa. It is committed to tackling the climate crisis, having invested in 28 renewable energy facilities including 10 wind farms, 15 solar PV farms, one hydropower station and two solar off-grid companies. The fund has achieved an installed capacity of 1.11 GW and produced 3,141GWh of renewable energy in 2019. This clean energy production created a carbon offset of 3.14 million tons of CO2 equivalent.**

**Level of aggregation**

**Product**

**Description of product/Group of products**

**In December 2018, the African Infrastructure Investment Fund 3 (AIIF3) acquired a minority stake in BBOXK's operations in East Africa, as part of a US\$31 million investment plan. BBOXK Capital is a pay-as-you-go solar electricity service company that designs, manufactures and distributes plug-and-play solar home systems for off-grid rural and peri-urban communities. AIIF3 has a minority interest in BBOXK's subsidiaries operating in Kenya, Rwanda and the Democratic Republic of Congo, referred to as Next Generation Utilities (NGUs). BBOXK focuses on satisfying the fundamental need for electricity as well as providing superior customer service.**

**Are these low-carbon product(s) or do they enable avoided emissions?**

**Low-carbon product**

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

**Other, please specify (Own approach)**

**% revenue from low carbon product(s) in the reporting year**

**% of total portfolio value**

**Asset classes/ product types**

**Please select**

**Comment**

**To date: over 250 000 people have been positively impacted by BBOXK solar products; 4 GWh of energy has been generated using BBOXK solar home systems; 63 000 school-aged children can now study comfortably; US\$2.4 million has been saved in energy expenses; and, 40 000 tonnes of CO2 has been offset.**

**Level of aggregation**

**Product**

**Description of product/Group of products**

**Old Mutual Property regularly improves the efficiency of its property portfolio as part of its Green Building Strategy. This enables tenants and employees to work in more energy-efficient buildings and avoid additional emissions.**

**Are these low-carbon product(s) or do they enable avoided emissions?**

**Avoided emissions**

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**

**Other, please specify (Own approach)**

**% revenue from low carbon product(s) in the reporting year**

**% of total portfolio value**

**Asset classes/ product types**

Investing	Real Estate/ Property
-----------	-----------------------

**Comment**

**Every year OML undertakes energy efficiency projects in our properties to reduce emissions, thereby helping tenants avoid emissions. In 2020, OML undertook the installation and upgrading of LED lighting at Phumulani Mall, Bedford Square, and Riverside Mall. This cost approximately R2.13 million with an estimated annual saving of 656 MWh, and an annual monetary saving of approximately R949,222.**

**C5. Emissions methodology**

**C5.1**

(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

Scope 1

Base year start  
**January 12019**

Base year end  
**December 31 2019**

Base year emissions (metric tons CO2e)  
**2242.38**

Comment

Scope 2 (location-based)

Base year start  
**January 12019**

Base year end  
**December 31 2019**

Base year emissions (metric tons CO2e)  
**87131.94**

Comment

**No low-carbon electricity, heat or steam purchased. Hence, market-based Scope 2 emissions are the same as location-based.**

Scope 2 (market-based)

Base year start  
**January 12019**

Base year end  
**December 31 2019**

Base year emissions (metric tons CO2e)  
**87131.94**

Comment

**No low-carbon electricity, heat or steam purchased. Hence, market-based Scope 2 emissions are the same as location-based.**

## C5.2

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(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.  
**The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)**

## C6. Emissions data

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### C6.1

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(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

Gross global Scope 1 emissions (metric tons CO2e)  
**2748.74**

Start date  
**<Not Applicable>**

End date  
**<Not Applicable>**

Comment

**The emission sources include stationary fuel, fugitive emissions and mobile fuel.**

### C6.2

---

(C6.2) Describe your organization's approach to reporting Scope 2 emissions.

Row 1

Scope 2, location-based

**We are reporting a Scope 2, location-based figure**

Scope 2, market-based

**We are reporting a Scope 2, market-based figure**

Comment

**No low carbon instruments were purchased. Hence, market-based and location-based Scope 2 emissions are the same.**

## C6.3

---

(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO<sub>2</sub>e?

Reporting year

Scope 2, location-based

**93138.74**

Scope 2, market-based (if applicable)

**93138.74**

Start date

**<Not Applicable>**

End date

**<Not Applicable>**

Comment

**No low carbon instruments were purchased. Hence, market-based and location-based Scope 2 emissions are the same.**

## C6.4

---

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

**Yes**

### C6.4a

---

(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.

Source

**Emissions generated by the following facilities and/or entities are excluded from the reporting boundary: Old Mutual South Africa (OMSA) leased portfolio; Corporate building in Bloemfontein, South Africa; Old Mutual Rest of Africa owned buildings (including Old Mutual UAP) and China. Old Mutual Insure branches and franchises (including Credit Guarantee Insurance Corporation (CGIC): South African branches (Leased), and Rest of Africa branches in the following countries: Zimbabwe, Nigeria, Uganda, Malawi, Ghana, Rwanda, Namibia, Kenya, Eswatini, Tanzania, Botswana and South Sudan.**

Relevance of Scope 1 emissions from this source

**Emissions are relevant but not yet calculated**

Relevance of location-based Scope 2 emissions from this source

**Emissions are relevant but not yet calculated**

Relevance of market-based Scope 2 emissions from this source (if applicable)

**Emissions are relevant but not yet calculated**

Explain why this source is excluded

**At present, we are only able to disclose our emissions from a portion of facilities and/or entities under our operational control. We have investigated the facilities and/or entities that still need to be included and are working to include these within our GHG inventory in the near term.**

---

Source

**Fugitive emissions apart from air-conditioning gas refills in Old Mutual Property and Mutualpark buildings.**

Relevance of Scope 1 emissions from this source

**Emissions are relevant but not yet calculated**

Relevance of location-based Scope 2 emissions from this source

**Emissions are not relevant**

Relevance of market-based Scope 2 emissions from this source (if applicable)

**Emissions are not relevant**

Explain why this source is excluded

**Emissions from these sources cannot be calculated as data is unavailable.**

---

(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

#### Purchased goods and services

##### Evaluation status

**Relevant, calculated**

##### Metric tonnes CO<sub>2</sub>e

**1187.49**

##### Emissions calculation methodology

**An emission factor for Mondi Rotatrim paper was used (obtained via private communication in October 2020). Emission factors for water purchased is provided by Defra, Guideline to Defra's GHG Conversion Factors for Company Reporting, Annexes. Updated in August 2020.**

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

**100**

##### Please explain

**9.74 tonnes of office paper was purchased in the reporting year and 1,237,742.83 kilolitres of municipal water was purchased by OML in the reporting year. Information on other purchased goods and services was not evaluated.**

#### Capital goods

##### Evaluation status

**Relevant, not yet calculated**

##### Metric tonnes CO<sub>2</sub>e

**<Not Applicable>**

##### Emissions calculation methodology

**<Not Applicable>**

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

##### Please explain

**Old Mutual Limited purchases a wide range of capital goods. This Scope 3 category is under investigation as we have not yet collected emissions-related data from our suppliers and, as a result, are not in a position to provide this figure at this stage.**

#### Fuel-and-energy-related activities (not included in Scope 1 or 2)

##### Evaluation status

**Relevant, calculated**

##### Metric tonnes CO<sub>2</sub>e

**9220.74**

##### Emissions calculation methodology

**Emission factor for transmission and distribution losses for electricity purchased in South Africa is sourced from the Eskom 2020 Integrated Annual Report.**

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

**100**

##### Please explain

**Emissions from electricity transmission and distribution losses that result from our consumption of electricity from the South African national grid. For the reporting period, electricity consumption totalled 91,312,492.20 kilowatt hours.**

#### Upstream transportation and distribution

##### Evaluation status

**Relevant, not yet calculated**

##### Metric tonnes CO<sub>2</sub>e

**<Not Applicable>**

##### Emissions calculation methodology

**<Not Applicable>**

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

##### Please explain

**Old Mutual Limited makes use of various courier and delivery services. This Scope 3 category is under investigation as we have not yet collected emissions-related data from our suppliers and, as a result, are not in a position to provide this figure at this stage.**

#### Waste generated in operations

##### Evaluation status

Relevant, calculated

##### Metric tonnes CO<sub>2</sub>e

5704.99

##### Emissions calculation methodology

Waste to landfill and waste recycled or composted were used to calculate emissions according to the GHG Protocol using Defra's 2020 emission factors for municipal waste.

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

##### Please explain

The waste generated in operations includes landfill and hazardous waste, recycling and organic waste, but this is a limited measure with 23 buildings unable to report full waste data. We are in the process of conducting a full waste audit and management plan.

#### Business travel

##### Evaluation status

Relevant, calculated

##### Metric tonnes CO<sub>2</sub>e

596.28

##### Emissions calculation methodology

Car rental and air flight emissions incurred by our employees were calculated using the GHG Protocol methodology and relevant emission factors as provided by Defra, Guideline to Defra's GHG Conversion Factors for Company Reporting, Annexes. Updated in August 2020. Regarding air travel, an 8% uplift factor is included to take into account non-direct routes and delays/circling. The impact of radiative forcing has also been included.

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

##### Please explain

Business travel includes rental cars, commercial flights, accommodation and travel claims (Marriott only). Information on other "business travel" was not available.

#### Employee commuting

##### Evaluation status

Relevant, not yet calculated

##### Metric tonnes CO<sub>2</sub>e

<Not Applicable>

##### Emissions calculation methodology

<Not Applicable>

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

##### Please explain

We have not yet undertaken an employee commuting survey including relevant criteria for measurement.

#### Upstream leased assets

##### Evaluation status

Relevant, not yet calculated

##### Metric tonnes CO<sub>2</sub>e

<Not Applicable>

##### Emissions calculation methodology

<Not Applicable>

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

##### Please explain

This Scope 3 category is under investigation as we have not yet evaluated emissions that we are responsible for in using or occupying any facilities that we lease from third parties.

#### Downstream transportation and distribution

##### Evaluation status

Relevant, not yet calculated

##### Metric tonnes CO<sub>2</sub>e

<Not Applicable>

##### Emissions calculation methodology

<Not Applicable>

##### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

##### Please explain

Old Mutual Limited makes use of various courier and delivery services. This Scope 3 category is under investigation as we have not yet collected emissions-related data from our suppliers and, as a result, are not in a position to provide this figure at this stage.

#### Processing of sold products

Evaluation status

**Not relevant, explanation provided**

Metric tonnes CO<sub>2</sub>e

**<Not Applicable>**

Emissions calculation methodology

**<Not Applicable>**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

Please explain

**Old Mutual Limited is a financial services provider and does not process or manufacture products.**

#### Use of sold products

Evaluation status

**Not relevant, explanation provided**

Metric tonnes CO<sub>2</sub>e

**<Not Applicable>**

Emissions calculation methodology

**<Not Applicable>**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

Please explain

**Old Mutual Limited is a financial services provider and does not sell products that generate emissions in their use.**

#### End of life treatment of sold products

Evaluation status

**Not relevant, explanation provided**

Metric tonnes CO<sub>2</sub>e

**<Not Applicable>**

Emissions calculation methodology

**<Not Applicable>**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

Please explain

**Old Mutual Limited is a financial services provider and does not sell products that generate emissions in their use.**

#### Downstream leased assets

Evaluation status

**Relevant, calculated**

Metric tonnes CO<sub>2</sub>e

**171843.09**

Emissions calculation methodology

**Tenants that have a Full Maintenance Lease (FML) are billed by the municipality directly and are billed zero for electricity. Kilowatt hours are estimated based on average kilowatt hour estimations. Electricity-generated emissions using Eskom emission factor for South African national electricity grid, as supplied by the Eskom 2020 Integrated Annual Report.**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**100**

Please explain

**This Scope 3 category is partially reported currently focusing on tenant electricity consumption from Old Mutual Limited (OML) owned properties. Purchased electricity consumed by OML tenants are as follows: Futuregrowth (70,159,996.00 kWh), Old Mutual Properties (98,024,639.16 kWh) and Mupine (288,978.00 kWh). Information on other downstream leased assets not evaluated.**

#### Franchises

Evaluation status

**Not relevant, explanation provided**

Metric tonnes CO<sub>2</sub>e

**<Not Applicable>**

Emissions calculation methodology

**<Not Applicable>**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

Please explain

**Old Mutual Limited has not yet evaluated.**

Investments

Evaluation status

**Relevant, not yet calculated**

Metric tonnes CO2e

**<Not Applicable>**

Emissions calculation methodology

**<Not Applicable>**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

Please explain

**This Scope 3 category is under investigation as we have not yet evaluated emissions we are responsible for under investments.**

Other (upstream)

Evaluation status

**Not relevant, explanation provided**

Metric tonnes CO2e

**<Not Applicable>**

Emissions calculation methodology

**<Not Applicable>**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

Please explain

**There are no other upstream activities that need to be included in the OML GHG footprint.**

Other (downstream)

Evaluation status

**Not relevant, explanation provided**

Metric tonnes CO2e

**<Not Applicable>**

Emissions calculation methodology

**<Not Applicable>**

Percentage of emissions calculated using data obtained from suppliers or value chain partners

**<Not Applicable>**

Please explain

**There are no other downstream activities that need to be included in the OML GHG footprint.**

**C6.7**

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(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

**No**

**C6.10**

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(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Intensity figure

**6.5e-7**

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

**95887.48**

Metric denominator

**unit total revenue**

Metric denominator: Unit total

**146533000000**

Scope 2 figure used

**Market-based**

% change from previous year

**28.95**

Direction of change

**Increased**

Reason for change

**The total revenue decreased from R176,116 million in 2019 to R146,533 million in 2020. As the denominator (revenue) is inversely proportional to the overall intensity metric (tCO2e/ revenue), there was an increase in tCO2e/ revenue between 2019 and 2020.**

---

Intensity figure

**8.55**

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

**95887.48**

Metric denominator

**full time equivalent (FTE) employee**

Metric denominator: Unit total

**11217**

Scope 2 figure used

**Market-based**

% change from previous year

**3.9**

Direction of change

**Increased**

Reason for change

**This metric includes permanent and non-permanent full-time employees. The FTE increased from 10,863 in 2019 to 11,217 in 2020 and scope 1 and 2 emissions increased between 2019 and 2020, therefore resulting in an overall increase in the intensity metric (tCO2e/ FTE).**

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Intensity figure

**0.068**

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

**95887.48**

Metric denominator

**Square meter**

Metric denominator: Unit total

**1414914**

Scope 2 figure used

**Market-based**

% change from previous year

**6.25**

Direction of change

**Increased**

Reason for change

**This metric includes the building areas for Old Mutual Limited. To note, the Old Mutual Properties building area only includes Gross Lettable Area. It excludes the building area under the operational control of the landlord. This skews the intensity metric as the area is understated. The square meterage increased from 1396,436 in 2019 to 1,414,914 in 2020. Scope 1 and 2 emissions also increased between 2019 and 2020, therefore resulting in an overall increase in the intensity metric (tCO2e/ m2).**

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## C7. Emissions breakdowns

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### C7.1

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(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?

No

## C7.2

(C7.2) Break down your total gross global Scope 1 emissions by country/region.

Country/Region	Scope 1 emissions (metric tons CO2e)
South Africa	2748.74

## C7.3

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

By activity

### C7.3c

(C7.3c) Break down your total gross global Scope 1 emissions by business activity.

Activity	Scope 1 emissions (metric tons CO2e)
Stationary fuel	848.05
Fugitive gas	761.98
Mobile fuel	1138.71
Onsite renewable energy	0

## C7.5

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

Country/Region	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low-carbon electricity, heat, steam or cooling accounted for in Scope 2 market-based approach (MWh)
South Africa	93138.74	93138.74	91312.49	0

## C7.6

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.

By facility

### C7.6b

(C7.6b) Break down your total gross global Scope 2 emissions by business facility.

Facility	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Futuregrowth	7430.24	7430.24
Old Mutual Property	49759.56	49759.56
Mutual Place	5187.69	5187.69
Mutualpark	25376.39	25376.39
Marriott	132.66	132.66
Corporate office, Port Elizabeth	10.22	10.22
Corporate office, Pretoria	51.02	51.02
Old Mutual International Head Office,	5073.74	5073.74
Bishops court	117.22	117.22

## C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Increased

## C7.9a

(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	224.24	Decreased	0.25	Two new solar installations were completed by Futuregrowth – Kuyasa and Gateway in April 2020, adding an additional 1,165 MWh of renewable electricity. Solar renewable electricity generated onsite increased by 10% between 2019 and 2020. The emissions value is calculated as follows: $10\% \text{ of } 2,242.38 \text{ tCO}_2\text{e}$ (Scope 1 value in 2019) is 224.24 tCO2e. Our total Scope 1 and 2 emissions in 2019 was 89,374.32 tCO2e. Therefore we arrived at -0.25% through $(-224.24 / 89,374.32) \cdot 100 = -0.25\%$ (i.e. a 0.25% decrease in emissions).
Other emissions reduction activities	3201	Decreased	3.58	Mutualpark progressed in its solar installation project. Old Mutual Property (Phumulani Mall, Bedford Square and Riverside Mall) installed or upgraded their LED lighting. These projects are estimated to save 3,201 tCO2e per annum. Therefore, due to 'other emissions reduction activities' implemented during the year, 3,201 tCO2e is estimated to be avoided. Our total Scope 1 and 2 emissions in 2019 was 89,374.32 tCO2e. Therefore we arrived at -3.58% through $(-3,201 / 89,374.32) \cdot 100 = -3.58\%$ (i.e. a 3.58% decrease in emissions).
Divestment		<Not Applicable >		
Acquisitions		<Not Applicable >		
Mergers		<Not Applicable >		
Change in output	16584	Increased	18.56	Primarily due to the COVID-19 pandemic, there was an increase of 7% in OMI's Scope 2 emissions and this is mainly attributed to purchased electricity under the operational control of Old Mutual Property (OMP), which increased from 31 899 MWh (33 175 tCO2e) to 48 784 MWh (49 759 tCO2e) between 2019 and 2020. Despite a reduction in tenant occupancy – causing a reduction in associated kilowatt hours at tenant-occupied facilities (Scope 3) – there was an increase in OMP's Scope 2 emissions for three main reasons: 1. Over time OMP had driven significant energy efficiencies in the centralised HVAC system, balancing the requirement for fresh air with pre-conditioned return air and reducing the fan speeds on air handling units (a 20% reduction in speed = a 50% reduction in power consumed). Efficiencies were terminated to drive as much fresh air into the properties during the pandemic, which meant having to condition 100% of warm outside air with the fans running at 100%. This increased electricity consumption at the larger retail centres. 2. Lifts are designed to operate efficiently when occupied to 70% of rated capacity as then the counterweight matches the occupancy load. Forced low occupancy such as two people per lift makes the running of the equipment very inefficient, using more electricity. 3. Load shedding in the latter part of 2020 also had an impact. When normal power returns all the HVAC equipment must restart and the system draws 150% load on start-up. Over time, this impacts landlord consumption. Our total Scope 1 and 2 emissions in 2019 was 89,374.32 tCO2e. Therefore we arrived at 18.56% through $(16,584 / 89,374.32) \cdot 100 = 18.56\%$ (i.e. a 18.56% increase in emissions).
Change in methodology		<Not Applicable >		
Change in boundary		<Not Applicable >		
Change in physical operating conditions		<Not Applicable >		
Unidentified		<Not Applicable >		
Other	506.55	Increased	0.57	The increase of 23% in Scope 1 emissions between 2019 and 2020 is primarily due to an increase in stationary diesel and fugitive emissions. The 16% increase in generator diesel is due to: 1. Futuregrowth reporting an increase from 37 kl to 82 kl of diesel; 2. new generators were installed at Setsing, Mkhuhlu, Thulamahashe, Kamaqhekeza, Moutse, Nkomazi, The Crossing and Heidelberg facilities; 3. Diepsloot reported an increase of 2,384 litres of diesel for generators from 791 to 19,651 litres as there were numerous power outages and Eskom declared the area a no-go area as technicians were attacked while doing maintenance. This resulted in no power for nine consecutive days and the need to rent two generators to run the centre; 4. Bridge Centre reported an increase of 1,399% from 400 to 5 995 litres due to loadshedding; 5. Mutual Park used six generators when UPS and generator maintenance is undertaken and 6. Mutual Place is now using a digital meter to report diesel consumption more accurately. The increase of 106% in fugitive emissions is due to the use of 500 kg of HFC134a at OMP Vincent Park for emergency repairs to Chiller 2 and 3, which was undertaken in Q1. The system was re-gassed once all repairs were completed. The change in stationary diesel and fugitive emissions between 2019 and 2020 is 506.55 tCO2e. Therefore, we arrived at 0.57% through $(506.55 / 89,374.32) \cdot 100 = 0.57\%$ (i.e. a 0.57% increase in emissions).

## C7.9b

(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Market-based

## C8. Energy

### C8.1

(C8.1) What percentage of your total operational spend in the reporting year was on energy?

More than 0% but less than or equal to 5%

## C8.2

(C8.2) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	Yes

## C8.2a

(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	LHV (lower heating value)	0	8001.99	8001.99
Consumption of purchased or acquired electricity	<Not Applicable>	0	91312.49	91312.49
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	11976	<Not Applicable>	11976
Total energy consumption	<Not Applicable>	11976	99314.48	111290.48

## C8.2b

(C8.2b) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Yes
Consumption of fuel for the generation of heat	Yes
Consumption of fuel for the generation of steam	No
Consumption of fuel for the generation of cooling	No
Consumption of fuel for co-generation or tri-generation	No

## C8.2c

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Fuels (excluding feedstocks)

**Diesel**

Heating value

**LHV (lower heating value)**

Total fuel MWh consumed by the organization

**4989.59**

MWh fuel consumed for self-generation of electricity

**3334.86**

MWh fuel consumed for self-generation of heat

**1654.73**

MWh fuel consumed for self-generation of steam

**<Not Applicable>**

MWh fuel consumed for self-generation of cooling

**<Not Applicable>**

MWh fuel consumed for self-cogeneration or self-trigeneration

**<Not Applicable>**

Emission factor

**2.68787**

Unit

**kg CO2e per liter**

Emissions factor source

**UK Department for Environment, Food and Rural Affairs (Defra), 2020. Greenhouse gas reporting: Conversion factors 2020, London.**

Comment

Diesel used in generators for electricity and in vehicles (heat).

Fuels (excluding feedstocks)

Liquefied Petroleum Gas (LPG)

Heating value

LHV (lower heating value)

Total fuel MWh consumed by the organization

25.01

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

25.01

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

1.55537

Unit

kg CO2e per liter

Emissions factor source

UK Department for Environment, Food and Rural Affairs (Defra), 2020. Greenhouse gas reporting: Conversion factors 2020, London

Comment

LPG used in heating and cooking.

Fuels (excluding feedstocks)

Petrol

Heating value

LHV (lower heating value)

Total fuel MWh consumed by the organization

2987.38

MWh fuel consumed for self-generation of electricity

0

MWh fuel consumed for self-generation of heat

2987.38

MWh fuel consumed for self-generation of steam

<Not Applicable>

MWh fuel consumed for self-generation of cooling

<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration

<Not Applicable>

Emission factor

2.31467

Unit

kg CO2e per liter

Emissions factor source

UK Department for Environment, Food and Rural Affairs (Defra), 2020. Greenhouse gas reporting: Conversion factors 2020, London.

Comment

Petrol used in vehicles (heat).

## C8.2d

(C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

	Total Gross generation (MWh)	Generation that is consumed by the organization (MWh)	Gross generation from renewable sources (MWh)	Generation from renewable sources that is consumed by the organization (MWh)
Electricity	11976	11976	11976	11976
Heat	0	0	0	0
Steam	0	0	0	0
Cooling	0	0	0	0

## C8.2e

(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero emission factor in the market-based Scope 2 figure reported in C6.3.

Sourcing method

**None (no purchases of low-carbon electricity, heat, steam or cooling)**

Low-carbon technology type

**<Not Applicable>**

Country/area of consumption of low-carbon electricity, heat, steam or cooling

**<Not Applicable>**

MWh consumed accounted for at a zero emission factor

**<Not Applicable>**

Comment

**No low carbon instruments were purchased. Hence, market-based and location-based Scope 2 emissions are the same.**

## C9. Additional metrics

### C9.1

(C9.1) Provide any additional climate-related metrics relevant to your business.

Description

**Other, please specify (Purchased electricity per square meter)**

Metric value

**183.61**

Metric numerator

**kWh**

Metric denominator (intensity metric only)

**square metre**

% change from previous year

**21**

Direction of change

**Decreased**

Please explain

**This decrease in electricity consumption can be attributed to continued energy-efficiency efforts within our property portfolio as well as the impacts of the COVID-19 pandemic, which significantly reduced the number of people working from office environments, in favour of a work-from-home model. In Old Mutual Property's Bedford Square, Phumulani Mall and Riverside Mall buildings, metal halide downlighters were replaced with LED lighting in 2020, which culminated in a total annual saving of 523,453kWh.**

## C10. Verification

### C10.1

(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

### C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Verification or assurance cycle in place

**Annual process**

Status in the current reporting year

**Complete**

Type of verification or assurance

**Limited assurance**

Attach the statement

**Old Mutual Limited FY2020 Verification Statement.pdf**

Page/ section reference

**1-3**

Relevant standard

**ISO14064-3**

Proportion of reported emissions verified (%)

**100**

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## C10.1b

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(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Scope 2 approach

**Scope 2 market-based**

Verification or assurance cycle in place

**Annual process**

Status in the current reporting year

**Complete**

Type of verification or assurance

**Limited assurance**

Attach the statement

**Old Mutual Limited FY2020 Verification Statement.pdf**

Page/ section reference

**1-3**

Relevant standard

**ISO14064-3**

Proportion of reported emissions verified (%)

**100**

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## C10.1c

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(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Scope 3 category

**Scope 3 (upstream & downstream)**

Verification or assurance cycle in place

**Annual process**

Status in the current reporting year

**Complete**

Type of verification or assurance

**Limited assurance**

Attach the statement

**Old Mutual Limited FY2020 Verification Statement.pdf**

Page/section reference

**1-3**

Relevant standard

**ISO14064-3**

Proportion of reported emissions verified (%)

**100**

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## C10.2

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(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?  
**No, but we are actively considering verifying within the next two years**

## C11. Carbon pricing

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### C11.1

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(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?  
**Yes**

#### C11.1a

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(C11.1a) Select the carbon pricing regulation(s) which impacts your operations.  
**South Africa carbon tax**

#### C11.1c

---

(C11.1c) Complete the following table for each of the tax systems you are regulated by.

South Africa carbon tax

Period start date

**January 1 2020**

Period end date

**December 31 2020**

% of total Scope 1 emissions covered by tax

**41.43**

Total cost of tax paid

**59317.77**

Comment

**During the first phase of the carbon tax in South Africa, OML pays an indirect carbon tax on fuel purchases. The carbon tax forms part of the fuel levy system on petrol and diesel emissions. As at 5 June 2019, a rate of ZAR 7 cents per litre of petrol and ZAR 8 cents per litre of diesel is levied on these purchases.**

#### C11.1d

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(C11.1d) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

### C11.2

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(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?  
**No**

### C11.3

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(C11.3) Does your organization use an internal price on carbon?  
**No, but we anticipate doing so in the next two years**

## C12. Engagement

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### C12.1

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(C12.1) Do you engage with your value chain on climate-related issues?  
**Yes, our suppliers**  
**Yes, our investee companies**

## C12.1a

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(C12.1a) Provide details of your climate-related supplier engagement strategy.

Type of engagement

**Information collection (understanding supplier behavior)**

Details of engagement

**Collect climate change and carbon information at least annually from suppliers**

% of suppliers by number

**80**

% total procurement spend (direct and indirect)

**80**

% of supplier-related Scope 3 emissions as reported in C6.5

**100**

Rationale for the coverage of your engagement

**We aim to engage with all our key suppliers to continuously gather from them climate change-related information. The majority of the key suppliers, based on % total procurement spend (direct and indirect), are engaged with on a continuous basis. An OML-specific engagement activity normally entails a number of meetings, telephone calls and emails which result in a service level agreement that fulfils OML's agenda of moving towards a low carbon future. An example of this is in Cape Town at our Mutualpark campus, which has been certified as a 6-star Green Building – our Green Cleaning Policy ensures that our cleaning contractor uses only chemicals that are green rated.**

Impact of engagement, including measures of success

**The purpose of the engagement is to produce a service level agreement that fulfils OML's agenda of moving towards a low-carbon future. An example of a positive outcome achieved is in Cape Town at our Mutualpark campus, which has been certified as a 6-star Green Building - our Green Cleaning Policy ensures that our cleaning contractor uses only chemicals that are green rated.**

Comment

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## C-FS12.1c

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(C-FS12.1c) Give details of your climate-related engagement strategy with your investee companies.

Type of engagement

**Engagement & incentivization (changing investee behavior)**

Details of engagement

**Exercise active ownership**

% of investees by number

**100**

% Scope 3 emissions as reported in C-FS14.1a/C-FS14.1b

**0**

Portfolio coverage

**All of the portfolio**

Rationale for the coverage of your engagement

**Within Old Mutual Investment Group, our Listed Equity Stewardship Programme, meets its objective of directly engaging with 100% of all South African listed equities on wide-ranging issues including ESG and climate change. Foreign entities are engaged with via proxy voting on company resolutions, where those of an ESG and climate change nature are prioritised.**

Impact of engagement, including measures of success

**During 2020 we engaged with 61 companies on 82 different ESG issues. In terms of measurement of success, 46% were resolved, 10% closed and 44% were still active at year-end. 14% of these engagements were related to climate change and/or carbon emissions.**

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## C12.3

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(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?

**Direct engagement with policy makers**

**Trade associations**

**Funding research organizations**

## C12.3a

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(C12.3a) On what issues have you been engaging directly with policy makers?

Focus of legislation	Corporate position	Details of engagement	Proposed legislative solution
Adaptation or resilience	Support	As a Responsible Business we focus on Financial Education, Financial Inclusion and Responsible Investment, concentrating on financial wellbeing and responsible investment. Through these focus areas we are aligned to the South African Government's National Development Plan (NDP) and committed to working with others in civil society and across the private and public sector to building a prosperous and equitable South Africa.	The National Development Plan (NDP) offers a long-term perspective. It defines a desired destination and identifies the roles that different sectors of society need to play in reaching that goal. The NDP aims to eliminate poverty and reduce inequality by 2030. Old Mutual is proud to be involved in the communities we serve – an ethos which is a cornerstone in each of our businesses. We support the NDP's goals of eliminating poverty, generating accessible clean energy and reducing inequality in South Africa.

### C12.3b

(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?

Yes

### C12.3c

(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.

Trade association

**South African Insurance Association (SAIA)**

Is your position on climate change consistent with theirs?

**Consistent**

Please explain the trade association's position

**The SAIA's position is in favour of supporting and encouraging the insurance industry to take action to reduce the industry's impact on the environment through identifying and analysing environmental and social risks and their potential negative impact. To further this agenda, in 2012, the SAIA established the Environmental and Social Risks Board Committee which oversees strategic initiatives in support of the top 10 environmental and social risks the Committee has identified as central to the insurance industry in South Africa.**

How have you influenced, or are you attempting to influence their position?

**In 2020, the CEO of Old Mutual Insure continued to support SAIA at the Board and committee level. On Committees, Old Mutual Insure works to improve multi-peril insurance and its approach to climate-change risks from an insurer's perspective.**

---

Trade association

**South African Property Owners Association (SAPOA)**

Is your position on climate change consistent with theirs?

**Consistent**

Please explain the trade association's position

**In 2014, SAPOA took a position on the promotion of good governance and city management – which includes environmentally sustainable spaces – by signing a Memorandum of Understanding with the South African Cities Network. The partnership aims to establish forums in which the public and private sector can build consensus on a range of issue areas, including climate change. SAPOA encourages participation to promote the sustainable expansion of South Africa's commercial and industrial property sectors.**

How have you influenced, or are you attempting to influence their position?

**Old Mutual Property (OMP) is an advocate of sustainable properties and the Managing Director of OMP is President of SAPOA. At this level, Old Mutual seeks to forward the environmental agenda of property management within SAPOA, ensuring that the concerns and opinions of the property industry are heard by the government and other stakeholders.**

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Trade association

**Association for Savings & Investment in South Africa (ASISA)**

Is your position on climate change consistent with theirs?

**Consistent**

Please explain the trade association's position

**ASISA is a non-profit company formed in 2008 to represent the savings, investment and insurance industry that contributes trillions of rand to South Africa's economy. ASISA's mission is to promote a culture of savings and investment in South Africa by: • Building a transformed, vibrant, and globally competitive financial sector. • Actively participating in education, transformation and social development. • Encouraging South Africans to save. • Promoting transparency and disclosure. • Focussing on the consumer. • Encouraging ethical and equitable behaviour. • Collaborating with Government to achieve level playing fields and healthy competition, and engage on policy and regulatory issues.**

How have you influenced, or are you attempting to influence their position?

**Old Mutual Emerging Markets Limited is a voting member, meaning that they can i) nominate and elect representatives to serve on the ASISA Board in accordance with ASISA's Memorandum of Incorporation (MOI); ii) vote on matters that are dealt with at the Association's Annual General Meetings; and iii) nominate representatives to serve on all ASISA's technical committees, which include board committees, standing committees and working groups.**

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Trade association

**Code for Responsible Investing in South Africa (CRISA)**

Is your position on climate change consistent with theirs?

**Consistent**

Please explain the trade association's position

**The South African market is predominantly driven by a non-mandatory market-based code of governance for companies (King Report on Governance), as opposed to legislation. It is in this context that CRISA aims to provide the investor community with the guidance needed to implement ESG factors into investment decisions in order to reduce the environmental impact of investments.**

How have you influenced, or are you attempting to influence their position?

**At Old Mutual, we are committed to responsible investment and we continue to support this agenda through our role on the CRISA Committee. The Head of Responsible Investment at OML, who is a member of the CRISA Committee, attends committee meetings and participates in ongoing discussions.**

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Trade association

**United Nations' Principles for Responsible Investment (PRI)**

Is your position on climate change consistent with theirs?

**Consistent**

Please explain the trade association's position

**The PRI provides a recognised framework for the incorporation of environmental, social and governance issues into investment and ownership decision making practices.**

How have you influenced, or are you attempting to influence their position?

**As a PRI signatory, we are aware of the mandatory PRI reporting requirements of the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD) that comes into effect in 2020, and we are committed to supporting the TCFD principles as part of our overall Responsible Business strategy. As an asset-owner signatory to the UNPRI we support this position.**

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(C12.3d) Do you publicly disclose a list of all research organizations that you fund?

No

## C12.3f

(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

Following the separate listing of OML on the JSE in 2018, OML has initiated a strategic process to develop a consolidated climate-change strategy. OML has a long history of doing business responsibly and making a real impact in the communities in which we operate.

With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks, which will inform the new centralised climate change process at OML, inclusive of our direct and indirect activities that influence policies.

This includes the establishment of a climate change governance structure and the overall alignment of the OML Responsible Business Strategy with urgent sustainability measures. OML's strategy will look to consolidate existing best practice within the Group and establish a group strategy to ensure that all direct and indirect activities that influence policy are consistent with the overall climate-change strategy as it is developed within our Responsible Business Strategy.

## C12.4

(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication

In mainstream reports

Status

Complete

Attach the document

2020\_Responsible\_Business\_Impact\_Report.pdf

Page/Section reference

8

Content elements

Governance

Strategy

Emissions figures

Comment

## C-FS12.5

(C-FS12.5) Are you a signatory of any climate-related collaborative industry frameworks, initiatives and/or commitments?

	Industry collaboration	Comment
Reporting framework	Principles for Responsible Investment (PRI)	Our Responsible Investment approach draws on the principles of the United Nations backed Principles for Responsible Investment (UNPRI), to which we are a signatory.
Industry initiative	Other, please specify (Code for Responsible Investing in South Africa (CRISA))	Our Responsible Investment (RI) approach draws on the principles of the Code for Responsible Investing in South Africa (CRISA) and other RI-focused policies and legislation. In South Africa this includes Regulation 28 of the Pension Funds Act, the Financial Sector Charter (FSC) and the King IV Code of Corporate Governance (Principle 17). We are actively engaged with the CRISA Committee, the ASISA RI Committee and the National Advisory Body for impact investing. Globally we are members of the UN PRI and active members of the International Corporate Governance Network.
Commitment	Please select	

## C14. Portfolio Impact

### C-FS14.1

(C-FS14.1) Do you conduct analysis to understand how your portfolio impacts the climate? (Scope 3 portfolio impact)

	We conduct analysis on our portfolio's impact on the climate	Disclosure metric	Comment
Bank lending (Bank)	No, but we plan to do so in the next two years	<Not Applicable >	With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks. This will inform the new centralised process at OML regarding the analysis to understand how our portfolio impacts the climate (Scope 3 portfolio impact).
Investing (Asset manager)	No, but we plan to do so in the next two years	<Not Applicable >	As part of the continued development of understanding our portfolio's climate impact, we intend to conduct both portfolio-wide carbon footprints and value at climate risk analysis of our portfolio.
Investing (Asset owner)	No, but we plan to do so in the next two years	<Not Applicable >	We have initiated the process of assessing our portfolio's exposure to climate-related risk and opportunities. This forms part of the broader OML Climate Change Strategy. We are currently performing a detailed fossil fuel analysis of the Group's assets to provide a baseline view of exposure and carbon intensity of listed holdings. We are also furthering our efforts to analyse our carbon investment exposure to track mitigation measures and inform investment decision-making.
Insurance underwriting (Insurance company)	No, but we plan to do so in the next two years	<Not Applicable >	Following the separate listing of OML on the JSE in 2018, OML has initiated a strategic process to develop a consolidated climate change strategy. Historically, OML has driven climate change-related responses in a decentralised way based on clear business cases for particular businesses or products (e.g. through OM Insure and OM Responsible Investment). In the last reporting year, we have recognised the need to bring the climate-change strategies of each business together in a coordinated and centralised manner.
Other products and services, please specify	Not applicable	<Not Applicable >	

**C-FS14.1c**

(C-FS14.1c) Why do you not conduct analysis to understand how your portfolio impacts the climate? (Scope 3 Category 15 "Investments" emissions or alternative carbon footprinting and/or exposure metrics)

We do not currently capture this data. We have initiated the process of assessing our portfolio's exposure to climate-related risk and opportunities. This forms part of the broader OML Climate Change Strategy, which falls within the OML Responsible Investment Strategy. We are currently performing a detailed fossil fuel analysis of the Group's assets to provide a baseline view of exposure and carbon intensity of listed holdings. We are also furthering our efforts to analyse our carbon investment exposure to track mitigation measures and inform investment decision-making.

Our Responsible Business Strategy, a component of OML's strategic pillar "Old Mutual Cares", is our mechanism to coordinate our approach to climate change, to leverage the successes of the businesses with mature responses and to develop explicit strategies for other businesses and products.

With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks, which will inform the new centralised process at OML. This includes the establishment of a climate-change governance structure and the overall alignment of the OML Responsible Business Strategy with urgent sustainability measures. OML's strategy will look to consolidate existing best practice within the Group and establish a group strategy for understanding how our portfolio impacts the climate.

These processes are expected to be completed during the FY2022.

**C-FS14.3**

(C-FS14.3) Are you taking actions to align your portfolio to a well below 2-degree world?

	We are taking actions to align our portfolio to a well below 2-degree world	Please explain
Bank lending (Bank)	No, but we plan to do so in the next two years	With reference to the TCFD recommendations, we are in the process of understanding where we have the greatest climate impact, and where we face the greatest climate risks, which will inform the new centralised process at OML regarding the analysis to understand how our portfolio impacts the climate (Scope 3 portfolio impact). This work will include both scenario analysis and modelling, and the setting of carbon targets for both our direct operations and our portfolios. OML, as a group, is currently detailing its investment strategy across all fossil fuel-related industries.
Investing (Asset manager)	No, but we plan to do so in the next two years	At OM Investment Group, we are evaluating the viability of aligning our portfolio with a well below 2°C world. Within OM Alternative Investments, we look to measure the carbon footprint of our portfolios, and the carbon offset generated by our renewable energy investments, and drive a transition to a sustainable, 1.5°C world energy mix. This means aligning our investments with a practical energy mix across Africa that promotes development but remains within the carbon budget of a 2°C world. OML, as a group, is currently detailing its investment strategy across all fossil fuel-related industries.
Investing (Asset owner)	Yes	We have initiated the process of assessing our portfolio's exposure to climate-related risk and opportunities. This forms part of the broader OML Climate Change Strategy. We are currently performing a detailed fossil fuel analysis of the Group's assets to provide a baseline view of exposure and carbon intensity of listed holdings. We are also furthering our efforts to analyse our carbon investment exposure to track mitigation measures and inform investment decision-making. Through this process, we are committed to taking the necessary actions as a responsible business to align to a well below 2-degree world. Alignment of our portfolio is in line with this commitment and is being considered as part of our overall Climate Change Strategy. OML, as a group, is currently detailing its investment strategy across all fossil fuel-related industries.
Insurance underwriting (Insurance company)	No, but we plan to do so in the next two years	OML's strategy will look to consolidate existing best practice within the Group and establish a group strategy for consolidating an OML Group approach to align our portfolio to a well below 2°C world. OML, as a group, is currently detailing its investment strategy across all fossil fuel-related industries.
Other products and services, please specify	Not applicable	

### C-FS14.3a

(C-FS14.3a) Do you assess if your clients/investees' business strategies are aligned to a well below 2-degree world?

	We assess alignment	Please explain
Bank lending (Bank)	<Not Applicable>	<Not Applicable>
Investing (Asset manager)	<Not Applicable>	<Not Applicable>
Investing (Asset owner)	No, but we plan to do so in the next two years	We plan to assess our clients' business strategies and business exposures to various climate risks and opportunities, including their just-transition strategies, considering external socio-economic conditions. This is part of our work to understand value at climate-risk of our portfolio - which is ongoing and will feed into our organisational climate transition pathway.
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>
Other products and services, please specify	<Not Applicable>	<Not Applicable>

### C-FS14.3b

(C-FS14.3b) Do you encourage your clients/investees to set a science-based target?

	We encourage clients/investees to set a science-based target	Please explain
Bank lending (Bank)	<Not Applicable>	<Not Applicable>
Investing (Asset manager)	<Not Applicable>	<Not Applicable>
Investing (Asset owner)	No, but we plan to do so in the next two years	This is one of the outcomes envisaged as part of our engagement strategy through investment managers clients, as aligned to the overall OML Climate Change strategy.
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>
Other products and services, please specify	<Not Applicable>	<Not Applicable>

### C15. Signoff

#### C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

#### C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	Chief Executive Officer	Chief Executive Officer (CEO)

### Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Public

Please confirm below

I have read and accept the applicable Terms