

Climate-related financial disclosures for abrdn Life and Pensions Limited (abrdn Life) in line with the recommendations of the Taskforce on Climate related Financial Disclosures (TCFD)

June 2023

abrdn plc group

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Our approach to climate reporting

abrdn Life is a Solvency II insurer and regulated subsidiary in the abrdn Group. We provide an overview of material information against the four pillars of TCFD in the Group's Annual report (pages 28 to 47). The climate-related disclosure in the Sustainability and TCFD document (5 to 86) is intended to provide a second layer of granularity with complementary information at an entity level. Both documents follow the recommendations of the TCFD framework and – taken together – represent the reporting of climate-related disclosure for abrdn plc group in 2022.



[Link to abrdn Group's Annual report](#)



[Link to abrdn Group Sustainability and TCFD report](#)

Compliance Statement

This report should be read in conjunction with abrdn Group's Sustainability and TCFD report 2022 and the TCFD section of abrdn Group's annual report and accounts 2022. This report together with the abrdn Group's TCFD reporting meets the requirements of chapter 2.2 on TCFD entity reports of the FCA's Environmental, Social and Governance Sourcebook as also set out in the FCA Policy Statement 21/24. Our disclosure is, in our opinion, in line with the TCFD recommendations.

Aron Mitchell

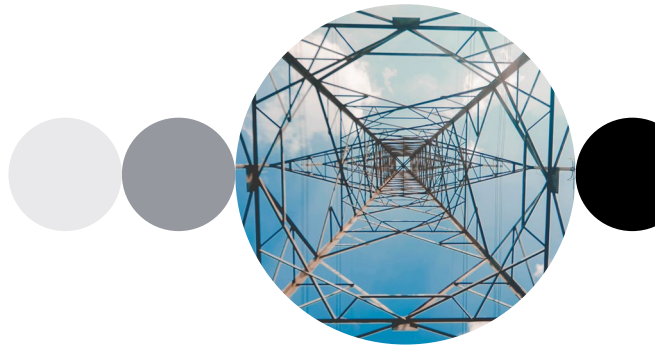
Chief Executive Officer

abrdn Life

30 June 2023



Background to abrtn Life



abrtn Life and Pensions Limited (abrtn Life)

abrtn Life provides investment services to UK institutional pension schemes and other UK insurance entities. abrtn Life issues unit-linked investment policies, trustee investment plans ("TIPs"), to trustees of UK pension schemes and reinsurance policies to insurance companies covering unit-linked pension liabilities. abrtn Life also has a number of segregated investment mandates ("SIMs") where abrtn Life provides investment management services to pension schemes in respect of their assets. The products that are offered by abrtn Life are insurance-based investment products (IBIPs) as defined by the Financial Conduct Authority (FCA).

Purpose of the report

The recommendations by the Taskforce on Climate-related Financial Disclosures (TCFD) – initiated by the Financial Stability Board in 2015 and adopted in 2017 – provide a consistent global framework for disclosing financial impacts of climate-related risks and opportunities. The disclosures made by an organisation in line with TCFD recommendations enable stakeholders to gain a better understanding of the climate-related risks and opportunities (including how they are managed) that are likely to impact the organisation's future financial position.

Policy Statement 21/24 on Enhancing climate-related disclosures introduced requirements for certain regulated firms. These requirements are contained in the FCA's ESG sourcebook.

This report provides climate-related financial disclosures for abrdn Life and Pensions Limited (abrdn Life) for the reference period 1 January 2022 to 31 December 2022. This report meets the requirements of chapter 2.2 on TCFD entity reports of the FCA's Environmental, Social and Governance Sourcebook.

The TCFD has developed 11 recommendations for disclosure which are structured around four thematic areas, notably governance, strategy, risk management and metrics and target. This report provides disclosure against the 11 recommendations for abrdn Life.



Cross-referencing to abrdn's Group reports

abrdn Group has published climate-related financial disclosures in line with the TCFD recommendations since 2019. In its reporting, abrdn sets out the company's overall framework for identifying, assessing and managing climate-related risks and opportunities. This framework applies to abrdn Life which broadly relies on the TCFD disclosures made by abrdn.

In February 2023, abrdn published its Sustainability and TCFD report 2022 which provides disclosure in line with the TCFD recommendations for the 2022 reporting year. The report can be found at this link:

[Sustainability and TCFD report 2022 for abrdn Group](#)

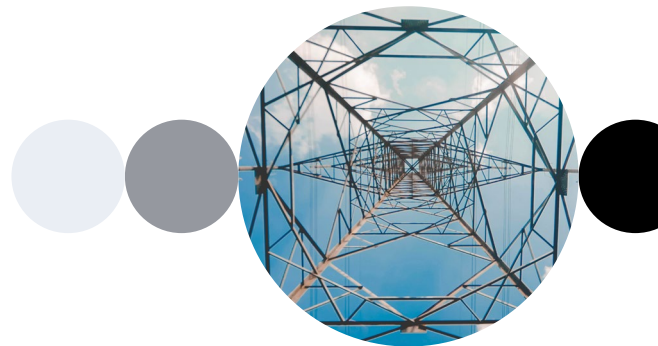


The following table sets out where the relevant sections on TCFD disclosures can be found in abrdn's Group report.

Governance	Strategy	Risk Management	Metrics and targets
<p>Description of the board's oversight of climate-related risks and opportunities.</p> <p><i>Sustainability and TCFD report 2022 (pages 9-10)</i></p>	<p>Description of the climate-related risks and opportunities that the organisation has identified over the short, medium and long term.</p> <p><i>Sustainability and TCFD report 2022 (pages 14-16)</i></p>	<p>Description of the processes for identifying and assessing climate-related risks.</p> <p><i>Sustainability and TCFD report 2022 (pages 14,22)</i></p>	<p>Description of the metrics used to assess climate-related risks and opportunities in line with the strategy and risk management process.</p> <p><i>Sustainability and TCFD report 2022 (pages 28-34)</i></p>
<p>Description of the management's role in assessing and managing climate-related risks and opportunities.</p> <p><i>Sustainability and TCFD report 2022 (pages 9-10)</i></p>	<p>Description of the impact of climate-related risks and opportunities on the organisation's businesses, strategy and financial planning.</p> <p><i>Sustainability and TCFD report 2022 (pages 14-16)</i></p>	<p>Description of the processes for managing climate-related risks.</p> <p><i>Sustainability and TCFD report 2022 (pages 22-27)</i></p>	<p>Description of scope 1, 2 and if appropriate scope 3 GHG emissions (scope 3 is mandatory from a FCA perspective as of 2024) and related risks.</p> <p><i>Sustainability and TCFD report 2022 (pages 28-34)</i></p>
	<p>Description of the resilience of the organisation's strategy taking into account the different climate-related scenarios.</p> <p><i>Sustainability and TCFD report 2022 (pages 17-20)</i></p>	<p>Description of how the processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management.</p> <p><i>Sustainability and TCFD report 2022 (pages 22-27)</i></p>	<p>Description of the targets used to manage climate-related risks and opportunities and performance against the targets.</p> <p><i>Sustainability and TCFD report 2022 (pages 28-34)</i></p>

The following sections provide a short overview of abrdn's Group approach to the TCFD recommendations and any additional information relevant to understand how abrdn Life takes climate-related risks and opportunities into account when managing or administering investments on behalf of clients and customers.

Governance



The governance framework for abrdn Life is based on the abrdn Group framework and day to day provision of various Group services, including investment management, is provided by another firm in the abrdn Group, abrdn Investment Managers Limited (aIL) to abrdn Life via a Management Services Agreement (MSA).

ESG considerations are incorporated into the investment Management process.

The CEO of aIL has overall responsibility for ensuring that the abrdn Life Board is kept suitably apprised of its climate and sustainability obligations required by virtue of the MSA and that the regulatory requirements will apply to various firms in the abrdn Group in the same way. This can be delegated to the Risk and Compliance function within the Group or at entity level in practice.

As noted above, abrdn Life is also supported by abrdn plc Group governance, which supports the integration of sustainability issues into our strategy (including our own Sustainability related company targets), governance, risk framework and investment processes, enabling us to identify and review sustainability related risks and opportunities, with clear accountabilities.

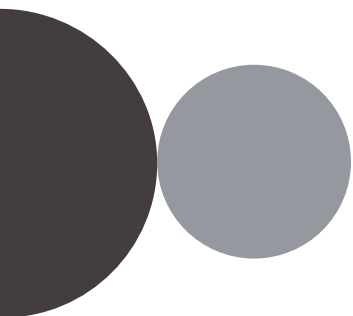
abrdn Group's climate related governance can be found here:

Board oversight of climate-related risks and opportunities as set out in the Sustainability and TCFD report 2022 (pages 9-10)

Management role in assessing and managing climate-related risks and opportunities as set out in the Sustainability and TCFD report 2022 (pages 9-10)

In addition, in 2022 the Group implemented a Sustainable Investing governance structure for its investment business, including abrdn Life. The Sustainable Investing governance structure is critical for the development and implementation of abrdn Group's sustainability (including climate-) related strategy. This includes but is not limited to abrdn Group's approach to integrating sustainability (including climate-) related risks and opportunities in investment decision-making and the development of lower-carbon products to support client objectives. The Sustainable Investing governance consists of the Sustainability Council, with representation from across the business, and its Strategy Groups. The latter include the:

- Climate Change Strategy Group setting abrdn Group's climate related strategy and escalating material issues to abrdn Group's senior management in relation to climate related risks and opportunities
- Sustainable Investing Strategy Group setting standards and frameworks for the investment process
- Sustainable Product Strategy Group supporting the development of the sustainability fund range.





Net zero directed investing strategy

abrdn Group is a member of the Net Zero Asset Managers initiative (NZAM) and is committed to reduce the carbon intensity of the assets invested in on behalf of clients to support the transition to net zero. abrdn Group's investments target is to reduce the carbon intensity of the in-scope assets by 50% by 2030 versus a 2019 baseline. Assets in scope for the decarbonisation target are Equities, Fixed Income, Quantitative strategies, Discretionary, and Real Estate (out of scope are Multi-asset, Sovereign bonds, Cash and FX, Derivatives, Passive funds, Third party funds, Private equity, Private credit, and Infrastructure). In line with this:

Individual funds may or may not have a binding decarbonisation target.

The scope of assets for the decarbonisation target is driven by data availability, maturity of methodologies and control over decision-making. Whilst a number of clients have set explicit decarbonisation targets, the investments' decarbonisation target still has to be reflected in mandates, a process that takes time and is heavily reliant on client action.

Further details on abrdn Group's decarbonisation target can be found in the Sustainability and TCFD report 2022 from page 28 onwards.

Climate scenario analysis

abrdn Group's approach to climate scenario analysis is outlined in the Sustainability and TCFD report 2022 (pages 17–20). The outcomes of the analysis are provided in aggregate form focusing on asset classes in which valuations are largely derived from future corporate earnings streams, namely listed equities and corporate bonds. In line with this:

17% of abrdn Life's AUM is covered by abrdn Group's aggregate disclosure of climate scenario analysis outcomes (as at 31 December 2022).

Delegation

abrdn Life approves and adopts the Group's Procurement, Outsourcing and Third Party Management policy and Third Party Risk Management Framework which outlines the process and criteria for the appointment of delegates. These consider and reflect climate related factors in both the risk assessment and due diligence of our delegates – including if the service produces emissions and could impact the environment (e.g. waste, water, paper, etc) and gaining assurance over the climate related policies and standards in place at the delegate. Risk assessments and due diligence are completed both at the time of appointment of the delegate and at regular intervals on a risk-based approach during the term of the service.

Further information on abrdn Group's climate-related strategy can be found here:

Climate-related risks and opportunities identified over the short, medium and long term as set out in the Sustainability and TCFD report 2022 (pages 14–16)

Impacts of climate-related risks and opportunities on abrdn Group's businesses, strategy and financial planning as set out in the Sustainability and TCFD report 2022 (pages 14–16)

Resilience of the strategy to climate-related risks and opportunities, taking into account the different climate-related scenarios, as set out in the Sustainability and TCFD report 2022 (pages 17–20)

Risk management

Integration of climate-related risks into the investment processes

The integration of climate-related risks and opportunities in the investment process is a key element of abrdn Group's approach to risk management. In 2022, abrdn Group's has formalised its the approach by setting out the overall framework, including investment desks' specific approaches to integration in investment decision-making, in a document that will be made available on abrdn Group's Sustainable Investing webpage.

Active ownership

abrdn Group has identified the highest-financed emitters in the Group's Equity and Fixed Income holdings. abrdn Group has developed a framework, which is being used to drive the climate-related engagement strategy with the highest-financed emitters in equities. This framework is based on a set of factors, including the Climate Action 100+ Net Zero Company Benchmark, the scope and coverage of GHG reduction targets, and a focus on governance such as, climate-related KPIs reflected in the LTIP and social impact of the energy transition.

abrdn Group has initiated a two-year engagement programme with these emitters with a view to influencing real-world decarbonisation progress. In the event that abrdn Group sees insufficient progress, abrdn Group will escalate engagement, exercise voting rights, and may recommend divestment.

In addition, active ownership is an important part of the investment process and abrdn Group's approach to integrating sustainability (including climate-related) risks into investment decision-making when investing in corporate assets. Investments desks will decide in line with their desk-level processes if engagement on a climate-related risk will be carried out.

Three lines of defence

abrdn Group operates a 'three lines of defence' model in the management of sustainability, including climate-related, risks ensuring that there are clearly defined roles and responsibilities within the Enterprise Risk Management Framework:

First line: Investment teams have the primary responsibility for identifying, assessing, and managing sustainability, including climate-related, risks alongside other risks to investments. Sustainable Investing governance committees, support investment desks with regards to the overall sustainability risk integration framework and its implementation and supporting investment teams in understanding the regulatory environment.

abrdn Group appointed a Chief Sustainability Officer to lead the Sustainable Investing strategy for abrdn's Investments Vector. The Investment Vector Sustainability Group (IVSG) reports to abrdn's Chief Sustainability Officer.

The IVSG consists of four specialised teams:

- Sustainability Insights & Climate Strategy
- Sustainable Investing
- Active Ownership
- Sustainability Investment Specialists

The IVSG maintains strong partnerships across the abrdn Investment Teams.

2nd line: Investment Risk oversees ESG-related portfolio composition factors. The overall RAG status of funds as well as action taken to address moderate / high risks are reported to boards, and relevant committees as required, on a regular basis. The Investment Risk team attends the abrdn Life Risk Committee meeting quarterly.

Compliance Teams assess sustainability-related, global regulatory developments and monitor the group's compliance with those rules. Compliance teams further review fund material including marketing material to ensure that sustainability related statements are clear, fair and non-misleading. The abrdn Life compliance function provides regulatory updates and insights to the abrdn Life Board quarterly.

A dedicated Monitoring & Oversight (M&O) team operates a risk-based programme, which incorporates

Risk management

sustainability-related regulations, to provide assurance to senior management over the effectiveness of controls to ensure regulatory compliance. The outcome of the reviews is reported to the relevant entity boards and other governance forums, including the Risk and Capital Committee, Group Audit Committee and Executive Leadership Team Controls meeting. Assurance activities include thematic reviews of risk or regulatory topics and focused reviews on specific regulatory or customer outcomes. Updates on M&O activity are provided to the abrdn Life Board quarterly.

3rd line: abrdn Group's Internal Audit function conducts internal audits of sustainability rule implementation as part of its internal audit agenda. Updates from Internal Audit are provided to the abrdn Life Risk Committee.

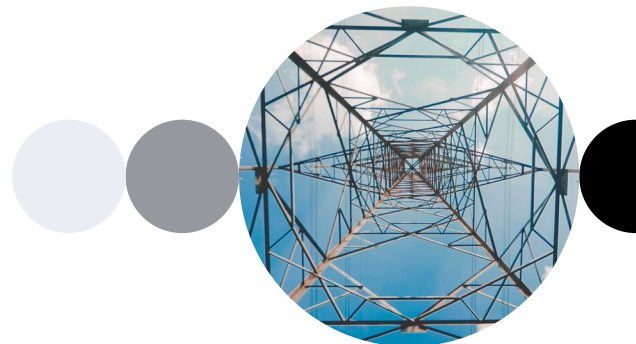
Further information on abrdn Group's climate-related risk management can be found here:

Processes for identifying and assessing climate-related risks as set out in the Sustainability and TCFD report 2022 (pages 14, 22)

Processes for managing climate-related risks as set out in the Sustainability and TCFD report 2022 (pages 22-27)

How the processes for identifying, assessing and managing climate-related risks are integrated into the organisation's overall risk management as set out in the Sustainability and TCFD report 2022 (pages 22-27)

Metrics and targets



Metrics

abrdn Group uses some core portfolio-level metrics to monitor aggregate carbon performance. The metrics provide the following insights:

- **Weighted Average Carbon Intensity (WACI)** is a normalised carbon intensity figure, expressed as tCO₂e/million USD revenue. The portfolio weighting of each holding is multiplied by the ratio of the investee company's emissions normalised by the investee company's revenue.

In this instance company revenue is used to normalise emissions to allow for investors to account for a company's size and economic activity (e.g. typically larger companies will have a greater total emissions footprint but may be more carbon efficient on an intensity basis). Company revenue is a useful proxy for the economic activity of a company. Normalising emissions allows for more accurate comparisons between companies of different sizes and between funds of different sizes. However, volatility in revenues will impact WACI results and such revenue volatility is not always perfectly tied to actual economic activity or total emissions. Moreover, normalising emissions by revenue means that WACI does not perfectly reflect the carbon impact of an investment on the real-world.

- Whereas **Economic Emissions Intensity** is useful for understanding carbon intensity relative to the value invested in a company. Economic Emissions Intensity (EEI) is a normalised carbon intensity metric, expressed as tCO₂e/million USD invested. The portfolio weighting of each holding is multiplied by the ratio of the investee company's emissions normalised by the investee company's enterprise value including cash (EVIC). This is equivalent as dividing the portfolio Financed Emissions by the portfolio's AUM.

In this instance EVIC represents the total value of a company's equity and debt, allowing investors to normalise emissions by company size, based on equity and debt valuations. (i.e. typically larger company's will have a greater total emissions footprint but may be more carbon efficient on an intensity basis). Normalising emissions allows for more accurate comparisons between companies of different sizes and between funds of different sizes. However, volatility in EVIC will impact EEI results and EVIC volatility is not always perfectly tied to actual economic activity or total emissions. Moreover, normalising emissions by EVIC means that EEI does not perfectly reflect the carbon impact of an investment on the real-world.

- **Financed Emissions** provides an absolute view of emissions 'owned' by different investors, but the view from the metric is subject to market volatility. Financed Emissions calculate the absolute total emissions, expressed as tCO₂e, that are attributed to the investor. The methodology used follows the Partnership for Carbon Accounting Financials (PCAF) and is recommended by TCFD. The attribution factor is calculated by taking the monetary size of the investment and dividing it by the investee company's enterprise value including cash. This attribution factor is then multiplied by the company's total emissions to calculate the final Financed Emissions result.

It is important to consider that Financed Emissions will be principally driven by the size of the investment made in a company and therefore, larger funds will tend to have higher Financed Emissions. Moreover, volatility in a company's EVIC can lead to changes in Financed Emissions between equity and credit investors.

We use these three measures to assess the carbon impacts of our portfolios.

The measures for abrdn Life as at 31 December 2022 are as follows:

	Measure	Unit of measurement	aIL
Corporate emissions	Weighted average carbon intensity (WACI) (S1&2)	tCO ₂ e/million USD revenue	172.98
	Economic emissions intensity (S1&2)	tCO ₂ e/million USD Invested	72.26
	Total financed emissions (S1&2)	tCO ₂ e	3.2M
	Data Disclosed (Trucost)	(%)	29.90
	Partially Disclosed (Trucost)	(%)	41.50
	Estimated (Trucost)	(%)	18.60
	Data Coverage	(%)	89.97
Sovereign emissions	Weighted average carbon intensity (WACI) (S1&2)	tCO ₂ e/million USD GDP	301.12
	Data Coverage	(%)	100

Metrics and targets

Data

In 2022, abrdn has upgraded its climate and carbon tools to deal with new TCFD provisions, such as EVIC, scope 3 carbon data and portfolio aggregation to improve the ESG data provision to our investment teams and to our clients.

Our specialist data provider for emissions is Trucost, which we selected upon a broad review of carbon emissions data providers. Trucost is an established ESG data provider, our selection was based on their global coverage and strong estimation methodology.

Our specialist data and modelling provider for scenario analysis is Planetrics, which we selected upon a broad review of providers. Planetrics and abrdn work on a partnership basis to develop bespoke solutions, with broad global coverage and a robust climate scenario analysis framework.

Further information on abrdn's climate-related metrics and targets can be found here:

Metrics used to assess climate-related risks and opportunities in line with the strategy and risk management process as set out in the Sustainability and TCFD report 2022 (pages 28-34)

Scope 1, 2 and if appropriate scope 3 GHG emissions and related risks as set out in the Sustainability and TCFD report 2022 (pages 28-34)

Targets used to manage climate-related risks and opportunities and performance against the targets as set out in the Sustainability and TCFD report 2022 (pages 28-34)

For more information visit abrdn.com

abrdn Group comprises abrdn plc and its subsidiaries. abrdn plc is registered in Scotland (SC286832) at 1 George Street, Edinburgh EH2 2LL.

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