

Corporate Responsibility report 2021



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About this report

This is the independent annual Corporate Responsibility report of Tryg A/S. The report composes Tryg's Communication on Progress (COP) report and thus underlines Tryg's continuous commitment to the UN Global Compact's Ten Principles on human rights, labour rights, the environment and anti-corruption. The report covers activities in Tryg A/S for the financial year 1 January 2021 to 31 December 2021.

The report describes how Tryg is progressing in relation to our Corporate Responsibility strategy and targets. We aim to provide transparent, accurate and reliable information about our Corporate Responsibility efforts and performance and about the impact of our business on people and the planet. Our approach to sustainability reporting is to focus on material issues in line with relevance to our stakeholders and business as well as society.

The report includes an ESG data overview of Tryg's key performance indicators, Tryg's climate reporting in line with Insurance & Pension Denmark's industry recommendations, Tryg's reporting on EU Taxonomy-eligible and non-eligible economic activities as well as Tryg's climate-related disclosure in line with the TCFD (Task Force on Climate-related Financial Disclosures) recommendations.

Previous years' data and reports are available at tryg.com/en/CR/reporting. For further information, please visit tryg.com.

Statutory statement on corporate social responsibility

This report represents our statutory statement on corporate social responsibility, gender diversity at management level and data ethics presented in accordance with Sections 132, 132a and 132d of the Danish Executive Order on Financial Reports for Insurance Companies and Lateral Pension Funds (Nationwide Occupational Pension Funds).

Compliance review

As part of PwC's assurance report on Tryg's annual report for 2021, PwC has performed a consistency check of the management review, including Tryg's Corporate Responsibility report, which represents Tryg's statutory statement on corporate social responsibility, gender diversity at management level and data ethics presented in accordance with Sections 132, 132a and 132d of the Danish Executive Order on Financial Reports for Insurance Companies and Lateral Pension Funds (Nationwide Occupational Pension Funds) as well as Tryg's climate reporting in line with Insurance & Pension Denmark's industry recommendations.

Read the assurance report in Tryg's Annual report 2021 on pages 57-60

Acquisition of Trygg-Hansa in Sweden and Codan in Norway

In 2021, Tryg completed the acquisition of Trygg-Hansa in Sweden and Codan in Norway, and Tryg is now the largest non-life insurance company in Scandinavia.

Tryg has pushed its Corporate Responsibility strategy targets for 2023, which now also include the activities of the acquired businesses in Norway and Sweden, to 2024.

However, Tryg's Corporate Responsibility report 2021 does not include the activities and results of the acquired businesses in Norway and Sweden as the integration has not been completed. Trygg-Hansa's and Codan Norway's activities will be included in Tryg's Corporate Responsibility report 2022.

Tryg and Intact have now initiated the separation of the RSA business. The purpose of the separation process is, inter alia, to provide Tryg with sole legal ownership of Trygg-Hansa in Sweden and Codan in Norway. The separation is intended to be completed on 1 April 2022. The separation process is described in more detail in section 7.3 of the Tryg rights issue prospectus dated 1 March 2021. Tryg's rights issue prospectus can be found at tryg.com.

The climate crisis calls for action by all

As a non-life insurance company, our greatest mission and responsibility is to enable society, people and businesses to protect themselves from risk. Our core business is to ensure peace of mind for our customers in their everyday lives and thereby deliver on our purpose: as the world changes, we make it easier to be tryg¹. The world as we know it is changing rapidly, and risks are becoming increasingly complex due to climate change and globalisation. There is a need for modern society to adapt accordingly, and as an insurance company with risk management as our area of specialisation, Tryg has an essential role to play.

It's now or never

In 2021, it became more evident than ever that climate change poses a great threat to society and to everyday life as we know it. Last summer, almost every continent on our planet was affected by extreme weather, heat records or even natural disasters. In August, the International Panel on Climate Change released its newest climate report, which not only once and for all established the fact that greenhouse gases from human activities are responsible for global warming, but also that climate change is both widespread, rapid and intensifying. In other words, all societal actors need to collaborate and act now. Fortunately, humanity has already proved that by working together across sectors and national borders we can overcome complex problems to which urgent solutions are needed.

The future market leader of Scandinavia

In Tryg, we are also aware of climate change. In the past decade, we have seen an increase in the number of climate-related claims in Denmark, Norway and Sweden, posing a threat to societies, to our customers and to our business. Hence, it seems obvious to us to intensify our climate-related work and heighten our ambitions.

In 2021, Tryg acquired Trygg-Hansa in Sweden and Codan in Norway, and Tryg is now the largest non-life insurance company in Scandinavia. As a result, we have pushed our Corporate Responsibility strategy targets for 2023 until 2024, now including also the acquired businesses in Norway and Sweden.

We have raised our carbon emissions reduction target for 2024 to 35% compared to 2019. Our target is to become carbon-neutral in 2023 by compensating for the rest of our carbon emissions. Reducing our carbon footprint calls for a change in both mindset and behaviour among all employees. In the autumn, we launched an internal campaign aimed at creating behavioural change among our employees. The aim was to contribute to Tryg's ambition of becoming a greener workplace by changing our employees' mindset through motivational elements and fact-based information.

Making our procurement and claims handling processes more sustainable is an inevitable step on Tryg's sustainability journey, and this part of our business will remain an important strategic focus area. In 2021, we continued our journey towards achieving more sustainable claims settlements with a lower carbon footprint in collaboration with our suppliers. For instance, our ambition is to reduce the amount of plastic waste deriving from bumpers by repairing them rather than replacing them. In 2021, we saved more than 45 tonnes of plastic waste by repairing bumpers rather than replacing them, which resulted in a total CO₂ reduction effect of more than 80 tonnes. The initiative contributes to our target of achieving a total CO₂ reduction effect of 20,000-25,000 tonnes in 2024 and to the transition to a low-carbon economy.

Life with COVID-19

In 2021, the world continued its fight against COVID-19, which has taught us that by working together globally and across sectors, we can develop impressive solutions to critical challenges.

In Tryg, the pandemic has taught us that one size does not fit all when it comes to the way we arrange our working and everyday lives. Since March 2020, most of our employees have been working both from home and from Tryg's offices – and with great results. To give our employees the opportunity to arrange their working lives according to their individual needs, we have now introduced the opportunity to work from home an average of one to two days a week.


Jukka Pertola
Chairman








Morten Hübbe
Group CEO

¹Tryg means feeling protected and cared for.



Overview of 2021

The table illustrates targets and performance of Tryg's Corporate Responsibility strategy and efforts.
For specific data, please see extensive ESG (Environmental, Social and Governance) data on pages 27-29.

Strategic focus area	UN Global Compact	UN Sustainable Development Goals	Target 2024	Target 2030	Result 2021
Responsible company					
Responsible procurement	Principles 1-10	 	<p>Up to 90% of contract suppliers to be screened for sustainability Up to 100% of contract suppliers within claims to be screened for sustainability</p> <p>Up to 50% of our screened suppliers to achieve a high performance rating¹ Up to 70% of our screened suppliers within claims to achieve a high performance rating</p>		<p>18%</p> <p>24%</p>
Responsible investment	Principles 7-9	 		<p>50% CO2 intensity reduction from equity portfolio</p> <p>Exclusion of fossil fuel production companies with no strategy for a green transition</p>	<p>127.5 tonnes CO2 / USDm revenue³</p>
Diverse workplace	Principle 6		<p>41% women in management positions 33% women at top management level 41% women at director level</p>		40%
Green workplace					
	Principles 7-9	 	<p>35% CO2 reduction</p> <p>58% CO2 reduction from energy consumption</p> <p>12% CO2 reduction from waste production</p> <p>23% CO2 reduction from air travel</p> <p>23% CO2 reduction from car fleet</p>	55% CO2 reduction	<p>59%²</p> <p>42%</p> <p>52%</p> <p>86%</p> <p>18%</p>
Sustainable insurance					
Sustainable claims handling	Principles 7-9	 	<p>80% increase in sustainable claims spend</p> <p>20,000-25,000 tonnes CO2 reduction from more sustainable claims handling</p>		<p>35%</p> <p>6,740 tonnes CO2</p>

¹In 2021, we started to prepare the performance questionnaires that will enable us to evaluate our suppliers' sustainability performance from 2022.

²COVID-19 significantly affected Tryg's carbon emissions in 2021 (read more on pages 17-18).

³Read more on page 13.

Tryg at a glance

Great diversity of products

We offer a broad range of insurance products for private individuals as well as businesses.

Attractive dividend policy

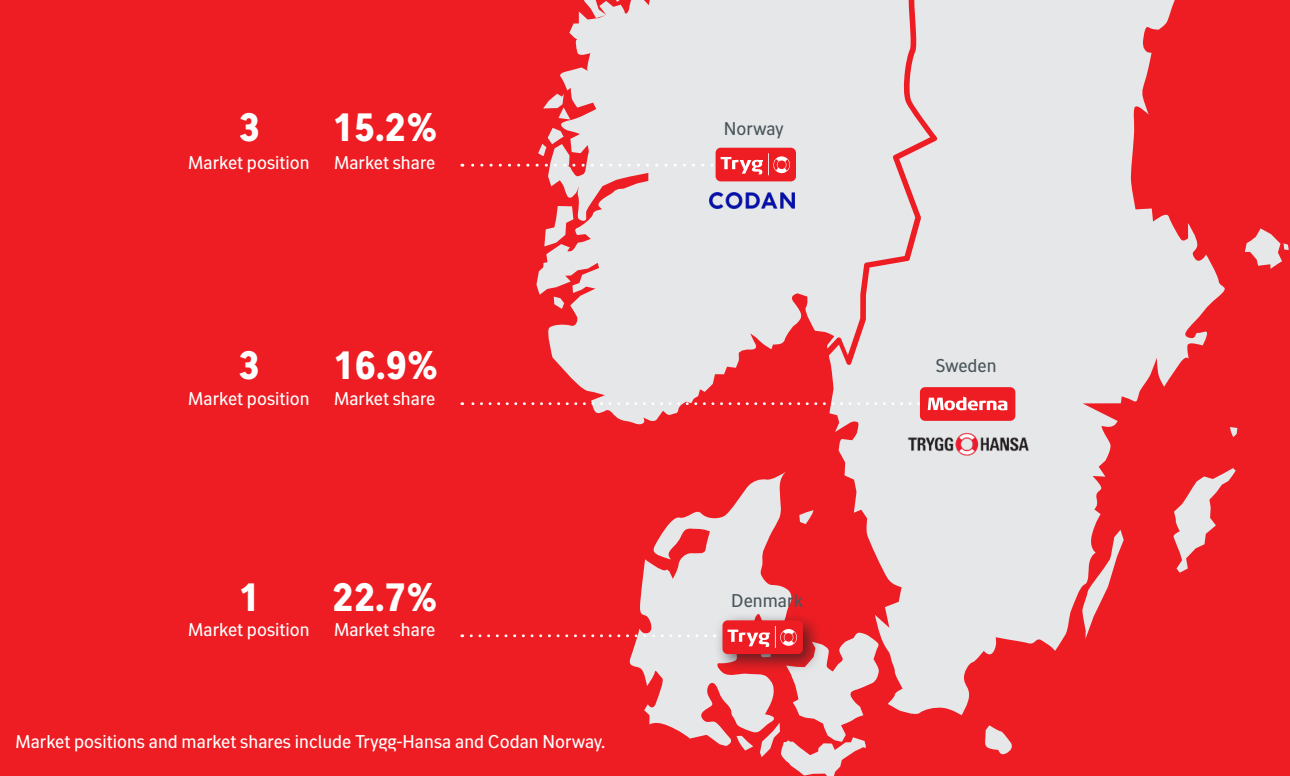
We aim to distribute a nominal, stable increase in dividend and to pay out 60-90% of our profit.

TryghedsGruppen

TryghedsGruppen owns 45% of Tryg and contributes to projects that create peace of mind via Tryg Fonden. In 2021, TrygFonden contributed up to DKK 650m.

Four million customers

Our 4,700 employees provide peace of mind for four million customers and handle approximately one million claims a year.



Business areas

Tryg is the largest non-life insurance company in Scandinavia with a Top 3 market position across Denmark, Norway and Sweden. We are the largest player in Denmark and the third-largest in Norway and Sweden.

Private

Private provides insurance products to private customers in Denmark and Norway. Private offers a range of insurance products including car, contents, house, accident, travel, motorcycle, pet and health.

57%

Portfolio

1,355

Employees

Commercial

Commercial provides insurance products including motor, property, liability, workers' compensation, travel and health to small and medium-sized businesses in Denmark and Norway.

22%

Portfolio

640

Employees

Corporate

Corporate provides insurance products including property, liability, workers' compensation, transport and group life to corporate customers.

14%

Portfolio

222

Employees

Sweden

Sweden provides insurance products to private individuals within car, house, pet, child, boat and accident insurance.

7%

Portfolio

314

Employees

Our purpose

As the world changes,
we make it easier to be tryg^{a)}



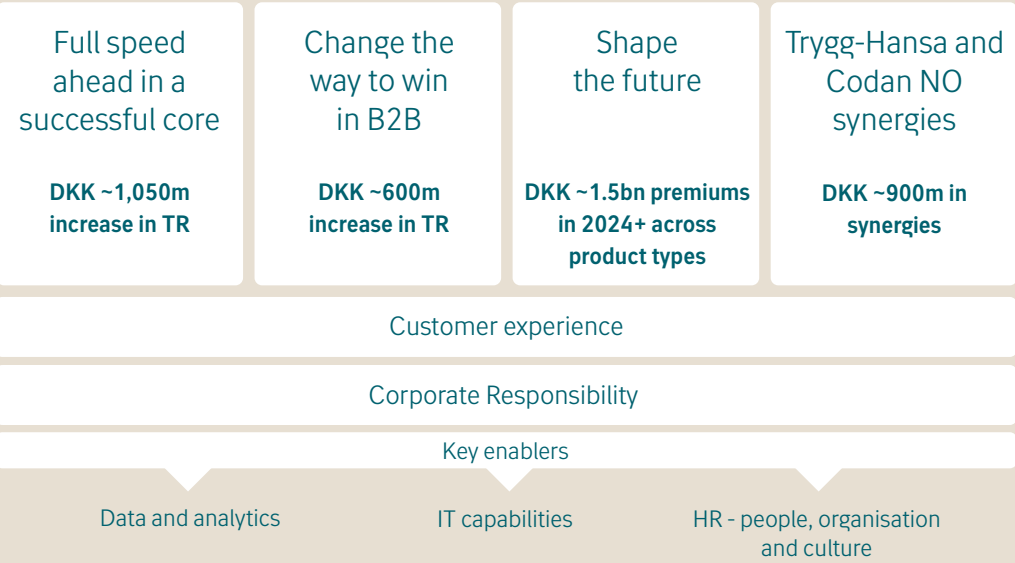
Tryg's business model

Tryg is a non-life insurance company. In a changing world, Tryg makes it easier to be 'tryg' for its customers by offering them insurance against risks, efficient claims handling, and advice and services to prevent claims from arising in the first place. Making it easier for our customers to feel protected and cared for benefits all Tryg's stakeholders – our customers, our employees and our shareholders.

Tryg's Corporate Responsibility efforts are closely linked to our business model and core business. While providing a safety net across the Nordic countries for our customers as insurance providers in case of a claim, we also offer prevention initiatives to reduce and limit claims. We thereby provide safety before, during and after a claim.

a) "Tryg" means feeling protected and cared for.

2024 corporate strategy



Tryg's corporate strategy

In 2021, Tryg presented a new corporate strategy, including a set of new financial and strategic targets to be realised by 2024. In 2021, Tryg also presented a Corporate Responsibility strategy, which will govern our Corporate Responsibility efforts up to and including 2024. The strategy is integrated in Tryg's corporate strategy and is characterised by a strategic, commercial and holistic approach, the purpose of which is to integrate Corporate Responsibility and into every corner of Tryg as an insurance company.

Read more about Tryg's corporate strategy in Tryg's Annual report 2021 on pages 15-16
Read more about Tryg's Corporate Responsibility strategy on pages 9-10

TryghedsGruppen

TryghedsGruppen holds 45% of the shares in Tryg and annually contributes around DKK 650m to projects that create peace of mind in Danish society via TrygFonden. A substantial share of TryghedsGruppen's profit derives from the dividend paid out by Tryg to its shareholders. Part of the profit contributes to financing TrygFonden's activities. In 2021, Tryg paid out approximately DKK 1,224m in dividend to TryghedsGruppen. For the sixth year running, TryghedsGruppen paid out a member bonus to Tryg's customers in Denmark corresponding to 5% of the annual premiums paid for 2020.

TrygFonden

TrygFonden is the leading and most well-known peace-of-mind foundation in Denmark, supporting hundreds of activities that contribute to this, such as coastal lifeguards, cuddle bears for children in hospitals and defibrillators. Behind TrygFonden is TryghedsGruppen. In 2021, TrygFonden contributed approximately DKK 650m to projects that create peace of mind in Denmark.

Corporate Responsibility governance

Tryg's Corporate Responsibility work is rooted in our Executive Board, while our strategic Corporate Responsibility efforts are driven by our Corporate Responsibility Board.

Corporate Responsibility Board

The purpose of Tryg's Corporate Responsibility Board is to drive the strategic Corporate Responsibility efforts within our company. The Board is represented by Group CFO Barbara Plucnar Jensen, as chair, while Board members include the Vice Presidents from key areas representing Tryg across the Nordic countries. Business areas are represented depending on the agenda.

The Corporate Responsibility Board discusses Corporate Responsibility risks and opportunities and recommends actions for further improvements.

The Corporate Responsibility Board meets four times a year to discuss Tryg's strategic direction in relation to Corporate Responsibility. The Board plays an advisory role in supervising the company's strategic direction and initiatives, as well as recommending actions for further improvements, which are reported to the Executive Board. Furthermore, the Board approves the Corporate Responsibility report and relevant policies prior to final approval by the Executive Board and the Supervisory Board. Moreover, it oversees and monitors performance and follows up on or initiates new initiatives for Tryg.

[Download the Board's Terms of reference](#)
[Download Corporate Responsibility policy](#)

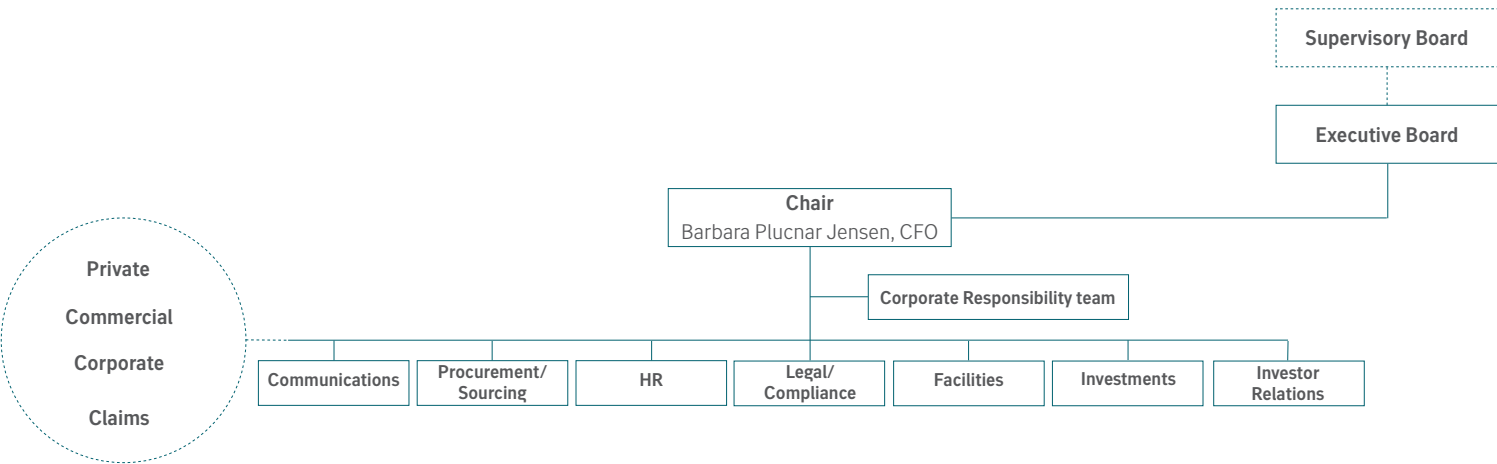
[Read Tryg's climate-related disclosures in line with the TCFD \(Task Force on Climate-related Financial Disclosures\) recommendations on pages 33-35](#)

Organisational anchoring

Tryg's Executive Board is ultimately responsible for the work related to Corporate Responsibility and is informed about performance, risks and opportunities on a quarterly basis or more frequently if necessary. Tryg's Supervisory Board is regularly informed about strategy and initiatives as well as progress on targets and performance related to Corporate Responsibility.

Tryg's Executive Board's incentive programmes are based on a result and performance assessment of the Executive Board members' work in the performance year, based on specific weighted targets. These targets include fulfilment of ESG/Corporate Responsibility-related targets/activities.

[Read more about Tryg's remuneration of management in Tryg's Annual report 2021 on pages 41-44](#)



Barbara Plucnar Jensen
Group CFO and
Chair of Corporate
Responsibility Board

Corporate Responsibility strategy 2024

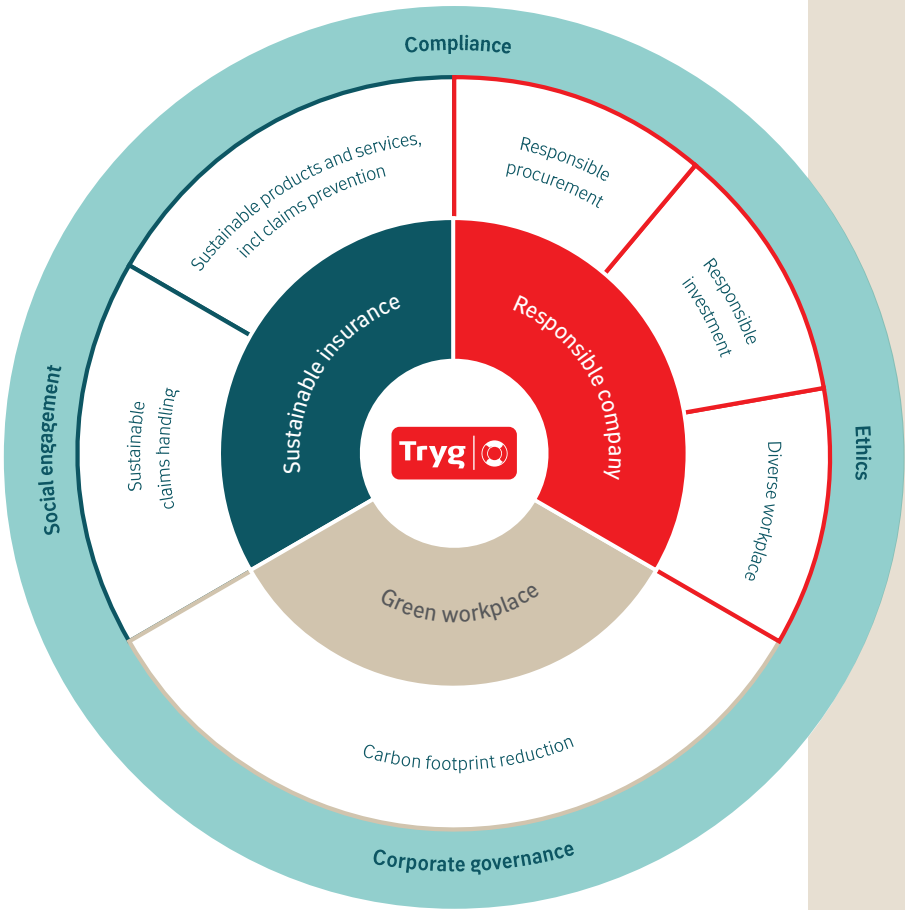
As the largest non-life insurance company in Scandinavia, Tryg wants to live up to our purpose: as the world changes, we make it easier to be tryg². We want to contribute to a sustainable future and create long-term value for our customers, employees and shareholders, and for society. To achieve this, we have launched our Corporate Responsibility strategy: Driving sustainable impact.

The strategy is based on a materiality assessment to ensure that we focus on the sustainability issues that are most important for Tryg and for our stakeholders.

The strategy is focused on how Tryg as a company and our employees can contribute to a more sustainable society, and how we can influence our suppliers and help our customers make more sustainable choices. Furthermore, the strategy is characterised by a strategic, commercial and holistic approach, the purpose of which is to integrate Corporate Responsibility and sustainability into every corner of Tryg. The strategy has three focus areas: Responsible company, Green workplace and Sustainable insurance. For the strategic focus areas, we have set targets for both 2024 and 2030, as we want to contribute to actual and measurable impact as well as monitoring progress – also in the shorter term.

The foundation for being a responsible and sustainable company is based on high ethical standards, compliance with all applicable national and international legislation and good corporate governance. This is Tryg's licence to operate, and both as a market leader and as a member of the UN Global Compact, we are expected to comply with the UN Global Compact Ten Principles. Business ethics, compliance and corporate governance are underlying, but fundamental elements of everything we do as a company, in our daily lives as employees and in our Corporate Responsibility strategy.

Read more about our work with ethics and compliance **on pages 23-25**



Responsible company³



Responsible procurement

Up to 90% of contract suppliers to be screened for sustainability in 2024

Up to 100% of contract suppliers within claims to be screened for sustainability in 2024

Up to 50% of our screened suppliers to achieve a high performance rating in 2024

Up to 70% of our screened suppliers within claims to achieve a high performance rating in 2024

Responsible investment

50% CO2 intensity reduction from equity portfolio in 2030

Exclusion of fossil fuel production companies with no strategy for a green transition in 2030

Diverse workplace

41% women in management positions in 2024

33% women at top management level in 2024

41% women at director level in 2024

Green workplace⁴



2024:

35% CO2 reduction

Carbon-neutral in 2023

58% CO2 reduction from energy consumption

12% CO2 reduction from waste production

23% CO2 reduction from air travel

23% CO2 reduction from car fleet

2030: 55% CO2 reduction

Sustainable insurance³



Sustainable products, services and claims handling

80% increase in sustainable claims spend in 2024

20,000-25,000 tonnes CO2 reduction from more sustainable claims handling in 2024

³Targets are based on a 2020 baseline

⁴Targets are based on a 2019 baseline

²Tryg means feeling protected and cared for.

Materiality matrix

In 2020, Tryg conducted an extensive materiality assessment to identify the environmental, social, economic and governance issues that are perceived as being most important to Tryg and to our stakeholders. In 2021, we reviewed the 2020 results to understand the impact of recent changes in our business and our external environment on our strategy and to further shape our reporting. Due to an increased focus, 'Underwriting' has been added to Tryg's materiality matrix. The review was discussed and approved by Tryg's Corporate Responsibility Board.

In the materiality matrix, each issue is colour-coded according to the ESG (Environmental, Social and Governance) issues involved. The red circle around some of the issues indicates that the issue is an approach rather than a concept. The materiality matrix allows us to decide what to focus on and invest time in by contrasting two dimensions. The first (horizontal axis) is the importance of the issue to Tryg and the expected impact of the issue on the success of our business. The second (vertical axis) is the importance of the issue to our stakeholders.

For more information on the process of Tryg's 2020 materiality assessment, please refer to the Corporate Responsibility report 2020, page 9



Responsible company

Responsible procurement

Tryg's procurement decisions have environmental, social and economic impacts. Each year, we make purchases and claims payments equaling DKK 15.2bn. Thus, integrating sustainability in our procurement and claims handling processes, and influencing our suppliers to operate a sustainable business are important aspects of Tryg's contribution to a more sustainable society. We aim to be a responsible purchaser and live up to the highest standards of responsible procurement. We strive at all times to contribute to sustainable development by entering into agreements and collaborations with suppliers who share our values and visions for sustainable development. We seek to incorporate sustainability in every step of our procurement processes. We train our purchasers and proactively enter into dialogue with our suppliers on how to improve their sustainability performance.

We are committed to upholding human rights as described in the Universal Declaration of Human Rights. Our commitment is enforced through our signatory membership of the UN Global Compact. The UN Global Compact Ten Principles are anchored in our Corporate Responsibility policy as well as in Tryg's Code of Conduct and Supplier Code of Conduct. Tryg's materiality assessment indicates a risk of violations of human and labour rights in our supply chain. To mitigate any violations, Tryg actively monitors our contract suppliers for compliance with our Supplier Code of Conduct as part of our supplier evaluation programme.

[Download Supplier Code of Conduct](#)

Supplier evaluation programme

Supplier Code of Conduct compliance

In 2021, we successfully started to distribute our Supplier Code of Conduct. 23% of our contract suppliers have accepted our Supplier Code of Conduct. In order to evaluate our suppliers' compliance with the Supplier Code of Conduct, we have implemented a systematic screening process in collaboration with an external supplier evaluation platform provider. Via the platform, we screen and evaluate our suppliers in terms of ESG risks, the UN Global Compact Ten Principles and the additional minimum requirements described in our Supplier Code of Conduct. Our target for 2024 is to screen up to 90% of our contract suppliers for sustainability, including Supplier Code of Conduct compliance and ESG risks. In 2021, we successfully completed the screening of 18% of our contract suppliers. In addition, in 2021, we added the sub-target of screening up to 100% of our contract suppliers within claims. In 2021, we successfully completed the screening of 24% of our contract suppliers within claims.

We are proactively using the feedback and results received to enter into dialogue with our suppliers on how we can actively strengthen our suppliers' commitment. The evaluation has also enabled us to better understand the ESG risks within our supplier base. Applying the obtained insights, we are in the process of reviewing our criteria for defining risk and high-risk suppliers. By doing so, we aim to build a stronger foundation for effectively managing ESG issues in our supply chain. We expect to implement a formalised follow-up procedure for risk suppliers in 2022.

Supplier sustainability performance

Similar to the Supplier Code of Conduct compliance screening, in 2021 we started to prepare performance questionnaires that will enable us to introduce sustainability requirements and evaluate and enhance our suppliers' sustainability performance. Our target for 2024 is for up to 50% of our screened suppliers to achieve a high performance rating. In 2021, we have added the sub-target for up to 70% of our screened suppliers within claims to achieve a high performance rating.

Since the sustainability performance of many of our suppliers has not been evaluated before, it is highly important to us that each questionnaire is relevant to the suppliers that receive them and that it enables them to identify areas in which they can take action to improve their sustainability performance. Thus, we are customising all our evaluations to match the unique sustainability risks, requirements, opportunities and targets of our various supplier types. In 2022, we will start implementing the first performance questionnaires. We plan to start with the questionnaires for car sellers, car auto repair shops and private hospitals, and to then proceed to designing questionnaires for claims service suppliers and craftsmen. Based on the evaluations and responses from our suppliers, we will be able to provide transparency and insights on where suppliers meet and exceed our expectations. Furthermore, we will obtain insights on any scope for improvement.

In 2022, we will start integrating the results of our supplier sustainability evaluations in our claims referral processes. By doing so, we aim to reward suppliers with a high performance score and allocate more volume to them.

In 2021, Tryg completed the screening of 18% of its contract suppliers and 24% of its contract suppliers within claims

23% of Tryg's contract suppliers have accepted Tryg's Supplier Code of Conduct



Tryg's commitment to incorporating sustainability in procurement processes contributes to SDG 12, Responsible consumption and production, specifically targets 12.2, 12.5 and 12.6.



Tryg's commitment to incorporating sustainability in procurement processes contributes to SDG 13, Climate action, specifically targets 13.1 and 13.3.

Responsible investment

Tryg wants to ensure that its assets are invested in a responsible manner and that investments are conducted in accordance with Tryg's values.

The materiality assessment has identified responsible investment as a material issue to Tryg, as we are at risk of violating international standards, including human and labour rights as well as environmental and anti-corruption standards, when investing. Additionally, climate change and the transition to a low-carbon economy also represent risks to Tryg, as they represent risks to the companies that we invest in.

Tryg has investments of around DKK 43bn⁵, and the risk profile is split into a match portfolio and a free portfolio. The match portfolio, which comprises Nordic government and mortgage bonds, totals DKK 30bn. The free portfolio, which comprises various bonds, funds, investment properties and equities, totals DKK 13bn. Most of Tryg's investment assets are managed externally and typically held through commingled fund structures. Tryg's investment activities are therefore outsourced to our external portfolio managers.

Tryg believes that responsible investment can have the greatest impact through integrating ESG considerations into the investment process, being active owners and voting on shareholder proposals at annual general meetings, engaging with companies to improve and screening for potential violations of international conventions. Thus, we consider the divestment of companies from our investment portfolio as a last resort.

[Download Responsible investment policy](#)

Active ownership

Tryg engages in active ownership, which means that we enter into dialogue with the companies that we invest in and vote at annual general meet-

ings. The purpose of the dialogue is to promote shareholder value and sustainable development whenever possible. We believe that both these considerations often go hand in hand.

Tryg's active ownership initiatives are primarily directed towards managing and monitoring our external managers' responsible investment processes. Thus, we seek to ensure that external managers apply active ownership to individual holdings. The process for ensuring the compliance of external managers with Tryg's responsible investment policy is described in Tryg's active ownership policy. Our primary focus is to select external managers who share our principles and have policies in place to ensure that investments are managed responsibly.

The responsibility practices of all Tryg's external managers are evaluated on a variety of metrics, including whether they are UN PRI signatories, and also how well they implement responsibility into their organisations (see table on page 13). We apply UN PRI Assessment Scores and aim for an average minimum score for our external managers of 'B' or higher, which corresponds to a score in the upper half of the scoring scale. As the UN PRI Assessment score was not updated in 2021, last year's score is used for the calculations. The UN PRI scoring system is expected to be modified in 2022, and our reporting categories, average scores and targets will be updated accordingly.

During 2021, we worked towards ensuring that sustainability is also practised by our external managers. In our listed equity portfolio, this led to a change of two mandates that did not include strong enough ESG integration. The remaining actively managed equity mandates have all included more stringent fossil fuel policies.

Our active ownership statistics describe the percentage of possible shareholder meetings

attended by our managers. We have set a voting target of at least 90% of the possible shareholder meetings for our actively managed equity holdings. During 2021, the active ownership practices of our managers generally grew more assertive towards companies with a very unequal gender distribution in management positions and towards carbon-intensive companies with lagging sustainability ambitions.

[Download Active ownership policy](#)

Ethical screening process

Tryg's manager selection process focusses on choosing external managers with a responsible mindset similar to Tryg's, and we continuously screen our holdings to ensure individual holdings live up to our values. The screening is based on data from an external screening provider platform. Furthermore, Tryg has formulated a formal escalation process that outlines the steps to be taken after a screening of investments.

Each year, Tryg screens its holdings for controversial behaviour and controversial weapons. Controversial behaviour means a violation of the UN Global Compact Ten Principles. Controversial weapons are mainly weapons that are more specifically tailor-made, and essential levels of involvement and/or significant ownership in companies of the former. Examples include anti-personnel mines, nuclear weapons, cluster weapons, biological and chemical weapons, depleted uranium and white phosphorus munitions.

In 2021, no companies were flagged for controversial behaviour or involvement in controversial weapons, and no follow-up dialogues were necessary.

[Download Process for ethical screening](#)

⁵Tryg's investment portfolio will increase to around DKK 68bn, when the integration of Trygg-Hansa og Codan Norway is complete.

Responsible company

The transition to a low-carbon economy

Tryg is integrating ESG considerations into its investment process with the primary aim of contributing to the transition to a low-carbon economy. Our target is to reduce the carbon intensity of our equity portfolio by at least 50% in 2030 compared to 2020 by investing in companies gradually reducing their carbon footprint. Also, we want to contribute to the green transition by aiming to divest all our investments in fossil fuel production companies with no strategy for a green transition before 2030 in order to support our long-term ambition of having a low-carbon and fossil-free investment portfolio. We will begin divesting no later than 2023.

To support our carbon intensity reduction target and mitigate risk in our investment portfolio, we monitor the carbon footprint and climate-related risks associated with our investments using third-party data. We currently monitor our equity portfolio and parts of our credit bond portfolio and focuses, in particular, on climate-related transition risks and opportunities arising from the transition to a low-carbon economy. Our equity portfolio is characterised by low exposure to climate-related transition risks.

In 2021, the carbon intensity of our listed equity investments was lower than the general equity universe in line with our strategy. The carbon intensity may fluctuate over time as the portfolio composition and underlying companies' carbon footprint may change. Yet, in the long run, our target is to reduce the carbon intensity by 50% for our listed equity portfolio.

Going forward, we will seek to further expand our carbon-footprint and climate-risk monitoring and include a larger share of our investment assets in the analysis.

To further contribute to the green transition, we have committed DKK 60m to continue our investment in developing renewable energy sources in East Africa. This investment will help fund the construction of solar, hydroelectric and geothermal plants.

The table on the right provides information on our external managers, active ownership and carbon intensity.



Tryg's commitment to reducing the carbon intensity of its equity portfolio and divesting investments in fossil fuel production companies with no strategy for a green transition contributes to SDG 13, Climate action, specifically targets 13.1 and 13.3.



External manager statistics		2021 results
Percentage of UN PRI Signatories		100%
Average manager score for Strategy & Governance		A+ ⁶
Average manager score for Listed Equity – Incorporation		A ⁶
Average manager score for Listed Equity – Active Ownership		A ⁶
Active ownership statistics		
Voting percentage for equity portfolio		97.7%
Carbon footprint (tonnes CO2e / USDm revenue, Scope 1 and 2 emissions)		
Equity portfolio (coverage ratio)		127.5 (96%)
Equity benchmark (coverage ratio)		160.6 (96%)
Percentage difference between equity portfolio and equity benchmark		-20.6%

⁶Tryg applies UN PRI Assessment Scores based on alphabetic grading (A+ to E)

Diverse workplace

Being a diverse and inclusive workplace is an important priority to Tryg. We believe that a diverse representation of employees and, more importantly, diversity of thought are key elements to the future success of Tryg.

We want to reflect the society that we are part of, and we need a diverse pool of employees and managers with different backgrounds, skills and experiences to understand and match the changing needs of our customers and society.

Tryg is committed to creating positive change and increasing the level of diversity and inclusion in our industry as well as in society.

Including all employees

Tryg believes that an inclusive culture is key to attracting new talent, but also to motivating and retaining employees. We recognise that inclusion is key to ensuring a diverse employee representation irrespective of ethnic origin, gender, age, sexual orientation, health status, disability, political opinion or religious beliefs, or other needs, and we are committed to fostering an inclusive culture where everyone is respected and welcomed for who they are.

Tryg's Code of Conduct as well as our employee and leadership characteristics (behaviours) stress the importance of creating an inclusive workplace with equal opportunities and encouraging a company culture that values diversity, inclusion and curiosity about other people's perspectives, creating a workplace where everyone can contribute, perform and grow to their full potential.

Promoting diversity of thought in management teams

Diverse perspectives are crucial to fostering innovation, better business decisions and results. As part of Tryg's diversity and inclusion strategy,

we focus on increasing diversity of thought in our management teams. The ambition is to improve the number of management teams that are diverse on three factors: gender, age and industry/ experience.

Responsibility for increasing diversity in management teams is anchored in each of Tryg's business areas. In 2021, the business areas defined their own ambitions and action plans for how to work with broadening diversity amongst their management teams. HR supports the business areas in reporting and ensuring progress.

Ensuring gender balance in leadership

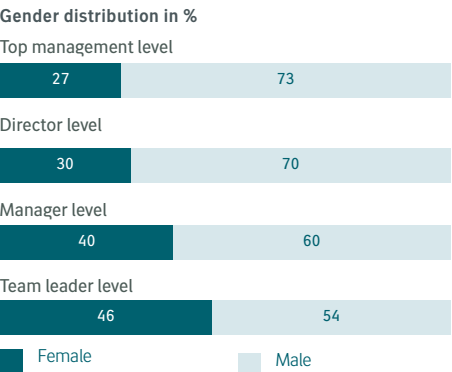
The financial sector is generally characterised by low female representation in management positions, which is a challenge when it comes to diversity and inclusion.

Tryg has had a strong focus on diversity for several years with the aim of increasing the share of women in management positions to 41%. We do not focus on diversity just because it is the right thing to do, but also because we firmly believe that a higher number of women in management will increase our talent pool and create an engaging, successful company culture that can attract and retain the best talents.

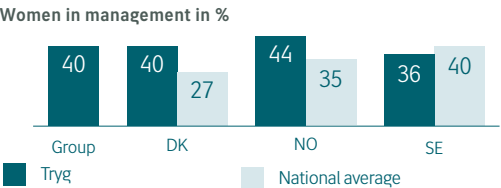
The share of women in management positions increased from 38% in 2020 to 40% in 2021, just short of the target of 41%. Progress has been driven by continuous focus in our recruitment and HR processes, and we have achieved a 52/48 gender balance for managerial recruitments.

With 46% women in team leader positions and 40% women at manager level, we have created a balanced pipeline at the lowest leadership levels. However, there is still potential when it comes to realising full gender balance with 30% female directors, 27% women in top management and 25% on Tryg's Executive Board.

Breaking through the glass ceiling is an important focus area for Tryg, and we are dedicated to creating a better balance at the top levels of the organisation. From 2022, we will supplement our target of 41% women in management positions with sub-targets to increase the share of women at top management level⁷ to 33% and women at director level to 41% in 2024.



In Norway, 44% of management positions are filled by women (41% in 2020). This fulfils the group target, but is also above the Norwegian national average of 35%. Moderna in Sweden still has some work to do with 36% (32% in 2020) women in management positions compared to a national average of 40%. In Denmark, we saw a significant increase in the past year, and at 40% (36% in 2020) we are well above Denmark's national gender balance in management average of 27% in 2021⁸.



Tryg's Supervisory Board is composed of six men and seven women, and under Danish law as well as Tryg's own policy, there is equality among the genders.



Tryg's commitment to increasing the number of women in management positions contributes to SDG 5, Gender Equality, specifically indicator 5.5.2.

⁷Top management level consist of following positions: Executive Board, Senior Vice Presidents & Vice Presidents.
⁸Source: World Economic Forum Global Gender Gap Report 2021. Def.: Legislators, senior officials and managers

Responsible company

Actions to increase diversity and inclusion

Fostering diversity and inclusion requires looking beyond the barriers and focusing on the underlying structures, HR processes and our organisational culture. Creating the cultural change required to meet our ambition will take time, and there are no quick or easy solutions.

To attract, hire and retain diverse talents, we focus on attracting diverse candidates through our employer branding efforts. We promote diversity in our recruitment process through challenging bias and training our hiring managers in unconscious bias and the benefits of diversity.

Tryg will recruit the candidate with the best competencies and skills for the team, and we are striving to hire candidates that will help increase diversity of thought in our management teams. A concrete initiative involves external candidate searches for management positions in cases of limited applicant pool diversity. For several years, we have had a CEO approval process in place for managerial recruitments aimed at ensuring a gender-balanced leadership population.

We are building a diverse leadership pipeline by identifying and developing diversified talent in our talent and succession management processes, and we are building an inclusive culture by raising awareness and training our leaders on the topic of diversity and inclusion as part of our leadership programmes.

Tryg remains a committed member of the Danish Diversity Council to help inspire and grow the number of women in management and build an inclusive company.

[⬇ Download](#) General action plan for diversity including women in management

Harassment

Tryg has a responsibility for creating a safe, trustful and motivating environment with equal opportunities for its employees. We do not tolerate any kind of harassment in the workplace, and for several years we have had internal processes in place to prevent and handle inappropriate behaviour.

Tryg's Code of Conduct encourages all employees to speak up if they experience abusive behaviour of any kind. Employees can either talk to their direct manager, staff representative, occupational health and safety representative, HR or use our anonymous whistleblower hotline to ensure that incidents are quickly and fairly handled. In Tryg, all reported instances of harassment are individually assessed and individually handled. In 2021, six cases were reported to and investigated by HR. Three cases led to resignations, one to a warning, and one is pending.

In Tryg, we see this as an inevitable focus area for our leaders, management teams and HR to focus on. It is of high priority for Tryg to create a trustful and honest culture, where employees respect each other's boundaries and where it feels safe to speak up.

To ensure that we have a respectful company culture, in our yearly employee satisfaction survey we ask all our employees if they have experienced harassment in the past year.

In 2022, we will focus on preventing harassment through awareness-increasing initiatives targeted at employees and managers. For example, we will increase awareness through our yearly Code of Conduct e-learning programme and set up a series of leadership webinars on the matter.

[⬇ Download](#) Code of Conduct



Working at Tryg

Providing a healthy and safe working environment and securing the well-being of our employees is vital to Tryg. Our materiality assessment indicates that Tryg has an impact on its employees and their well-being through, for example, the physical and mental working environment. We are continuously working to improve working conditions for our employees to ensure that Tryg is an attractive workplace where everyone thrives and can perform to their full potential.

Collective agreements

Tryg is party to collective agreements in the Scandinavian countries, where more than 99% of our employees are based. Most of our Scandinavian employees are covered by these agreements, and the rest are on individual contracts. All Tryg employees are covered by national standards and requirements.

Employee well-being

Tryg continuously seeks to improve the physical and mental well-being of our employees.

Health and physical well-being are fundamental to employee well-being. We ensure that the physical conditions at all our offices are compliant with official recommendations for the physical working environment and prioritise the creation of optimum conditions for physical employee well-being. We offer our employees physiotherapy and ergonomic advice in the offices. It is crucial that our employees are motivated by their surroundings and provided with the equipment necessary to perform their work.

The mental well-being and health of our employees are as important as their physical health. We offer psychological help to any of our employees who are going through an emotional crisis or challenge – stress, depression, divorce, accidents or deaths – either in their professional or private lives.

COVID-19

In 2021, the COVID-19 pandemic continued to affect society and Tryg's employees' working lives as they spent long periods working from home.

To ensure the well-being of our employees and support them in working from home, we took several initiatives. Our employees have been allowed to take home IT equipment and their office chairs to enable them to set up a proper home office. We established a COVID-19 intranet site to ensure that our employees were informed about Tryg's guidelines. We supported our leaders with training in communicating and leading from a distance, and we established a special intranet site with tools, training material, advice and guidelines.

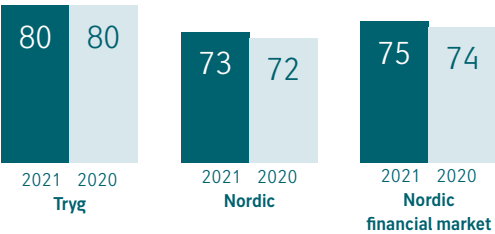
Tryg conducted three extraordinary employee satisfaction surveys in 2020 and a follow-up survey in March 2021. The 2021 surveys showed that most of our employees were thriving working from home, with the general well-being score averaging 3.9 out of 5. The survey showed a slight decline from the 4.1 score in the 2020 surveys, which was to be expected after the longest period of working from home during the pandemic.

New ways of working

During the pandemic, Tryg gleaned a number of learnings about how we work and cooperate, both locally and across the Nordic countries. The extraordinary employee well-being surveys indicated that our employees would like to be able to work from home a couple of days a week post-pandemic. As a result, Tryg initiated a project entitled 'New ways of working' to ensure that we used these learnings to create the right working conditions for our employees, both in terms of motivation, efficiency and collaboration. In 2021, Tryg announced that post-pandemic our employees will have the opportunity to work from home one to two days a week to allow them to arrange their working lives to suit their individual needs and to allow for flexibility and an improved work-life balance.

Employee satisfaction

Tryg's annual employee satisfaction survey is key to measuring employee satisfaction and provides us with a starting point for talking about well-being in the workplace. In 2021, our overall employee satisfaction score remained at 80, which is above the average for the Nordic financial sector of 75. In 2021, 18 departments were supported in their work with the survey results, compared to 13 departments in 2020.



Employee bonus scheme

Each year, Tryg's Supervisory Board decides whether a general employee bonus scheme should be established, to be released when specific yearly targets are met. In 2021, a bonus scheme was established, and a bonus was paid out to Tryg's employees. Employees can choose between receiving the bonus in the form of cash or Tryg shares. It is more favourable to receive the bonus in the form of shares since we are keen for our employees to be shareholders of Tryg and thus feel a sense of ownership.

Employee benefits

- Welfare and goods**
 - Health insurance, collective life insurance, collective casualty insurance
 - Business travel cards for trains and buses
 - Canteen arrangements
 - Hairdresser and massage arrangements at HQ
 - Insurance discount in Tryg
 - Shop where employees can buy products and services at a discount
 - Leisure associations
 - Gym and fitness agreements
 - Holiday homes for employees at favourable prices
 - Sustainable Christmas presents
- Working environment**
 - Psychological counselling
 - Medical counselling
 - Stress counselling
 - Ergonomic counselling
- Salary and pension**
 - Employee bonus scheme
 - Company phones
 - Employee grant
 - Success fee
- Holidays, absence and leave**
 - Paid sick leave
 - Maternity, paternity and parental leave for men and women
 - Care days and senior holidays
 - Holidays in compliance with national holiday acts



Green workplace

As one of Tryg's strategic focus areas, we are dedicated to becoming a green workplace. As an insurance company, our direct carbon footprint is relatively limited. Yet, as a responsible company, we are committed to minimising our own negative climate and environmental impacts. Our target is to reduce our carbon emissions by 35% in 2024 and 55% in 2030 compared to 2019 and to achieve carbon neutrality in 2023 by compensating for the rest of our carbon emissions deriving from Scope 1 and Scope 2 and from waste, air and train travel in Scope 3. Our goal is to compensate less and reduce more over time.

We are aware that Tryg plays an important role through the indirect impact of our **claims handling, supply chain, insurance products and services** as well as our **investments**, and we strive to minimise any negative impact from these areas of our business as well. Tryg's climate and environmental policy sets out Tryg's commitment to minimising the carbon footprint and negative impact of our own operations and our business activities.

[Download Climate and environmental policy](#)

Carbon emissions

In 2021, Tryg's total carbon emissions decreased by 59% compared to 2019⁹, corresponding to a decrease of 3,045 tonnes of CO₂ in total and 790 kg of CO₂ per employee. Further, Tryg's carbon emissions in 2021 decreased by 17% compared to 2020, corresponding to a decrease of 419 tonnes of CO₂ in total and 130 kg of CO₂ per employee¹⁰. In 2021, Tryg purchased and cancelled certified renewable electricity for all our offices in Denmark, Norway and Sweden. Factoring this in, Tryg's total carbon emissions for 2021 decreased by 71% compared to 2019¹⁰.

However, 2021 was an unusual year due to the COVID-19 pandemic, which again significantly affected Tryg's carbon emissions.

During the year, most of our employees in Denmark, Norway and Sweden were asked and advised to work from home for longer periods of time to support the governments' recommendation of reducing the number of people in the workplace during the peaks of the pandemic. As a result, the carbon emissions from our total electricity consumption decreased by 48%, carbon emissions from our total district heating consumption by 29% and carbon emissions from our total waste production by 52% compared to 2019, all contributing to the decrease in Tryg's total carbon emissions.

Except for business-critical travel, there was no business travel across national borders during January to mid-August and again from mid-December following the governments' recommendations to work from home. This led to an 86% decrease in carbon emissions from air travel compared to 2019. Under normal circumstances, air travel accounts for around 50% of Tryg's total carbon emissions. Thus, our limited use of air travel during 2021 contributed to the decrease in Tryg's total carbon emissions.

In addition, Tryg launched several initiatives in 2021 to reduce the negative environmental impact of its own internal operations, which also contributed to the decrease in our total carbon emissions.

For further details, please see [ESG data overview on page 27](#)

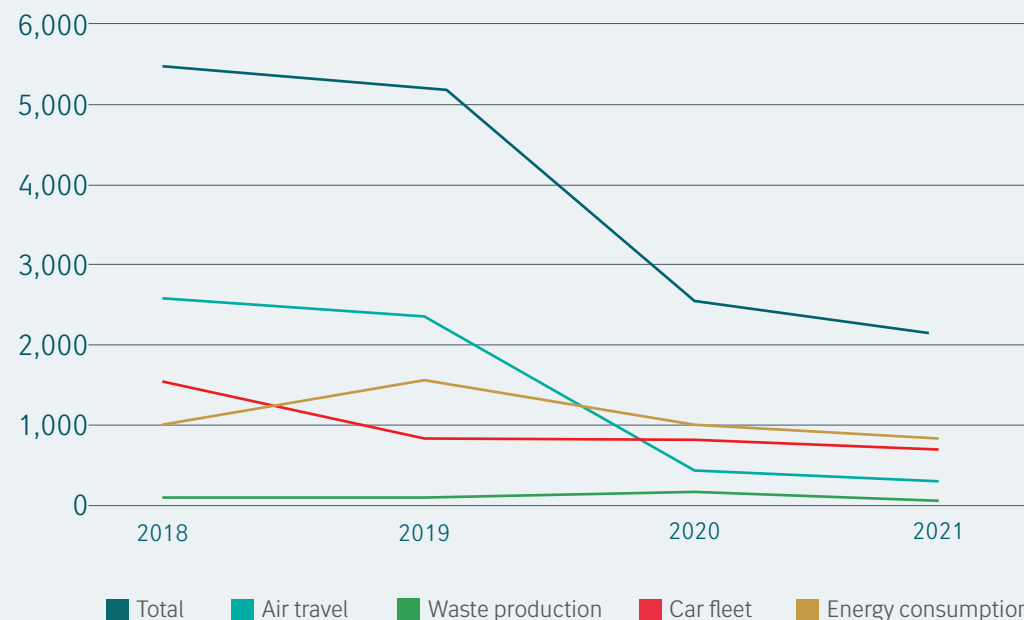
⁹Baseline year

¹⁰Location-based

Tryg's total carbon emissions decreased by 59% compared to 2019

Carbon emissions

Tonnes



Initiatives

Our ambition to be a green workplace calls for a change of mindset, conduct and habits.

We seek to reduce the carbon footprint associated with our offices as well as transport, including car, taxi, train and air travel. We want to make our offices more environmentally friendly by purchasing renewable energy and reducing the carbon emissions deriving from our energy consumption by 58% and the emissions deriving from our waste production by 12% in 2024 compared to 2019.

Since transport accounts for a large share of our carbon emissions, we wish to change our transport habits. Thus, our target is to reduce our carbon emissions deriving from air travel by 23% and the emissions deriving from our car fleet by 23% in 2024 compared to 2019.

Tryg does not own its offices. We therefore encourage the building owners to make resource and efficiency improvements to the buildings and invest in renovating the buildings to keep them energy-efficient. We generally adhere to the principle of always considering the more sustainable option when having to replace energy-consuming installations at our offices.

Energy consumption

The energy consumption¹¹ of Tryg's offices accounted for about 43% of Tryg's total own carbon emissions in 2021.

In 2021, Tryg purchased and cancelled certified renewable electricity for all our offices in Denmark, Norway and Sweden. This has reduced our total carbon emissions by 81% (see page 27)¹². Yet, we continuously work towards increasing the energy efficiency and reducing the energy consumption of our offices, also in collaboration with the building owners.

¹¹Location-based
¹² Market-based

A number of initiatives have been started at our two offices in Bergen in Norway to improve the energy efficiency of the buildings. At one of our Bergen offices, the building owner has installed 1,000 square metres of solar panels on the roof to provide the office with renewable energy.

At our other Bergen office, the building owner has finished installing ventilation systems that recirculate the heat and thus reduce energy consumption. Also, the office is now heated by an energy-efficient district heating and cooling plant.

Waste production

The waste generated by Tryg's offices accounted for about 3% of Tryg's total own carbon emissions in 2021.

Tryg is continuously working to minimise waste volumes and segregate our waste at local waste segregation stations. In 2021, we focused on increasing the use of the waste segregation stations at our offices among our Norwegian employees, e.g. by updating the waste segregation guidelines.

Air travel

Air travel accounted for about 17% of Tryg's total own carbon emissions in 2021.

To ensure that Tryg's target of reducing carbon emissions from air travel is met, in 2021 we started breaking down Tryg's aggregate target between Tryg's main business areas. Thus, the target will be broken down hierarchically as KPIs. This work will continue in 2022. Also, an employee guideline has been formulated on what to consider before booking a flight in order to attend a meeting, e.g. whether physical attendance is required.

Car fleet

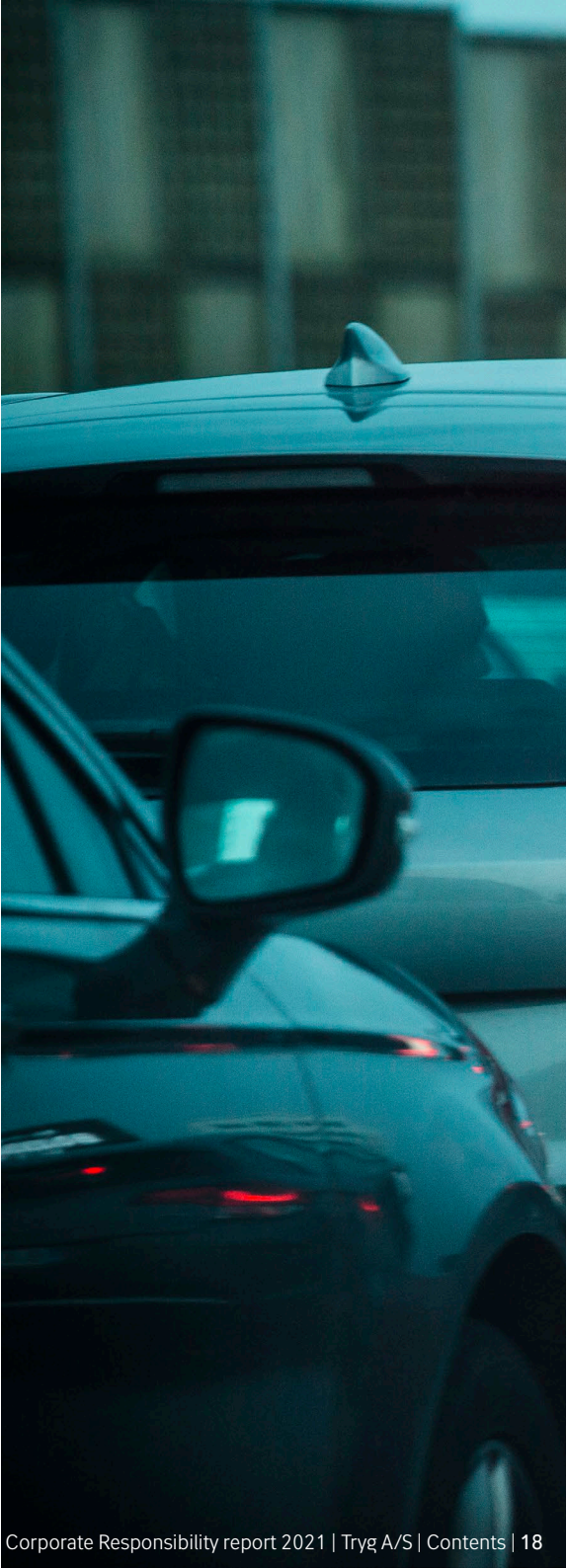
Tryg's car fleet accounted for approximately 35% of Tryg's total own carbon emissions in 2021.

In 2021, we increased the company car TCO (total cost of ownership) for employees selecting a car classified as A+++ (which is all electric cars and certain plug-in hybrids, cf. the Danish car energy class system) as their company car to incentivise our employees to select a more environmentally friendly car. In 2021, 30% of Tryg's car fleet were A+++ cars.

Percentage of kilometres driven in Trygs car fleet in 2021	
Driving in zero-emission cars	4
Driving in low-emission cars	8

In recent years, we have installed additional electric vehicle charging stations at our offices in Norway and Denmark to encourage our employees to choose an electric or plug-in hybrid car.

The charging stations are for use both by employees with company cars and for employees with a private electric or plug-in hybrid car.



Green workplace

Climate and environmental certifications

Tryg's seven biggest offices in Norway are certified under the Eco-Lighthouse certification scheme for enterprises seeking to document their environmental efforts and demonstrate social responsibility in order to create more environmentally friendly operations and safer working environments. We produce an annual Eco-Lighthouse report to describe progress and document the policies and procedures in place to manage our climate and environmental impact.

In 2021, Tryg's offices in Norway were recertified according to the specific criteria applying to the insurance industry.

In Denmark, Tryg is implementing a high standard of environmental management according to the internationally recognised standards for effective environmental management, ISO 14001:2015, and the EU's Environmental Management Audit Scheme, EMAS. Both standards are based on the implementation of an effective environmental management system and the mitigation of negative impacts on the environment. We expect to be granted both ISO 14001:2015 and EMAS certification in Denmark in 2022.

Internal informative and behavioural campaign

Tryg's employees play an important role in meeting our carbon emission reduction targets, which is why it is essential to inform and motivate our employees to change their mindset and habits. In autumn 2021, we did an internal campaign to inform our employees about our new Corporate Responsibility strategy and motivate them to behave more sustainably in order to contribute to Tryg's carbon emission reduction target and our overall ambition of being a green workplace.

Canteen

Tryg has outsourced its canteen operations at its head offices in Denmark and Norway, which cater for approximately 900 and 700 Tryg employees every day, respectively. The supplier was elected for its high food quality standards and sustainability efforts. This means that our food waste is managed and limited, and our waste is sorted.

In the canteen at our head office in Denmark, we sort food waste and regular waste into fractions. At our other large offices in Denmark, sorting systems have also been established in the canteens. In 2021, we established sorting systems in our canteens in Oslo and Bergen in Norway as well.



Tryg's commitment to reducing waste production contributes to SDG 12, Responsible consumption and production, specifically indicators 12.2.1 and 12.5.1.



Tryg's commitment to reducing its own carbon emissions contributes to SDG 13, Climate action, specifically targets 13.1 and 13.3.



Sustainable insurance

One of Tryg's biggest impacts relates to the products and services offered to its customers. We want to support and motivate our customers on their own sustainability journey by offering sustainable products and services as well as incorporating sustainability into our claims handling process. By offering products and services with claims prevention measures, we may prevent claims from happening in the first place or minimise the damage. When claims do occur, we want to ensure that they are handled in a sustainable manner.

Sustainable products and services

Tryg wants to promote sustainable behaviour by offering products and services that include various sustainable elements. Claims handling processes are often associated with the use of considerable resources and energy leading to carbon being emitted into the atmosphere. Thus, Tryg seeks to leverage its impact as an active peace-of-mind creator by preventing claims from happening in the first place, thus preventing both worry and inconvenience for our customers, but also by avoiding harming the climate and the environment through an increased focus on claims prevention measures in our products and services. Tryg's ambition is for claims prevention products and services to make up a quarter of Tryg's top-line growth from new products and services.

We want to offer products and services that contribute to society both environmentally and socially. In 2021, we looked into how we can integrate sustainability into our products and services even further and in a manner that is aligned with our business model and strategy, that resonates with our customers and that considers the EU Taxonomy Regulation. Additionally, we have started working towards incorporating sustainability measures into our underwriting strategy. This work will continue in 2022.

Welfare

Preventing illness and injury is an important part of Tryg's ambition of being an active peace-of-mind creator. Since introducing its first health insurance in 2006, Tryg has launched several health products and services – many of which include preventive measures.

Tryg wants to accommodate its customers' increased demand for better treatment as well as contributing to the public healthcare system and the common goal of offering the best possible healthcare services. Health and welfare are about feeling safe and secure, and therefore Tryg sees it as its responsibility to proactively contribute to the physical and mental well-being of the population in the Nordic countries.

To engage in a deeper conversation on how Danish society can handle the structural challenges of the future healthcare system, Tryg has initiated The Think Tank for Future Welfare Solutions. Together with Danish key welfare stakeholders such as unions, healthcare providers, health economists, patient associations, hospital staff and interest groups, we seek to facilitate a dialogue on solutions and new ways of tackling the comprehensive challenges that the Danish healthcare systems will face in a 10 to 20-year period, such as demographic changes, a shortage of health professionals and a more complex picture comprising an increase in chronic and multiple illnesses.



Private

Simpler health insurance

In our busy everyday lives, prioritising one's health can be difficult. Therefore, it is important that it is easy and simple to receive guidance and treatment when necessary. Tryg has launched Treatment Simple in Norway, which is Tryg's health insurance product that does not require a health statement, making it quick and easy to receive the necessary treatment, and at a lower price than our normal health insurance product. The insurance covers the most common health issues, physical treatment or medical consultation within a few days and includes access to Tryg's medical hotline, providing instant access to doctors when necessary. The insurance is also available for our commercial customers.

Help for relatives

The relatives of critically ill persons are often a vulnerable and overlooked group. People often have problems making their everyday life work – both at home and at work – due to the new and challenging tasks and responsibilities they have to take on when a loved one falls ill. As part of Tryg's health and person insurance, we launched Tryg Relative, which offers all our customers with a health and person insurance access to our RelativesHotline, where experienced nurses help customers navigate the health system and address stress symptoms. It is also possible to purchase extra help and care if needed.

Alarm and bike safety accessories

Tryg has launched its new contents insurance in Denmark comprising Basis, Extended and Super covers. The Extended contents insurance includes either an optional house alarm or an optional bike security accessory in the form of a bike lock with or without an alarm, a reflector with a built-in GPS tracker or an alarm box for the bike. The Super contents insurance includes both an optional house alarm and an optional bike security accessory, enabling our customers to protect their home and belongings from burglary and theft as well fire.

Damp alarm in motor homes and caravans

Every year, many motorhomes and caravans are damaged as a result of infiltration of damp. The extent of the damage increases with time, and it is important to identify potential damp problems early to be able to limit the extent and cost of any claim. Tryg has entered into a partnership with Avara, which has developed a damp alarm that detects damp before damage occurs. To motivate our Norwegian customers to install alarms in their motorhome or caravans, we offer those who install an Avara damp alarm or any other Avara alarms a discount on their motorhome or caravan insurance.

Electric car insurance

Tryg wants to promote sustainable consumption, including choosing a car with a lower carbon footprint. As a result, Tryg Denmark has entered into a partnership with Polestar, a new electric car brand that has launched a 100% digital sales concept in Denmark. The partnership comprises an online insurance solution for Polestar customers, who are offered car insurance from Tryg when they buy their new Polestar car, including insurance free of charge for two months, to make it as simple as possible for them to insure their electric car.

Commercial and Corporate

Digital workplace assessment

A healthy and safe working environment is important to ensuring the well-being and motivation of employees and to preventing sick leave or workplace injuries. To support our customers in preventing sickness and injuries among their employees, Tryg offers our Danish business customers access to an online workplace assessment through their industrial injury insurance, enabling our customers' employees to complete the statutory workplace assessment from their computer or smartphone. The assessment helps employers to identify any challenges in the working environment that can lead to sick leave or workplace injuries, thus helping to prevent sickness and injuries.

Prevention of back injuries

Back pain and back injuries are a widespread problem at many workplaces, and treatments of the back account for almost 60% of physical treatments among corporate customers with a health insurance at Tryg. To improve employee welfare and reduce sick days among our customers' employees, Tryg has partnered up with a start-up that has developed a vest with sensors capable of recording strain on and movement in the back when wearing it. The vest provides the company with data, making it possible to identify potential challenges and focus areas and thus improve the working environment. The vest has been tested on 50 employees from a corporate customer for six months to identify any scope for improvements and whether the vest can prevent back injuries among employees doing a lot of heavy lifting during their working day. The test is part of a project aimed at preventing back injuries and back pain among Tryg's commercial and corporate customers' employees.



Tryg's commitment to incorporating sustainability into products and services, including claims prevention, contributes to SDG 12, Responsible consumption and production, specifically indicators 12.2.1 and 12.5.1 as well as target 12.6.



Tryg's commitment to incorporating sustainability into products and services, including claims prevention, contributes to SDG 13, Climate action, specifically indicator 13.1.1 and target 13.3.

Sustainable insurance

Sustainable claims handling

Each year, Tryg handles more than one million claims. Hence, one of our biggest impacts as an insurance company is associated with our claims handling processes.

To support its customers’ sustainable choices, Tryg seeks to make its claims handling processes as sustainable as possible. Our long-term goal is to be amongst the leading Nordic insurance companies in the quest for more sustainable claims handling. By encouraging our employees, our suppliers and our business partners to take a leading role in exploring how we can become even better at sustainable claims handling, we will drive positive environmental and social progress and contribute to a more circular economy.

In the update of our targets for 2023 to 2024, we have increased our ambition level with regard to the share of our claims spend that is classified as sustainable. It is of high importance to us to ensure that as many as possible of our claims handling activities are classified as sustainable. As a result, we raised our target to increase our claims spend classified as sustainable by 80% in 2024 compared to 2020. Hence, 30% of our claims spend is to be classified as sustainable in 2024, meaning we are to almost double the share of our spend classified as sustainable compared to 2020.

To increase the claims spend that we classify as sustainable, we intensified the use of the claims handling methods that historically have proven to be more sustainable in 2021. Furthermore, together with suppliers and partners, we have introduced new claims handling initiatives that enable us to implement more sustainable claims handling methods. From 2020 to 2021, we increased our share of sustainable spend by 35% and tracked more than 30 initiatives. In 2021, the motor sector contributed most to the progress achieved. Going forward, we expect the property sector to contribute to a larger degree.

In 2021, Tryg took measures to verify its sustainable spend classification methodology. We will continue to seek dialogue and collaboration with industry peers to further align the reporting methods used in relation to more sustainable claims handling.

Read more about our sustainable spend classification methodology and reporting

Carbon emission reductions from sustainable claims handling
The carbon footprint of Tryg’s claims handling activities is significant in comparison to the rest of our carbon footprint. To contribute to a low-carbon economy, our target is to achieve a total CO2 reduction effect of 20,000-25,000 tonnes through more sustainable claims handling in 2024.

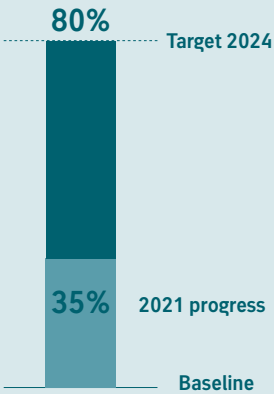
Further initiatives will be aimed at documenting carbon emission reductions through performing life-cycle analyses and collaborating with our suppliers to identify more opportunities for reducing CO2 in our claims handling processes.

In 2019, Tryg carried out three pilot studies to establish the method for calculating CO2 emission reductions, which included the repairing of car windshields instead of replacing them, performing phone fixes instead of providing traditional on-the-spot roadside assistance and reusing car spare parts instead of replacing with new parts.

Additionally, in 2021, Tryg calculated the CO2 reduction effect of other claims handling initiatives, such as digitising veterinarian and doctor consultations, repairing plastic car bumpers and remote monitoring rather than on-site monitoring of building claims. From existing and new cases, we achieved a total CO2 reduction effect of 6,740 tonnes in 2021 through more sustainable claims handling.

In 2022, we will increase our efforts to reduce the carbon emissions deriving from our claims handling activities by intensifying the use of operational or supplier-specific targets to further these initiatives. Additionally, we plan to map the total carbon emissions deriving from our claims handling activities.

Target 2024: 80% increase in sustainable claims spend



CO2 reduction effect of more sustainable claims handling initiatives (tonnes CO2e)

Initiatives	2020	2021
Motor		
Used spare parts	2,778	3,187
Repairing of windshields	2,936	3,377
Road assistance by phone-fix service	41	60
Repairing of plastic car bumpers	49	84
Health & Animal		
Digital doctor consultations (Tryg Lægehjælp)		2
Digital veterinarian consultations (FirstVet)		25
Property/Building		
Remote monitoring of building claims		5
Total CO2 reduction effect	5,804	6,740



Tryg’s commitment to incorporating sustainability into claims handling processes contributes to SDG 12, Responsible consumption and production, specifically indicators 12.2.1 and 12.5.1 as well as target 12.6.



Tryg’s commitment to incorporating sustainability into claims handling processes contributes to SDG 13, Climate action, specifically indicator 13.1.1 and target 13.3.

Ethics and compliance

Business ethics, risk management and good corporate governance are underlying, but fundamental elements of responsible business conduct. This is the foundation on which Tryg builds its business and of everything we do as a company, in our daily lives as employees and in our work with our Corporate Responsibility strategy.

Tryg is committed to running an ethical, transparent and responsible business. Our commitment to ethical and good corporate governance as well as compliance with all applicable national and international legislation is the foundation on which we build and drive our business forward. We want to promote responsible business conduct throughout our value chain and expect our employees, suppliers, business partners and external investment managers to comply with these principles.

Our materiality assessment shows that business ethics, data privacy and cybersecurity are material matters to Tryg. Building knowledge and capacity on these issues, not only internally among our employees, but in all our business relations, requires continuous attention.

Tryg's Code of Conduct defines the rules that all employees are required to adhere to. From 2022, it will be mandatory for employees to complete a yearly e-learning programme on Tryg's Code of Conduct.

Our tax policy and our anti-corruption policy further outline our commitment to acting as a responsible company. In 2021, we updated our tax policy to be inspired by the GRI sustainability reporting standard #207 and follow expected future guidelines and legislation from the EU and OECD. The purpose of the policy is to create greater transparency in relation to Tryg's management of tax risks, efforts to comply and approach to tax planning.

Our Supplier Code of Conduct sets out minimum requirements for our suppliers and partners to operate in accordance with responsible business principles and in full compliance with all applicable legislation and regulations. Tryg's responsible investment policy outlines the principles we follow to ensure that our investments are conducted in accordance with our values.

- ⬇ [Download Code of Conduct](#)
- ⬇ [Download Supplier Code of Conduct](#)
- ⬇ [Download Tax policy](#)
- ⬇ [Download Anti-corruption guidelines](#)
- ⬇ [Download Responsible investment policy](#)

Whistleblower hotline

Tryg's whistleblower hotline is open to employees and all stakeholders wishing to report the violation or potential violation of legislation and other issues within the scope of Tryg's whistleblower hotline, for example harassment. Reports are handled by the Whistleblower unit in Tryg (consisting of the Chairman of the Risk Committee and Audit Committee, Head of Compliance and Vice President Legal). Our whistleblower hotline has been updated to comply with new regulation. In 2021, six cases were reported and investigated compared to one case in 2020.

Security

As an insurance company for which digitalisation and innovation are high priorities, Tryg is exposed to several security threats that must be mitigated. It is vital that we pay attention to security, since a high level of security creates a safe workplace as well as the basis for a successful and adaptive business.

To ensure a high level of security, it is important that our employees are aware of and comply with

Tryg's security rules for employees, which cover topics such as emails, IT equipment and confidential material. To uphold our security level, we test all our employees in their knowledge of our security rules once a year.

Cybersecurity

Cybersecurity is an important part of Tryg's work with security, as we are dependent on fully functional IT systems to perform our work and run our business as an insurance company. Tryg complies with the ISO 27001 standard on information security management, on which our information security rules are based. It is important that our employees are mindful of how to use our IT systems in a secure and responsible manner, which is why several cybersecurity-related topics are included in our security rules for employees.

Tryg pays particular attention to phishing and phishing attacks, as the majority of all ransomware attacks happen through phishing. To increase Tryg's cybersecurity level, we have implemented an email filter that automatically detects many of the phishing emails that are targeted at our employees on a daily basis. To raise awareness and educate our employees, we also run campaigns that 'test' our employees by sending them phishing emails. Any employees who click on a link in one of test phishing emails are taken to an online training site. The goal is to teach our employees to spot phishing emails that may get through our phishing email filter.

In 2021, 14 Tryg employees from Denmark, Norway and Sweden completed the Business Cybersecurity Ambassador course offered by the Danish Insurance Academy in order to further improve Tryg's cybersecurity level. The purpose of the course is to enable participants to spot and handle IT security breaches by providing them with a fundamental understanding of cybercrime and cybersecurity.

Ethics and compliance

Data

Data privacy and data ethics are important issues for Tryg, as we deal with personal data on a daily basis, including sensitive data about our customers, those insured, our employees etc.

Data privacy

Ensuring that our customers' personal data are stored and handled in a lawful, secure and compliant manner is a high priority for Tryg. Through our Privacy and Cookies Notice, available at tryg.com, we seek to be transparent about how we collect, process and use our customers' personal data. In the notice, we describe whom we process data about, which data we collect, which sources we collect data from, whom we share the data with and for how long we store the data.

[Download Privacy and Cookie Notice](#)

In 2021, we completed an assessment of Tryg's maturity in relation to GDPR in Denmark, Norway and Sweden. The results were reported to Tryg's Risk Committee, providing the committee with insights into Tryg's maturity in relation to various GPDR-related matters. Also, we updated our internal governance model, the purpose of which is to clearly define roles and responsibilities in relation to Tryg's systems, processing activities and suppliers and hence enhance our capability to monitor and manage compliance-related risks in relation to GDPR. The governance model includes the implementation of a new compliance tool, which makes it more efficient to assess and monitor risks.

To support our efforts to ensure that all personal data are processed in a compliant manner, Tryg has established a GDPR and IT Security Board charged with monitoring and coordinating cross-organisational activities to ensure Tryg's compliance with applicable privacy and security regulations, standards and industry practice as well as addressing material data ethical issues. The Board is chaired by Tryg's Group COO.

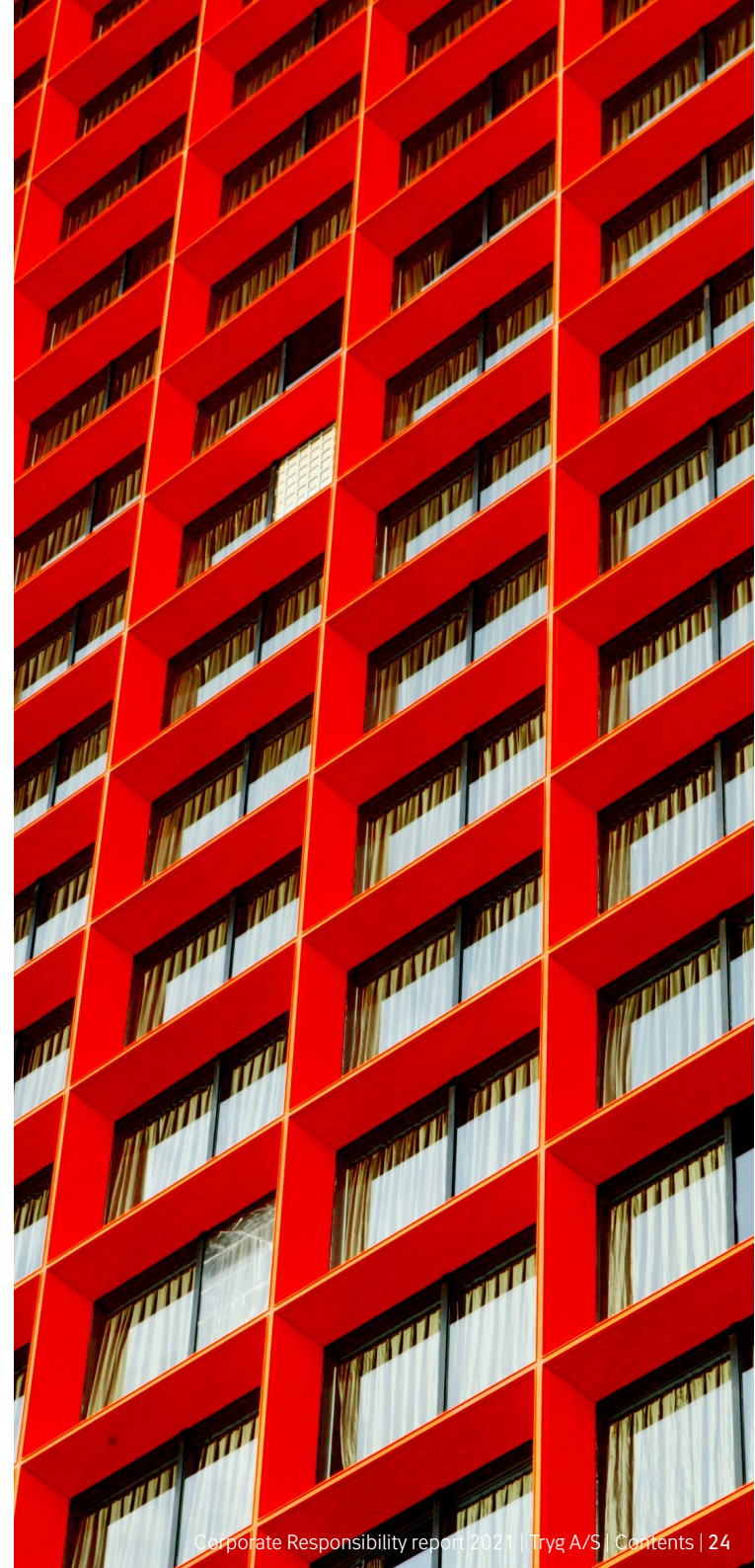
Tryg has a Data Protection Officer, who advises the organisation on Tryg's obligations under applicable privacy laws and monitors compliance with GDPR, including awareness raising and staff training. The Data Protection Officer also acts as contact point for the supervisory authorities in data protection matters.

Tryg has established a GDPR partner programme and appointed GDPR partners in all Tryg's lines of business in Denmark, Norway and Sweden. The GDPR partners have received in-depth GDPR training and are continuously being informed on new customs, rulings and risks by Tryg's Data Protection Officer to enable the partners to answer their colleagues' GDPR questions.

As part of Tryg's GDPR awareness activities targeted at its employees, a designated GDPR site has been created on the intranet to inform and guide employees on daily data privacy matters such as what a data breach is and how to report it, the rights of our customers and other individuals about whom we hold personal information, requirements for risk assessments of our processes, systems and vendors as well as an FAQ site. The GDPR site is accessible by all our employees.

Tryg's internal procedures for handling data breaches enable all employees in Denmark, Norway and Sweden to report any data breaches. To strengthen this process, a digital platform for reporting data breaches is available for our Danish and Norwegian employees. The purpose of the platform is to increase the safety and user-friendliness of our data breach reporting process and to ensure the timely handling of all potential breaches.

Also, an e-learning course on GDPR and IT security is mandatory for all new employees as part of Tryg's onboarding programme. In 2021, all new employees completed the online training. In Norway, we updated the e-learning course, and all our Norwegian employees had to complete the course again. It will be mandatory for all employees to complete a yearly e-learning programme on Tryg's Code of Conduct, including GDPR and IT security, from 2022.



Ethics and compliance

Data ethics

As an insurance company, we aspire to work with data in a way that helps us build long-term and trustful relationships with our customers, suppliers, the authorities, business partners, colleagues and other stakeholders.

The use of data, including personal data, is essential for our business model, since data is our primary resource in the development of products that meet our customers' needs. Using data in a responsible and ethical way is key for Tryg to be able to protect our most important resource and to secure our business model.

Our data ethical principles form part of Tryg's Code of Conduct, are based on industry standards stemming from the Danish trade association Insurance & Pension Denmark's Data Ethical Codex, relevant legal requirements as well as internationally agreed standards, and outline three main principles. Our data ethical principles are anchored within and approved by Tryg's GDPR and IT Security Board.

Transparency

It is vital to Tryg that we communicate about our use of data as well as our work with data ethics. This includes being transparent about when we use data to influence our customers' behaviour to avoid or prevent claims. All products involving advanced data collection as well as new commercial products which may have significant implications for privacy and the processing of the personal data of our customers must be submitted to Tryg's internal GDPR and IT Security Board to ensure that data ethical and privacy dilemmas are properly addressed. Tryg does not sell its customers' personal data.

Free choice

In Tryg, we care for personalisation and prevention. To offer tailor-made solutions that meet our customers' needs and to facilitate a good customer experience, we use data. By using data, we are able to design the best possible and transparent offers for our customers as well as preventing claims. We believe that customer-specific data are valuable to being able to offer tailor-made insurance products and services based on personal behaviour. However, we respect our customers' right to privacy and free choice. Therefore, we always ensure that an alternative insurance product is available.

Our use of artificial intelligence and new technologies is founded on respect for our customers. We screen all purposes carefully to ensure that our use is lawful and respects our customers' privacy rights.

We use automated processing of our customers' personal data (profiling) to calculate and fix prices to ensure that our customers are offered insurance products that meet their specific needs, to minimise risk as well as fraud and for tailor-made marketing. When pricing our products, we limit our profiling to particular categories of customer data concerned with health and union membership only. No profiling of ethnic origin or sexual or political orientation takes place.

Security

Tryg strives to ensure strong data security, as protecting the privacy of our customers, employees and business partners is a fundamental value for us. We attach the highest importance to protecting the data of our customers, suppliers, employees and other stakeholders in our development,

procurement and use of our IT solutions. We promote generally accepted information security based on current best practices and standards.

We require our IT suppliers to meet security standards and comply with all applicable privacy legislation. We carry out an audit risk assessment of our suppliers prior to their employment. As part of their employment contract with Tryg, our suppliers are required to agree to obligations on confidentiality and restrictions in use.

Tryg's employees must be well-informed about data ethics, data security as well as the proper and confidential handling of personal data. All our employees must sign a confidentiality undertaking. We create awareness and teach our employees about privacy through e-learning and training programmes, which all employees must attend and pass.

We collaborate and share knowledge on data security with the industry and authorities as part of our membership of the Danish trade association Insurance & Pension Denmark. To the extent possible, Tryg will share threat intelligence to support a high level of information security in the insurance industry and in society.

We always carefully analyse any data breaches and train our employees in privacy, as we want to prevent data breaches. To support our ongoing work with data ethics and ensure that we live up to our principles, all new commercial products with significant implications for the privacy of our customers must, for example, be screened by Tryg's internal GDPR and IT Security Board to properly address material data ethical dilemmas.

[⬇ Download Code of Conduct](#)

Insurance fraud

Insurance fraud can have adverse impacts and implications for Tryg and for its customers. Insurance fraud leads to increasing claims costs, which may lead to price increases. As a result, our honest customers would end up paying for customers who commit fraud. Therefore, it is important for Tryg to prevent and mitigate insurance fraud.

Every year, cases of suspected insurance fraud are investigated by our special investigation unit. In 2021, 8,067 notifications compared to 8,433 notifications in 2020 were passed on to our unit in Denmark. 39% were classified as insurance fraud compared to 40% in 2020.

It is important that we treat our customers with respect, which is why processes are in place to ensure that all investigations are approved in advance and are performed properly and with respect for the guidelines defined by our trade association Insurance & Pension Denmark. We always make sure to inform our customers when they have been selected for investigation. All our customers are assigned a personal contact, so they can easily provide us with the information needed to settle their claim. In this way, honest customers will receive the compensation they are entitled to, while fewer fraudsters succeed in their endeavours. All our customers will experience professional and proper case handling.

Social engagement

Tryg wants to contribute to society. Our Corporate Responsibility strategy is characterised by a strategic, commercial and holistic approach, the purpose of which is to integrate Corporate Responsibility into Tryg's business. Yet, as a responsible company, we want to engage with the societies we are part of. We believe that entering into partnerships with various stakeholders and working across sectors are part of our responsibility and contribution to society.

Safety

Tryg wants to contribute to safety in society. The Nightravens and Lifebuoys initiatives are designed to actively create peace of mind. Making people feel safer in the nightlife or along the coastline, near lakes and harbours benefits our customers, our business and society.

Lifebuoys

The red-white lifebuoy has become a symbol of safety and has, since 1952, provided safety along the coastline and near lakes, rivers and harbours in Norway. The lifebuoy is a vitally important rescue tool, and for decades Tryg has provided lifebuoys to Norwegian society. We have placed more than 50,000 lifebuoys all over Norway, from Lindesnes at the very south of Norway to Svalbard, the Norwegian archipelago in the Arctic Ocean, which every year help save people from drowning.

Safe in water courses

Since 2017, Tryg has worked with the Norwegian Society for Sea Rescue, Region West, to offer Safe in water courses to 14 to 15-year-old schoolchildren. Originally, the courses were run during autumn and winter to give the children a chance to experience being in the cold water, while being supervised by skilled instructors, wearing wetsuits and life jackets. In 2021, Tryg continued its collaboration with the Norwegian Society for

Sea Rescue. To be able to reach more children, the course is now being run as a classroom lesson, which the children participate in a couple of days before practising self-rescue, life-saving and first aid outside. Tryg has contributed educational videos for the classroom lessons and has provided lifebuoys to the mobile course stations carrying the course equipment. In 2021, 109 courses were held, and more than 3,000 schoolchildren did the course, which is being offered in several places in Norway.

Nightravens

The Nightravens are local groups of volunteers who walk the streets at night to create a safe environment, offering help and preventing unwanted incidents. The main target group is young people, and the mission of the Nightravens is to be present where young people hang out in the streets or local squares.

Since the early 1990s, Tryg has been the Nightravens' main partner. Tryg cooperates closely with the Nightravens Board, contributes staff resources to run the Nightravens secretariat and funds the equipment needed. Additionally, Tryg hosts the national Nightravens Conference in Bergen, Norway, every other year.

There are more than 280 Nightravens groups in Norway made up of a diverse mix of volunteers in terms of ethnicity, gender and age, which have the additional effect of working as a social community network for the volunteers.

Some groups are called Dayravens and walk the streets during the day to create peace of mind among young people who often gather at local shopping centres or in city centres after school. In addition to the Dayravens and the Nightravens, there are the MC-ravens who serve the same purpose as the Dayravens and the Nightravens but drive motorcycles.



Tryg's commitment to preventing drownings through the Lifebuoy initiative contributes to SDG 16, Peace and Justice, specifically indicator 16.1.4.



Tryg's partnership commitments contribute to SDG 17, Partnerships, specifically target 17.17.



Tryg's commitment to running the Nightravens secretariat contributes to SDG 16, Peace and Justice, specifically indicator 16.1.4.



Environmental, Social and Governance (ESG) data

Climate and environmental data

	Unit	2024 target	2030 target	2021	2020	2019*	2018
Scope 1 (direct emissions)							
Car travel, total ¹	Tonnes CO2e			724 ²	852	880	1,594
Stationary combustion:							
Heating oil, total	Tonnes CO2e			0	0	20	11
Natural gas, total	Tonnes CO2e			53	63	93	72
Total Scope 1 carbon emissions	Tonnes CO2e			777	915	994	1,677
Scope 2 (indirect emissions)							
Electricity consumption, total (location-based)	Tonnes CO2e			576 ³	687	1,109	743
Electricity consumption, total (market-based)	Tonnes CO2e			0 ⁴	2,473	3,714	2,939
District heating, total	Tonnes CO2e			323 ³	354	453	259
Energy consumption, total	GJ			55,849	54,574	72,918	62,713
Renewable energy share, total (location-based)	%			36			
Total Scope 2 carbon emissions (location-based)	Tonnes CO2e			899	1,041	1,562	1,002
Total Scope 2 carbon emissions (market-based)	Tonnes CO2e			323	2,827	4,167	3,199
Scope 3 (indirect emissions)							
Air and train travel, total	Tonnes CO2e			344 ⁵	474	2,443	2,545
Waste, total	Tonnes CO2e			62 ³	71	128	161
Total Scope 3 carbon emissions	Tonnes CO2e			406	545	2,571	2,707
Total direct and indirect carbon emissions (location-based)	Tonnes CO2e	35% reduction	55% reduction	2,082	2,501	5,127	5,386
Total direct and indirect carbon emissions per employee (location-based)	Tonnes CO2e			0.44	0.57	1.24	
Total direct and indirect carbon emissions (market-based)	Tonnes CO2e			1,506	4,287	7,732	7,583
Total direct and indirect carbon emissions per employee (market-based)	Tonnes CO2e			0.32	0.97	1.86	

*Baseline year

¹Includes company travel in Tryg's leased cars in Denmark. Carbon emissions for 2019-2021 are based on data obtained from leasing supplier, which reports on carbon emissions. Carbon emissions are calculated based on fuel consumption. Thus, the decrease from 2018 to 2019 is mainly due to a new and more accurate carbon emissions calculation method for 2019-2021.

²The decrease is mainly attributable to an increase in A+++ cars in Tryg's car fleet.

³ The decrease is mainly attributable to COVID-19 and initiatives to reduce carbon emissions of Tryg's own internal operations. Read more on page 17.

⁴ Tryg purchased certified renewable electricity for all its electricity consumption, which has caused the significant decrease.

⁵The decrease is mainly caused by COVID-19.

All figures related to stationary combustion, electricity consumption, district heating, energy and waste for 2019 and 2020 include 13 of Tryg's locations (with 50+ employees) compared to previously five locations in 2018, corresponding to 95% of our employees.

The reporting is a review of the Tryg's energy and carbon footprint based on the total energy consumption related to corporate operations. The carbon footprint gives a general overview of Tryg's greenhouse gas emissions, converted into CO2 equivalents, and it is based on reported data from internal and external systems.

The carbon footprint analysis is based on the international standard: A Corporate Accounting and Reporting Standard, by the Greenhouse Gas Protocol Initiative (GHG Protocol) and is developed by the World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD). The reporting considers the following greenhouse gases, all converted into CO2 equivalents: CO2, CH4 (methane), N2O (laughing gas), SF6, HFCs and PFCs. This methodology is based on the operational control aspect that defines what should be included in the carbon inventory, as well as in the different scopes.

The key external sources used as a basis for the calculations in this report are: World Resource Institute (WRI/US), International Energy Agency (IEA/OECD), Intergovernmental Panel on Climate Change (IPCC), Department of Energy and Climate Change (DECC/UK), EcolInvent LCI Database.

Tryg is aware of the fact that most of its direct and indirect carbon emissions derive from Scope 3 categories. Tryg is working towards extending its reporting on Scope 3 carbon emissions in relation to the categories most material to Tryg's business model.

Environmental, Social and Governance (ESG) data

Social data

	Unit	2021	2020	2019	2018	2017
Total number of employees (FTEs)	Number	4,674	4,400	4,151	4,027	3,373
Total gender distribution (female/male)	%	45/55	46/54	46/54	46/54	47/53
Total share of women in management positions	%	40	38	35	33	37
Employees, <30 years	%	17	17	16	15	16
Employees, 30-49 years	%	52	53	53	53	52
Employees, 50 years and above	%	31	30	31	32	32
Employee turnover	%	11	9.8	12	12.7	14.6
Total leavers	Number	516	482	529	431	512
Share of voluntary leavers	%	7.7	5.5	7.4	10.8	9.5
Share of involuntary leavers	%	3.3	4.3	4.6	1.9	5.1
Gender pay ratio ¹	Times	1.18	1.14	1.21	1.2	1.27
Sick leave	%	3.05	3.07	3.19	4.09	4.09
Total employee training hours	Hours	79,008	70,781	86,476	71,478	69,960
Average employee training hours	Hours	17	16	20	19	20
Employee satisfaction ²	Index point	80	80	78	78	76
Customer retention rate:						
Private Denmark	%	90.5	90.1	91.6	91.2	90.2
Commercial Denmark	%	88.6	88.6	88.6	88.0	87.7
Private Norway	%	88.5	88.4	86.9	86.7	85.8
Commercial Norway	%	89.4	89.2	89.0	87.7	86.9
Customer satisfaction score ³	Score	85	84	68	67	

¹Gender equality of remuneration is calculated based on male salary divided by female salary.

²Based on an annual employee satisfaction survey.

³In 2021, Tryg changed its method for measuring customer satisfaction. Hence, the scores for 2018-2019 are Transactional Net Promoter Scores.

Environmental, Social and Governance (ESG) data

Governance data

	Unit	2021	2020	2019	2018	2017
Size of the Supervisory Board incl. employee representatives	Number	13	12	12	13	13
Independent Board members	Number	6	5	5	5	6
Supervisory Board meetings	Number	17	22	8	9	15
Attendance rate, Supervisory Board meetings	%	100	99.6	100	98	97
Members of the Audit Committee	Number	4	3	3	4	4
Audit Committee meetings	Number	8	7	6	6	6
Attendance rate, Audit Committee meetings	%	96.9	100	100	92	92
Members of the Risk Committee	Number	5	4	4	5	5
Risk Committee meetings	Number	8	15	6	6	6
Attendance rate, Risk Committee meetings	%	97.5	100	100	88	88
Members of the Remuneration Committee	Number	5	5	4	5	5
Remuneration Committee meetings	Number	11	11	6	6	4
Attendance rate, Remuneration Committee meetings	%	100	95	100	97	100
Members of the Nomination Committee	Number	3	3	3	3	3
Nomination Committee meetings	Number	5	8	3	2	2
Attendance rate, Nomination Committee meetings	%	100	100	100	100	100
Members of IT-Data Committee	Number	4	4	4	4	4
IT-Data Committee meetings	Number	4	4	3	3	2
Attendance rate, IT-Data Committee meetings	%	100	100	100	92	100
Share of women on the Supervisory Board incl. employee representatives ¹	%	54.85	50	50	38.46	38.46
Board members, <30 years	Number	0	0	0	0	0
Board members, 30-49 years	Number	3	3	1	1	1
Board members, 50 years and above	Number	10	9	11	12	12
CEO pay ratio ²	Times	27.38	27.91	25.59	26.26	22.07
Whistleblower cases	Number	6	1	3	7	7
Remuneration of the Supervisory Board and the Executive Board ³						

¹ Tryg has equal gender representation on the Supervisory Board under Danish law and according to Tryg's policy.

² Calculated from CEO remuneration divided by employee salary.

³ See tables on pages 43-44 in Tryg's Annual report 2021.

Further disclosures

The climate partnership of the Danish financial sector

In 2019, the Danish government set up 13 climate partnerships divided into industries, which will contribute to the government's ambition of reducing Denmark's carbon emissions by 70% in 2030 compared with 1990.

In 2020, the climate partnership of the Danish financial sector presented its action plan for how the partnership can contribute to Denmark reaching its ambitious target.

Financial undertakings will reduce their own carbon emissions by at least 70% by 2030. Since the financial sector's own emissions account for less than 0.1% of total Danish emissions, the sector wants to contribute to the Danish reduction target in four areas:

1. Setting targets for and monitoring the reduction of customers' carbon footprints
2. Actively engaging with customers
3. Integrating sustainability in business models, and
4. Reducing emissions from the financial sector itself.

Tryg supports the action plan and focus areas of the Danish financial sector and will contribute to meeting the Danish carbon emission reduction target.

[**⬇ Download** Action plan for the financial sector's climate partnership](#)

The Danish trade association Insurance & Pension Denmark, of which Tryg is a member, has composed – in collaboration with its members – a set of reporting standards for its members in order to ensure comparable reporting on the financial sector's four carbon emission reduction focus areas from reporting year 2021, which Tryg complies with.

[**⬇ Download** Insurance & Pensions Denmark's recommendation for climate reporting \(only available in Danish\)](#)

The climate partnership of the Danish financial sector

Climate reporting

Part 1: Comply/explain reporting

Metric	Reader's guide	Accounting policy
Active engagement in climate improvements Dialogues on energy efficiency improvement etc. in connection with customer contact	Climate and environmental policy 2021, page 3	Climate and environmental policy 2021, page 3
Sustainable business models Payments to claims prevention	1%	Claims prevention expenses are defined in accordance with Executive Order no. 1592 of 9/11 2020 § 37 para. 1 of the Executive Order and are accounted for as claims. Claims prevention expenses comprise internal and external costs to mitigate expected future damage to existing insurance contracts.
The company's own emissions CO2-Scope 1	Page 27	Includes all direct emission sources. This includes all use of fossil fuels for stationary combustion or transport, in owned and, depending on the consolidation approach selected, leased or rented assets. It also includes any process emissions, from e.g. chemical processes, industrial gases, direct methane emissions etc.
CO2-Scope 2	Page 27	Includes indirect emissions related to purchased energy; electricity and heating/cooling where Tryg has operational control. The electricity emission factors used are based on national gross electricity production mixes from the International Energy Agency's statistics (IEA Stat). Emission factors per fuel type are based on assumptions in the IEA methodological framework. Factors for district heating/cooling are either based on actual (local) production mixes or average IEA statistics. In 2021, Tryg purchased and cancelled certified renewable electricity for all electricity used. Thus, Tryg applies both the location-based method and the market-based method. The location-based method reflects the average emission intensity of the grids on which energy consumption occurs, while the market-based method reflects emissions from electricity that Tryg has purposefully chosen.
Renewable energy share	Page 27	Represents how much of the total energy consumed is from renewable energy sources. Is calculated according to FSR - Danish Auditors, CFA Society Denmark and Nasdaq's suggestions on standardised ESG key figures.
Energy consumption	Page 27	Is calculated based on consumption multiplied by converters. The consumed energy has been added from both Scope 1 and Scope sources (cf. previous definitions) but must additionally contain energy from renewable energies. Is calculated according to FSR - Danish Auditors, CFA Society Denmark and Nasdaq's suggestions on standardised ESG key figures.

[Read more on Tryg's carbon footprint analysis method on page 27](#)

Part 2: Optional reporting

Metric	Reader's guide	Accounting policy
Carbon footprint of investments CO2 emissions from investment assets	Page 13	Tryg monitors the carbon intensity of its investments. Carbon intensity is measured as tonnes of CO2 per USDm of revenue and includes Scope 1 & 2 emissions. The analysis includes Tryg's equity portfolio.
Sustainable business models EU Taxonomy-eligible activities and investments	Pages 35-37	Pages 35-37
The company's own emissions CO2-Scope 3	Page 27	Includes indirect emissions resulting from value chain activities. The Scope 3 emissions are a result of Tryg's upstream and downstream activities, which are not controlled by Tryg. Tryg's Scope 3 analysis includes emissions resulting from Tryg's waste production and business travel activities.
Driving in zero-emission cars Driving in low-emission cars	Page 18 Page 18	Includes company travel in Tryg's leased cars in Denmark. Is calculated based on driven kilometres in zero-emission and low-emission cars as a percentage of kilometres driven in Tryg's leased cars in total.

Task Force on Climate-related Financial Disclosures

Climate change is causing harm and is a cause of concern for Tryg's customers and for society, and we anticipate that physical and transitional climate-related risks and opportunities may impact Tryg as a business in both the mid and long terms. Tryg's materiality assessment shows that environmental and climate-related issues such as climate change, natural disasters and the transition to a low-carbon economy are material issues for Tryg, our stakeholders and society, and thus an important strategic consideration for Tryg.

As a result, Tryg has progressed in how it assesses, acts and reports on climate-related risks and opportunities and is working towards aligning its disclosures with the TCFD (Task Force on Climate-related Financial Disclosures) recommendations. In the coming years, we plan to continue improving data, methods and practices in order to further align our disclosures on climate-related risks and opportunities with the TCFD recommendations. In 2022, Tryg expects to publicly declare support for the TCFD and its recommendations, thus demonstrating that Tryg is taking action to build a more resilient financial system through climate-related disclosure.

Governance

Tryg has a Corporate Responsibility Board consisting of management representatives from key departments and with Tryg's Group CFO as chair. The Corporate Responsibility Board is a preparatory body supporting the decision-making process on the strategic direction and level of ambition of the Executive Board regarding Tryg's work with Corporate Responsibility, including environmental and climate-related issues. The purpose of the Board is to identify Tryg's strategic focus areas and determine the level of ambition, which is then approved by the Executive Board and the Supervisory Board. The Board discusses and identifies Corporate Responsibility-related risks and opportunities, including climate-related

risks and opportunities, to ensure that Tryg's strategic direction is aligned. The Board convenes four times a year.

Tryg's Executive Board is ultimately responsible for the work related to Corporate Responsibility, including environmental and climate-related issues, and is informed about progress, risks and opportunities at least once a quarter, or whenever necessary. Tryg's Executive Board's incentive programmes are based on a result and performance assessment of the Executive Board members' work in the performance year, based on specific weighted targets. These targets include fulfilment of ESG/Corporate Responsibility-related targets/activities.

Tryg's Supervisory Board is kept informed about strategy, risk, opportunities, initiatives and progress on targets related to Corporate Responsibility, including environmental and climate-related issues, and is thus monitoring and overseeing the implementation of strategy and progress against targets. The Supervisory Board approves Tryg's Corporate Responsibility strategy, including its ambitions and targets, Tryg A/S's annual independent Corporate Responsibility report as well as Tryg's climate and environmental policy and Corporate Responsibility policy, which is the foundation of Tryg's work with Corporate Responsibility and environmental and climate-related issues.

[Read more about Tryg's Corporate Responsibility governance on page 8](#)

[Download Terms of reference for Tryg's Corporate Responsibility Board](#)

[Read more about Tryg's two-tier management system in Tryg's Annual report 2021 on pages 41-44](#)

Strategy

Physical risks and opportunities

Extreme weather events such as flooding, cloud-bursts, storms, rising sea levels and heatwaves, as well as changing weather patterns such as warmer temperatures, represent physical risks, not only to Tryg, but also to our private, commercial and corporate customers, and the level of weather-related claims is increasing within all Tryg's business areas.

Tryg monitors data available on adverse climate-related risks and seeks to mitigate such risks to the greatest possible extent. We advise our customers on how to protect their assets from climate-related risks. Furthermore, we incorporate preventive measures, which address climate and weather-related changes, in our products and services, including also as part of our underwriting process.

Climate and weather-related claims

In 2021, Tryg's expenditure on weather-related claims handling amounted to DKK 456m. Environmental and climate-related events can cause an increase in the frequency of weather-related claims by both private, commercial and corporate customers. This may give rise to insurance risks, more specifically underwriting risk.

Underwriting risk is the risk that insurance premiums will not be sufficient to cover the compensations and other costs associated with the insurance business. Underwriting risk is managed primarily through the company's insurance policy defined by the Supervisory Board, and administered through business procedures, underwriting guidelines etc. Additionally, underwriting risk caused by environmental and climate-related events is managed through geographical limitations.

Reinsurance is used to reduce the underwriting risk in situations where this cannot be achieved to a sufficient degree via ordinary diversification, thereby capping the cost of large and weather-related claims. In case of major events involving damage to buildings and contents, Tryg's reinsurance programme provides protection for up to DKK 8.5bn, which statistically is sufficient to cover at least a 250-year event. In the event of a frequency of natural disasters, Tryg is covered for up to DKK 900m, after a total annual retention of DKK 300m.

Weather claims, net of reinsurance

Expected level 2022 (including Alka): DKK 600m



[Read more about insurance risk in Tryg's Annual report 2021 on pages 35-38](#)

In Denmark the government pays out compensation for damage caused by storm surges through the Danish Storm Council. In Norway, damage caused by natural perils is compensated for through the Norwegian Natural Perils Pool.

To mitigate climate-related risks, Tryg seeks to prevent environmental and climate-related claims as part of our Corporate Responsibility strategy. To prevent claims, we advise our customers on how to protect their assets from environmental

Task Force on Climate-related Financial Disclosures

and climate-related damage. On our customer websites, we offer advice for customers on how to minimise the effect of storms, cloudbursts and flooding. In Norway, we warn our customers about increased flooding risks and advise on how to prevent damage caused by flooding. Tryg works closely with municipalities to prevent damage to buildings and assets caused by climate and weather-related events, e.g. by sharing data on areas that are most exposed to weather-related claims.

In Norway, Tryg is partnering with UNI Research on seasonal weather warnings. Based on last year's seasonal weather warnings and the amount of snow on the mountains, we warn our customers about increased flooding risks and advise them on how to prevent damage caused by flooding. Tryg is a partner in Climate Futures, a Norwegian project aimed at co-producing new solutions for predicting and managing climate risks from ten days to ten years into the future together with a cluster of partners in climate and weather-sensitive sectors. By participating in this project, we gain knowledge that can improve the value and relevance of the claims prevention advice and actions that we offer to our customers.

Read more about claims prevention in Tryg on page 21

Transitional risks and opportunities

Climate-related issues are also associated with the transition to a global low-carbon economy, including regulatory, technological and societal developments, which represent a range of risks and opportunities for Tryg as a business.

Regulation

One of the main transitional risks is associated with developments in climate-related policies and regulation. Future policy actions, both at a national level and at EU level, may seek to either constrain actions that contribute to the adverse

effects of climate change or promote adaptation. This causes compliance risk, which is the risk of loss as a result of lack of compliance with rules, regulations, market standards or internal guidelines.

This includes the implementation of national carbon taxes or the tightening of energy efficiency standards. Even though Tryg's direct carbon footprint is limited, the implementation of such initiatives still represents a risk to Tryg, which calls for adaptation. As part of our Corporate Responsibility strategy, Tryg has set CO2 reduction targets for both 2024 and 2030. We expect these targets and our efforts to reduce our own emissions to mitigate the risks associated with the implementation of a carbon tax or the tightening of energy efficiency standards.

Regulatory developments at EU level that include new disclosure or reporting requirements introduced within the financial sector to address climate-related issues, e.g. the EU's action plan on Sustainable Finance, including the Sustainable Finance Disclosure Regulation (SFDR), the Taxonomy Regulation and the Corporate Sustainability Reporting Directive (CSRD), represent a transitional risk, to which Tryg has to adapt to stay compliant as well as competitive.

The handling of compliance risk is coordinated centrally via the Compliance function, which, among other things, sits on industry committees in connection with legislative monitoring, ensures the implementation of regulation in Tryg through business procedures, provides ongoing training in compliance matters and performs compliance controls within the organisation. Compliance risks and the result of the compliance controls performed are reported to the Supervisory Board's Risk Committee.

Claims handling

The transition to a low-carbon economy and the developments in technology, knowledge and data that follow enable Tryg to implement more sustainable claims handling processes and develop and expand our more sustainable claims handling methods.

As an insurance company, many of Tryg's indirect carbon emissions derives from our claims handling. Sustainable claims handling is a key area, in which we can become more sustainable and contribute to a low-carbon economy, while offering our customers a more sustainable claims handling process. Also, sustainable claims handling reduces the use of materials, benefitting both the environment and Tryg's claims costs.

As part of our Corporate Responsibility strategy, we want to offer our customers more sustainable claims handling processes, and we have designed a strategy that is measurable and anchored across our organisation, including quantitative targets.

Read more about Tryg's strategy for sustainable claims handling on page 22

Products and services

Tryg's transitional opportunities include the developments in technology, knowledge and data that enable us to improve our claims prevention measures and develop better climate adaptation, resilience and insurance risk solutions. By contributing to the prevention of climate and weather-related claims, Tryg is able to support society and the transition to a low-carbon economy, while offering relevant products and services to our customers and increasing our customers' peace of mind. Additionally, the prevention of climate and weather-related claims mitigates the insurance risk resulting from the potential increase in climate and weather-related claims.

As part of our Corporate Responsibility strategy, we want to promote sustainable behaviour by offering our customers products and services that include various sustainability elements, including claims prevention measures. Claims handling processes are often associated with the use of considerable resources and energy as well as carbon emissions. Our ambition is for claims prevention products and services to make up a quarter of Tryg's topline growth from new products and services and to offer a wide range of products and services that include social and environmental sustainability measures in different ways and to different degrees.

Read more about Tryg's sustainable insurance products and services on pages 20-22

Investment

To mitigate the risks associated with our investment portfolio, Tryg monitors the carbon footprint and climate-related risk associated with its investments. We currently monitor our equity portfolio and parts of our credit bond portfolio and focus especially on transitional risks and opportunities that arise from the shift to a low-carbon economy. Our equity portfolio is characterised by low exposure to climate-related transitional risks. Going forward, we will seek to further expand our monitoring of climate-related risks and include a larger portion of our investment assets in our analyses.

Read more about Tryg's responsible investment strategy on pages 12-13

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Risk management

Corporate Responsibility and climate-related risks are included in Tryg's overall risk management processes.

Tryg's risk profile is continuously measured, quantified and reported to the management and the Supervisory Board. We have adopted a three-lines-of-defence governance model across the organisation:

The 1st line consists of the business areas, which are responsible for the daily risk management based on Tryg's policies and responsible for being compliant with both internal and external requirements.

The 2nd line consists of the Compliance, Actuarial and Risk Management functions. The Compliance function has the overall responsibility for overseeing and monitoring compliance with applicable laws and legislation as well as internal policies and guidelines. The responsibility of the Actuarial function is to ensure and assess the adequacy of the provisions. The Risk Management function is responsible for ensuring a consistent approach to risk identification across the organisation, risk assessment at Group level and reporting to the Supervisory Board.

The 3rd line consists of Internal Audit, which ensures an independent and objective audit of the organisation's internal controls, risk management and governance processes. Internal Audit reports independently to the Supervisory Board and to its Audit Committee.

The Supervisory Board has set up an Audit Committee and a Risk Committee consisting of four members of the Supervisory Board each. In addition, the Chief Financial Officer, the Chief Risk Officer and the General Counsel (as overseer of the Compliance function) are invited to the meetings. The function of the Supervisory Board's Risk Committee is to ensure that all risk and capital-related topics are discussed thoroughly before being discussed in the Supervisory Board. The Risk Committee meets a minimum of four times annually.

Read more about risk management in Tryg in Tryg's Annual report 2021 on pages 35-38

Tryg conducts an annual materiality assessment to ensure that we focus on the opportunities and risks in relation to environmental, social, economic and governance issues that are most material to our business and our stakeholders. The assessment informs our Corporate Responsibility approach, including our strategy and reporting.

Read more about Tryg's materiality assessment on page 10

In 2022, Corporate Responsibility-related risks, including climate-related risks, will be further integrated into Tryg's overall risk management processes.

Metrics and targets

As a part of Tryg's Corporate Responsibility strategy for 2024, we have defined targets for both 2024 and 2030 to be able to monitor progress and measure how well we are able to harness the opportunities arising from the transition to a low-carbon economy. These targets include reducing our carbon emissions by 35% in 2024 and 55% in 2030 compared to 2019 and achieving carbon neutrality in 2023, compensating for the rest of our carbon emissions, in relation to our carbon emissions deriving from Scope 1 and Scope 2 and from our waste, air and train travel in Scope 3. Our goal is to compensate less and reduce more over time. Making our claims handling processes more sustainable is an important part of Tryg's contribution to the transition to a low-carbon economy. As a result, our targets are to increase our sustainable claims spend by minimum 80% in 2024 compared to 2020 and to reach a total CO2 reduction effect of 20,000-25,000 tonnes through more sustainable claims handling.

Read more about Tryg's Corporate Responsibility strategy and its targets on page 9

For details of Tryg's Scope 1, 2 and 3 carbon emissions and other Corporate Responsibility data, please see page 5 and ESG data overview on pages 27-29.

EU Taxonomy

With the European Green Deal, the EU has set the target of becoming the first climate-neutral continent by 2050 and reducing greenhouse gas emissions by 55% in 2030 compared to 1990. To meet this target, the EU has passed an ambitious regulatory framework to redirect investments towards sustainable projects and activities.

To ensure that the sustainability efforts of companies, investors and policy makers are both aligned and effective, the EU Taxonomy¹³ determines a common language for environmentally sustainable economic activities. The taxonomy presents a classification system defining what can be classified as sustainable economic activities across sectors, supply chains and asset classes. The Climate Delegated Act currently defines activities that substantially contribute to climate change mitigation and climate change adaptation. Four other environmental objectives will be defined in 2022 by EU regulators.

This report provides an overview of Tryg's non-life insurance and reinsurance activities as well as Taxonomy-eligible assets, and by this we are defining the parts of Tryg's activities and assets that are eligible for classification as sustainable according to the EU Taxonomy.

Our work with the EU taxonomy

In 2021, Tryg assessed which of our economic activities are eligible for classification as environmentally sustainable in accordance with the EU Taxonomy. We have determined the premiums and assets associated with those of our insurance activities and investments described in the EU Taxonomy.

We note that the concept of taxonomy eligibility was developed later in the regulatory process than the concept of taxonomy alignment. Thus, our assessment of Taxonomy-eligible insurance activities and assets is based on our interpretation of the concept as well as our approach to data collection. We have, to the best of our abilities, performed an assessment on the current basis and disclose our best

estimation of data, reflecting approximate levels rather than exact numbers. Pending further regulatory guidance, this reflects the uncertainties and limitations associated with the formal interpretation as to what extent insurance activities and assets are defined as Taxonomy-eligible as well as the limited availability of data on eligibility from the companies that Tryg invests in.

Tryg will consider any necessary amendments to our methodology based on new EU guidelines that further develop the concept for the 2022 reporting, and we will continue to follow the regulatory developments closely in order to align our reporting accordingly.

Taxonomy-eligible KPIs

This section provides an overview of quantitative indicators of Tryg's Taxonomy-eligible activities and assets as well as contextual information in support thereof.

Our work towards EU Taxonomy reporting in 2024

Tryg's Corporate Responsibility strategy 2024 includes specific targets for responsible investments that to some extent correspond to the purpose of the EU Taxonomy, including a reduction of CO2 emissions and diverting capital from fossil fuel consumption.

Tryg is working strategically to integrate sustainability into our product design processes and into our engagement with customers and other stakeholders, including a strong focus on claims prevention (see pages 20-21), and we will continue to do so in accordance with the development of the EU Taxonomy and guidelines.

We have initiated an assessment of how and to which extent Tryg's business is Taxonomy-aligned. We will continue to follow the regulatory developments closely in order to report on our quantitative as well as qualitative information accordingly.

¹³Including delegated acts issued pursuant to article 8 as well as articles 10 and 11 (the "Climate Delegated Act") of the EU Taxonomy.

Insurance and activities

Our methodology

Tryg's economic activities are segmented in accordance with the categories defined in the Climate Delegated Act¹⁴ to assess taxonomy eligibility. This involves the product categories associated with non-life insurance as well as reinsurance (see tables below)¹⁵.

For each product category, we have examined whether the insurance products provide cover for climate-related risks as defined by the EU Taxonomy¹⁶. Once an insurance policy does not explicitly exempt climate-related events from coverage, we conclude that the insurance product encompasses climate-related cover¹⁷.

The examination is based on an analysis of the most sold insurance products within each product category. In cases where the terms and conditions of the most sold product within the category includes climate-related cover, we report the full gross written premium ("GWP") of the product category in question as Taxonomy-eligible. E.g., the most sold insurance product within the 'Other motor insurance' category is a regular car insurance. This product covers temperature, wind, water and solid mass-related damage, and therefore the full GWP of all insurances in the 'Other motor insurance' category is reported as Taxonomy-eligible. By analysing the most-sold insurance product within each of the eight categories (a-h), we have come as close to a representative assessment as possible at this stage.

For each product category assessed as Taxonomy-eligible, we have calculated how large a share of Tryg's premiums is made up of the product category in question. Information concerning premiums, including written premiums, is based on existing financial information for 2021.

Tryg's assessment shows that all the listed product categories encompass climate-related cover. Therefore, the full GWP for each product category is reported as Taxonomy-eligible. Activities outside product categories a-h are reported as non-eligible.

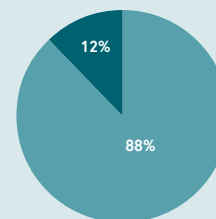
As regards reinsurance, we have calculated the proportion of Taxonomy-eligible activities that is reinsured. As we do not provide reinsurance as part of our product portfolio, available data with regard to reinsurance are limited to those of our insurance activities that are reinsured elsewhere.

The data sources extracted for the calculation of the proportion of insurance activities that are Taxonomy-eligible and those that are not are accounting data and information retrieved from the Tryg Group's registers in accordance with requirements set out in the Solvency II regulation. The information concerning premiums is therefore based on existing financial information for 2021 collected in accordance with Tryg's audited financial reporting.

Overview

The proportion of Tryg's non-life insurance activities that are Taxonomy-eligible equate to 88% of Tryg's total gross premiums written in 2021¹³.

Eligible vs non-eligible activities



■ Total eligible ■ Total non-eligible

Proportion of full gross written premium (GWP) of each Taxonomy-eligible product category compared to total GWP:

Non-life insurance activities

	GWP (currency DKKm)	% of total (GWP)
Eligible activities, total	22,151	88
a) medical expense insurance	633	3
b) income protection insurance	3,368	13
c) workers' compensation insurance	954	4
d) motor vehicle liability insurance	2,043	8
e) other motor insurance	5,748	23
f) marine, aviation and transport insurance	480	2
g) fire and other damage to property insurance	7,919	32
h) assistance	1,006	4

Reinsurance

	GWP (currency DKKm)	% of total (GWP)
Proportion of Taxonomy-eligible activities of which are reinsured	1,010	5
Proportion of Taxonomy-eligible activities stemming from reinsurance activities	0	0
Proportion of Taxonomy-eligible activities of which are reinsured (retrocession)	0	0

¹⁴COMMISSION DELEGATED REGULATION (EU) 2021/2139 of 4 June 2021.

¹⁵This reporting does not include gross written premiums for Tryg's life insurance activities provided by Alka Liv and Tryg Liv.

¹⁶Appendix A to Annex 2 to the Climate Delegated Act.

¹⁷Pursuant to a working paper by Insurance Europe, the full gross written premium (GWP) of a line of business (LoB) can be reported as eligible, once the LoB-level analysis has confirmed there is some climate-related cover in such LoB.

Investment assets

Our methodology

In order to assess whether an asset falls within the definition of Taxonomy-eligibility, we have conducted a screening of our assets under management for investment based on the methodology described in the Climate Delegated Act and the delegated act issued under Article 8 of the EU Taxonomy.

NACE codes have been used for the initial screening; however, seeing that the economic activities described in the Taxonomy do not correspond exactly to the NACE codes available, certain adaptations to the methodology have been made in order to meet the criteria for calculation of Taxonomy-eligibility. In addition to applying the NACE code classification system, the assessment of the Taxonomy-eligibility of Tryg's assets is based on accounting data and information retrieved from Tryg's existing registers¹⁸.

Our adaptations ensure that our screening results reflect the data as accurately as is possible at this stage. We will continue to develop our screening method in line with the EU's development of guidelines and criteria for assessing environmentally sustainable economic activities, in order to report exact data in the future.

In 2021, Tryg completed the acquisition of Trygg-Hansa in Sweden and Codan in Norway. The activities of the acquired businesses in Norway and Sweden, including their investment assets, are outside the scope of this assessment until the merger has been completed. On completion of the merger, the proportion of Taxonomy-eligible investment assets will increase as we can then include the full amount of our investment assets in our eligibility assessment.

Overview

The proportion of Taxonomy-eligible assets that are under management for investment by Tryg Invest amounts to 5.36% of the total value in 2021. While most of our assets fall under categories that are excluded from the eligibility calculation such as derivatives and bonds as well as activities that do not yet qualify as Taxonomy-eligible (e.g. cash, interest and rent receivables), the proportion of eligible assets will increase as the concept of Taxonomy alignment is further defined.

Proportion of Taxonomy-eligible assets	Proportion of assets not Taxonomy-eligible
5.36%	94.64%
Absolute value of Taxonomy-eligible assets	Absolute value of assets not Taxonomy-eligible
DKK 4,486.36m	DKK 79,147.61m

¹⁸Including information required under the Solvency II directive (2009/138).

Reporting requirements, cf. Sections 132, 132a and 132d

Tryg reports with reference to the fulfilment of targets for the share of the underrepresented gender at management levels, non-financial reporting and data ethics in accordance with the provisions of Sections 132, 132a and 132d of the Danish Executive Order on Financial Reports for Insurance Companies and Lateral Pension Funds (Nationwide Occupational Pension Funds).

Section 132a

Readers' guide

Status and target for the Supervisory Board on increasing the share of the underrepresented gender:

Section 132a, subs. 1

According to Danish law as well as Tryg's own policy there is equality among genders on the Supervisory Board, and Tryg is therefore not required to set targets. A description is available on pages 14-15.

Policy, target, action plan and result on increasing the share of the underrepresented gender at other management levels:

Section 132a, subs. 2 and 4

Policy, target, action plan and result on increasing the share of the underrepresented gender at other management levels are available on page 5 and pages 14-15.

Section 132b

Readers' guide

Business model:

Section 132b, subs. 2, (1)

Tryg's business model is described on page 7.

Corporate Responsibility policy:

Section 132b, subs. 2, (2)

Tryg's Corporate Responsibility policy is referred on page 8.

Policies section:

Section 132b, subs. 2, (2)

A description of policies has been integrated into the relevant chapters. See pages 8-25.

Actions:

Section 132b, subs. 2, (3)

A description of key actions has been integrated into the relevant chapters. See pages 11-25

Systems and due diligence processes:

Section 132 b, subs. 2, (3)

A description of systems and due diligence processes has been integrated into the relevant chapters. See pages 8-25.

Key risks:

Section 132b, subs. 2, (4)

A description of key risks has been integrated into the relevant chapters. See pages 11-25.

KPIs:

Section 132b, subs. 2, (5)

See targets in overview section on page 5 or in the relevant chapters. See page 9 and pages 11-22.

Results:

Section 132b, subs. 2, (6)

See results in overview section on page 5 or in the relevant chapters. See pages 11-25.

Section 132d

Readers' guide

Data ethics policy:

Section 132d, subs. 2

Tryg's data ethics policy appears from pages 24-25, where Tryg's governance of and work with data ethics is also described.