

SUSTAINABILITY REPORT 2023



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ATHORA AT A GLANCE

Athora Holding Ltd., together with its subsidiaries (Athora, Athora Group or Group), is a leader in the European savings and retirement services market.

Our focus is the large, traditional life and pensions market, where we provide guaranteed products to customers who value the safety and attractiveness of our returns. We also offer unit-linked and hybrid offerings. Athora serves more than 2.8 million individual and corporate customers across Europe.

Additionally, we provide innovative M&A¹ and risk transfer solutions to other insurers and pension funds seeking to enhance their capital position or enact strategic change.

Our mission

To deliver more value to our customers in fulfilling their long-term insurance needs

As an insurer, we have a clear social purpose: to help our customers achieve financial security and comfort throughout life; safeguarding future income provisions and providing much-needed and desirable products in a market where supply is often limited.

Our business model allows us to provide appealing, stable returns for both our customers and our investors. This is achieved through disciplined accumulation of insurance portfolios in our target markets, efficient and focused business operations, and a sophisticated approach to investment, capital and risk management.

Athora’s investment approach is underpinned by our strategic relationship with Apollo Global Management, Inc. (Apollo). Apollo provides Athora Group with specialised asset management expertise and differentiated access to investment opportunities.

Our company values are fundamental to our culture at Athora. They define our approach to everything we do, including in creating a sustainable future for our stakeholders.

We serve customers across several European jurisdictions, with our primary insurance operations based in the Netherlands (comprising over 70% of Athora Group Assets under Management and Administration (AuMA) as at 31 December 2023), Belgium, Germany and Italy. In the Netherlands, Belgium and Italy, we sell a range of life and pension products that are designed to provide value to our target markets and meet our customers’ needs. In Germany, our focus is on efficiently managing existing books of policies and maintaining an attractive proposition to our existing customer base.

Our reinsurance carriers, Athora Life Re and Athora Ireland, provide risk transfer solutions, including internal solutions to Athora’s primary operating subsidiaries.

¹ Mergers and Acquisitions.

Dare to be different



We create more value for our customers and our business by doing things differently. Together, we challenge the status quo, we do things differently where it brings more value, we share ideas and we embrace new ways of working.

Seek simplicity



We aim for simplicity in a complex business environment. We strive to design simple and cost-effective products and processes that benefit our customers, our partners and our colleagues.

Care



We care about our business, our customers and each other. We welcome and respect diversity of opinion and thought and our collaborative and inclusive workplace ensures we can thrive.

Do the right thing



We take our responsibilities seriously. We commit to always ‘doing the right thing’ to create a sustainable future for our customers, our partners, our colleagues and the communities we operate in.

10 locations

including European operational offices

€73.3 billion AuMA¹

2.8 million customers



€6.9 billion

total IFRS² equity and CSM^{3,4}

1,500 global employees⁵

¹ The definition of AuMA changed during the year to exclude consolidated third-party funds and include off-balance sheet assets under administration, when certain criteria are met, as set out in the 2023 Annual Report glossary. Prior year comparatives have been restated.
² International Financial Reporting Standards.
³ Contractual Service Margin.
⁴ Prior year comparatives of IFRS equity have been restated to reflect the transition to IFRS 9/17 accounting standards. CSM is presented gross of tax and net of reinsurance.
⁵ Rounded number of employees as at 31 December 2023.

2023 SUSTAINABILITY HIGHLIGHTS



At Athora, Sustainability is embedded in our business strategy and the way we work. Our approach to environmental, social and governance (ESG) matters is an important factor in how we serve our customers, investors, employees, communities and ultimately, the planet.

Across our business, 2023 was a year of preparation and establishing solid foundations for the growth of our Sustainability efforts, plus strengthening our collective commitment to share and streamline our practices over jurisdictions.

KEY 2023 HIGHLIGHTS INCLUDE

OUR ROLE AS AN INSURER

Over 2.8 million customers served across Europe
Athora Germany (Athora Lebensversicherung) provided an attractive total interest rate of 4% for traditional life insurance policies (compared with market average of below 2.2%)¹

Athora Italia declared a market-leading gross yield of 4.04% on a key fund, against a challenging market

Industry awards for best-in-class products at Athora Belgium

¹ As per 2023 reporting from ratings agency Assekurata

OUR ROLE AS AN EMPLOYER

Athora Netherlands retained industry Top Employer award² for quality of employment practices including hybrid working

Inclusion, Diversity and Equality (IDE) Key Performance Indicators (KPIs) approved by Athora Holding Ltd. Board of Directors (the Group Board or the Board) and being tracked

Athora Pride Network established
Successful pilot of Respectful Workplaces behavioural change training

² Awarded by the Top Employer Institute.

OUR ROLE AS A CORPORATE CITIZEN

Over €350,000 in charitable donations (corporate and employee) and sponsorships

London office achieved BREEAM³ certification 'Outstanding' plus LEED⁴ certified 'Gold'

Group-wide greenhouse gas (GHG) emissions data system implemented

€419.9 million paid in total taxes contributed to local economies where we operate

³ Building Research Establishment Environmental Assessment Method.

⁴ Leadership in Energy and Environmental Design.

OUR ROLE AS AN INVESTOR

€73.3 billion of AuMA as at 31 December 2023

€16.9 billion of assets invested directly into the economy⁵
Sustainability Investment Working Group established

Awarded first place in the VBDO Sustainability Ranking (Athora Netherlands)

⁵ Through private loans, mortgage loans and private equity investments.

GROUP CEO MESSAGE

SUSTAINABILITY AT ATHORA

Over 2023, we have progressed our work to embed and implement our Sustainability Strategy across the Group. Strong engagement across our markets of operations, and engagement of Business Unit leadership teams, is enabling the unification and streamlining of Sustainability activities across the organisation. We have seen growth in key initiatives over the year, laying the foundations for future success in the space, including preparing for upcoming regulatory obligations.

Athora continues to serve our 2.8 million customers by providing attractive and competitive products, which meet their insurance and savings needs. We have also continued to improve the Sustainability characteristics of the investments supporting our products. In the Netherlands, this was recognised in the VBDO Sustainability benchmark, where Athora Netherlands ranked first.

Alongside our commercial efforts, we remain focused on our role as an Employer, noting the criticality of our human capital to the business. We recognise the importance of IDE in the workplace. And during the year, we approved our IDE KPIs as a means to clearly steer our efforts in this area.

Lastly, we are working to better monitor and report on our Sustainability progress, in order to assess and improve performance. This has included the launch of a Group-wide GHG emissions data platform, which will be critical for meaningful target setting, progress monitoring, and identifying improvement areas relating to carbon emissions. Over the year to come, we will continue to explore robust methods and data sources to assess Sustainability performance across our business.

LOOKING FORWARD

I am proud of our progress to date and delighted to share our third Sustainability report. Our reporting covers Athora's approaches and actions over 2023, and plans going forward. As we look ahead, we will continue to build on the progress to date and are committed to the implementation of our Sustainability Strategy, ensuring that our contribution to the future is a positive one.



Mike Wells
Group CEO



INTRODUCTION TO SUSTAINABILITY AT ATHORA

SUSTAINABILITY VISION:

We aim to ensure that our work enables our customers, employees, community and planet to thrive without compromising the means of future generations, whilst generating value for all our investors.

GROUP SUSTAINABILITY STRATEGY

From inception, Sustainability has been integral to Athora. Our purpose addresses a social good – meeting the societal need for lifelong financial security.

Alongside this, we believe a thriving future society requires more than financial comfort. We are doing our part to contribute to a biodiverse planet, a stable climate, and to economically and socially strong communities.

Published in 2022, our [Group-wide Sustainability Strategy](#) sets out how we put our beliefs into action, delivering on our commitments by advancing meaningful activities.

This is summarised in our Sustainability Strategy Framework (see Figure 1), which reflects the importance and scale of Sustainability at Athora.

The core of our Sustainability Strategy focuses on key impact areas that are at the intersection of our business activities and our defined Sustainability themes. These impact areas are guided by our Sustainability vision and principles, and are supported by appropriate monitoring, metrics, disclosures and governance.

Our business activities are shaped around our four core roles as:

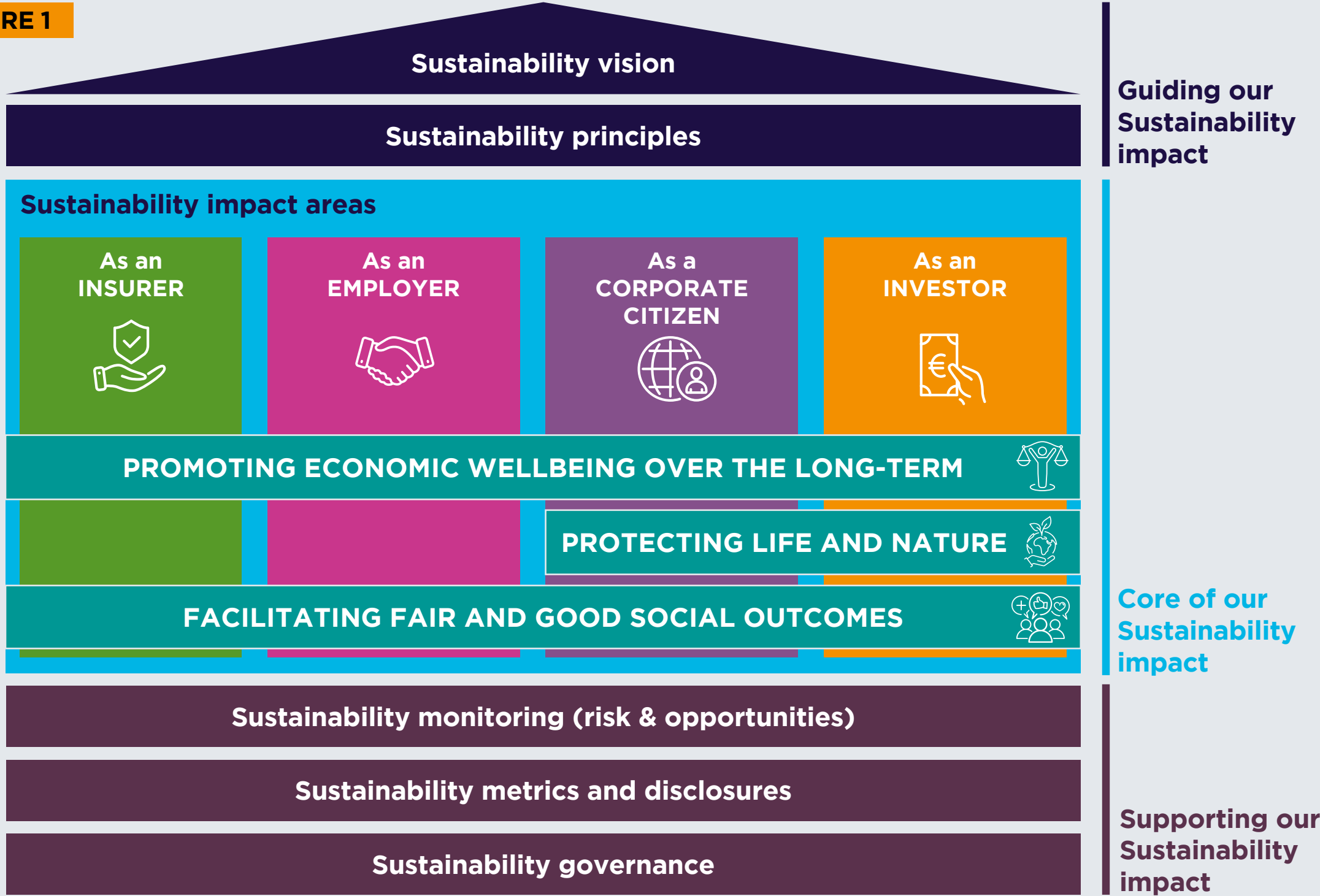
AN INSURER

AN EMPLOYER

A CORPORATE CITIZEN

AN INVESTOR

FIGURE 1



To ensure a meaningful impact, we remain focused on three Sustainability themes which reflect our industry role, strengths and values. These themes are aligned with nine of the United Nations Sustainable Development Goals (UN SDGs):

- Promoting economic wellbeing over the long term:** We provide economic wellbeing to our insurance customers over the long term, and we are well positioned to broaden our role in this area and thereby increase our impact by engaging with our communities and promoting financial literacy.



- Protecting life and nature:** We recognise our shared responsibility to look after nature, including life on land and life below water, from managing our own environmental footprint to contributing to (and investing in) initiatives aimed at protecting, conserving and restoring the environment.



- Facilitating fair and good social outcomes:** We are committed to facilitating good social outcomes, including fairness and equality within our organisation and wider society, from reviewing our own Human Resources (HR) processes and policies to our investment in (and contributions to) broader initiatives.



We have chosen to use the terminology 'Sustainability' in reference to efforts and activities that ensure our Group's contribution to an ecologically and socially sustainable and fair world. ESG factors form part of our Sustainability considerations.

REPORTING STANDARDS

Continuing to strengthen our alignment with recognised international frameworks and standards, we report with reference to the Global Reporting Initiative (GRI) 2021 Universal Standards and the 2023 insurance industry-specific disclosure requirements of the Sustainability Accounting Standards Board (SASB). We continue to progress towards alignment with the Task Force on Climate-related Financial Disclosures (TCFD) and have conducted Business Unit-appropriate preparations for the upcoming requirements of the European Union (EU) Corporate Sustainability Reporting Directive 2022/2464 (CSRD). Recognising the importance of common public metrics for our stakeholders, we present performance data wherever possible.

STAKEHOLDER ENGAGEMENT

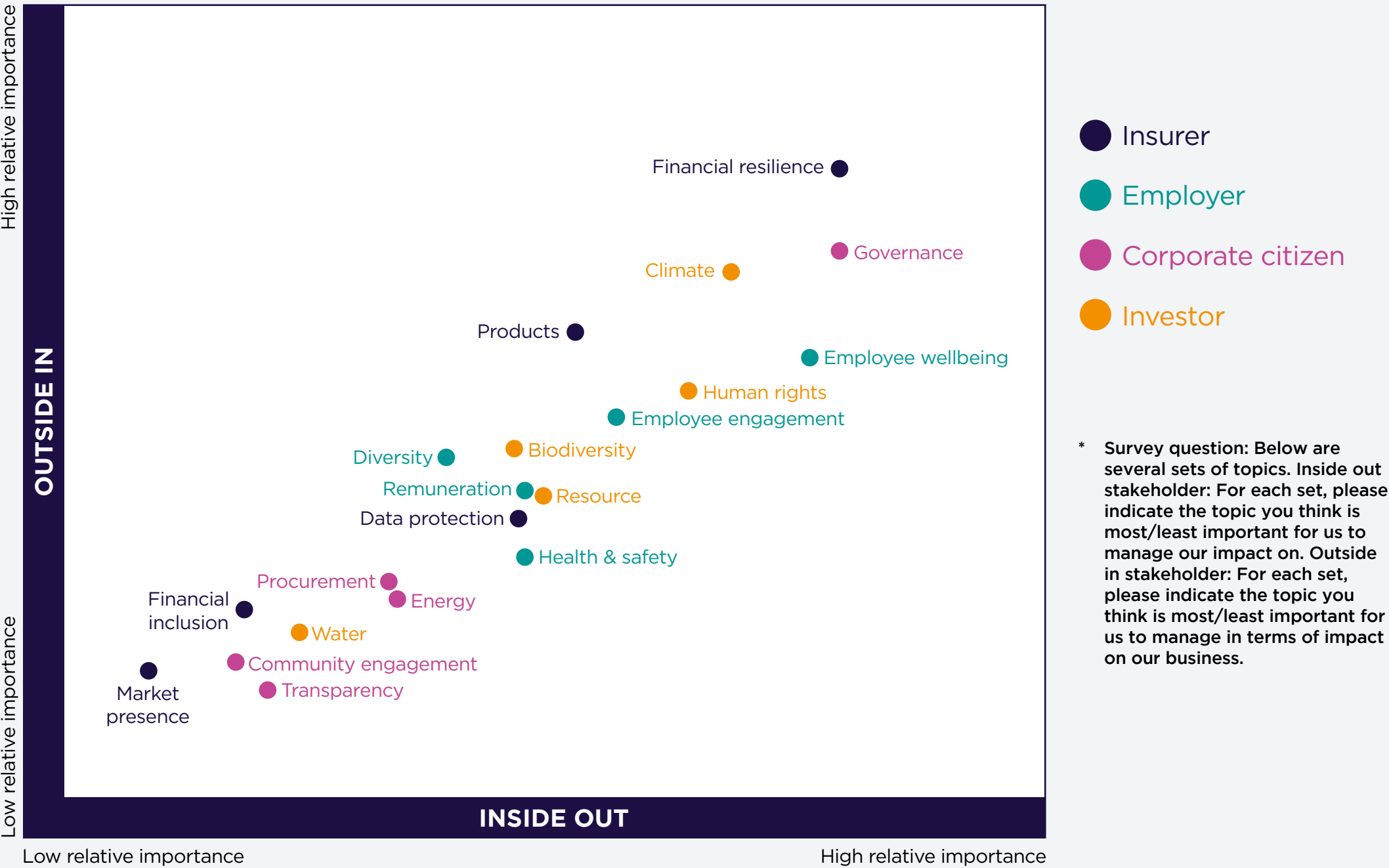
We engage with and listen to our stakeholders – our customers, employees, regulators, investors and strategic partners – gathering feedback over a number of communication channels. As a Group, we also engage with specialist rating agencies to obtain an external and independent view on key areas of our business and progress, including on Sustainability.

In 2023, we received the results of a Sustainability-focused stakeholder survey, which has allowed us to gain a better understanding of the importance of such topics to our stakeholders.



IMPORTANCE ACCORDING TO STAKEHOLDERS*

Internal perspective (outside in) versus external perspective (inside out)



SUSTAINABILITY GOVERNANCE

Good governance is the bedrock for strong and stable progress, and this is no different for our Sustainability efforts. Responsibilities for ESG matters are integrated across our leadership and are complemented by local structures driving ownership throughout Athora.

ATHORA BOARD

The Group Board is responsible for ensuring the long-term success and sustainability of Athora, including setting the Sustainability Strategy and objectives of the Group.

The Board has delegated responsibility for oversight of Sustainability and related activities across the Group to the Group Nominating & Corporate Governance Committee (NCGC). This includes responsibility for reviewing and approving reported Sustainability information.

The NCGC oversees and guides activities related to the Group’s implementation of Sustainability objectives, supporting delivery and management of any associated risks. As part of their decision making, they also consider the views of internal and external stakeholders as appropriate.

The Board receives at least semi-annual updates from the Group Sustainability Office on the implementation of the Sustainability Strategy, and provides strategic input and challenge as needed.

In 2023, a training session on Sustainability matters, with a focus on the upcoming CSRD requirements, was arranged for all Board directors across the Group.

Taking a deliberate and strategic approach to Sustainability topics is increasingly vital for long-term business growth; to that end, I’m pleased to see the ongoing engagement and focus throughout Athora, especially on implementing our Sustainability Strategy.

In addition, integrating ESG considerations into business decisions continues to grow in importance. The Committee’s holistic oversight and guidance are key in successfully navigating these complexities; as Chair, I look forward to continuing to support Athora’s Sustainability journey.

Anna Maria D’Hulster, Independent Non-Executive Director, Athora Holding Ltd. Board of Directors and Chair of NCGC, Immediate Past Secretary General of The Geneva Association

SENIOR MANAGEMENT OVERSIGHT

Senior management are responsible for the implementation of the Sustainability Strategy approved by the Group Board. This is overseen through the Group Management Committees.

Sustainability is embedded in the relevant committees’ terms of reference and senior management receive regular updates on progress, with individuals also consulted on an ad-hoc basis depending on their areas of responsibility.

DRIVING AND EMBEDDING SUSTAINABILITY

Our Group Director of Sustainability is solely focused on Sustainability and leads our Group Sustainability Office. The Group Sustainability Office is responsible for driving the development and practical implementation of Athora’s Sustainability Strategy at a Group level, including updating the Board and key Group Management Committees regularly on progress.

Each function and Business Unit is responsible for embedding the Sustainability Strategy Framework into business-as-usual activities and processes, with coordination and support from the Group Sustainability Office.

To further connect Sustainability efforts across the business, we hold a regular Sustainability Forum, with over 30 representatives across our Business Units and functions. The Sustainability Forum shares updates on actions taken, new initiatives and future plans. In addition to these forums, dedicated working groups meet regularly, with representatives across the Group and Business Units; during 2023, this included the Sustainability Investment Working Group and the ESG Compliance Working Group.

CASE STUDY

Established in 2022, Athora Netherlands’ Sustainability Office drove a busy year of development, coordination and refinement on the Sustainability front, finalising and publicly launching the Business Unit’s own strategy and ambition.

The Netherlands business comes into compliance with CSRD requirements from 1 January 2024, with reporting due from 2025. Efforts are firmly underway to address and implement the requirements. As well as fulfilling regulatory fundamentals, we aim to satisfy increasing expectations from our stakeholders, including our customers, investors, employees, communities and planet.

See ‘Our Role as a Corporate Citizen – CSRD’, p. 31 for more information.

SUSTAINABILITY MONITORING

Monitoring our Sustainability-related activities and their outcomes allows us to ensure they are effective, both for compliance and performance purposes.

We also recognise the importance of assessing and managing Sustainability-related risks, including in allowing us to identify and act upon opportunities.

As a cross-cutting, transverse set of risks, responsibility sits with respective functional teams and Business Units, with support from the Group Sustainability Office. Group Risk has prepared Sustainability-related risk drivers to assist those responsible across the business in identifying these risks within their respective domains.

For more information, see ‘TCFD considerations – Risk management’, p. 40.



OUR ROLE AS AN INSURER





KEY 2023 HIGHLIGHTS:

- Over 2.8 million customers served across Europe
- Athora Germany (Athora Lebensversicherung) provided an attractive total interest rate of 4% for traditional life insurance policies (compared with market average of below 2.2%¹)
- Athora Italia declared a market-leading gross yield of 4.04% on a key fund, against a challenging market
- Industry awards for best-in-class products at Athora Belgium

At Athora, our core business activity is providing long-term savings and retirement services. This revolves around meeting an important social purpose: helping our customers plan for their future and supporting their financial wellbeing, especially in later life.

Through our offerings, we provide the means for secure financial accumulation and decumulation, leading to security, safety and comfort for our customers and their loved ones.

Our businesses in the Netherlands, Belgium, Germany and Italy service and (outside of Germany) actively sell products offering guaranteed levels of return, alongside unit-linked and hybrid products². Athora Ireland and Athora Life Re offer risk transfer solutions covering the same product classes.

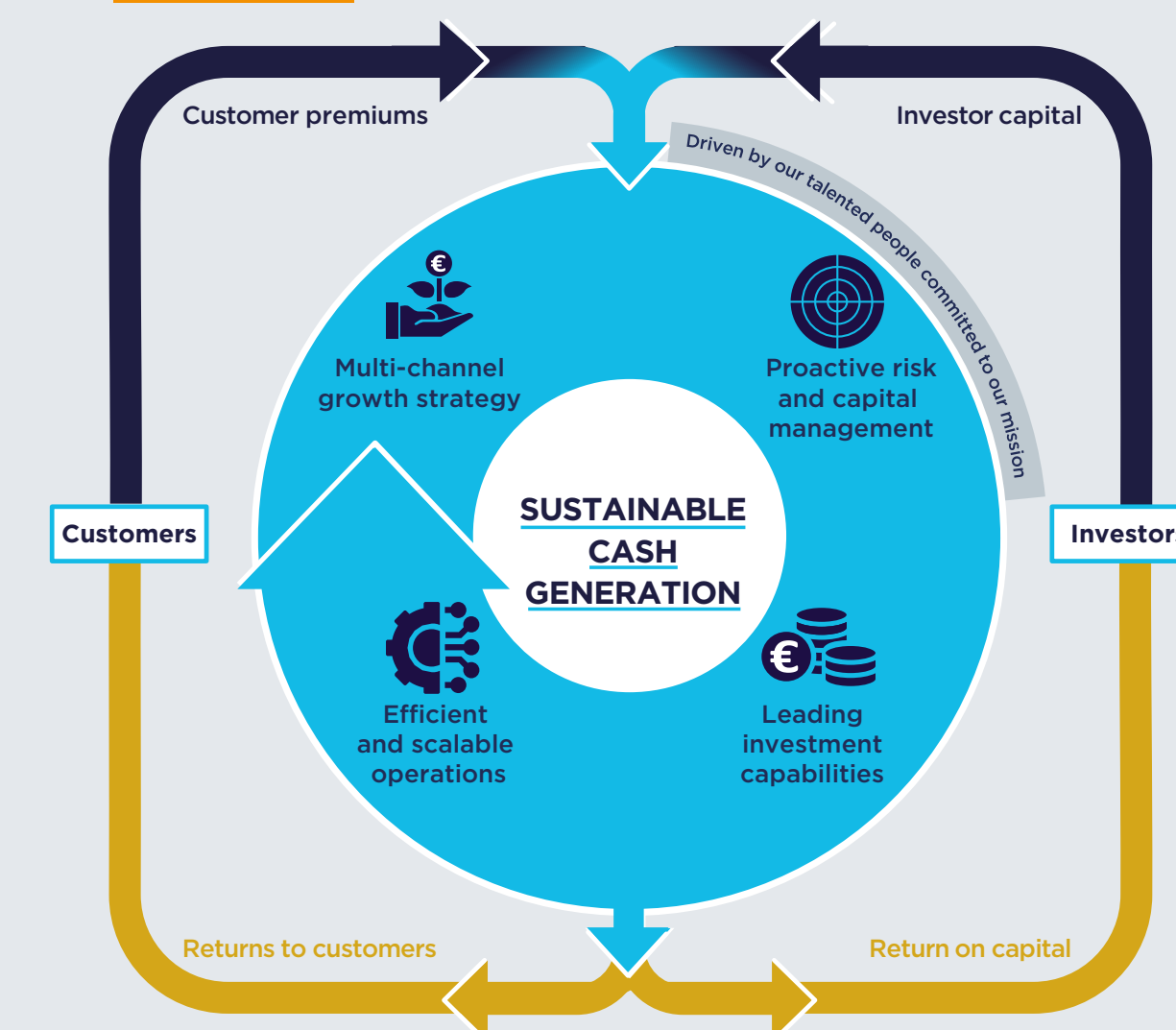
PROVIDING ACCESS TO LONG-TERM AND ATTRACTIVE PRODUCTS

Many European insurers have continued to move away from long-duration and guaranteed insurance products. In parallel, customer demand for these products has continued to increase as a result of the rising numbers of retirees and increased macroeconomic uncertainty.

Interest rates have continued to trend upwards throughout 2023, which, coupled with continued capital market volatility, has created a challenging market environment.

Against this backdrop, our business model (see Figure 2) remains resilient and capable of providing attractive and stable customer returns. We support this through acquiring and investing in unique and differentiated assets, assisted by the investment expertise of our strategic partner, Apollo.

FIGURE 2



¹ As per 2023 reporting from ratings agency Assekurata

² Not offered by all Business Units

To support our customers and fulfil our social mission, it is important that we remain a successful and resilient company. We have a strong financial profile and a supportive long-term investor base which allows us to expand our reach and scale, increasing supply and accessibility of secure life insurance policies with market-leading returns.

This was reflected over 2023 by the continued expansion within our existing European markets, as well as the strong customer returns delivered on core guaranteed products across all regions that we operate in.

In April 2023, we completed the acquisition of WTW’s Dutch Premium Pension Institution and signed two further Dutch Pension Risk Transfer transactions. Athora Italia also onboarded new bancassurance agreements with BDM Banca (formerly Banca Popolare di Bari) and Cassa di Risparmio di Orvieto.

CASE STUDY

Over 2023, Athora Lebensversicherung continued to provide a total interest rate of 4.0% to its policyholders¹. Athora Lebensversicherung has, therefore, once again positioned itself at the upper end of the German market, which, according to rating agency Assekurata, will average a current interest rate of less than 2.2% in 2023.

During the year, we also announced that the 4.0% total interest rate will remain for 2024, keeping this attractive rate stable for four years in a row.

CASE STUDY

Through our Zwitserleven brand in the Netherlands, we were able to offer at-or-near best-in-class rates of return on our annuity products that kept us within the top three market rates throughout the year. The strength of the policyholder proposition, with further reinforcement from brand and marketing initiatives towards the end of the year, was reflected in a ~40% year-on-year increase in annuity sales for 2023. The Zwitserleven brand continues to represent reassurance and familiarity to policyholders, building on a heritage of more than 130 years, while also delivering leading returns to customers.

CASE STUDY

Athora Italia declared a 2023 gross yield of 4.04% on the Athora Risparmio Protetto segregated fund, one of the leading rates in the Italian market². With a challenging local market, stemming from the impact of the insurer Eurovita being placed into administration, we are pleased to offer such a rate enabled by our solid balance sheet.

¹ The total interest rate consists of a regular interest rate of 3.0% and a final bonus of 1.0%.
² As per Milano Finanza analysis.



CASE STUDY

In October 2023, Athora Belgium revised the guaranteed interest rate on its core ‘*Branche 21 Single Premium*’ product to 3% (from a previous rate of 0.01%), driven by Athora’s investment capabilities in the higher interest rate environment. This drove the offering to the top end of the market and resulted in a highly attractive policyholder offering, as demonstrated by significantly accelerated sales momentum, strong broker engagement and positive customer satisfaction outcomes.

CASE STUDY

For a third year, Athora Belgium was recognised at the Decavi Life Insurance Awards, which rewards the best products, services and initiatives in the Belgian insurance market each year.

We retained both awards from the previous year: the Best Unit-Linked Fund in the Low Risk category for the Athora Lazard Patrimoine Opportunities SRI fund and the Best Unit-Linked Fund in the Medium Risk category for the Athora Universal Invest High fund. These successes reconfirm our high standing and expertise in unit-linked products.

We’ve had a strong year for product development in Belgium; following a strategic review, we’ve been able to enhance our universal life product, improving its accessibility, competitiveness and, ultimately, value to our customers. Retaining two Decavi Life Insurance Awards for our unit-linked offerings was also a testament to our efforts. We are pleased and proud with not only this recognition, but the positive broker and customer response we’ve seen across our updated offerings.

Ann Van Haute, Athora Belgium Director of Marketing & Communications



ENABLING OUR CUSTOMERS TO CHOOSE ATTRACTIVE AND RESPONSIBLE PRODUCTS

At Athora, we offer opportunities to invest sustainably; as well as the inherent benefits to our society and planet, we know this is something that our customers value.

Most of our unit-linked solutions across the Netherlands and Belgium are backed by assets classified as at least Article 8 (promoting environmental and social practices) under the EU Sustainable Finance Disclosures Regulation 2019/2088 (SFDR). In addition, Athora Italia introduced an Article 8 SFDR-compliant internal fund in a hybrid product in March 2023.

Furthermore, we continuously work to increase sustainable options throughout our offerings; the guaranteed products within Athora Netherlands and Athora Belgium are also classified as Article 8 under SFDR.

Across the Group, we work with our asset managers to guard against greenwashing and increase transparency over the Sustainability of our offerings. We collect and assess relevant data over and above current regulatory requirements, including ESG factors, Sustainability risk information and adverse impact assessments. Periodically, we also review asset managers' categorisations, including through the European ESG Template.

CASE STUDY

Athora Netherlands and Athora Belgium continue to maintain and prioritise Article 8 and the more stringent Article 9 (targeting sustainable investments) SFDR offerings:

- 90% (2022: 89%) of unit-linked funds offered to our customers in the Netherlands are categorised as Article 8 or Article 9 funds under SFDR. By the end of 2023, 98% (2022: 97%) of AuMA at Athora Netherlands were invested in these funds.
- Similarly, 80% (2022: 83%) of unit-linked funds offered to our customers in Belgium are classified as Article 8 or Article 9 under SFDR. As of the end of 2023, 84% (2022: 81%) of Athora Belgium's unit-linked AuMA was invested in these funds.

OFFERING RISK TRANSFER SOLUTIONS

Our risk transfer solutions support the stability of the insurance and pension market, facilitating the smooth running of our financial system and, ultimately, protecting the security of customers' assets.

Our reinsurance carriers provide this important social purpose; primarily supporting our insurance subsidiaries, we have continued to develop innovative solutions that support insurers with risk transfer and capital optimisation activities across market cycles, strengthening the European retirement and savings market.

PLACING THE CUSTOMER AT THE HEART OF WHAT WE DO

Offering attractive and comprehensible products is crucial to how we conduct business at Athora.

To support this, we are committed to providing timely, accurate, and relevant communications, and to delivering private information securely.

Our Group and Business Unit policies and processes guide our approaches and allow us to measure and ensure effectiveness.

Customer communication

Insurance products have the potential to be complicated and we strive to provide transparent marketing and clear communication.

Regulatory oversight exists in all our active markets. Every product we offer is covered by appropriate communication processes, policies and governance, reflecting region-specific and product-specific regulatory requirements, as well as market expectations.

This drives our approach across each Business Unit, including, where relevant, how we inform policyholders on the product's suitability, pricing, terms and scope of coverage, any exclusions or exceptions, and how information can be accessed throughout the lifecycle.

As part of our compliance with the Insurance Distribution Directive (IDD), we have been strengthening our communication processes over 2023 in line with evolutions in requirements, including providing additional Sustainability-related information.

CASE STUDY

During 2023, Athora Italia started laying the groundwork to evaluate and update customer touchpoints. The updates are focused on improving customer experience with respect to interaction and communication, with implementation to start in 2024.

Respecting data privacy

Data protection is integral to our communication processes, as well as throughout our wider business operations.

We are committed to our obligations under the General Data Protection Regulation (GDPR) and support this through our Group Data Privacy, Retention and Deletion Policy, along with other documents including our Code of Conduct and supplementary manuals.

During 2023, we strengthened our Group policy, alongside creating additional employee manuals on data protection, impact assessments and the recording of data processing. We also updated and rolled out our annual all-employee training course, including activities to support a Privacy Champion mentality in each jurisdiction.

Product development

Athora’s approach to product development is governed by our Product Development and Lifecycle Management Policy, with support on pricing approach from our New Business Pricing Policy and New Business Pricing Standards.

Our Product Development and Lifecycle Management Policy stipulates the framework for managing new, existing or revised products. It also outlines the principles for the management of market conduct risk throughout the product lifecycle, covering product risk appetite and tolerance, product development, product lifecycle management, product monitoring, reporting and mitigation, and key roles and responsibilities.

The policy establishes the requirements for our products to meet the needs and objectives of our customers, for the clear and accurate communication of product features and service standards, and for the way we market our products. The policy also contains guidance on various Sustainability-related criteria, meaning Sustainability is embedded within product decisions early, from the development stage onwards.

Our pricing documents further support adequate and useful product development, including setting out KPIs that ensure products provide value to customers.

As well as meeting regulatory expectations, these documents ensure we serve our customers in line with industry practice, alongside providing a measure to assess the effectiveness of our actions.

In 2023, we continued to enhance product-related governance and focus on customer value within our Group Product Approval Process.

Formalising a number of existing processes at the Group level, appropriate layers of assessment will be provided depending on the materiality of a proposed action.

Material actions will be subject to additional evaluation based on strategic financial and risk considerations, including the purpose and value of the product to the customer.

At Athora Italia, this increased focus on customer value builds on modelling conducted over 2022 and 2023, taking on board recent guidance from the European Insurance and Occupational Pensions Authority (EIOPA).

CASE STUDY

In Italy, we are continuing to enhance how we evaluate and meet customer needs, overhauling our Product Oversight Governance policies and procedures during 2023. With a focus on strengthening the Product Definition and Approval Process, we worked alongside our distribution partners to carefully analyse our customer base, gaining a deeper understanding of the needs and requirements of our target market.



We work to create relevant products that prove useful to our target markets, and evaluating the value for money of our customer offerings is a key part of that. We are pleased to be working to develop a broader approach in this space.

Mery Di Benedetto,
Athora Italia Head of Technical Department



ENHANCING CUSTOMER SATISFACTION

We take customer satisfaction very seriously at Athora. Serving our customers well, and maintaining these relationships, is a key focus of our business model and fundamental to our success. This is reflected in customer satisfaction metrics, which comprise one of our core Group KPIs.

We use various recognised methodologies to measure customer satisfaction, and over 2023 have started working to agree a standardised metric across Business Units.

Athora Belgium uses the Net Promoter Score (NPS) to measure customer and broker satisfaction and saw a strong increase in NPS over 2023. During the year, our Belgian business has also implemented a number of structural and procedural improvements aimed at strengthening this further.

The NPS is also used in the Netherlands, along with the Delighted Customer Score (DCS) – a measure which helps the business to identify short-term improvements that can be made in key customer service processes. Both measures remained resilient over the year.

As our German business is closed to new business, customer satisfaction is measured by the number of complaints. We review every complaint received (and every improvement measure suggested following investigation) in a regular discussion, which includes the Athora Germany Chief Operational Officer. As part of this process, customer complaints are reviewed regularly, and relevant findings are addressed.

As part of this process, where necessary, customer complaints are reviewed and analysed to determine if there are any root causes, and if so, how these could be addressed.

Athora Italia includes explicit Service Level Agreements (SLAs) regarding customer satisfaction in all distribution agreements. These are defined and agreed with each distributor, and this is in progress for our new bancassurance arrangements with BDM Banca and Cassa di Risparmio di Orvieto.

During 2023, amidst a change in distribution footprint, our Italian business nonetheless saw a level of complaints below the market average. Nevertheless, we seek to reduce this even further and during the year made a number of improvements, informed by customer feedback, including structural improvements to our claims settlement management processes.

Over Athora as a whole, customer satisfaction levels remain robust, with active plans in place to increase these even further going forward.

WORKING WITH INDUSTRY ASSOCIATIONS AND PEERS TO DRIVE IMPACT

We collaborate and contribute with industry peers to maximise our actions. Across the Group, we are members of relevant associations, including: Verbond van Verzekeraars, Finance for Biodiversity Foundation, and Swiss Life Network in the Netherlands; Assuralia, BROCOM, and ACAM-VMVM in Belgium; Gesamtverband der Deutschen Versicherungswirtschaft (GDV), Industrie- und Handelskammer (IHK), and Arbeitgeberverband der Versicherungsunternehmen (AGV) in Germany; the Bermuda International Long Term Insurers and Reinsurers (BILTIR), and the Association of Bermuda International Companies (ABIC) in Bermuda; Associazione Nazionale fra le Imprese Assicuratrici (ANIA) in Italy; and Insurance Ireland in Ireland.

OUTLOOK

We will continue to fulfil our social mission, offering accessible, stable and valuable products, as well as increasing our customers' access to sustainable funds.

As we continue to grow, we gain the ability to provide financial security to even more policyholders across Europe, remaining focused on doing the right thing for our customers as we expand.

To that end, we stay committed to seeking enhancements to our products, investment strategies and communication, and delivering on the feedback received through our customer surveys and other channels.

In March 2024, Athora Netherlands reached a settlement agreement with interest groups regarding investment-linked insurance policies sold by SRLEV N.V. (a subsidiary of Athora Netherlands) and its predecessor companies. Through this agreement, Athora Netherlands provides clarity and aims to bring closure to this long-standing industry issue for customers.



OUR ROLE AS AN EMPLOYER



KEY 2023 HIGHLIGHTS

- Athora Netherlands retained industry Top Employer award¹ for quality of employment practices including hybrid working
- IDE KPIs approved by the Group Board and being tracked
- Athora Pride Network established
- Successful pilot of Respectful Workplaces behavioural change training

As we continue to expand our footprint in the European savings and retirement services market, the dedication and efforts of our employees remain critical to our success. We are fully committed to providing an environment in which all employees are recognised, valued, and able to fulfil their potential.

We aim to provide an inclusive and safe workplace, relevant development opportunities and appealing employment packages, and we listen to our employees to understand where we can further improve.

CASE STUDY

For the third year running, Athora Netherlands has received the Top Employer certificate from the Top Employers Institute. The institute is an international body that recognises excellent HR policies, with over 1,800 companies worldwide participating in its annual policy testing. Certificates are awarded for achieving various high standards, covering areas including employment conditions, training and development opportunities and IDE.

FOSTERING INCLUSION, DIVERSITY AND EQUALITY

As well as being the right thing to do, we believe that embedding IDE is fundamentally beneficial for business outcomes, and seek to create and maintain an environment where all employees feel valued, listened to and treated with respect. We aim to use our Board-approved IDE Vision statements to guide our efforts in embedding IDE within Athora’s culture.

OUR IDE VISION STATEMENTS

- **Inclusion:** We are building an inclusive, united and collaborative culture where we are all listened to, can safely express our thoughts, ideas and concerns, and feel valued. We rely on all our ideas, perspectives and challenges to build our business together.
- **Diversity:** We want Athora to reflect the diversity – difference in every sense – of our people and partners, customers, and the communities and societies we operate in. We believe diversity widens our perspective, fuels creativity, innovation and team performance, and mitigates conscious and unconscious bias for us collectively and as individuals. We are building a culture where diversity in all its forms can thrive.
- **Equality:** We ensure that everyone feels they are treated equally at Athora, no matter who we are or what we do. Our differences are never barriers to success at Athora.

Our Group IDE Strategy was approved by the Board in December 2022. The strategy provides a framework for assessing progress, categorising IDE actions under five pillars: (i) Recruitment; (ii) Teams; (iii) Performance Management; (iv) Communication; and (v) Awareness.

Over 2023, we have made tangible progress across a number of the pillars. Key examples include:

Recruitment: An in-house Talent Acquisition team has been established within the People & Culture function². This has supported enhancements to our recruitment process: all candidates are invited to an interview with a member of the People & Culture team and work is ongoing to incorporate a cultural interview panel into senior-level processes. (See ‘Promoting culture and leadership development’, p. 21, and ‘Outlook’, p. 24, for more details.)

Teams and Awareness: Athora’s Employee Resource Groups (ERGs) – the Athora Women’s Inclusion Network (AWIN) and the Athora Pride Network – made significant progress on establishing and expanding into further Athora regions, as well as running multiple initiatives promoting awareness. For more detail on our ERGs, see the AWIN and Athora Pride Network subsections to follow.

As well as implementing our strategy, this year, our Group IDE KPIs and targets received Board approval. This step forward provides a further measure of accountability and a robust method to assess effectiveness.

The IDE Council continues to support collaboration between the different teams and functions working on IDE-related initiatives. Accountability is also maintained via semi-annual IDE Board updates, and the structure under which IDE progress is assessed (including our IDE Vision and Strategy) will continue to be refined in the coming year.

IDE COUNCIL OBJECTIVES

- Work in partnership with the People & Culture team and the business to refine and deliver on our IDE Vision and Strategy
- Coordinate and enable collaboration between colleagues on IDE initiatives across Athora
- Champion IDE by acting as role models, representatives and advocates with regard to IDE topics
- Enable visibility and accountability of IDE via Board updates and discussion of the topics within other appropriate forums

KEY PEOPLE DIVERSITY DEMOGRAPHICS:

39%

of employees identify as women

45%

of our new hires¹ in 2023 (2022: 48%) identify as women

14%

(2022: 17%)

of employees work part-time

¹ Awarded by the Top Employer Institute.

² Previously Group HR.

¹ Hires from 1 January 2023 to 31 December 2023 inclusive.

Engagement on IDE

Our employees are the drivers and the recipients of our IDE efforts, and we actively invite and consider their views through a range of methods, including regular drop-in sessions with People & Culture.

Employee opinion on our initiatives has been overwhelmingly positive during 2023, and we seek ongoing feedback to ensure this remains the case.

Discussions within our ERGs often also bring important topics to light, and we work to ensure any key messaging is communicated to leadership.

For more on employee engagement see ‘*Embedding our values and behaviours – Employee engagement*’, p. 22.

CASE STUDY

After being appointed in 2022, this year, Athora Netherlands’ Diversity Officer established a Diversity Committee. This supports the Officer’s work in raising awareness and prioritising IDE throughout the business, encouraging colleagues’ involvement and ownership towards cultural change within teams.

CASE STUDY

Athora Belgium has installed a Diversity Wall in the cafeteria of the Brussels office. The wall contains the word ‘Welcome’ in the mother tongues of all our Belgian colleagues, highlighting our great diversity.

The installation will be used as a touch point for initiatives, having already motivated a culinary-themed inaugural event to celebrate International Mother Language Day. The successful initiative ran over three days, with employees bringing food and drink typical of their regions to share amongst attendees.

Athora Women’s Inclusion Network (AWIN)

Established in 2022, AWIN has gone from strength to strength over 2023.

Our first ERG, the initiative is sponsored by Athora leadership including our Chief Executive Officer, General Counsel and Independent Board Directors, and provides a platform for all Athora employees to discuss gender-related issues, as well as aiming to contribute to addressing gender imbalance in the financial sector.

In 2023, AWIN hosted a number of roundtable discussions on gender equity between our sponsors and employees in London, Bermuda and Dublin. The ERG also started collaborations with two external networks, Apollo’s Women’s Network (Apollo Women Empower (AWE)) and the Insurance Supper Club, a global non-profit organisation dedicated to the development and advancement of women in insurance.

As well as external networking opportunities, the partnerships provide exposure to other organisations which contribute to the advancement of women in financial services; for example, AWIN members attended an event hosted by AWE with GAIN¹, an organisation that equips female and non-binary students with a platform to learn about careers in investment management.

Towards the end of 2023, AWIN expanded internally by setting up local chapters of the network in Ireland, Bermuda and Germany. Rather than a one-size-fits-all approach, each chapter has developed their focus based on local needs, so that relevant support can be provided to each employee base.

CASE STUDY

To celebrate International Women’s Day 2023, AWIN interviewed several inspirational women within Athora and the wider insurance industry. The conversations were centred around the 2023 theme of ‘*Embracing Equity*’ and focused on the experience and advice of the participants on this topic. The interviews were aired on International Women’s Day in a number of Athora’s offices.

¹ Girls Are Investors Network.

Athora Pride Network

The Athora Pride Network aims to support and foster an inclusive work environment, particularly in relation to individuals’ sexual orientation, gender identity and gender expression. Established in 2023, the network hit the ground running, facilitating a new collaboration with Pride at Work, Ireland’s largest LGBTQ+ workplace training and partnership programme. With their guidance, practical training on good allyship and gender was rolled out across offices in Ireland, Bermuda and the United Kingdom (UK).

The network also supported our Dublin staff in proudly attending the Dublin Pride Parade for the first time.



Setting up our second ERG is a meaningful step forward for Athora and the Pride Network is invaluable as a platform for LGBTQ+ colleagues and their allies.

Our thought-provoking allyship and gender training sessions received really positive feedback, and I can’t wait to see what we can achieve next.

Fiona Cassells, Athora Pride Network member and Athora Group Senior Tax Manager





PROMOTING CULTURE AND LEADERSHIP DEVELOPMENT

At Athora, we are committed to building and maintaining a diverse and engaged culture. We support this with our policies, communication and training, by ensuring we listen to our employees' feedback, and by rewarding those who go above and beyond in service of Athora values.

A strong culture starts with great leadership; during 2023, we implemented several changes at the senior management level, streamlining the organisational structure to optimise accountability.

CASE STUDY

This year, we added psychometric profiling to our leader recruitment process. This helps us to identify candidates who match and enrich our valued behaviours and intent, and enables us to make more informed decisions in our hiring process. Using this approach, we maximise cultural alignment, ensuring new leaders reflect our values and are equipped to navigate the Athora environment.

In 2024, we will further refine our approach with the introduction of a cultural interview panel to enable us to more deeply understand leadership candidates' behaviour, motivations, people leadership and working style.

EMPLOYEE ENGAGEMENT

As part of developing an engaged culture, we seek feedback from our teams through a variety of channels, including focus groups, surveys, drop-in sessions (both with leadership and with People & Culture), one-to-one discussions and town halls.

Following the 2022 annual engagement survey results, during 2023, we held dialogue sessions with managers to build a deeper picture of root causes. Following this, engagement plans were set out by each function and Business Unit to address key findings.

In November 2023, all employees (outside of our Netherlands Business Unit, who conducted a separate exercise) completed an engagement survey. Results were discussed through a series of town hall meetings, with further engagement and action planning invited at team level.

In general, the results showed a stable level of engagement and overall positive responses, including with respect to the recent senior management restructuring. This reflects well on our efforts to ensure transparency and clear communication through a period of change for Athora. Opportunities for improvement arising from the survey were managed locally, to ensure the most relevant actions were taken.

We were also pleased to see that the actions taken as a result of the 2022 results positively impacted relevant scores in 2023. (See '*Employee recognition*', p. 22, for an example of this.)

CASE STUDY

In Bermuda, employee focus groups were conducted to gain deeper insight into staff views, particularly in relation to IDE. A key theme highlighted during the discussions was the level of transparency around career development and promotion opportunities.

One of the outcomes of this has been a renewed focus on succession planning, with senior staff developing and sharing plans to facilitate wider awareness.

EMBEDDING OUR VALUES AND BEHAVIOURS



Code of Conduct

Our Code of Conduct, revised in 2022, is a living document that supports our culture throughout Athora. It designates the conduct, values and behaviours we expect of all our employees to ensure we carry out our business in a way that is right for all our stakeholders: customers, employees, regulators, supervisors, investors, the public and strategic partners.

The document also outlines our approach to addressing complex or unpredictable situations, empowering and encouraging employees to speak up if they witness inappropriate behaviour or actions.

We work to ensure employees have the information they need to act in line with our Code of Conduct¹ and fulfil their responsibilities. All policy commitments relating to responsible conduct are posted on the corporate intranet and are communicated to employees whenever they are published or updated (at least annually).

Every employee must complete the annual Code of Conduct training, including additional mandatory training on specific technical areas such as Financial Crime, with completion rates tracked and reported on.

Courses are reviewed, enhanced and updated at least annually, with ultimate responsibility for the training lying with the Board, who delegate through the Group Management Committees to our Group Compliance function.

Our Code of Conduct is also available on our [website](#) and designed to be shared with other stakeholders, such as business partners and contractors.

Respectful Workplaces and Risk Culture

During 2023, there were two key additions to our training schedule with respect to embedding our Athora culture.

Developed in response to employee feedback, Respectful Workplaces training covers the expected behavioural standards of our culture and how to take action should these not be met. The interactive, in-person session was delivered by an experienced external provider, focusing on responsibilities under relevant legislation and Athora policy.

This behavioural change programme was piloted from late 2023 over select locations and will be rolled out Group-wide in 2024.

Respectful behaviours are the bedrock of a strong business. Our Respectful Workplaces training provides the knowledge and tools to build an inclusive, responsible culture. With the pilot completed successfully, this is an important programme to extend to leaders, managers and employees throughout the business.

Carolyn Gazzard, Group Head of Talent

Our new Risk Culture training provides a refresher on how to identify organisational risks and make appropriate decisions on escalation and resolution.

This is an assessed, online course, which received a 100% completion rate within 12 weeks of launching.

Employee recognition



A key pillar of our culture is acknowledging when our employees go the extra mile, including encouraging colleagues to celebrate one another's achievements.

To that end, 2023 saw our fourth annual Living Athora Values Awards (LAVA), our Group-wide recognition programme. Sponsored by our leadership teams, this year's ceremony saw a record 155 nominations, with four employees proudly recognised as Athora Values role models. Winners came from right across the Group, including from our Dublin, London and Bermuda offices.



CASE STUDY

Over 2023, Athora Belgium continued their drive to champion employee recognition and improve feedback, acting in response to employee survey results.

New training sessions were developed and rolled out to all colleagues, covering giving and receiving feedback, as well as recognising others' good work and behaviours.

The courses received positive reviews and a subsequent engagement survey showed impactful progress: a 12% increase in those who agree "I receive regular feedback from my manager" and a 22% increase in those who agree "I feel appreciated and valued by my manager".

¹ This includes but is not limited to our Code of Conduct, Modern Slavery Statement, Group Outsourcing Policy, Sourcing and Vendor Management Policy, Employee Handbook (which contains a number of policies relating to employment, employee training, and grievance processes), Anti-Bribery and Corruption Policy, and Market Abuse & Insider Dealing Policy.

ENABLING EMPLOYEE TALENT AND DEVELOPMENT

Supporting growth

At Athora, we support talented employees to develop throughout their careers. We provide training and growth opportunities including continued education and professional qualifications, technical, compliance and behavioural training¹, and coaching and mentoring. Our training schedule is reviewed and updated regularly based on employee feedback and company needs, equipping our people with the right skills and capabilities for a dynamic and evolving industry.

We conduct mid-year and annual performance reviews for all permanent staff. To supplement these, managers are encouraged to develop personal career development plans with their team members, which can be used to facilitate regular development check-ins during the year.

In 2023, we developed our Group-wide Learning and Development platform for launch in 2024. All content will be linked to Athora values and priorities. The software includes a bespoke development mapping tool, enabling employees to easily access learning most relevant to their needs.

CASE STUDY

At Athora Netherlands, the successful Develop & Accelerate talent programme continued through 2023. The programme focuses on themes such as change management, stakeholder management and leadership, with participants working on strategic assignments towards personal goals. During 2023, we also updated the programme for increased accessibility so that even more of our target groups will be able to take part in 2024.

CASE STUDY

In our Dublin office, we ran a series of training sessions designed directly in response to employee feedback. Topics covered included managing hybrid teams, Microsoft Office and presentation skills. The sessions were not only well attended but received strong positive reviews.

Attracting and retaining talent

With competition for talent remaining high, we continue to work hard to attract and retain our people. Across the Group, we also stay prepared for the future with talent identification and succession planning being a key priority.

Key retention programmes, which kicked off in 2022, continued through 2023. These focus on supporting our employees through organisational change, including increased communication efforts and providing insight into career opportunities at Athora.

Listening to, and acting on, feedback is a vital element of supporting our teams, and we are pleased to see that employee engagement has remained stable through a period of change. See ‘Employee engagement’, p. 21, for more information.

Athora also encourages internal mobility, with internal career opportunities posted on our intranet, and in some cases, advertised via newsletter.

198

new hires²
in 2023

8%³

total voluntary
turnover rate
in 2022

SUPPORTING EMPLOYEE HEALTH AND WELLBEING

To serve our customers and drive our culture, our employees require safe, supportive work environments, with processes and programmes that aid productivity and wellbeing.

All new hires have a Health and Safety induction including receiving contact information for local safety personnel. Important safety guidance is displayed pictorially on physical office notice boards, with all Health and Safety information available on the company intranet at any time.

We provide comprehensive healthcare cover for employees (and their dependents where applicable) and run a number of activities each year to support our people’s physical, mental and financial health.

At Athora, we value the social cohesion and ease of collaboration that comes from working together in the office, while understanding that a well-designed hybrid working model supports employee wellbeing, as well as providing Sustainability and efficiency benefits from reduced travel. Through our Smart Working Framework, we continue to empower employees across the Group to find the right hybrid working arrangement for their business, team and individual needs.

We also recognise the benefits of flexible working in supporting employees’ work-life balance and a range of diverse personal situations.

CASE STUDY

Our new office in Amsterdam has been designed with employees’ productivity, health and happiness in mind. It holds the WELL Building Standard, an accreditation awarded for building features that support human health and wellbeing. In 2023, we also laid the groundwork for further awards that reflect our efforts, receiving exceptionally high scores in the Leesman Index, which measures how well office environments support their employees. The results place us among the top 7% in the world and top 10 in Benelux, establishing our Amsterdam office as providing a superior workplace experience.



CASE STUDY

In Bermuda, we are committed to supporting work-life balance and wellbeing, including supporting employees who may require a temporary flexible working arrangement. These are assessed on an individual basis and are set up to accommodate individual staff needs. This option recognises that employees may experience times in life when personal responsibilities become higher priority, and allows for a more diverse range of individuals to retain the security of their role and position in the labour market.

¹ Athora provides internal training courses on a range of topics, including anti-trust, anti-corruption, anti-discrimination, anti-harassment, conduct and business ethics, cybersecurity, data privacy, market abuse, the emergency response plan, the Employee Handbook, Health and Safety, human rights and trafficking, the Code of Conduct and Vendor Code of Conduct, Sustainability and whistleblowing.

² Hires from 1 January 2023 to 31 December 2023 inclusive.

³ The number of employees voluntarily leaving the company during 2023 divided by the average number of company employees. Voluntary separations do not include promotions, transfers and other internal movements, layoffs, dismissals or retirement.



CASE STUDY

In our German offices, we continue to offer several positively-received health management benefits. We provide free COVID-19 vaccinations to each employee and one other individual (friend or family member) of their choice. We also offer free flu vaccinations and eye examinations for employees, as well as a subsidy of up to €300 per year for glasses required for the workplace. In 2023, in response to employee feedback, we provided additional office space for meetings and phone calls, including for our customer service representatives, in order to reduce noise pollution in the office. We also ran sessions with a health expert on healthy sleep, eye and neck relaxation, and other work-related topics.



CASE STUDY

At Athora Belgium, we continued our provision of an in-house nurse-coach at the office to support the physical and mental health and wellbeing of employees. We also conducted a wellbeing campaign aimed at preventing illness, which saw good results: a roughly 7% increase in the number of employees that took no time off for illness compared to the previous year.

PROMOTING FAIR AND BALANCED REMUNERATION

We design our remuneration packages to attract and retain talented individuals. As in previous years, our approach to compensation and incentivisation – from our employees up to our Independent Board Directors – is guided by our Group Remuneration Policy. We review our packages regularly in line with various measures and over 2023, made a number of positive adjustments; these included inflation-related salary uplifts and upgrades to our share plans.

CASE STUDY

After announcing our all-employee share plan in December 2022, eligible employees were awarded phantom shares in 2023, supporting our culture of employee ownership. Supporting our culture of employee ownership, share plans were enhanced further during the year to provide additional upside potential for employees.

OUTLOOK

In 2024, we continue our focus on building a strong Athora culture, further enhancing behaviours, values and accountability. Our new behavioural assessment stage is now embedded in the recruitment process, and we are rolling out our Respectful Workplaces training across more of the business, with content adapted and focused for local markets. In the second half of the year, we will launch a refreshed Performance Management Programme, which will measure against specific behavioural criteria directly aligned to our leadership and culture behaviours. We have launched our new Learning and Development platform and will seek feedback from our employees to ensure it provides an effective experience. We will continue to focus on employee engagement, and proactively work on any opportunities highlighted by our people to further enhance the Athora employee experience. We are continuing to fully embed IDE within Athora, including implementing our IDE Strategy and initiatives while strengthening coordination across our jurisdictions. To ensure the effectiveness of our actions, we are closely monitoring data and outcomes, particularly in relation to pay, performance evaluations and recruitment. Our employees' health and safety remains central to our business and we continue to champion employee wellbeing. In April 2024, as a result of our top placing in the Leesman Index, we officially received the Leesman+ Certification, celebrating the superior employee experience at our Amsterdam office.

OUR ROLE AS A CORPORATE CITIZEN

KEY 2023 HIGHLIGHTS

- Over €350,000 in charitable donations (corporate and employee) and sponsorships
- London office achieved BREEAM certification ‘Outstanding’ plus LEED-certified ‘Gold’
- Group-wide GHG emissions data system implemented
- €419.9 million paid in total taxes

As a Corporate Citizen, we understand that our actions have direct impacts outside of Athora. By considering our communities and planet in not only *what* we do, but *how* we do it, we also contribute to the reputation of the wider financial system and protect customers’ (and society’s) trust in the handling of their assets.

At Athora, we are working to reduce, and more robustly measure, GHG emissions. Within that, we seek ways to promote responsible production and consumption. We set the same expectations for our supply chain and insist that they act in accordance with our strong values, including on human rights.

As a responsible business, we employ robust governance and compliance structures and contribute to our communities, both through our taxes and charitable initiatives.

REDUCING GREENHOUSE GAS EMISSIONS

At Athora, we are committed to reducing our emissions and contributing to the slowing of climate change. Our two main avenues for impact are our investments and our own business operations.

Over 2023, we continued to develop our approach to measurement of our own operations emissions, including the implementation of a Group-wide GHG emissions data system. This system provides a standardised platform to record emissions data, increasing our ability and capability for tracking usage and trends, and helping us set a sensible baseline to report progress against as part of the upcoming CSRD obligations.

The platform contains an embedded library of over 70,000 emissions factors, which are updated annually. These industry best practice factors will assist us in enhancing the accuracy of our GHG emissions calculation.

We continue to seek methods to improve our data capture capability over both operations and investments, committing to setting our targets based on relevant and credible data.

For more information on investment impact and target setting, see ‘*TCFD considerations – Risk management*’, p. 40, and ‘*TCFD considerations – Metrics and targets*’, p. 40.

We continued to implement practical and immediate solutions to reduce our energy consumption and emissions across our operations. This includes utilising renewable energy sources where possible, waste recycling, donating end-of-life electronics to charities, reducing water and energy consumption through installation of motion sensors, installing LED lighting, encouraging sustainable travel and continuing our hybrid working model.

Our 2023 office moves in London, and from Amstelveen to Amsterdam, have also given us the opportunity to consider the Sustainability characteristics and emissions reduction potential of a building from the start – including smart heating, recycling and options for low-emission commuting (e.g., cycling).

CASE STUDY

Our new London office has achieved BREEAM certification ‘*Outstanding*’, which is the highest possible score. BREEAM scores are calculated using several scientifically-based Sustainability measures for the built environment. The office is also LEED-certified ‘*Gold*’, another worldwide measure of sustainable building.

The energy efficiency of the new building has noticeably reduced our energy consumption, helping to reduce our market-based Scope 2 carbon emissions even further.

Total energy consumption in 2023:

3,177,243kWh¹
(2022: 3,551,514 kWh²)

Total renewable energy consumption in 2023:

399,049kWh¹

Total GHG emissions from own operations in 2023:

2,504 tonnes CO₂e³

¹ The amount is the sum of energy consumption in 2023 in the following locations: Hamilton, Bermuda; Dublin, Ireland; London, UK; Alkmaar, Amstelveen (up to May 2023), and Amsterdam (from May 2023 onwards), Netherlands; plus, estimates for Belgium, Germany and Italy offices. Belgium, Germany and Italy data is estimated as the transition to the new GHG emissions data tool was underway at the time of reporting. From 2024 onwards, we will be capturing data for all locations in our GHG emissions data tool.

² This amount is the sum of the energy consumption measured during 2022 in the following locations: Hamilton, Bermuda; Dublin, Ireland; London, UK; Alkmaar and Amstelveen, Netherlands; Brussels, Belgium; Wiesbaden, Germany.

³ The amount is the sum of GHG emissions from own operations in 2023 in the following locations: Hamilton, Bermuda; Dublin, Ireland; London, UK; Alkmaar, Amstelveen (up to May 2023), and Amsterdam (from May 2023 onwards), Netherlands; Wiesbaden, Germany; plus, estimates for Belgium and Italy offices. Belgium and Italy data is estimated as the transition to the new GHG emissions data tool was underway at the time of reporting. From 2024 onwards, we will be capturing data for all locations in our GHG emissions data tool.

CASE STUDY

Athora Netherlands is targeting overall net-zero GHG emissions by 2050, with additional intermediate targets:

- A reduction of 50% in GHG emissions by 2030 compared to 2019
- A reduction of 75% in GHG emissions by 2040 compared to 2019

In addition, Athora Netherlands seeks to be fully CO₂ neutral over own operations without the use of carbon credits by 2030. The offices have operated on 100% green gas and electricity for several years, with Dutch own operations emissions net-neutral since 2015.

We are pleased with the progress against all goals, with 2023 (compared to 2019) own operations seeing a:

- 78% (2022: 76%) drop in net carbon emissions
- 69% (2022: 45%) reduction in electricity use
- 45% (2022: 83%) reduction in gas use

Gas use is higher than in 2022 due to roadworks disrupting the heating system at the previous office; with no gas heating in the new Amsterdam building, use will fall to zero going forward.

Similarly to 2022, reductions have been driven by the increase in home working, reduction of staff and continued transition to an electric lease car fleet. We remain on track for our fleet transformation to be complete by 2026, negating the single biggest source of CO₂ emissions from Athora Netherlands’ own operations.

PROTECTING LIFE AND NATURE

Protecting life and nature remains one of our key Sustainability themes and we prioritise practical and active contributions. As well as operational actions and direct biodiversity preservation, we also look at how we can influence through our investment activities (For more information, see ‘Our role as an Investor’, p. 33).



CASE STUDY

With beehives already in the gardens of our Brussels and Amstelveen offices, in 2023 we expanded this initiative to our Wiesbaden office in Germany. Installing two hives in an undisturbed and sufficiently weatherproof space, we also planted insect-friendly greenery in the area for nearby sustenance.

Our hives contribute to supporting pollination and repopulation of this ecologically important species, which is increasingly threatened by climate change and declining food sources.

The existing hives also remained healthy and stable, which was supported by our harvests of honey during the year. In Belgium, pots were gifted to colleagues; in the Netherlands, the honey was sold, with the profits going to a local beekeeping charity.

CASE STUDY

Nature conservation was a hot topic at Athora Germany’s summer party.

As part of the celebrations, employees donated to Schutzgemeinschaft Deutscher Wald e.V., an association that campaigns for the protection and preservation of forests. Our donations will finance the planting and first few years of care of hundreds of trees.

PROMOTING RESPONSIBLE PRODUCTION AND CONSUMPTION

We consider ways to reduce the materials, water and energy we use each workday, decreasing our emissions and environmental impact.

CASE STUDY

In 2023, Athora Germany made a number of Sustainability-led office updates, including commissioning a Combined Heat and Power (CHP) plant and several electric vehicle fast-charging stations. The CHP plant has already been installed, with measurement of related emissions savings to begin in 2024.

CASE STUDY

At Athora Belgium, we have continued to transform our car fleet. We offer 20 electric and 20 hybrid cars, with more on order for 2024 as we continue to replace the current fleet with lower emission vehicles. In addition, we have assisted employees with installing charging stations in their homes as well as encouraging cycling or public transport usage, further facilitating the move away from CO₂-heavy commuting.



CASE STUDY

During 2023, Athora Netherlands conducted an all-employee laptop refresh.

Taking steps throughout the value chain to reduce environmental impact, manufacturing of the new laptops was carbon neutral, with all production and distribution emissions offset by the supplier.

When it came to the rollout, we were supported by our continued partnership with ‘Closing the Loop’, a circular economy organisation which works to offset the effects of e-waste.

Old laptops were refurbished and resold, and for each new laptop our Dutch employees received, another was saved from landfill in countries with limited recycling facilities over Sub-Saharan Africa and Asia. Closing the Loop works with these countries to set up local recycling facilities, creating employment as well as supporting improved environmental outcomes.

DELIVERING A SUSTAINABLE SUPPLY CHAIN

At Athora, we expect our suppliers and strategic partners to meet the same high standards as our own.

- To help ensure this is the case, for all new or expanding relationships we:
- Involve our Sourcing and Vendor Management team from an early stage
 - Ensure that the principles of integrity, fairness, impartiality and discretion are fully met during the selection process
 - Apply relevant due diligence on potential business partners, including screening for anti-bribery and anti-corruption matters
 - Have business partners commit to abide by our relevant policies as well as by a range of other important Athora standards and rules

New vendors must complete all processes satisfactorily or they are not contracted with.

For existing relationships, we perform regular service management reviews and due diligence risk assessments upon contract renewal.

Our Group Outsourcing Policy and Sourcing and Vendor Management Policy, which includes our Vendor Code of Conduct, lay out our third-party management policies in detail.

Throughout our company and all of our business relationships, we are committed to upholding international human rights standards. Athora has a zero-tolerance approach to any forms of modern slavery and human trafficking in our organisation and supply chain, including child and forced labour. Our [Modern Slavery Statement](#), issued in 2022, reaffirms this commitment.

CASE STUDY

Over 2023, Athora Netherlands has continued building provisions for Scope 3 measurement and reduction into procurement, screening all key suppliers against a range of Sustainability criteria and collecting Sustainability data to inform emissions and climate risk calculations. The business has also established the requirement for formal KPIs to be set in 2024

This will support our Netherlands business in meeting CSRD requirements, under which Scope 3 emissions will need to be reported. It will also enable Athora Netherlands’ ultimate aim, which is to only contract with parties that align with a net-zero GHG emissions by 2040 target.

CASE STUDY

Throughout 2023, Athora Germany continued their outsourcing partnership with Behindertenwerk-Main-Kinzig (BWMK). BWMK offers work and qualifications for people with disabilities and has been working with Athora since 2021. The employees at BWMK have helped to successfully implement digitisation projects by sorting, scanning and indexing our hard copy documents, allowing for a reduction in paper-based incoming mail and a corresponding reduction in our natural resource use.

SUPPORTING OUR COMMUNITIES

As a socially responsible business, we are committed to making a positive and meaningful impact in the communities we serve.

Contributing through charitable donations, sponsorships and volunteering, we support and empower our employees to give back to local causes. This includes inviting employee opinion in directing our funding.

In 2023, we rolled out our Charitable Efforts Guidelines. These guidelines unify our approach to selecting charitable organisations and donation budgets across the Group, coordinating our work to address pressing societal needs and contribute to the betterment of society. Following the implementation, paid time off for community involvement has been further formalised over the Group, providing more opportunities for our employees to give back.

Over the year, we contributed over €350,000 (corporate and employee donations and sponsorship) and 688 volunteering hours across our jurisdictions, supporting causes including food poverty, homelessness, women’s safety, children’s welfare, career coaching, financial literacy, mental health, civic pride, cancer care and research, and humanitarian aid relief including the Turkey-Syria earthquake.

Our support for those affected by the Ukraine crisis continued, including opening temporary housing for refugees in the Netherlands, created by refurbishing an unused office building.

We also maintained our sponsorship of two sporting events: the Athora Great Bruges Marathon in Belgium and the Athora 8k Run & Walk in Bermuda in aid of The Coalition for the Protection of Children.

CASE STUDY

In Belgium, we implemented an employee-driven charitable selection scheme. The initiative invited employees to submit organisations for receipt of time and monetary assistance, and from these, we selected five worthy causes; one of these was L’Entraide de Saint-Gilles, a social assistance service helping hundreds of people each week, mainly unhoused individuals. The service manages six accommodation units and social workers are on hand to support reintegration. Each year, they organise a Christmas dinner for their residents and in 2023, volunteers from Athora helped set up, decorate, and serve the meal.

CASE STUDY

Athora Netherlands’ partnership with NL Cares continued through 2023, alongside two new collaborations: the LEF Foundation, which pairs companies with educational institutions to deliver financial awareness classes for young adults; and DoesGoed, which pairs volunteers with a range of initiatives, from teaching Dutch to new residents to coaching children’s sports.

Athora Netherlands also established two new funds. The first of these is a sustainable sponsoring fund, which invites funding proposals from employees or organisations; selections are made by a newly formed corporate sponsorship committee. The committee will also monitor actions and results, assessing effectiveness and driving improvement in how we give back to our communities. Another new initiative, the Athora Care Fund, supports colleagues’ fundraising with donations of up to €500.



CASE STUDY

In the UK, our charity committee takes care to select partners where we can make effective impacts.

This year, we selected ConnectHive, a non-profit supporting social mobility for young people, and Upper Room, which offers practical support and specialist employment advice to unhoused individuals.

As a small office within a large company, we have specifically chosen smaller organisations where we can make a big difference.



CASE STUDY

In Ireland, we continued our partnership with Hugh’s House, which provides free local accommodation for families with children in long-term hospital care. Our support includes corporate donations, employee fundraising and on-site volunteering.

This year, we also set up a new fund to support employees’ own charitable endeavours; up to €250 can be requested towards each project or initiative.



CASE STUDY

In November, our Bermuda office supported the important work of the Eliza DoLittle Society, a food bank charity helping the local community.

Twelve of our colleagues volunteered for shifts, packing food parcels for recipients in need. The packages were distributed as part of the charity’s Christmas activities, contributing to the relief of food poverty over the festive season.

CASE STUDY

In 2023, Athora Life Re launched ‘*Athora Bermuda Volunteer Heroes*’. This scheme recognises and highlights the efforts of staff who participate in voluntary activities, with awards at the end of each year.



A TRANSPARENT APPROACH TO TAX

At Athora, paying the appropriate amount of tax in each of our jurisdictions is foundational to running a responsible business. It ensures the long-term interests of our communities are best served and is part of our commitment to stakeholders.

Our tax obligations are aligned to where we generate our profits. All Group tax decisions follow our Athora Code of Conduct and the applicable legislation of the countries where we operate.

In 2023, our total tax contribution amounted to €419.9 million (see Figure 3). This can be divided into total taxes borne of €65.3 million and total taxes collected of €354.6 million.

Through our Board-approved [Athora Group Tax Policy](#) and our commitment to corporate social responsibility, we ensure that our approach to tax maintains high standards. This includes ensuring compliance with international tax standards and ensuring that we report in an efficient, accurate and timely manner. We support the development of strong tax teams who focus on both local and global issues, and take advice as needed to stay informed on emerging regulation. Our tax compliance has multiple layers of oversight, with our Business Units’ compliance reviewed at a Group level, and our Group compliance reviewed by our Audit Committee and external parties.

Athora manages tax-associated financial and reputational risk in several ways, employing experts with the relevant experience and qualifications for our global business while carefully considering tax implications in our business decisions. We also participate in public commentary processes on tax legislation via relevant trade groups. This includes membership in BILTIR’s Tax Working Group, which has been in discussion with the Bermudan government on the implementation of upcoming corporate tax changes. (See below for more information.)

Where commercial opportunities give rise to transactions between Group entities based in different jurisdictions, we ensure adherence to local and international regulations, legislation and guidance.

Through our strategic partner Apollo, we engage with stakeholders to share our approach to tax and welcome feedback on any tax-related concerns. We provide a range of methods for stakeholders to raise any business conduct or integrity concerns in relation to tax. (See ‘Maintaining high standards of governance and compliance – Speaking up’, p. 32).

During 2023, the European countries in which we operate (including the UK) enacted legislation giving effect to the Organisation for Economic Co-operation and Development (OECD) Pillar Two minimum 15% corporate income tax framework. Many other OECD countries have also passed, or plan to pass, the legislation.

With the goal to establish a global minimum tax, this initiative aims to remove the opportunity for reducing tax obligations by moving profit generation to low-tax jurisdictions.

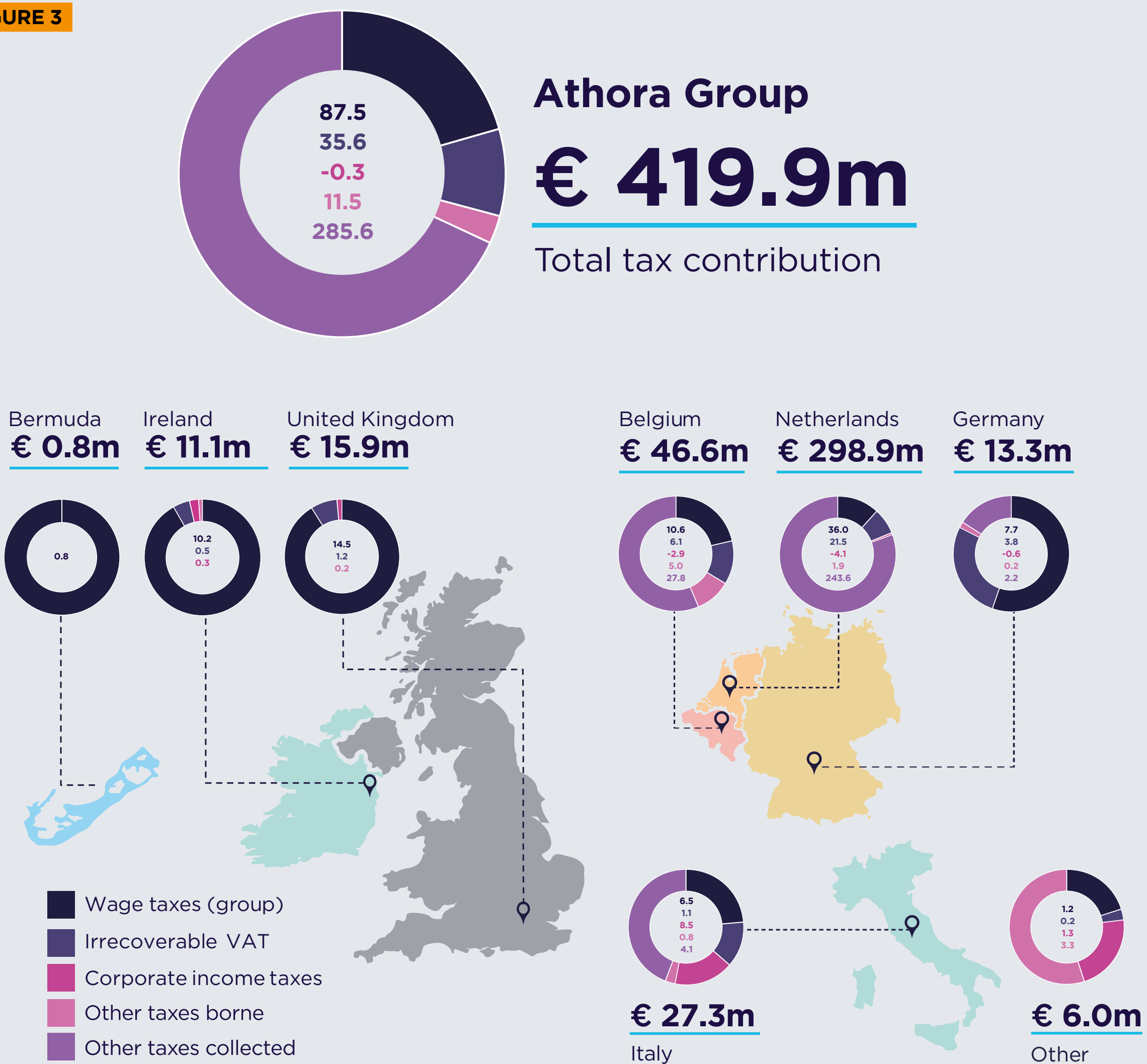
In response to Pillar Two, during December 2023, the Government of Bermuda also enacted a 15% corporate income tax regime, which will be effective from 1 January 2025.

In response to Pillar Two, during December 2023, the Government of Bermuda has also enacted a 15% corporate income tax regime, which will be effective from 1 January 2025.

As a business incorporated in Bermuda but with operations in multiple OECD countries that will be subject to the Pillar Two provisions, we have long been cognisant of the upcoming implementation of the framework; we are aware that, in the absence of Bermuda implementing a 15% corporate income tax, Pillar Two would have resulted in our future profits earned in Bermuda becoming subject to a 15% minimum tax payable to the tax authorities of other countries where we operate.

Considering the above and given that the location of our headquarters is due to our history and heritage – being originally established in Bermuda in 2014 by Athene Holding Ltd. – we strongly welcome the Bermuda legislation.

FIGURE 3



MAINTAINING HIGH STANDARDS OF GOVERNANCE AND COMPLIANCE

Good business conduct is fundamental at Athora. As an insurer, we understand the importance of transparency and robust governance in providing security for our customers’ future savings and income. We maintain good relationships with our supervisors, monitoring regulatory developments in the market and working to ensure timely compliance.

Business Unit functions drive local regulatory compliance and conduct active risk management, with holistic coordination from our Group Compliance and Risk functions where required.

The expertise of our Internal Audit function also helps us maintain high standards. Independently evaluating the effectiveness of our internal controls, risk identification and governance processes, they ensure we preserve our strong reputation and stable business practices, keeping our customers’ assets safe.

Leading responsibly

Our Board, along with our Group CEO, is ultimately accountable for all policy commitments relating to responsible business conduct.

We recognise that a responsible business starts from the top and we take considered steps to ensure the fitness of our leaders.

Our Fit & Proper Policy defines the principles to be applied when assessing Directors’ suitability. This includes an assessment of whether the individual has the relevant experience, skills, knowledge and soundness of judgement to properly fulfil the duties and responsibilities of their office. Our NCGC nominates and recommends Directors, considering these factors along with diversity and independence. Director appointments are subject to shareholder approval.

We also conduct an annual self-assessment where each Director is invited to anonymously provide constructive feedback on the Board’s performance and activity, as well as on the performance and activity of any Board Committee on which they serve, which is reviewed and summarised by a third party.

Overall configuration is also important; we have five Independent Directors on our Group Board, and a committee structure designed to facilitate deep and specific ownership of key topics by Group Board members.

Regulatory compliance

In 2020, the Bermuda Monetary Authority (BMA) became group supervisor of Athora Group. We continue to hold periodic regulatory meetings with our college of supervisors, which includes all of Athora’s principal insurance regulators.

We stay abreast of the evolving regulatory landscape, including as it pertains to Sustainability, and work to ensure full compliance in each of our jurisdictions, actively monitoring and managing compliance-related risks.

In March 2023, the BMA published a Guidance Note: ‘Management of Climate Change Risks for Commercial Insurers’. This outlines its expectations for commercial insurers and insurance groups on their management and reporting of climate-related risks.

We continue our commitment to strengthening our governance, risk management practices, framework and measures for climate risk, in line with the BMA’s guidance.

In the European markets, we have seen the introduction of the SFDR in December 2019, its subsequent application through the SFDR itself in March 2021 (SFDR Level 1) and the adoption of related EU regulatory technical standards in January 2023 (SFDR Level 2). The SFDR and its delegated instruments have provided clear standards for the transparency of Sustainability risks and the integration of Sustainability factors for financial market participants and financial advisers.

All our products and services are classified in alignment with SFDR disclosure provisions, and our documents, policies, website and other communications are aligned with the updated SFDR and its delegated instruments.

We also work towards ensuring adherence to other EU Sustainability reporting regulations and directives. These include the EU taxonomy for sustainable activities and the upcoming requirements of CSRD.

CSRD

CSRD aims to improve and standardise Sustainability reporting practices across companies, with reporting subject to limited assurance.

A key element of preparation is establishing the material topics on which reporting should focus. This is achieved by conducting a double materiality assessment, where two aspects are considered to identify materiality: the financial impact of a topic on the business, and how the business can impact the world. Companies must also set targets and select an appropriate emissions baseline to report progress against.

Timelines for CSRD compliance are staggered based on company size and location.

Athora Netherlands is in scope from 1 January 2024, with the first report under the directive due in 2025. Belgium, Germany and Italy Business Units will follow, coming into scope from 1 January 2025 (reporting due in 2026). Athora Ireland falls into scope on 1 January 2026 (reporting in 2027), with the rest of the Group to follow on 1 January 2028 (reporting in 2029).

Across all of our Business Units, we are preparing to comply with CSRD requirements, including running training sessions to upskill and empower employees and Directors.

Due to report first, our Netherlands business is well underway with preparations. This includes conducting a double materiality assessment, which was used to form the basis of a CSRD implementation plan. Furthermore, to bolster learning for the year ahead, Athora Netherlands has requested and received limited assurance on selected elements of 2023 reporting.

Upholding business standards

As part of our commitment to responsible business practices, we welcome concerns shared by any of our stakeholders – employees (past and present), customers, investors, strategic partners and the public in general. We support several methods for each of them to do so, as outlined in our Speaking Up Policy.

For current employees with a concern, there are additional ways to report, including speaking to a line manager or other trusted leader, the People & Culture function, Compliance (local or Group), Group Internal Audit or the Group Board’s Audit Committee.

Athora supports employees to raise concerns free from retaliation.





Speaking Up

Our Speaking Up processes are outlined in our Code of Conduct and Speaking Up Policy, and we welcome concerns raised regarding any conduct issues.

As well as the contact methods outlined above, for Speaking Up matters, we also have an anonymous, third-party managed hotline that employees can utilise.

The process, once a report is received, is outlined in our Speaking Up Policy.

Where a report is received via the hotline, the local Head of Compliance (or the Group Head of Compliance, depending on the allegations) is responsible for acknowledging receipt within seven days of submission, and ensuring that the investigation is completed within sufficient timelines, with the reporter notified of the general outcome.

Local processes may vary in line with local regulations.

Across each Business Unit, investigations are also conducted in accordance with our Code of Conduct, with confidentiality respected in line with laws and regulations.

To ensure that concerns are shared appropriately between Business Units and Group, and to facilitate collaboration, the Business Unit Compliance functions have formal check-in points with the Group Compliance function throughout the year.

Speaking Up matters are also flagged beyond our Compliance teams and, at a minimum, reported to the Group Audit Committee.

Our Group Audit Committee provides regular updates to the Group Board regarding any concerns raised during the year, and actions taken to resolve them.

Grievance processes

Each grievance received is formally investigated following the procedures set out in our Employee Handbook, which is available to employees on the intranet at any time, as well as discussed as part of induction and annual training.

If we decide to proceed with an investigation, the individual raising the concern retains full confidentiality throughout the process. Should an investigation find in favour of the complainant, recommendations will be made to change the relevant internal processes and procedures. Progress is monitored to ensure that any remediation has been implemented.

At Athora, we take employees’ feedback seriously and conduct regular check-ins and discussions with employees on a range of company procedures, including the grievance processes themselves. Our grievance processes and related governance are also regularly updated in line with best practice. The People & Culture function is ultimately responsible for reviewing the process to identify areas of improvement.

Anti-corruption

All operations are risk-assessed for potential corruption issues, with no incidents occurring in 2023.

Anti-bribery and corruption risk is assessed annually at both Business Unit and Group level, and our Anti-Bribery and Corruption Policy is also reviewed annually.

Every employee¹ must take mandatory training on Financial Crime alongside the Code of Conduct. All key suppliers operate under a code of conduct that includes measures to combat bribery and corruption.

Conflicts of Interest

As part of Athora’s commitment to responsible business practices, we have a responsibility to avoid any actual or potential conflicts of interest. Conflicts, or the perception of conflicts, could cause reputational damage and/or give rise to a material risk of damage to the interests of customers, employees, investors, the public and strategic partners.

Our Conflict Committee, which sits at Board level, is composed of five Independent Directors and one Shareholder Director, and monitors and assesses any actual and potential conflicts of interest. Athora has a Group-wide Conflicts of Interest Policy that must be adopted by all our Business Units on a comply-or-explain basis. This policy sees Athora annually ask its people to attest to their compliance with the policy alongside disclosing any actual or potential conflicts of interest.

Directors at Athora must also immediately notify the Conflict Committee of actual or potential conflicts or a change in circumstances relating to an existing authorisation. They must also report any changes in their commitments to the Board.

OUTLOOK

Supported by our Group Charitable Efforts guidelines, our philanthropic work continues, and through early 2024 we have already seen a wide range of charitable engagement. This includes Athora Germany marking International Women’s Day 2024 by creating and distributing toiletry gift bags to a women’s shelter in Wiesbaden, and civic volunteering days in Italy, where employees took on activities such as painting walls and cleaning parks.

We are committed to measuring and reducing all our GHG emissions and setting targets to reflect that. Building on the implementation of our Group-wide GHG emissions data system, we will use the data collected to help set our GHG own operations baseline and support target setting in this area. Furthermore, we will continue to investigate credible and relevant Group measures for our investment-related emissions, looking towards setting overall holistic targets at Group level, including a net-zero goal.

Along with our progress on emissions data capture capability, we continue to prepare in all areas for CSRD compliance across the Group. Athora Netherlands is finalising obligations for 2025 reporting, including engaging with external stakeholders.

Our emissions-reducing workplace updates continue; in 2024, Athora Belgium is subletting one floor of the Brussels office, optimising our presence and reducing our energy consumption. In Dublin, we are finalising decommission of an old data centre, which will increase energy efficiency going forward.

In addition, across the business, we are supporting greener travel. This includes the continued transition to electric fleets in the Netherlands and Belgium, and the upcoming installation of electric vehicle charging in Germany.

¹ Board members also receive training on a range of business ethics topics, though not specific anti-corruption training. However, all anti-corruption policy commitments are brought to the attention of the Board.

OUR ROLE AS AN INVESTOR

KEY 2023 HIGHLIGHTS:

- €73.3 billion of AuMA as at 31 December 2023
- €16.9 billion of assets invested directly into the economy¹
- Sustainability Investment Working Group established
- Awarded first place in the VBDO Sustainability Ranking (Athora Netherlands)

At Athora, we take responsible investment seriously. Holding €73.3 billion of AuMA as of 31 December 2023, we recognise the opportunity we have to promote positive corporate behaviour, and our ability to drive change through our asset and manager selections and active ownership. Ultimately, we aim to move towards investments in companies and countries that seek to meaningfully contribute to the UN SDGs.

In tandem, this year Athora has laid the foundations to increase ESG-specific investment, agreeing to set ESG investment targets which will be formalised in 2024 (see ‘Outlook’ for more details).

CASE STUDY

Athora Netherlands has again been awarded first place in the VBDO Sustainability Ranking. Running every two years, the benchmark compares the sustainable investment policies of insurers in the Netherlands over four areas: governance, policy, implementation and transparency.

The top placing reflects Athora Netherlands’ strong investment focus on transparent, positive, real-world impact.

This impact is achieved by investing in organisations and governments that recognise the importance of Sustainability, and companies important for the transition to a more sustainable future.

Athora Netherlands, along with strategic partner Cardano, has also continued to innovate to increase transparency, including finding new ways to assess their investees’ impacts and risks; for example, using geospatial data to investigate if companies have sites in drought-prone regions, or areas containing vulnerable biodiversity.



We are proud that our work on sustainable investment has been recognised by VBDO and seek to build on this, continuing to use our expertise to explore methods to make positive real-world impact. Together with our peers in the sector, we have the ability to drive progress towards a more sustainable economy and society.

Joep Swartjes, Athora Netherlands Senior Investment Manager



¹ Through private loans, mortgage loans and private equity investments.



SUSTAINABILITY INVESTMENT APPROACH

At Athora, we have three main objectives with regard to sustainable investment: to generate strong policyholder returns, comply with regulatory requirements, and uphold our ambition to support the transition to a sustainable society.

Our Group-level Sustainable Investment Policy sets out our approach to meeting these objectives, with a framework covering four core pillars:

In line with the expectations of our stakeholders, the principles of our [Sustainable Investment Policy](#) are based on a range of international agreements and concepts including, but not limited to, the Principles of the UN Global Compact, the UN SDGs and the IFRS Sustainability Disclosure Standards of the International Sustainability Standards Board.

CASE STUDY

Athora Netherlands is a signatory of the Finance for Biodiversity Pledge, committing to various measures, including managing the business’ investment activities with a view to protecting biodiversity.

PILLAR 1
Integration

Incorporating Sustainability considerations into investment analysis and decision-making processes including ESG scoring

PILLAR 2
Alignment

Aligning our investments with our Sustainability considerations and values and avoiding exposures to certain sectors or activities identified as causing significant harm from an ESG perspective

PILLAR 3
Engagement

Engaging to drive sustainable behaviours, working with asset managers to influence investee companies

PILLAR 4
Impact/Sustainability

Engaging to drive sustainable behaviours, working with asset managers to influence investee companies



ESG scoring

All assets we invest in are assessed using an ESG scoring approach, and scores are used to ensure ESG risk appetite for our Group portfolio is maintained below a set ceiling. (See ‘TCFD considerations – Risk management’, p. 40, for more information.)

Through our strategic relationship with Apollo and its specialised asset management expertise, 2023 saw significant progress on ESG risk rating, increasing the robustness of our methodology for several sectors within our return-seeking portfolio. (See ‘TCFD considerations – Metrics and Targets’, p. 40, for more information.)

During the year, Athora has continued to assess where and how further proprietary metrics can be developed, leading to a focused review of ESG scoring for public assets scheduled for 2024.

More widely, increasing the quantitative elements of our ESG assessment of investments is also key for Scope 3 emissions measurement, which will become mandatory for businesses under CSRD requirements. We continue to work with our investment managers on credible and useful methods to progress in this area.

CASE STUDY

Athora Netherlands continued to progress towards set KPIs and targets, including net-zero GHG emissions by 2050, and reducing the GHG intensity of investments by 50% in 2030 (compared to levels at the start of 2020).

Alongside this, over 2023, our Dutch business has further integrated ESG assessment into investment selection and management.

SUSTAINABILITY INVESTMENT WORKING GROUP

Starting as an informal, employee-led initiative, in 2023 we established a Sustainability Investment Working Group. The group meets every two weeks and has been instrumental in developing a structured approach to ESG-conscious investing. Though still a young initiative, tangible impacts have already been achieved, including supporting the creation of ESG-specific targets for 2024. (See ‘Outlook’, p. 37, for more details.)

Coming together organically from across the Group and Business Units, the group’s members have created a space for cooperative discussion with an understanding of the differing needs of each jurisdiction. In 2023, the group supported Athora Belgium in achieving reclassification of the elements of our Belgian business’ main fund to be categorised as Article 8 under SFDR.



In 2023, we achieved SFDR Article 8 categorisation for the entirety of our main fund. We also have a number of Article 9 funds in our unit-linked offering. We know from conversations with insurance brokers that sustainable fund options are of great value to their clients, as well as being a positive for social and environmental progress.

Along with support from Apollo and Athora Group, the Sustainability Investment Working Group has been pivotal in getting our sustainable fund offerings over the line and as the group gathers pace, I’m excited to see how it can enrich our business even further.

Marc-André Lizin,
Athora Belgium Investment Manager



INVESTING DIRECTLY INTO THE ECONOMY

We invest a significant proportion of our portfolio directly into the economy through private loans, mortgage loans and private equity investments.

In 2023, €16.9 billion of our €73.3 billion AuMA was in direct investments. This allows us to support entrepreneurial individuals and small and medium-sized enterprises that may find it harder to access public funding.

As part of sound business practice, we maintain a highly diversified Group portfolio. We prioritise value preservation within our return-seeking portfolio, following a conservative, anti-cyclical strategy.

Nevertheless, we favour sectors and businesses which also deliver positive outcomes to society.

CASE STUDY

During 2023, Athora Netherlands committed to a 2024 investment in the Apollo Clean Transition Equity Fund, classified as Article 8 under SFDR. The fund is focused exclusively on clean transition equity investments, covering investee companies that contribute to energy transition, industrial decarbonisation, sustainable mobility and sustainable resource use.

Athora Netherlands has also been exploring specific impact investments, including providing funding to Esdec, a company that provides smart mounting systems for solar panels.



ENGAGING IN PARTNERSHIPS TO MAKE AN IMPACT

Our third-party asset managers invest and engage on our behalf; we expect them to seek opportunities that create positive impacts, and for existing investments, actively consult with investee companies to improve Sustainability outcomes.

CASE STUDY

We hold investments of approximately €140.8 million in the Apollo Impact Mission (AIM) platform.

AIM focuses on achieving meaningful social and environmental impact at scale, while generating attractive risk-adjusted returns.

It approaches this by pursuing private equity-like opportunities with mature companies that exhibit collinearity, meaning the impact they have is intrinsic to their business model. This results in the profit and purpose of the company being mutually reinforcing, with impact not a concession but rather a driver of financial performance.

AIM also prioritises measurability. For each opportunity, the team determines an Impact Mission, which encapsulates the impact they believe a company can achieve. Progress is quantified throughout the life of the investment through company-specific Impact KPIs aligned with the company’s Impact Mission.

We highlight two of AIM’s investee companies below:

Accent is a leading manufacturer and distributor of high-quality baling wire, other packaging consumables and strapping equipment, products vital to the recycling industry.

Serving customers throughout North America and the UK, and within industries including waste management and recycling, paper and pulp and retail, the company’s products are critical in safely transporting and processing recyclable material. Furthermore, Accent’s supply chain is set up to ensure prompt delivery, helping to enhance the cost-effectiveness and efficiency of recycling for clients.

By providing these essential products in a timely manner, Accent supports companies in their recycling efforts, which in turn enables the positive environmental benefits that responsible waste management brings.

Operating in the UK, **United Living** provides design, construction and maintenance services within two key sectors: social and affordable housing and critical utilities infrastructure.

By providing and maintaining affordable housing, United Living helps increase the supply of high-quality homes for underserved communities. As well as offering safe and comfortable shelter, in the longer term, good quality affordable housing can enable households to accumulate savings, improve health outcomes and foster social mobility.

Additionally, through its infrastructure services, the company ensures communities have access to clean water, heating and telecommunication services.

United Living works to provide environmental benefits as well, offering retrofitting and other decarbonisation-focused services as part of housing renovation and repair.

As well as private clients, the company works with the UK government and is well positioned to contribute to the country’s plans to decarbonise; this includes developing energy transition infrastructure for hydrogen energy and carbon capture use and storage.

By improving the energy efficiency of the housing stock, the company helps to enable and catalyse the use of low-carbon solutions and reduce emissions.

CASE STUDY

Athora Netherlands, through strategic partner Cardano, works with Climate Action (CA) 100+, the world’s largest climate engagement initiative.

Including efforts through CA100+, Athora Netherlands undertook 469 engagement actions with companies and governments in 2023, of which 266 (or 41%) were on climate change.

One CA100+ focus during 2023 was the agriculture sector, where decreasing environmental harm requires actions such as preventing deforestation and reducing the carbon footprint of production.

Supporting the transition of this vital industry, Cardano is leading an engagement initiative with Bunge, one of the world’s largest agricultural commodity traders. As a result of this initiative, a shareholder resolution was filed in 2023 asking Bunge to set a net-zero target.

Following the resolution and several subsequent, constructive discussions, Bunge committed to preparing a reduction plan as the first step towards net-zero.

Cardano will continue to follow up to ensure the publication of a credible action plan and, ultimately, target setting.

CASE STUDY

In 2023, Athora Netherlands began the membership process for Platform Living Wage Financials (PLWF). PLWF is a collaborative investor alliance that champions living wages throughout global supply chains. The initiative engages with investee companies from sectors including agriculture, fashion and retail, encouraging practices that support increased social and economic resilience.

CASE STUDY

In partnership with fund managers Carmignac, Funds For Good, DNCA Investments, M&G Investments and Nordea Asset Management, Athora Belgium runs information sessions for brokers and their clients. These cover a variety of topics relevant to the life insurance market. In 2023, we joined forces with Bernard Nicolay, Adjunct Professor of Finance at Solvay Lifelong Learning and Solvay Brussels School of Economics and Management (Université Libre de Bruxelles), to run a successful and valuable session on sustainable finance insights.

OUTLOOK

In the first half of 2024, we formalised our Sustainability Investment Working Group, including establishing terms of reference. The group now reports to the Group Investment Committee, one of our Group Management Committees. This committee is chaired by the Group Chief Financial Officer and is the highest governance board regarding investments.

We will continue strengthening our commitments to sustainable investment, looking to increase our allocation across the Group to Green or Sustainability bonds. Athora Netherlands will also action an agreed €150 million investment into the Apollo Clean Transition Equity Fund.

Seeking to unify our risk and investment practices, over 2024, we will begin to embed ESG investment risk practices, processes and governance explicitly into our Sustainable Investment Policy. This will provide a coherent vision and single reference source for best practice, assisting with a holistic approach to Sustainability-related risk.

Finally, we continue to improve our data gathering and suitable aggregation methods towards assessing our investments’ ESG risks and associated emissions, ultimately progressing towards a holistic Group-level approach.

TCFD CONSIDERATIONS



Our approach to addressing the TCFD recommendations continued to develop and solidify over 2023.

Recognising the importance of disclosing in line with the measures, we are committed to finding practical ways of considering climate-related risk and opportunities effectively in our business activities, and investigating how the modelling capabilities and learnings within our Netherlands Business Unit can be expanded Group-wide.



The effects of climate change and the corresponding push to develop a low-carbon economy create tangible impacts on our industry and others. Understanding and quantifying the risks that are created by climate change, and the opportunities created by how we respond, is vital for the long-term security and asset return for our customers and other stakeholders.

Immo Querner,
PhD (Risk and Environmental Economics),
Athora Germany CEO



GOVERNANCE

As a key Sustainability area, progress against TCFD is a Group-wide responsibility. Responsibility for climate-related issues is embedded accordingly throughout the business, with roles assigned carefully to ensure appropriate governance over the monitoring, measurement and mitigation of our climate-related risks and opportunities.

At the Group level, the overall responsibility rests with the Group Management Committees. The Group Board receives Sustainability updates every six months within which climate-related updates are encompassed. Similarly, the Group Management Committees receive Sustainability updates at least every three months, as necessary.

For assessing and mitigating climate-related risks to investments, our Group Investment Office oversees day-to-day processes in collaboration with the second line and Business Units.

For more information on our Sustainability governance approach, see ‘Sustainability governance’, p. 10.

STRATEGY

Climate concerns are a significant element of our Sustainability Strategy Framework, ‘*Protecting life and nature*’ being one of our key themes.

We consider the actual and potential impacts of climate change within our own operations and investment choices. Furthermore, we continue to strengthen our approach to effective identification and assessment of our climate-related risks and opportunities across the Group.

We assign our climate-related risks into one of three categories:

- **Physical risks** from climate change arising from increasing severity and frequency of climate and weather-related events
- **Transition risks** arising from the adjustment towards a low-carbon economy, which will require significant structural changes to the economy
- **Liability risks** arising from individuals or businesses seeking compensation for losses suffered from climate-related physical or transition risks

We further recognise that with every risk comes a climate-related opportunity. We continue to identify the following as significant climate-related opportunities for Athora:

- **Cost savings** associated with improved operational efficiency, both for Athora’s own operations and investments
- **Operational efficiency** resulting from innovation, technological improvement and enhanced research resulting from climate change

RISK MANAGEMENT

ESG investment risk

Our investment activities expose us to ESG investment risks (including climate-related ones) across industries, sectors, geographies and financial instruments. Athora’s financial performance and solvency could be heavily affected by the cumulative effect of such risks. We are guided by Group-level policies in ensuring that Sustainability and climate-related risks and opportunities are appropriately considered at all stages of our investment activities, from due diligence to post-acquisition.

Further to this, we follow robust and regularly reviewed strategies, processes and reporting procedures as we measure the financial impact of Sustainability and climate-related risks in our investment portfolio. We monitor aggregated ESG scores with care to ensure we integrate risk factors responsibly.

Climate-related risks

Our Group Solvency Self-Assessment (GSSA) report is prepared in line with BMA requirements. Our European Business Units prepare Own Risk and Solvency Self-Assessment (ORSA) reports in line with Solvency II requirements. Athora Life Re prepares a Commercial Insurers Solvency Self-Assessment (CISSA) in line with the Bermuda commercial insurers’ supervisory requirements. The GSSA plays an important part in our strategic planning cycle and is viewed as a critical indicator of our Sustainability by the Board and the BMA. In the GSSA, we outline the capital reserves we need to achieve our business ambitions and to remain solvent, given our risk profile, so that we can continue to provide long-term safety and return to our customers. We have incorporated climate-related scenarios within our Group Stress Testing and Scenario Analysis Standard for consideration by all Business Units as part of local Solvency Self-Assessment processes. Our overall risk management approach to climate-related risks is under continuous development as we recognise the rapid evolution in this area.

METRICS AND TARGETS

Our efforts to reduce GHG emissions across our operations and investments continue through 2023. Group net-zero and related targets are in development, as we work collaboratively to ensure a holistic and useful approach to their measurement.

Operations

Across our own operations, we strengthened our Group-wide approach to measuring emissions with the implementation of a Group-wide GHG data capture system. This will allow us to set a baseline for emissions measurement, which is an important step forward in our transition to a low-carbon economy.

Investment

We continue to progress towards a unified approach to measuring our investments’ carbon footprint. Developing an aggregated, quantitative approach is key to setting useful Group-level objectives and targets in this area, and we continue to work with our asset managers to establish credible and comprehensive methods of measurement, while embracing market developments in this evolving space.

CASE STUDY

At Athora Netherlands, we continue the push towards our long-term targets and medium-term goals, playing our part in transitioning to a net-zero economy.

Our long-term target is to reach net-zero GHG emissions by 2050 for all Scope 1, 2 and 3 emissions, with intermediate targets in 2030 and 2040, including investment-specific and own operations-specific goals (for more information, see ‘Our role as a Corporate Citizen – Reducing greenhouse gas emissions’, p. 26, and ‘Our role as an Investor – ESG scoring’, p. 36).

We remain consistent with previous years in our carbon footprint assessment, measuring in line with the GHG Protocol (internationally recognised best practice), and calculating the carbon footprint of investments according to the method developed by the Partnership Carbon Accounting Financials (PCAF) with data provided by MSCI ESG Research, Eurostat, and other sources.



APPENDIX





APPENDIX A: SASB CONTENT INDEX

The table below indicates Athora’s response to the SASB Insurance Standards (2023) disclosures for the fiscal year 2023. On an ongoing basis, we review and enhance our approach to Sustainability reporting, including seeking opportunities to meet the SASB reporting disclosures in full, where applicable to us as a business.

Disclosure topics	Accounting metrics	Unit of measure	Code	Athora’s response
Transparent information and fair advice for customers	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of insurance product-related information to new and returning customers	Presentation currency	FN-IN-270a.1	No monetary losses have occurred during the fiscal year 2023.
	Customer retention rate	Rate	FN-IN-270a.3	One of Athora’s preferred monitoring metrics for customer retention is the policyholder lapse rate (policyholder lapses over the period, divided by initial policyholder reserves). Indicative figures on the annual policyholder lapse rate are as follows (supported by data as of 31 December 2023): <ul style="list-style-type: none">Athora Belgium: ~4%Athora Italia: ~10% (in line with market average, following increased market-wide lapses after the insolvency of mid-sized peer insurer Eurovita and interest rate volatility)Athora Germany: ~1%Athora Netherlands: Very low in decumulation phase owing to product features and surrender terms.
	Description of approach to informing customers about products	N/A	FN-IN-270a.4	Sustainability Report 2023 > Our role as an Insurer > Placing the customer at the heart of what we do, p. 15. Athora Netherlands Annual Report 2023 > Sustainability > People > Consumers and end-users, p. 56.
Incorporation of environmental, social and governance factors in investment management	Description of approach to incorporation of environmental, social and governance (ESG) factors in investment management processes and strategies	N/A	FN-IN-410a.2	Sustainability Report 2023 > Our role as an Investor > Sustainable investment approach, p. 35. Sustainability Report 2023 > TCFD considerations > Risk management > ESG investment risk, p. 40. Sustainable Investment Policy
Systematic risk management	Exposure to derivative instruments by category: (1) total potential exposure to non-centrally cleared derivatives, (2) total fair value of acceptable collateral posted with the Central Clearinghouse, and (3) total potential exposure to centrally cleared derivatives	Presentation currency	FN-IN-550a.1	Financial Condition Report 2023 > Performance, p. 8. Financial Condition Report 2023 > Solvency valuation, p. 41.
	Total fair value of securities lending collateral assets	Presentation currency	FN-IN-550a.2	Notwithstanding possible small positions, securities lending is not part of Athora’s strategic asset activities. Financial Condition Report 2023 > Solvency valuation, p. 41.
	Description of approach to managing capital- and liquidity-related risks associated with systemic non-insurance activities	N/A	FN-IN-550a.3	These risks are managed based on keeping indicators within limits under stressed environments. Financial Condition Report 2023 > Risk profile, p. 30. Financial Condition Report 2023 > Capital management, p. 46. Annual Report 2023 > Other information, p. 207.



APPENDIX B: GRI CONTENT INDEX

The Index below has been developed with reference to the GRI revised Universal Standards 2021 and Topic Standards. As we continue to report on our Sustainability progress, we will continue to refine our Sustainability reporting and GRI-related disclosures.

Statement of use	Athora has reported the information cited in this GRI Content Index with reference to the GRI Standards for the period 1 January – 31 December 2023.
GRI 1 used	GRI 1: Foundation 2021.

GENERAL DISCLOSURES 2021

GRI Standard	GRI Disclosures	Athora’s response
2-1	Organizational details	Athora Holding Ltd. Headquarters: First Floor, Swan Building, 26 Victoria Street, Hamilton HM12, Bermuda. Location of operations: Hamilton, Bermuda; Dublin, Ireland; London, UK; Amsterdam and Alkmaar, Netherlands; Brussels, Belgium; Wiesbaden and Munich, Germany; Milan and Genoa, Italy. Information on ownership and legal form can be found in the Annual Report 2023 > Corporate Governance, p. 58-59.
2-2	Entities included in the organization’s sustainability reporting	Athora Holding Ltd and Athora Life Re Ltd (Hamilton, Bermuda); Athora Ireland plc (Dublin, Ireland); Athora UK Services Ltd (London, UK); Athora Netherlands N.V., Athora Netherlands Services B.V. (Amsterdam and Alkmaar, Netherlands); Athora Belgium SA-NV, Athora Services Belgium NV (Brussels, Belgium); Athora Lebensversicherung AG and Athora Pensionskasse AG (Wiesbaden and Munich, Germany); Athora Italia S.p.A. (Milan and Genoa, Italy).
2-3	Reporting period, frequency and contact point	We publish our Sustainability Report annually, and the reported information covers the financial year from 1 January to 31 December. Athora’s Sustainability Report 2023 was published on 24 July 2024. Key point of contact: Sandra Hoac (sandra.hoac@athora.com).
2-4	Restatements of information	Sustainability Report 2023 > Athora at a glance, p. 3.
2-5	External assurance	Athora’s Sustainability Report 2023 has not been externally assured.
2-6	Activities, value chain and other business relationships	Sustainability Report 2023 > Introduction to Sustainability at Athora, p. 7. Annual Report 2023 > Chief Executive Officer’s report > Operate, p. 12. Annual Report 2023 > Athora at a glance, p. 4-5. Annual Report 2023 > Our businesses, p. 26-32.
2-7	Employees	Sustainability Report 2023 > Appendix > GRI Content Index – Supporting data, p. 48. Athora does not employ non-guaranteed hours employees.
2-8	Workers who are not employees	The number of workers who are not employees is not significant.
2-9	Governance structure and composition	Annual Report 2023 > Corporate Governance > Governance structure, p. 60-61.
2-10	Nomination and selection of the highest governance body	Annual Report 2023 > Corporate Governance > Governance structure, p. 60-61. Annual Report 2023 > Corporate Governance > Fitness and propriety requirements, p. 61-62. Sustainability Report 2023 > Our role as a Corporate Citizen > Maintaining high standards of governance and compliance, p. 31.
2-11	Chair of the highest governance body	Annual Report 2023 > Corporate Governance > Governance structure > Our Board members, p. 61.



GRI Standard	GRI Disclosures	Athora’s response
2-12	Role of the highest governance body in overseeing the management of impacts	Sustainability Report 2023 > Sustainability governance > Athora Board, p. 11.
2-13	Delegation of responsibility for managing impacts	Sustainability Report 2023 > Sustainability governance, p. 10.
2-14	Role of the highest governance body in sustainability reporting	Sustainability Report 2023 > Sustainability governance > Athora Board, p. 11.
2-15	Conflicts of interest	Sustainability Report 2023 > Our role as a Corporate Citizen > Conflicts of Interest, p. 32.
2-16	Communication of critical concerns	Sustainability Report 2023 > Our role as a Corporate Citizen > Upholding business ethics, p. 31. No critical concerns were identified during 2023.
2-17	Collective knowledge of the highest governance body	Sustainability Report 2023 > Sustainability governance > Athora Board, p. 11.
2-18	Evaluation of the performance of the highest governance body	Sustainability Report 2023 > Sustainability governance > Athora Board, p. 11. Sustainability Report 2023 > Our role as a Corporate Citizen > Maintaining high standards of governance and compliance, p. 31.
2-19	Remuneration policies	Annual Report 2023 > Corporate governance > Group remuneration policy, p. 63-64.
2-20	Process to determine remuneration	Annual Report 2023 > Corporate Governance > Group remuneration policy, p. 63-64. We engage external consultants on an ad-hoc basis to carry out remuneration benchmarks for Athora Group and its subsidiaries.
2-22	Statement on sustainable development strategy	Sustainability Report 2023 > Group CEO message, p. 6. Sustainability Report 2023 > Introduction to Sustainability at Athora, p. 7.
2-23	Policy commitments	Sustainability Report 2023 > Our role as an Employer > Promoting culture and leadership development > Embedding our values and behaviours > Code of Conduct, p. 22. Sustainability Report 2023 > Our role as a Corporate Citizen > Delivering a sustainable supply chain, p. 27. Athora Code of Conduct
2-24	Embedding policy commitments	Sustainability Report 2023 > Our role as an Employer > Promoting culture and leadership development > Embedding our values and behaviours > Code of Conduct, p. 22. Sustainability Report 2023 > Our role as an Employer > Enabling employee talent and development, p. 23. Sustainability Report 2023 > Our role as a Corporate Citizen > Delivering a sustainable supply chain, p. 27. Sustainability Report 2023 > Our role as a Corporate Citizen > Upholding business ethics, p. 31. Sustainability Report 2023 > Our role as a Corporate Citizen > Leading responsibly, p. 31.
2-25	Process to remediate negative impacts	Sustainability Report 2023 > Our role as a Corporate Citizen > Upholding business ethics, p. 31.
2-26	Mechanisms for seeking advice and raising concerns	Sustainability Report 2023 > Our role as a Corporate Citizen > Upholding business ethics, p. 31. There were four matters in total brought to the Audit Committee by Compliance during 2023. All were fully investigated and closed and are not deemed critical concerns. Athora Code of Conduct
2-27	Compliance with laws and regulations	Athora has not encountered any instances of non-compliance with environmental and social laws during the year.
2-28	Membership associations	Sustainability Report 2023 > Our role as an Insurer > Working with industry associations and peers to drive change, p. 17.
2-29	Approach to stakeholder engagement	Sustainability Report 2023 > Introduction to Sustainability at Athora, p. 7.
2-30	Collective bargaining agreements	96% of the total employees (in Athora Belgium, Italy, Germany and Netherlands) are covered by collective bargaining agreements. Collective bargaining agreements are localised. For employees not covered by collective bargaining agreements, terms and conditions of employment are determined by local legislation.



MATERIAL TOPICS 2021

GRI Standards	GRI Disclosures	Athora’s response
3-3	Management of material topics	Sustainability Report 2023 > Introduction to Sustainability at Athora, p. 7. Sustainability Strategy Athora Group has not yet determined or declared material topics. Information on the management of impacts for topics reported on is included as relevant throughout the body of the Sustainability Report 2023, as each topic is discussed.

TOPIC STANDARDS

GRI Standards	GRI Disclosures	Athora’s response
GRI 201: Economic Performance 2016		
201-1	Direct economic value generated and distributed	Sustainability Report 2023 > 2023 Sustainability highlights, p. 4. Annual Report 2023 > Consolidated financial statements, p. 80.
201-2	Financial implications and other risks and opportunities due to climate change	Sustainability Report 2023 > TCFD considerations, p. 38. Athora Netherlands Annual Report 2023 > Sustainability > Climate, p. 45-48. Athora Netherlands Annual Report 2023 > Sustainability > Nature, p. 48-50.
GRI 202: Market Presence 2016		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	Wages are benchmarked against relevant comparator groups within Athora and industry-specific market data to ensure internal parity and external competitiveness. We aim for the market median when benchmarking roles externally and monitor local minimum wage requirements to ensure compliance.
GRI 203: Indirect Economic Impacts 2016		
203-2	Significant indirect economic impacts	Sustainability Report 2023 > Our role as an Insurer, p. 12-17.
GRI 205: Anti-corruption 2016		
205-1	Operations assessed for risks related to corruption	Sustainability Report 2023 > Our role as a Corporate Citizen > Upholding business ethics > Anti-corruption, p. 32.
205-2	Communication and training about anti-corruption policies and procedures	Sustainability Report 2023 > Our role as a Corporate Citizen > Upholding business ethics > Anti-corruption, p. 32. Our role as an Employer > Promoting culture and leadership development > Embedding our values and behaviours > Code of Conduct p. 22. Sustainability Report 2023 > Our role as a Corporate Citizen> Delivering a sustainable supply chain, p. 27.
205-3	Confirmed incidents of corruption and actions taken	None reported.
GRI 206: Anti-competitive Behaviour 2016		
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	None reported.
GRI 207: Tax 2019		
207-1	Approach to tax	Athora Group Tax Policy Sustainability Report 2023 > Our role as a Corporate Citizen > Adhering to transparent approach to tax, p. 30. Annual Report 2023 > Notes to the consolidated financial statements > G. Other statement of consolidated financial position notes > G7. Deferred tax, p. 178 – 183.
207-2	Tax governance, control, and risk management	
207-3	Stakeholder engagement and management of concerns related to tax	



GRI Standards	GRI Disclosures	Athora’s response
GRI 302: Energy 2016		
302-1	Energy consumption	Sustainability Report 2023 > Our role as a Corporate Citizen > Reducing greenhouse gas emissions, p. 26.
302-4	Reduction of energy consumption	Sustainability Report 2023 > Our role as a Corporate Citizen > Reducing greenhouse gas emissions, p. 26.
GRI 305: Emissions 2016		
305-1	Direct (Scope 1) GHG emissions	Athora Netherlands Annual Report 2023 > Sustainability > Climate > Carbon footprint of our operations, p. 47-48. Sustainability Report 2023 > Our role as a Corporate Citizen > Reducing greenhouse gas emissions, p. 26.
305-2	Energy indirect (Scope 2) GHG emissions	Athora Netherlands Annual Report 2023 > Sustainability > Climate > Carbon footprint of our operations, p. 47-48. Sustainability Report 2023 > Our role as a Corporate Citizen > Reducing greenhouse gas emissions, p. 26.
305-3	Other indirect (Scope 3) GHG emissions	Athora Netherlands Annual Report 2023 > Sustainability > Climate > Carbon footprint of our investments, p. 45-46. Athora Netherlands Annual Report 2023 > Sustainability > Climate > Carbon footprint of our operations, p. 47-48. Sustainability Report 2023 > Our role as a Corporate Citizen > Reducing greenhouse gas emissions, p. 26.
305-4	GHG emissions intensity	Athora Netherlands Annual Report 2023 > Sustainability > Climate > Carbon footprint of our operations, p. 47-48.
305-5	Reduction of GHG emissions	Sustainability Report 2023 > Our role as a Corporate Citizen > Reducing greenhouse gas emissions, p. 26. Sustainability Report 2023 > TCFD considerations > Metrics and targets, p. 40.
GRI 401: Employment 2016		
401-1	New employee hires and turnover	Sustainability Report 2022 > Our role as an Employer > Enabling employee talent and development > Attracting and retaining talent, p. 23. Sustainability Report 2023 > Appendix > GRI Content Index – Supporting data, p. 48.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Sustainability Report 2023 > Appendix > GRI Content Index – Supporting data, p. 48. Part-time employees are eligible to the same benefits as full-time employees. Eligibility may vary between permanent and temporary employees.
401-3	Parental leave	We provide parental leave to 100% of our employees in line with local regulatory requirements. All employees are entitled to maternity, paternity leave, or adoption leave, as required.
GRI 403: Occupational Health and Safety 2018		
403-3	Occupational health services	We use external Health and Safety consultancy services to provide related guidance, with Group Facilities providing on-site support.
403-4	Worker participation, consultation, and communication on occupational health and safety	Sustainability Report 2023 > Our role as an Employer > Supporting employee health and wellbeing, p. 23.
403-5	Worker training on occupational health and safety	Sustainability Report 2023 > Our role as an Employer > Supporting employee health and wellbeing, p. 23. Employees that take on voluntary roles as Fire Wardens, Fire Marshals and First Aiders receive specific training and support.
403-6	Promotion of worker health	Sustainability Report 2023 > Our role as an Employer > Supporting employee health and wellbeing, p. 23.
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Sustainability Report 2023 > Our role as a Corporate Citizen > Delivering a sustainable supply chain, p. 27.
403-9	Work-related injuries	None reported.

GRI Standards	GRI Disclosures	Athora's response
GRI 404: Training and Education 2016		
404-2	Programs for upgrading employee skills and transition assistance programs	Sustainability Report 2023 > Our role as an Employer > Enabling employee talent and development, p. 23. Job placement services upon termination of employment are available as per regulatory requirement in each location and we provide severance pay and assistance, such as outplacement, as per regulatory requirements in each location.
404-3	Percentage of employees receiving regular performance and career development reviews	Sustainability Report 2023 > Our role as an Employer > Enabling employee talent and development, p. 23. All permanent employees receive mid-year and end of year performance and career development reviews.
GRI 405: Diversity and Equal Opportunities 2016		
405-1	Diversity of governance bodies and employees	Sustainability Report 2023 > Appendix > GRI Content Index - Supporting data, p. 48.
GRI 406: Non-discrimination 2016		
406-1	Incidents of discrimination and corrective actions taken	None reported.
GRI 417: Marketing and Labeling 2016		
417-1	Requirements for product and service information and labeling	Sustainability Report 2023 > Our role as an Insurer > Placing the customer at the heart of what we do > Customer communication, p. 15. Sustainability Report 2023 > Our role as an Insurer > Enabling our customers to choose attractive and responsible products, p. 15. Athora Netherlands Annual Report 2023 > Sustainability > People > Consumers and end-users, p. 56.
417-2	Incidents of non-compliance concerning product and service information and labelling	None reported in calendar year 2023.
417-3	Incidents of non-compliance concerning marketing communications	None reported in calendar year 2023.
GRI 418: Customer privacy 2016		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	None reported.



APPENDIX C: GRI CONTENT INDEX – SUPPORTING DATA

GRI 2-7: EMPLOYEES¹

Employee data, by gender

	Female	Male	Total
Total number of employees	592	925	1,517
Number of permanent employees	565	885	1,450
Number of temporary employees	27	40	67
Number of full-time employees	448	859	1,307
Number of part-time employees	144	66	210

Employee data, by region

	Belgium	Germany	Ireland	UK	Bermuda	Netherlands	Italy
Total number of employees	202	105	152	96	17	840	105
Number of permanent employees	199	105	139	85	17	801	104
Number of temporary employees	3	0	13	11	0	39	1
Number of full-time employees	172	82	149	93	17	695	99
Number of part-time employees	30	23	3	3	0	145	6

¹ New hires: hires from 1 January 2023 to 31 December 2023 inclusive; Headcount: active employees on 31 December 2023; Hiring Rate: New Hires in age, gender, or regional category divided by Headcount within that category.



GRI 401-1: NEW EMPLOYEE HIRES AND TURNOVER

Total number and rate of new employee hires during 2023¹

Age group

	New Hires (#)	Headcount (#)	Hiring rate
Under 30 years old	42	82	51.2%
30 – 50 years old	122	803	15.2%
Over 50 years old	34	632	5.4%
Total	198	1,517	13.1%

Gender

	New Hires (#)	Headcount (#)	Hiring rate
Female	90	592	15.2%
Male	108	925	11.7%
Total	198	1,517	13.1%

Region

	New Hires (#)	Headcount (#)	Hiring rate
Belgium	22	202	10.9%
Bermuda	3	17	17.6%
Germany	23	105	21.9%
Ireland	43	152	28.3%
UK	38	96	39.6%
Netherlands	60	840	7.1%
Italy	9	105	8.6%
Total	198	1,517	13.1%

¹ Netherlands and Italy Business Unit employees categorised by Business Unit. All other employees categorised by employee location.

Total numbers and rate of employee turnover during 2023²

Age group

	Leavers (#)	Headcount (#)	Leaving rate
Under 30 years old	24	82	29.3%
30 – 50 years old	195	803	24.3%
Over 50 years old	133	632	21.0%
Total	352	1,517	23.2%

Gender

	Leavers (#)	Headcount (#)	Leaving rate
Female	145	592	24.5%
Male	207	925	22.4%
Total	352	1,517	23.2%

Region

	Leavers (#)	Headcount (#)	Leaving rate
Belgium	38	202	18.8%
Bermuda	0	17	0.0%
Germany	35	105	33.3%
Ireland	35	152	23.0%
UK	25	96	26.0%
Netherlands	218	840	26.0%
Italy	1	105	1.0%
Total	352	1,517	23.2%

² Leavers: terminations for any reason (including planned employee transfers to external partners) from 1 January 2023 to 31 December 2023 inclusive; Headcount: active employees on 31 December 2023; Leaving Rate: Leavers in age, gender, or regional category divided by Headcount within that category.

GRI 401-2: BENEFITS PROVIDED TO FULL-TIME EMPLOYEES THAT ARE NOT PROVIDED TO TEMPORARY OR PART-TIME EMPLOYEES BY SIGNIFICANT LOCATIONS OF OPERATIONS

	Belgium	Germany	Ireland	UK	Bermuda	Netherlands	Italy
Life insurance	Permanent + temporary	Permanent	Permanent	Permanent	Permanent	N/A	Permanent
Healthcare	Permanent + temporary	N/A	Permanent	Permanent	Permanent	Permanent + temporary	Permanent
Disability and invalidity coverage	Permanent + temporary	Permanent in combination with life insurance	Permanent	Permanent	Permanent + temporary	Permanent + temporary	Permanent
Parental leave	Permanent + temporary	Permanent + temporary	Permanent + temporary	Permanent + temporary	Permanent + temporary	Permanent + temporary	Permanent
Retirement provisions	Permanent + temporary	Permanent	Permanent + temporary	Permanent + temporary	Permanent + temporary	Permanent + temporary	Permanent
Stock ownership	Permanent	Permanent	Permanent	Permanent	Permanent	N/A	Permanent

GRI 401-3: PARENTAL LEAVE¹

	Female	Male
Employees that took parental leave in 2023 (#)	10	5
Total number of employees that returned to work in the reporting period after parental leave ended (#)	10	5
Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work (#)	9	4
Return to work and retention rates of employees that took parental leave, by gender (%)	90%	80%

¹ Excludes Athora Netherlands Business Unit due to non-availability of 2023 data.
² Employee headcount as at 31 December 2023, excluding any externals / contingent workers.

GRI 405-1: DIVERSITY OF GOVERNANCE BODIES AND EMPLOYEES²

Gender diversity of Athora’s governance bodies

	Female	Male
Athora Holding Ltd. Board	18%	82%
Athora Belgium SA-NV Board	29%	71%
Athora Deutschland Group Board	40%	60%
Athora Ireland plc Board	40%	60%
Athora Life Re Ltd Board	20%	80%
Athora Netherlands N.V. Supervisory Board	33%	67%
Athora Italia S.p.A. Board	29%	71%
Total	28%	72%

Diversity of Athora’s governance bodies and employees

Gender		
	Female	Male
Board members	28%	72%
Group Management Committees	0%	100%
Rest of the organisation	39%	61%

Age group			
	Under 30 years old	31-50 years old	Over 50 years old
Board members	Not available		
Group Management Committees	0%	20%	80%
Rest of the organisation	5%	53%	42%

APPENDIX D: GLOSSARY

Apollo: Apollo Global Management, Inc. and its group of subsidiaries.

Athora or Athora Group: Athora Holding together with its group of subsidiaries.

Athora Belgium: The Group Business Unit primarily located in Belgium, consisting of Athora Europe Holding Limited and its subsidiaries, including Athora Belgium SA/NV.

Athora Germany: The Group Business Unit primarily located in Germany, consisting of Athora Deutschland Holding GmbH & Co. KG and its subsidiaries, including Athora Lebensversicherung AG and Athora Pensionskasse AG.

Athora Holding: Athora Holding Ltd., the Athora Group’s ultimate parent company, a company incorporated in Bermuda with company number 49779 and with its registered office at First Floor, Swan Building, 26 Victoria Street, Hamilton HM12, Bermuda.

Athora Ireland: Athora Ireland plc, Athora Group’s licensed Irish reinsurance carrier, a public limited company registered in Ireland with company number 346275 and with its registered office at 2nd Floor, IFSC House, Custom House Quay, Dublin, D01 R2P9, Ireland.

Athora Italia: The Group Business Unit primarily located in Italy, consisting of Athora Italy Holding DAC and its subsidiaries, including Athora Italia S.p.A.

Athora Life Re: Athora Life Re Ltd., Athora Group’s licensed Bermudan reinsurance carrier, an exempted company incorporated in Bermuda with company number 52455 and with its registered office at First Floor, Swan Building, 26 Victoria Street, Hamilton HM12, Bermuda.

Athora Netherlands: The Group Business Unit primarily located in the Netherlands, consisting of Athora Netherlands Holding Limited and its subsidiaries, including SRLEV N.V.

AuMA: Assets under Management and Administration.

AWIN: Athora Women’s Inclusion Network.

BMA: Bermuda Monetary Authority, the regulatory authority for the financial services sector in Bermuda.

Board (or Group Board): Board of directors of Athora Holding, the Group’s ultimate parent company.

BREEAM: Building Research Establishment Environmental Assessment Method.

Business Unit: Athora Group’s designated units of operation, including our primary insurance operations based in each of the Netherlands, Belgium, Germany and Italy.

Carbon capture use and storage: A set of technologies and processes that capture CO2 from emissions sources (such as power stations or industrial activity sites), transport and store it in suitable underground locations. This reduces the amount of CO2 reaching the atmosphere.

Carbon credits: Financial instruments representing physical emission reduction, which can be bought to offset GHG emissions.

Carbon footprint: A measure of all emissions directly and indirectly caused (i.e. Scope 1, 2 and 3) by an entity’s operations.

Cardano: Provider of asset management services to Athora Netherlands’ unit-linked business and a provider of ESG services to Athora Netherlands.

CHP: Combined Heat and Power, a process that generates heat and power simultaneously, capturing waste heat produced by electricity generation to create additional power. This provides greater levels of energy efficiency compared to traditional methods of energy generation.

Circular economy: A model of producing and consuming products which prioritises reducing waste and reusing existing materials; for example, via repairing, recycling, borrowing, or reducing use altogether.

CISSA: Commercial Insurers Solvency Self-Assessment, a Bermuda-specific requirement similar to an ORSA.

CSM: Contractual Service Margin, a measure which reflects the profits the company expects to recognise in the future under IFRS.

CSRD: Corporate Sustainability Reporting Directive 2022/2464 of 14 December 2022.

College of supervisors: A structure to facilitate supervision of insurers operating in multiple regulatory jurisdictions, which allows for cooperation and coordination among the regulatory supervisors.

DCS: Delighted Customer Score, a customer satisfaction metric used by Athora Netherlands, expressed as the percentage of customers rating the service at 8 or higher (on a scale from 1 to 10 where 1 = extremely dissatisfied and 10 = extremely satisfied).

EIOPA: The European Insurance and Occupational Pensions Authority, an EU financial regulator and one of three European Supervisory Authorities (the other two being the European Banking Authority and the European Securities and Markets Authority).

Emissions factors: Coefficients describing the estimated rate at which specific activities release GHGs into the atmosphere.

ERG: Employee Resource Group.

ESG: Environmental, social and (corporate) governance factors.

EU: European Union.

GDPR: General Data Protection Regulation (EU) 2016/679.

GHG: Greenhouse gases (gases which contribute to the ‘greenhouse effect’ by trapping heat in the Earth’s atmosphere), including CO₂.

Greenwashing: Actions and communications designed to make a business appear more environmentally sustainable than it is.

Green bonds: A type of bond where the funds are used exclusively for projects with positive environmental benefits.

GRI: Global Reporting Initiative.

Group: Athora Group.

Group Board (or Board): Board of directors of Athora Holding, the Group’s ultimate parent company.

Group Management Committees: Delegated management committees of Athora Holding and the Group Board.

GSSA: Group Solvency Self-Assessment, a Bermuda-specific requirement similar to a group ORSA.

HR: Human Resources.

IDD: Insurance Distribution Directive (EU) 2016/97.

IDE: Inclusion, Diversity and Equality.

IFRS: International Financial Reporting Standards.

KPI: Key Performance Indicator.

LEED: Leadership in Energy and Environmental Design.

M&A: Mergers and Acquisitions.

NCGC: Group Nominating & Corporate Governance Committee.

Net-zero: Direct and indirect (i.e., Scope 1, 2 and 3) GHG emissions from the business being at most equal to the amount removed from the atmosphere by the business, including through carbon credits.

NPS: Net Promoter Score.

OECD: Organisation for Economic Co-operation and Development.

OECD Pillar Two: Pillar Two of the OECD’s Global Anti-Base Erosion Model Rules, which are designed to ensure large multinational enterprises pay a minimum level of tax on the income arising in each operating jurisdiction.

ORSA: Own Risk and Solvency Self-Assessment, a requirement under Solvency II.

People & Culture: Group HR-equivalent function at Athora.

Pillar Two: OECD Pillar Two.

SASB: Sustainability Accounting Standards Board.

Scope 1 emissions: GHG emissions caused by direct company actions, e.g., emissions from company vehicles.

Scope 2 emissions: GHG emissions stemming indirectly from the purchase and use of energy, e.g., emissions associated with production of the electricity purchased to power the offices.

Scope 3 emissions: All other indirect GHG emissions from up and down the value chain, e.g., emissions generated by investments, or from an employee’s commute.

SFDR or SFDR Level 1: EU Sustainable Finance Disclosures Regulation 2019/2088.

SFDR Level 2: EU regulatory technical standards published in relation to SFDR.

Shareholder resolution: A powerful proposal tool that can be used in combination with engagement and voting to place important issues on a company board’s agenda.

SLA: Service Level Agreement.

Solvency II: The regime for the prudential regulation of European insurance companies that came into force on 1 January 2016, under the EU Solvency II Directive (2009/138/EC) and its delegated and implementing acts.

Sustainability: Efforts and activities that ensure our Group’s contribution to an ecologically and socially sustainable and fair world.

Sustainability bonds: A type of bond where the funds are used exclusively for projects with either positive environmental or socio-economic benefits.

TCFD: Task Force on Climate-related Financial Disclosures, launched by the Financial Stability Board.

UK: United Kingdom.

UN Global Compact: United Nations pact and organisation relating to Sustainability and social responsibility, formed in July 2000.

UN SDGs: United Nations Sustainable Development Goals.

VBDO: Dutch Association of Investors for Sustainable Development.

APPENDIX E: ABOUT THIS REPORT

This Sustainability Report has been prepared and issued by Athora Holding Ltd. together with its group of subsidiaries (Athora, Athora Group or Group). This document reports Athora’s non-financial Sustainability performance information for the period covering 1 January 2023 to 31 December 2023. Some commentary and examples may refer to 2024 events.

Non-financial Sustainability performance data disclosed in this report has not been externally audited or verified. This report has been developed with reference to the Global Reporting Initiative (GRI) Sustainability Reporting Standards 2021 and the Sustainability Accounting Standards Board (SASB) Insurance Standards 2023.

This document contains certain forward-looking statements that reflect Athora’s intentions, beliefs, assumptions or current expectations about and targets for the Group’s future Sustainability performance, taking into account all information currently available. These statements are not necessarily indicative or guarantees of future performance and results. Athora Group has applied various judgements, assumptions and best estimates made at given points in time. There is a risk that the judgement exercised, or the estimates or assumptions used, may subsequently turn out to be incorrect. These judgements and resulting data presented in this report are not a substitute for judgements and analysis made independently by the reader.

The disclosures in this report may use a greater number and level of judgements, assumptions and estimates, including with respect to the classification of Sustainability activities, than the Group’s reporting of historical financial information. These judgements, assumptions and estimates are highly likely to change over time, and, when coupled with the longer time frames used in these disclosures, make any assessment of materiality inherently uncertain. In addition, the Group’s Sustainability analysis and strategy will continue to evolve and the data underlying the Group’s analysis and strategy remain subject to change over time. As a result, the Group expects that certain Sustainability, climate and ESG disclosures made in this report are likely to be amended, updated, recalculated or restated in the future.

The reader should not place reliance on the forward-looking statements in this document. These may be affected by a variety of factors and the actual future condition, performance and results may differ materially from the plans, goals and expectations in this report. Athora does not guarantee that the assumptions underlying the forward-looking statements in this document are free from errors, does not accept any responsibility for the future accuracy of the opinions or expectations expressed in this document and does not undertake any obligation to update the statements in this document to reflect subsequent events. No responsibility, obligation or liability (whether direct or indirect, in contract, tort or otherwise) is or will be accepted in any jurisdiction in relation to this document by any member of the Group or any Group member’s respective directors, officers, employees, advisers, investors, representatives or agents. No representation or warranty, expressed or implied, is made as to the truth, fullness, accuracy, reasonableness or completeness of the information contained herein (or whether any information has been omitted from this document) or any other information relating to Athora, whether written, oral or in a visual or electronic form, in any jurisdiction, and howsoever transmitted or made available by Athora or any of its directors, officers, employees, advisers, investors, representatives or agents.





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