

SUSTAINABILITY  
REPORT

SUSTAINABILITY  
IS A COMMITMENT  
AND A PLEDGE

We have made our sustainability commitments with care and have a robust methodology in place to monitor our sustainability progress.

SUSTAINABILITY  
REPORT

108

1	Auditor's report	110
2	General information	113
3	Environmental information	127
4	Social information	143
5	Governance information	169
6	Sustainability performance indicators of the Sava Insurance Group and Sava Re	183
7	Appendices to the sustainability report	184



## STATEMENT OF MANAGEMENT'S RESPONSIBILITY

The management board of Sava Re d.d. hereby approves the Sava Insurance Group's sustainability report for the year ended 31 December 2024 and its appendices. The management board confirms that the sustainability report is compiled in accordance with the applicable Slovenian and EU legislation, including the European Sustainability Reporting Standards (ESRS) and Article 8 of the Taxonomy Regulation. The sustainability report has been prepared using relevant judgements, estimates and assumptions, which apply the methods most suited to the Company and the Group under given circumstances, based on which we can give the below assurances.

The management board members ensure that to the best of their knowledge:

- the sustainability report has been compiled in accordance with the European Sustainability Reporting Standards (ESRS) and Article 8 of the Taxonomy Regulation; and
- it contains a true and fair representation of the environmental, social and governance aspects of the Group.

The sustainability report is based on a double materiality analysis of the Sava Insurance Group.



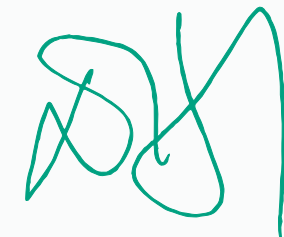
Marko Jazbec  
Chairman of the Management Board



Polona Pirš  
Member of the Management Board



Peter Skvarča  
Member of the Management Board



David Benedek  
Member of the Management Board

Ljubljana, 14 March 2025





# 1 Auditor's report



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Our report below represents the auditor's report that relates solely and exclusively to the official sustainability report, prepared in the XHTML format.

## INDEPENDENT LIMITED ASSURANCE REPORT ON THE CONSOLIDATED SUSTAINABILITY REPORT to the shareholders of the Sava Insurance Group

We have conducted a limited assurance engagement on the Consolidated Sustainability Report included in section Sustainability report of the Management Report of Sava Insurance Group (hereafter the "Group") as at December 31, 2024, and for the period from January 1, 2024, to December 31, 2024 (the "Consolidated Sustainability Report").

### Identification of Applicable Criteria

The Consolidated Sustainability Report was prepared by the management of the Group in order to satisfy the requirements of 70(c) and 70(č) of the Companies Act (ZGD-1) implementing 29(a) of the EU Directive 2013/34/EU, including:

- Compliance with the European Sustainability Reporting Standards introduced by Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards ("ESRS"), including that the process carried out by the Group to identify the information reported in the Consolidated Sustainability Report (the "Process") is in accordance with the description set out in note 'IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities' in the 'General information' chapter;
- Compliance of the disclosures in 'Disclosures required by Regulation (EU) 2020/852 on taxonomy and related delegated acts' within 'Environmental information' of the Consolidated Sustainability Report with Article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation"); and
- Compliance with the requirement to prepare the Consolidated Sustainability Report in accordance with Article 58 of ZGD-1 which requires the Group to prepare Consolidated Sustainability Report in single electronic format as defined in Article 3 of Commission Delegated Regulation (EU) 2018/815 of 17 December 2018 supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format (the "ESEF Regulation").



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### Inherent Limitations in Preparing the Consolidated Sustainability Report

The criteria, nature of the Consolidated Sustainability Report, and absence of long-standing established authoritative guidance, standard applications and reporting practices allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different organizations and from year to year within an organization as methodologies evolve.

In reporting forward looking information in accordance with ESRS, management of the Group is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Consolidated Sustainability Report, management of the Group interprets undefined legal and other terms. Undefined legal and other terms may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

We draw your attention to the following specific limitations discussed in the Consolidated Sustainability Report:

- Environmental reporting as applied by all companies includes information based on climate-related scenarios that are subject to inherent uncertainty because of incomplete scientific and economic knowledge about the likelihood, timing, or effect of possible future physical and transitional climate-related impacts. For the avoidance of doubt, the scope of our engagement and our responsibilities did not include performing work necessary for any assurance on the reliability, proper compilation, or accuracy of the prospective information.
- Any supply chain emissions metrics listed in the Consolidated Sustainability Report may include information provided by suppliers and third-party sources. Our procedures did not include obtaining assurance over the information provided by suppliers or third parties.
- The Consolidated Sustainability Report may include metrics that are derived from reported events relating to employees and subcontractors. As such, our testing may not identify misstatements relating to completeness, for example in instances where events may have occurred but have not been reported.

### Responsibility of the Management Board of the Group

Management of the Group is responsible for designing and implementing a process to identify the information reported in the Consolidated Sustainability Report in accordance with the ESRS and for disclosing this process in note 'IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities' of the Consolidated Sustainability Report. This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected

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- to affect, the entity’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

Management of the Group is further responsible for the preparation of the Consolidated Sustainability Report, in accordance with 70(c) and 70(č) of the ZGD-1 implementing 29(a) of the EU Directive 2013/34/EU, including:

- compliance with the ESRS;
- preparing the disclosures in ‘*Disclosures required by Regulation (EU) 2020/852 on taxonomy and related delegated acts*’ of the Consolidated Sustainability Report, in compliance with Article 8 of EU Regulation 2020/852 (the “Taxonomy Regulation”);
- designing, implementing and maintaining such internal controls that management determines are necessary to enable the preparation of the Consolidated Sustainability Report that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

Management of the Group is also responsible for the preparation of the Consolidated Sustainability Report in line with the technical requirements related to the single electronic format as determined in Article 58 of ZGD-1 and Article 3 of the ESEF Regulation. This responsibility also includes the design, implementation and maintenance of internal controls to enable the preparation of the Consolidated Sustainability Report that is free from material non-compliance with the requirements of Article 58 of ZGD-1 and Article 3 of the ESEF Regulation.

Those charged with governance are responsible for overseeing the Group’s sustainability reporting process.

Practitioner’s Responsibility

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information (“ISAE 3000 (Revised)”).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the Consolidated Sustainability Report is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Consolidated Sustainability Report as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgment and maintain professional skepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Report, in relation to the Process, include:

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- Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Designing and performing procedures to evaluate whether the Process is consistent with the Group’s description of its Process, as disclosed in note ‘*IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities*’.

Our other responsibilities in respect of the Consolidated Sustainability Report include:

- Obtaining an understanding of the entity’s control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Report but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error;
- Designing and performing procedures responsive to disclosures in the Consolidated Sustainability Report where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;
- Assess whether the Consolidated Sustainability Report has been prepared, in all material respects, in the format specified in Article 58 of ZGD-1 and Article 3 of the ESEF Regulation.

Our Independence and Quality Management

We complied with the applicable independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (the “Code”). The Code is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We applied International Standard on Quality Management (“ISQM 1”), Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of Work Performed

A limited assurance engagement involves performing procedures to obtain evidence about the Consolidated Sustainability Report.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Consolidated Sustainability Report.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
  - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
  - reviewing the Group’s internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures about the Process implemented by the Group was consistent with the description of the Process set out in note ‘*IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities*’.



In conducting our limited assurance engagement, with respect to the Consolidated Sustainability Report, we:

- Obtained an understanding of the Group’s reporting processes relevant to the preparation of its Consolidated Sustainability Report by:
  - performing inquiries to understand the Group’s control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Report;
- Evaluated whether material information identified by the Process is included in the Consolidated Sustainability Report;
- Evaluated whether the structure and the presentation of the Consolidated Sustainability Report is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Consolidated Sustainability Report;
- Performed substantive assurance procedures based on a sample basis on selected disclosures in the Consolidated Sustainability Report;
- Obtained evidence on the methods for developing material estimates and forward-looking information and on how these methods were applied;
- Obtained an understanding of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Consolidated Sustainability Report;
- Evaluated whether the Consolidated Sustainability Report has been prepared in the format specified in Article 58 of ZGD-1 and Article 3 of the ESEF Regulation.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Report is not prepared, in all material respects, in accordance with 70(c) and 70(č) of the ZGD-1 implementing 29(a) of the EU Directive 2013/34/EU, including:

- Compliance with the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Group to identify the information reported in the Consolidated Sustainability Report is in accordance with the description set out in note ‘IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities’;
- Compliance of the disclosures in ‘Disclosures required by Regulation (EU) 2020/852 on taxonomy and related delegated acts’ within ‘Environmental information’ of the Consolidated Sustainability Report with Article 8 of Taxonomy Regulation; and
- Compliance with the requirement to prepare the Consolidated Sustainability Report in the format specified in Article 58 of ZGD-1 and Article 3 of the ESEF Regulation.



**Other Matter**  
Our limited assurance engagement does not extend to information in respect of earlier periods.

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Dunajska cesta 165  
1000 Ljubljana

Barbara Žibret Kralj  
Key sustainability partner  
Ljubljana, March 14<sup>th</sup> 2025

*For signature please refer to the original Slovenian version.*

Ljubljana, March 14<sup>th</sup> 2025

TRANSLATION ONLY, SLOVENE ORIGINAL PREVAILS







## 2 General information

### ESRS 2 – General disclosures

#### BP-1 – General basis for the preparation of sustainability statements<sup>45</sup>

The sustainability report covers environmental, social and governance aspects. It is based on a double materiality analysis of the Sava Insurance Group. The Company, as the parent of the Group, reports on sustainability at the consolidated level. In the process, it ensures that all its subsidiaries are covered in a way that allows for the unbiased identification of significant impacts, risks and opportunities. Disclosures in the sustainability report are made for all members of the Group on a consolidated level where possible, and, where this is not possible, for the parent company and its EU-based subsidiaries.

The Sava Insurance Group has prepared its sustainability report on a consolidated basis. The scope of consolidation is the same as in the financial statements.

In our disclosures, we consider both the upstream and downstream parts of the Group’s value chain, where, based on the results of the due

diligence and materiality assessment process, we have identified material impacts, risks and opportunities of our own operations concerning specific stakeholder groups in the value chain.

We have not identified any material impacts, risks or opportunities with respect to stakeholders (suppliers) in the upstream value chain. We have extensive impacts on stakeholders in the downstream value chain, particularly from the environmental, social and governance perspective. In the area of governance, we also disclose material risks and opportunities that affect stakeholders in the downstream value chain. We disclose this information in sections ESRS [E1](#), [S3](#), [S4](#) and [G1](#).

In the sustainability report, we have not omitted specific information related to intellectual property, know-how or the outcome of innovation.

The certified auditor only reviews those parts of the business report that are appropriately identified by markups of disclosures in accordance with the European Sustainability Reporting

Standards (ESRS). Disclosures or parts of the business report that are not clearly identified by appropriate reference to the ESRS and those parts of the sustainability report that relate to a period before 1 January 2024 have not been audited. KPI calculations and comparative calculations based on data prior to 2024 have also not been audited.

#### BP-2 – Disclosures in relation to specific circumstances<sup>46</sup>

In our disclosures, we adhere to the medium- and long-term time horizons defined in the ESRS, except in the topical disclosures in section ESRS [E1](#), where we have specifically defined them based on our strategic documents.

Metrics that include data from the downstream value chain depend on the quality and appropriateness of the information provided by our partners in the value chain. The ability of insurers to collect information about their partners in the value chain depends on the availability of basic data from customers and

investee companies and/or guidelines on acceptable data sources and ways to address data gaps. Downstream value chain coverage will increase over time, as we expect the extent of estimates to decrease over time, and we will mostly have qualitative and quantitative primary data.

Metrics that include data from the downstream value chain and are estimated based on indirect sources relate to investment portfolios. Other data disclosed in the sustainability report are from internal sources.

The Group obtains data from an external ESG data provider, MSCI Inc. This mainly relates to disclosures on the alignment of investments with the EU Taxonomy (Regulation (EU) 2020/852), disclosures related to the SFDR (Regulation (EU) 2019/2088), disclosures related to the carbon footprint of the investment portfolio, and disclosures on excluded sectors as defined in the Group’s sustainability investment policy. We use the data for further analysis, the definition of investment strategies, business decision-making and preparation of reports.

<sup>45</sup> ESRS 2 BP-1 paragraphs 5 (a), 5 (b) i, 5 (b) ii, 5 (c) and 5 (d).  
<sup>46</sup> ESRS 2 BP-2 paragraphs 9 (a), 9 (b), 10 (a), 10 (b), 10 (c), 10 (d) and AR 1 (c).





MSCI’s methodology is available on the MSCI One web portal under ESG Manager. As MSCI updates its databases on an ongoing basis, it informs contracted data users of any updates or changes to documents or methodology.

MSCI obtains data directly from companies (e.g., from annual reports), non-governmental organisations, online publications, and other publications and sources (e.g., RIMES, Bloomberg, Equity Data Science and others).

Based on our analysis of various data providers, we believe that MSCI’s data are among the most reliable in the market.

We believe that the metrics incorporating value chain data used in this report are of appropriate quality. To ensure the highest possible data quality, we will regularly assess the quality of providers and compare data from different providers. We will also consider the guidelines and recommendations from industry organisations and associations or other bodies.

We include disclosures required by other legislation that obliges us to disclose sustainability-related information in the sustainability report. These

include the EU Taxonomy Regulation, which provides a regulatory framework to promote sustainable investment, and the SFDR Regulation, which requires financial market participants to publicly disclose their sustainable governance-related policies (section [ESRS S4](#)). This also requires disclosure of how sustainability risks are integrated into investment decisions and how the company addresses the principal adverse impacts of its investment decisions on sustainability factors.

We also disclose the information required by the Whistleblower Protection Act (section [ESRS G1](#)) and the indicators of the GRI standards ([appendix B – GRI index – unaudited](#)).

To provide comprehensive disclosures and a clear and reader-friendly content structure, we incorporated certain information into the sustainability report by reference (in accordance with section 9.1 “Incorporation by reference” of ESRS 1). A list of this information is provided in the following table.

List of ESRS disclosure requirements or specific data points that are required to be disclosed and incorporated by reference.

► **List of ESRS disclosure requirements or specific data points that are required to be disclosed and incorporated by reference<sup>47</sup>**

Disclosure requirements and related data points	Disclosures from other legislation
Disclosures pursuant to Article 8 of Regulation (EU) 2020/852	Regulation (EU) 2020/852 and related delegated acts (EU Taxonomy)



47 ESRS 2 BP-2 paragraphs 15 and 16.





Disclosure requirements and related data points	Reference in the report
GOV-1 paragraph 21 (a) – Number of executive and non-executive members	Business report, section A.5.3.4 “Management board”
GOV-1 21 paragraph (b) – Representation of employees and other workers	Business report, section A.5.3.3 “Supervisory board committees”
GOV-1 paragraph 21 (c) – Experience relevant to the sectors, products and geographic locations of the undertaking	Business report, sections A.5.3.3 “Supervisory board committees” and A.5.3.4 “Management board”
GOV-1 paragraph 21 (d) – Percentage by gender and other aspects of diversity that the undertaking considers	Business report, section A.5.3.2 “Supervisory board”
GOV-1 paragraph 21 (e) – Percentage of independent board members	Business report, section A.5.3.3 “Supervisory board committees”
GOV-1 paragraph 22 (a) – Information on the identity of the administrative, management and supervisory bodies or individual(s) within a body responsible for oversight of impacts, risks and opportunities	Business report, sections A.5.3.3 “Supervisory board committees” and A.5.4 “Fit and proper assessment of the members of the management and supervisory boards and of key function holders and other relevant personnel”
GOV-1 paragraph 22 (b) – Disclosure of how each body’s or individual’s responsibilities for impacts, risks and opportunities are reflected in the undertaking’s terms of reference, board mandates and other related policies	Business report, sections A.5.3.2 “Supervisory board” and A.5.4 “Fit and proper assessment of the members of the management and supervisory boards and of key function holders and other relevant personnel”
GOV-1 paragraph 22 (c) – Description of management’s role in the governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities	Business report, sections A.5.3.4 “Management board” and A.5.4 “Fit and proper assessment of the members of the management and supervisory boards and of key function holders and other relevant personnel”
GOV-1 paragraph 22 (c) i – Description of how oversight of the position is exercised at the level of the management or committee to which the management role is delegated	Business report, section A.5.3 “Bodies of Sava Re”
GOV-1 paragraph 22 (c) ii – information about the reporting lines to the administrative, management and supervisory bodies	Business report, sections A.5.3 “Bodies of Sava Re” and A.5.3.4 “Management board”
GOV-1 paragraph 22 (c) iii – Disclosure of how dedicated controls and procedures are integrated with other internal functions	Business report, section A.5.3 “Bodies of Sava Re”

Disclosure requirements and related data points	Reference in the report
GOV-1 paragraph 22 (d) – Disclosure of how the administrative, management and supervisory bodies and senior executive management oversee the setting of targets related to material impacts, risks and opportunities, and how they monitor progress towards them	Business report, section A.5.3.2 “Supervisory board”
GOV-1 paragraph 23 – Disclosure of how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee sustainability matters	Business report, section A.5.4 “Fit and proper assessment of the members of the management and supervisory boards and of key function holders and other relevant personnel”
GOV-1 paragraph 23 (a) – Information on sustainability-related expertise that the bodies, as a whole, either directly possess or can leverage	Business report, section A.5.3.3 “Supervisory board committees”
GOV-1 paragraph 23 (b) – Disclosure of how sustainability-related skills and expertise relate to material impacts, risks and opportunities	Business report, section A.5.4 “Fit and proper assessment of the members of the management and supervisory boards and of key function holders and other relevant personnel”
SBM-1 paragraph 40 (a) i – Description of the important groups of products and/or services offered by the undertaking	Business report, section A.2.5 “Profile of the Sava Insurance Group”
SBM-1 paragraph 40 (a) ii – Description of the markets and/or customer groups served by the undertaking	Business report, section A.2.5 “Profile of the Sava Insurance Group”
SBM-1 paragraph 42 – Description of business model	Business report, section A.2.5 “Profile of the Sava Insurance Group”
SBM-1 paragraph 40 (g) – Disclosure of elements of the strategy that relate to or impact sustainability matters	Business report, section A.6.2 “Strategic priorities of the Sava Insurance Group”
SBM-3 paragraph 48 (a) – Description of material impacts, risks and opportunities resulting from the materiality assessment	Financial statements with notes, sections C.3.6.4.3 “Credit risk” and C.3.6.3.1 “Non-life underwriting risks – Catastrophe risk”
E1.SBM-3 paragraph 18 – Type of climate-related risk	Financial statements with notes, sections C.3.6.4.3 “Credit risk” and C.3.6.3.1 “Non-life underwriting risks – Catastrophe risk”
E1.IRO-1 paragraph 20 (b) (AR 11) – Description of material impacts, risks and opportunities resulting from the materiality assessment	Financial statements with notes, section C.3.6.6.1 “Emerging risks”
G1-1 paragraph 10 (g) – Information on the policy for training within the organisation on business conduct	Business report, section A.5.3.3 “Supervisory board committees”





**GOV-1 – The role of the administrative, management and supervisory bodies<sup>48</sup>**

The disclosures in section [A.5 “Corporate governance statement”](#) enable us to provide information on the composition and diversity of our administrative, management and supervisory bodies. We describe the roles and responsibilities of these bodies in overseeing the process of managing material impacts, risks and opportunities, including the role of management in these processes. We describe the expertise and skills within these bodies related to sustainability matters or access to such expertise and skills.

In section [A.5 “Corporate governance statement”](#), we disclose information about the roles and responsibilities of the administrative, management and supervisory bodies.

**GOV-2 – Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies<sup>49</sup>**

In section [A.5 “Corporate governance statement”](#), we partially disclose how the administrative, management and supervisory bodies are informed of sustainability matters and how these matters have been addressed during the reporting period. We further elaborate on this in the following sections.

Key function holders and business line managers regularly inform the management board about all material business information affecting the company’s operations and strategic goals. Management board sessions are held on a regular basis, usually weekly. The management board is also briefed on sustainability topics through regular monthly sustainability executive meetings.

At the Group level, we monitor changes in the external environment on a regular basis, usually quarterly, and identify new or increased risks, including those related to sustainability, which may have an impact on operations.

The management board of Sava Re d.d. (the Company or Sava Re) oversees the implementation of the Group’s policy and strategy and the achievement of strategic and operational goals, establishes a system to ensure compliance with sustainability legislation and reports on this to the supervisory board.

At their executive meetings, the administrative bodies have regularly discussed key aspects of sustainability development and business operations, such as information on the material environmental and social impacts and impacts on the Group’s operations, risk management, and the identification of opportunities arising from sustainable business practices. We disclose these topics in more detail in section [ESRS 2 IRO-1](#). In 2024, they closely monitored preparations for sustainability reporting under the new CSRD Directive (Directive (EU) 2022/2464) and ESRS standards.

Ongoing dialogue between the management board and the management and supervisory bodies ensures that impacts, risks and opportunities are comprehensively identified, analysed and addressed in line with the Group’s long-term sustainability goals.

We present the report of the supervisory board in section [A.4 “Report of the supervisory board”](#).

**GOV-3 – Integration of sustainability-related performance in incentive schemes<sup>50</sup>**

The variable part of the individual-performance-based pay of the members of the management bodies is linked to the achievement of the Group’s long-term strategic goals, which include long-term sustainability goals, key business development goals and risk management goals.

Responsible  
Group governance  
is the foundation  
of sustainable  
business

48 ESRS 2 GOV-1 paragraphs 21 to 23.  
49 ESRS 2 GOV-2 paragraphs 26 (a), 26 (b), 26 (c) and 26 (c) ii.  
50 ESRS 2 GOV-3 paragraphs 29, 29 (a) and 29 (b).





GOV-4 – Statement on due diligence<sup>51</sup>

In the following table, we disclose the mapping of information on due diligence processes as disclosed in our sustainability report. This is intended to facilitate an understanding of the Group’s due diligence process in relation to sustainability matters.

Core elements of due diligence	Paragraphs in the sustainability report
(a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-1 paragraphs 21 to 23 ESRS 2 GOV-2 paragraphs 26 (a) to 26 (c)
(b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 SBM-1 paragraphs 45 to 45 (d) ESRS S1-2 paragraphs 27 to 27 (e) ESRS S3-2 paragraphs 21 to 21 (d) ESRS S3-3 paragraphs 27 (a) to 27 (d) ESRS S4-2 paragraphs 20 to 20 (d) ESRS S4-3 paragraphs 25 (a) to 25 (d) ESRS G1-1 paragraph 10 (c)
(c) Identifying and assessing adverse impacts	ESRS 2 IRO-1 paragraphs 53 (a) to 53 (h) ESRS E1-5 paragraphs 37 to 39 ESRS E1-6 paragraphs 44 to 52 (b) ESRS S1-14 paragraphs 88 (a) to 88 (c) ESRS S4-5 paragraphs 41 to 41 (c) ESRS G1 – Protection of personal data
(d) Taking actions to address those adverse impacts	ESRS E1-3 paragraphs 29 (a) and 29 (b) ESRS E1-4 paragraphs 34 (a) and 34 (b) ESRS S1-5 paragraphs 47 (a) to 47 (c) ESRS S4-3 paragraphs 25 (a) to 25 (d) ESRS G1 – Protection of personal data
(e) Tracking the effectiveness of these efforts and communicating	ESRS 2 SBM-1 paragraphs 45 to 45 (d) ESRS E1-5 paragraphs 37 to 39 ESRS E1-6 paragraphs 44 to 52 (b) ESRS S1-2 paragraphs 27 to 27 (e) ESRS S4-4 paragraphs 31 (d) and 32 (c) ESRS G1 – Protection of personal data

51 ESRS 2 GOV-4 paragraphs 30, 32 and AR 48  
52 ESRS 2 GOV-5 paragraphs 36 (a), 36 (b), 36 (c), 36 (d) and 36 (e).

GOV-5 – Risk management and internal controls over sustainability reporting<sup>52</sup>

We have defined the risk management system and internal controls related to the sustainability reporting process in the Group’s rules on risk management and internal controls for sustainability reporting.

As part of the sustainability reporting process, we systematically carry out a risk assessment. We also perform regular internal controls. The findings of internal controls and risk assessments are regularly reported to the management and supervisory bodies, which use this information to make strategic decisions and set priorities for process improvements.

We are committed to continuously improving our sustainability reporting processes. This includes the gradual digitalisation of reporting processes, the enhancement of existing systems for data collection and analysis, and the regular updating of internal regulations to ensure compliance with the latest standards and legal requirements.







**SBM-1 – Strategy, business model and value chain<sup>53</sup>**

We are building a customer-centric, flexible and sustainability-oriented insurance group. The Sava Insurance Group operates in life, non-life, health and pension insurance, asset management and other complementary activities. We are becoming a comprehensive provider for our customers at all stages of their lives. We disclose more details about our services in section [A.2.5 “Profile of the Sava Insurance Group”](#).

We disclose more information on the customers we serve in section [ESRS S4](#).

The number and characteristics of employees is disclosed in section [ESRS S1-6](#).

The Group’s total revenue for 2024 was EUR 832.6 million.

More information on our operations and revenue structure is provided in the business report part.

**Sustainability-related goals<sup>54</sup>**

Across all key product and service groups, customer categories, geographic areas of operation and stakeholder relationships, we continuously strive to implement the core principles of sustainable development outlined in our Group’s sustainable business policy. We build

long-term corporate social responsibility through continuous dialogue with our stakeholders, supporting global sustainability goals, with a particular focus on climate action, and the good health and well-being of our customers, employees and the wider community.

In pursuing key sustainable development policies, we are guided by:

- the United Nations Sustainable Development Goals (SDGs) and the 2030 Agenda, respectively, with a particular focus on the following goals in our decision-making:
  - goal 3: Good health and well-being – by promoting a healthy lifestyle and well-being for all at all ages. With a special focus on the needs and interests of customers, in particular through the provision of appropriate insurance and financial products, and healthcare and other services, as well as on those of employees and the wider community;
  - goal 13: Climate action – by taking action to combat climate change and its impacts;
- the Paris Agreement and the European Green Deal;
- the international commitments, such as:
  - the United Nations Global Compact (UNGC), which sets out ten principles for responsible corporate governance, covering human rights, labour standards, climate

- change and anti-corruption;
- the United Nations Principles for Responsible Investment (UN PRI), which sets out six principles to guide investors in making responsible investment decisions.

The Sava Insurance Group’s strategic goals, which cover all relevant product and service groups, customer segments, geographical areas and stakeholder relationships, include:

1. following the EU initiative to reduce greenhouse gas emissions by 55% by 2030, thereby reducing carbon intensity,
2. responsible (re)insurance underwriting,
3. pursuing sustainability across the value chain and processes,
4. improving customer satisfaction,
5. ensuring satisfied and committed employees and fostering a strong sustainability culture.

Detailed goals are presented under individual sections ([E1](#), [S1](#), [S3](#), [S4](#) and [G1](#)).

The Sava Insurance Group’s strategic goals focus on integrating sustainability factors into all aspects of our business operations across all markets where we are present. The Group companies already offer innovative and sustainability-oriented products and solutions, thereby increasing their attractiveness to customers, investors and other stakeholders.

The link between our strategic goals and our products and services is evident at multiple levels:

- Reducing the carbon footprint (per employee, per revenue and from investments) across all Group companies, combined with:
  - developing sustainability-focused insurance and reinsurance products,
  - improving business processes and digitalisation, which also makes products and services more accessible to costumers.
- Increasing the share of investments aligned with the EU Taxonomy and the Group’s sustainability investment policy by:
  - developing sustainable investments and financial products that promote environmental and social activities (Article 8 of the SFDR Regulation),
  - limiting investments in industries that the Group does not wish to support, as set out in our exclusion list.
- Monitoring the share of premiums from products that comply with the EU Taxonomy by:
  - developing insurance and reinsurance products for sectors with low environmental impact,
  - developing insurance and reinsurance products that mitigate climate-related and other sustainability risks across all the Group’s insurance companies.

53 ESRS 2 SBM-1 paragraphs 40 (a) i, 40 (a) ii and 40 (b).  
54 ESRS 2 SBM-1 paragraphs 40(e), 40 (f) and 40 (g).





- Health, well-being and corporate culture initiatives, including:
  - expanding the range of health insurance products with additional benefits,
  - implementing prevention and health promotion activities.

Our 2023–2027 strategy addresses key challenges related to or impacting sustainability. These are outlined in section [A.6 “Mission, vision, strategic focus and goals”](#) and in sections on topical standards. Our key focus areas are: customer at the centre ([ESRS S4](#)), business process optimisation ([ESRS G1](#)), sustainability (stakeholder relations, [ESRS 2](#)), IT modernisation ([ESRS G1](#)), employee satisfaction and motivation ([ESRS S1](#)), and growth through acquisitions (linked to long-term stability and profitability, which we disclose in section [ESRS G1](#)). Sustainable operations are a key strategic priority for the Sava Insurance Group.

**Related business sectors<sup>55</sup>**

The operations of the Sava Insurance Group are closely linked to the following sectors:

- ESRS – insurance business: reinsurance and insurance, including both life and non-life insurance products, constitute the Group’s core business,

- ESRS – capital markets: mutual funds and pensions from an investment and asset management perspective,
- ESRS – other services: mainly assistance services offered either independently or as part of a broader range of insurance products and services.

**Business model and value chain<sup>56</sup>**

The business model of the Sava Insurance Group is based on providing a comprehensive range of insurance services, including non-life and life insurance, pension products, reinsurance, asset management and assistance services. The Group focuses on risk optimisation and investment management to ensure stability for its customers and investors. For more details, see section [A.2.5 “Profile of the Sava Insurance Group”](#).

The value chain of the Sava Insurance Group encompasses key external stakeholders who contribute to its operations. These include suppliers, distribution partners, (re)insureds, investment partners and end-users of the Group’s products and services. The Group collaborates with various business entities to provide a wide range of services, such as insurance and reinsurance, investment and pension products, and assistance services, thereby creating long-term value for customers.

We have developed an overview of the Group’s operations, business relationships and the framework in which these relationships take place, and an understanding of the Group’s key affected stakeholders.

Activities and business relationships are considered from the perspective of:

- analysis of the company’s business plan, strategy, financial statements and, where appropriate, other information provided to investors;
- the company’s operations, products/services and the geographical location of these operations;
- allocation of the company’s business relationships and value chain in the upstream and downstream supply chain, including the nature and type of business relationships.

We base our input data and approach for collecting, developing and maintaining this input data on the appropriate legal and regulatory framework in which the Group operates; Insurance Europe, the European insurance and reinsurance federation, which also provides professional support in the area of sustainability; analyses of peer companies; existing sector-specific benchmarks and other publications on general megatrends; and academic articles in the

area of sustainability. By engaging in international voluntary commitments (PCAF, PRI), we also participate in the development of methodologies for sustainability reporting and promote transparency and disclosures of sustainable practices.

**Outputs and outcomes for stakeholders<sup>57</sup>**

The Group paid out EUR 448.6 million in claims in 2024. Sava Re’s share rose by 42.9% in the period from 1 January 2024 to 31 December 2024, and we paid out a gross dividend of EUR 1.75 per share.

Employee and consumer indicators are presented in more detail in sections [ESRS S1](#) and [ESRS S4](#).

55 ESRS 2 SBM-1 paragraph 41.  
56 ESRS 2 SBM-1 paragraphs 42 and 42 (a).  
57 ESRS 2 SBM-1 paragraph 42 (b).



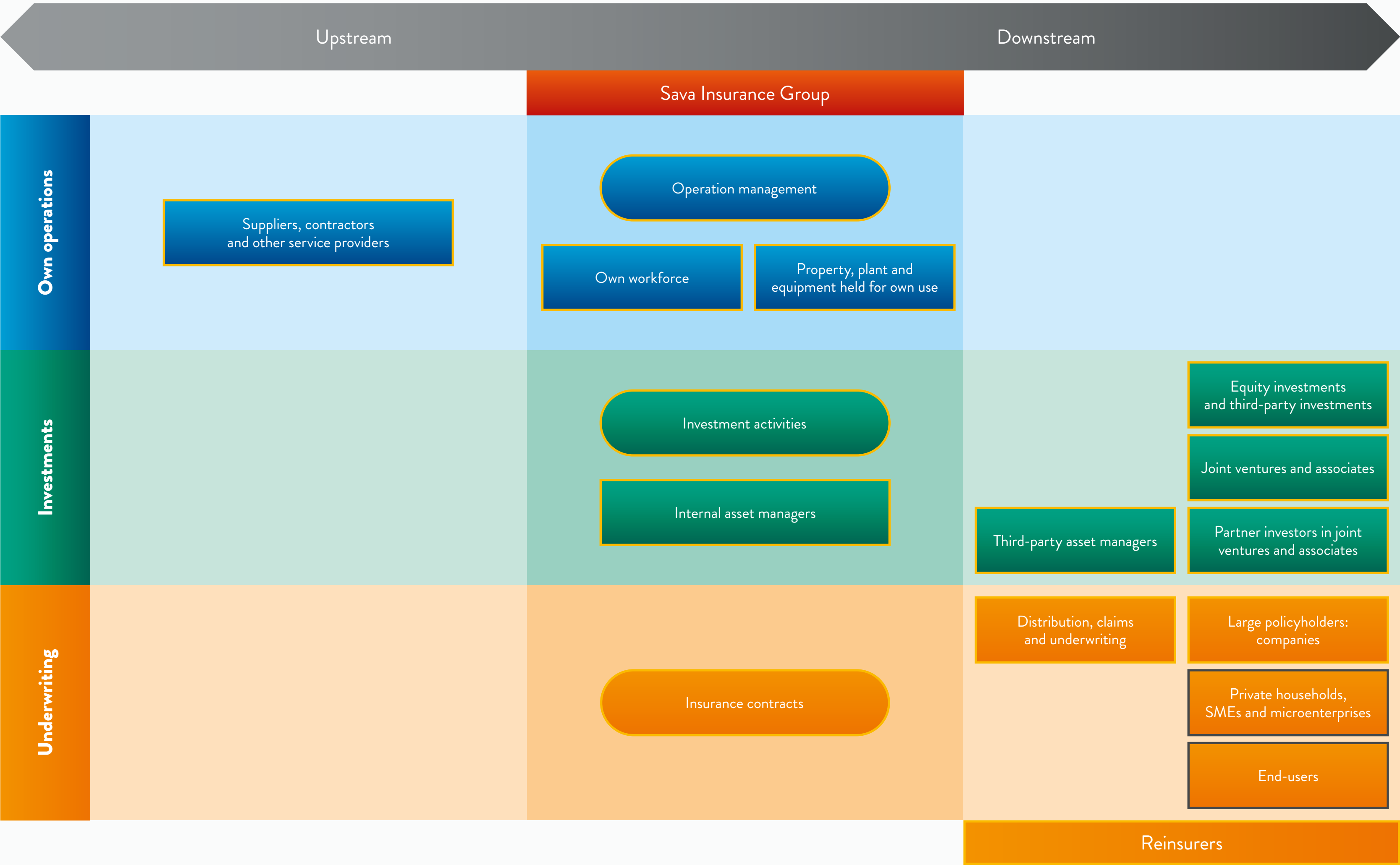


Description of the value chain<sup>58</sup>

The upstream value chain includes our supply chain. We work with many suppliers and partners, including major reinsurance service providers, technology service providers and professional advisers. Our relationships with suppliers and service providers provide our Group companies with the resources and services they need to ensure smooth operations.

As one of the leading insurance groups in the region, we are a key link in the value chain between suppliers and customers. Our primary role is to develop insurance, financial and investment products and assistance services tailored to the needs of individual markets and customer segments. Through appropriate risk management, we ensure efficient operations and create stability for our customers and the economy as a whole.

The downstream value chain comprises our consumers and end-users, as well as other stakeholders who directly or indirectly influence the success and sustainability of our operations. Our Group companies offer a wide range of products and services, giving us a diverse customer base with which to work.



Coverage on a quantitative and qualitative basis Use of internal data and/or application of estimates and approximations





SBM-2 – Interests and views of stakeholders<sup>59</sup>

Stakeholder engagement is an integral part of the Group’s business processes and encompasses a wide range of activities and methods, as detailed in the “Interests and views of stakeholders” table. This table also shows how we understand the interests and views of our key stakeholders in relation to our strategy and business model.

Based on the positions and interests of internal and external stakeholders, we adapt the Group’s business strategy and business model accordingly. To ensure the competitiveness of the business, we continuously adapt to the prevailing conditions in the specific markets where we are present. The changes primarily relate to the digital transformation of processes and products, sustainability aspects of business operations and the development of new products and services (for more details, see section [ESRS S4](#)). We follow the evolution of national and international industry guidelines and standards.

► Interests and views of stakeholders

Stakeholder groups	Purpose of stakeholder management	Engagement methods and approaches	Analysis of views	Consideration of stakeholder interests and views	Communicating stakeholder interests to the management and supervisory bodies	Monitoring the effectiveness of efforts and communication (feedback)
Employees	coordinating views, enhancing organisational culture and relationships, reducing turnover, improving health and well-being	annual career development meetings, internal events (conferences, professional training), communication via intranet and email, participation in governance (works council), personal contact, satisfaction and engagement measurement, works council, double materiality analysis	measuring satisfaction and engagement, thinking outside of the box, personal relationships, annual performance appraisal interviews	tailoring training programmes to career plans, adapting working conditions to interests and views, employee benefits (health day, volunteer day, etc.)	briefings at management board sessions, briefings at executive meetings, meetings with employee representatives	improving employee satisfaction indicators
Suppliers	identifying modern and sustainable solutions (services and products), low-carbon products and services, long-term cooperation	calls for applications, invitations to collaborate, questionnaires, meetings, presentations, appropriate remuneration policy, double materiality analysis	sustainability questionnaires, use of external data sources	coordinating business relationships	briefings at management board sessions, briefings at executive meetings	long-term partnerships, business contacts
External sales network	contacting customers, identifying real market needs, exploring new sales channels	personal consultations, regular contacts, conferences, training, double materiality analysis	personal contacts, business meetings, sales trend analysis	harmonising working conditions and tailoring the offer to actual market needs based on market conditions	briefings at management board sessions, briefings at executive meetings	monitoring sales trends, business meetings
Reinsurers	contacting major customers – business-to-business (B2B), identifying market needs	business contacts, international conferences, double materiality analysis	business contacts, trend monitoring	aligning the terms and conditions of business cooperation with market conditions	briefings at management board sessions, briefings at executive meetings	reinsurance portfolio value trends
Consumers/end-users	identifying actual market needs, offering modern sales channels, providing quality products and services, operating in a sustainable way	personal consultations, regular contacts, websites and other digital channels, contact centres, compliments and complaints, satisfaction measurement (surveys), double materiality analysis	satisfaction assessments, register of commendations and complaints	aligning the offering with real market needs based on market conditions	briefings at management board sessions, briefings at executive meetings	customer feedback via sales network or satisfaction measurement, sales trends

59 ESRS 2 SBM-1 paragraphs 45, 45 (a), 45 (a) i, 45 (a) ii, 45 (a) iii, 45 (a) iv, 45 (a) v, 45 (b), 45 (c), 45 (c) i, 45 (c) ii, 45 (c) iii and 45 (d).





Stakeholder groups	Purpose of stakeholder management	Engagement methods and approaches	Analysis of views	Consideration of stakeholder interests and views	Communicating stakeholder interests to the management and supervisory bodies	Monitoring the effectiveness of efforts and communication (feedback)
Owners	conducting business in a responsible and sustainable manner, clearly defining the dividend policy and returns, providing adequate information	regular public announcements (SEOnet), website publications, annual shareholder letter, domestic and international investment conferences, in-depth information on business operations, annual plan and strategic priorities, double materiality analysis	individual meetings, general meetings of shareholders, investment conferences	adapting business operations to market conditions	briefings at the general meeting of shareholders	share price performance
Supervisory bodies	ensuring business transparency and compliance, conducting business in a responsible and sustainable manner, clearly defining the dividend policy and returns, providing adequate information	regular and extraordinary supervisory board and committee sessions	supervisory board sessions, individual meetings	considering and reviewing key topics	briefings at regular and extraordinary supervisory board and committee sessions	long-term performance
Regulators	ensuring business transparency and compliance, conducting business in a responsible and sustainable manner	regular and ad hoc reporting, monitoring of regulatory recommendations	meetings, written communication via email	consistent tracking of changes in legislation, regulatory measures and recommendations	briefings at management board sessions, briefings at executive meetings	regulatory feedback during regular and extraordinary audits
Credit rating agencies	improving or maintaining an appropriate credit rating	annual review		ensuring proper business practices	active cooperation with credit rating agencies, briefings at management board sessions	credit rating
Wider community	addressing open issues, ensuring cooperation, improving safety, supporting the community, specific interests and vulnerable groups	donations, sponsorships, volunteering, preventive activities	analysis of initiatives and open issues	providing support in the form of financial resources, volunteer activities, or other forms of assistance/support	briefings at management board sessions, briefings at executive meetings	corporate/brand reputation monitoring, media monitoring, feedback from (local) communities
Media	informing the general public, strengthening a factual and positive image of the company and the Group, maintaining regular and positive relations	press releases, press conferences, email or other communication channels	media inquiries and initiatives, media briefings on key events	responding appropriately to potential media enquiries and initiatives	active engagement, regular updates on media coverage	monitoring (analysis) of media coverage, regular contacts

We are adapting our strategy by incorporating additional sustainability goals, improving data quality (which enhances the transparency and disclosure of our reporting), driving the digitalisation of processes, and continuously developing products that meet current market and stakeholder needs.

We expect the planned measures and activities to further strengthen relationships with our stakeholders and increase their trust in the Group. Our focus is on improving relationships with our employees, customers and end-users, suppliers, business partners, the wider community and other external stakeholders.

Information on how administrative, management and supervisory bodies are informed of the views and interests of affected stakeholders, particularly with regard to the company’s impact on sustainability, is presented in the above table outlining the interests and views of stakeholders.





SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model<sup>60</sup>

Our Group’s operations have the most material impacts on the social environment. For our own workforce, we have identified impacts related to working conditions, equal treatment and opportunities for all, and other work-related rights. We disclose these impacts in section [ESRS S1](#).

For affected communities, we have identified material impacts related to safety and the positive impact of our sponsorships and donations. We disclose these impacts in section [ESRS S3](#).

For consumers and end-users, we have identified impacts related to information, personal safety and social inclusion. We disclose these impacts in section [ESRS S4](#).

We have not identified any material risks and opportunities related to the above impacts that would have a material financial impact on our operations.

In terms of governance, we have identified the following as material impacts: long-term stability and profitability (disclosed in the business report part), corporate culture, innovative products and digital transformation, anti-corruption and anti-bribery matters, supplier relationship management and whistleblower protection. These are disclosed in section [ESRS G1](#), where we also report on risks that we assessed to be financially material (including protection of personal data, operation and robustness of IT systems, and statutory stakeholder notification).

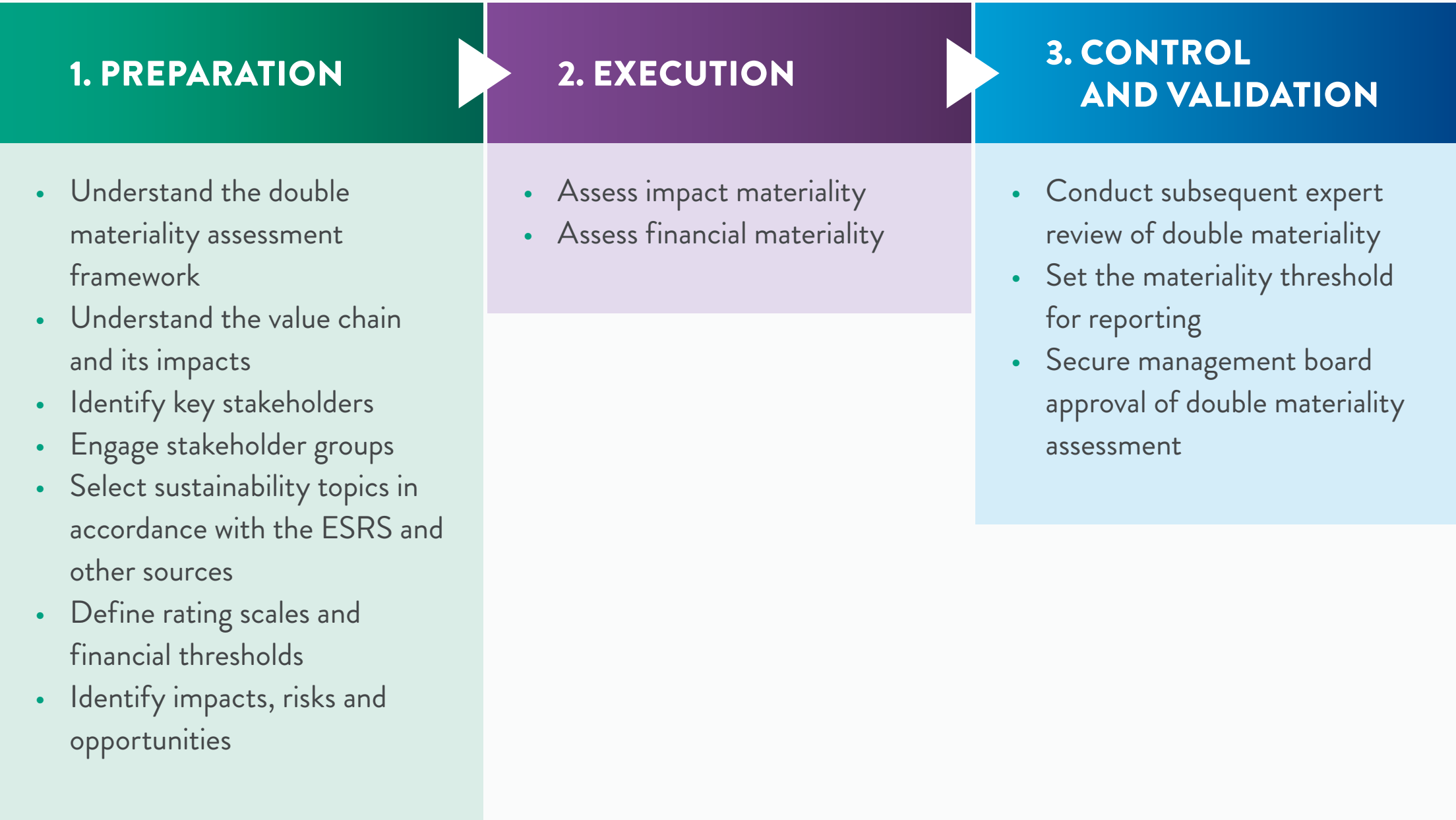
Our operations also have an impact on the environment, particularly in relation to climate change mitigation and renewable energy. Adapting to and mitigating climate change presents both risks and opportunities with a material financial impact on our operations. These are disclosed in section [ESRS E1](#).

In these sections, we disclose the current and expected implications of our material impacts, risks and opportunities on our business model, value chain, strategy and financial position. We have explained how the Group’s material impacts, whether negative or positive, affect people or the environment. We have also described the key actions taken to manage specific material impacts or risks, or to take advantage of specific material opportunities.

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities<sup>61</sup>

We have developed a double materiality assessment methodology within the Group based on the ESRS standards. The methodology includes the identification of material sustainability matters based on the analysis of impacts on people and the environment and the assessment of risks and opportunities as well as financial materiality. The methodology consists of multiple steps, as shown in the diagram.

In identifying impacts, risks and opportunities, we relied on our understanding of our business – both in terms of our business model and our value chain. We identified key stakeholders across the entire value chain, both upstream and downstream, and within our own operations, covering all markets where we are present. We ranked these stakeholders by relevance and developed an engagement plan to include them in the double materiality assessment.



60 ESRS 2 SBM-3 paragraph 48.  
61 ESRS 2 IRO-1 paragraph 53 (a).





**Impacts<sup>62</sup>**

We have used the list of subtopics defined in the ESRS standards to identify, assess, prioritise and monitor the actual and potential impacts of the Group. We have analysed our own strategic and other corporate documents, which include due diligence processes, and reviewed the relevant legal and regulatory framework in which we operate, analytical and strategic sustainability-related documents from Insurance Europe, the European insurance and reinsurance federation, the SASB sectoral standards, existing sector-specific benchmarks and other publications on general megatrends, as well as academic articles on sustainability in our value chain. We also analysed the sustainability reports of major peer companies. Based on this, we further defined a broader list of potentially material, specific subtopics.

We used a two-tier approach to the impact assessment – identifying expert assessors along the Group’s business lines and consulting with key stakeholders who are materially impacted by our business and/or who themselves have a material impact on us.

Each significant stakeholder group was fully represented, or it was included by a representative sample in the assessment. Details are given in the “Interests and views of stakeholders” table. During the assessment process, we did not identify any significant differences arising from the nature of operations, geographical areas or other factors that could increase the risk of adverse impacts.

The assessment of the Group’s material impacts on people and the environment is based on the impacts that are expected to result from our business operations, the achievement of goals and results stemming from the Group companies’ operations and the impacts across the value chain. The impact assessment scale considers the identified impacts on people and the environment in terms of three time horizons (short, medium and long term) and the business relationships involved (own operations and value chain), namely negative and/or positive and actual and/or potential impacts.

**Risks and opportunities<sup>63</sup>**

To identify, assess and prioritise risks and opportunities, we used a list of identified impacts

based on which external environmental factors could present either a risk and/or an opportunity to our Group. In doing so, we considered the relationships between impacts, dependencies, risks and opportunities arising from these. We analysed the Sava Insurance Group’s risk register, in which we have already identified environmental, social and governance risks with financial implications. In addition, we used the list of subtopics that are part of the ESRS standards and other documents that we have previously referred to in the impact assessment process.

Based on this, we have defined a broader list of potential risks and opportunities. A sustainability matter is financially material to the Group if it has, or is reasonably expected to have, a material financial impact.

The financial materiality of a sustainability matter is not limited to issues within the Group’s control. It also includes information on material risks and opportunities related to business relationships that extend beyond the scope of consolidation used in the preparation of the financial statements.

Opportunity assessment is based on operational analysis, cost-benefit assessment and alignment with our sustainability strategy. We integrate the identified opportunities into strategic business plans with the aim of creating greater added value for stakeholders, expanding our operations, improving business performance and increasing business resilience.
























In the process of identifying, assessing and managing material impacts, risks and opportunities, we have used various input parameters, including analyses, ratings and rankings from our governance systems, stakeholder insights and assessments, and external expert analyses and assessments within our industry and value chain.

62 ESRS 2 IRO-1 paragraph 53 (b).  
63 ESRS 2 IRO-1 paragraphs 53 (c), 53 (d), 53 (e), 53 (f) and 53 (g).





► Double materiality assessment













Subtopic	Impact, risk, opportunity		Actual, potential
Environment E1 Climate change			
Climate change adaptation  	impact		actual and potential
Climate change adaptation  	risk and opportunity	 	potential
Climate change mitigation  	impact	 	actual and potential actual
Society S1 Own workforce			
Secure employment 	impact		actual
Working time 	impact		actual
Adequate wages 	impact		actual
Social dialogue 	impact		actual
Freedom of association, the existence of works councils and the information, consultation and participation rights of workers 	impact		actual
Collective bargaining, including rate of workers covered by collective agreements 	impact		actual

Subtopic	Impact, risk, opportunity		Actual, potential
Work-life balance 🏠	impact	+	actual
Health and safety 🏠	impact	+ —	actual actual and potential
Gender equality and equal pay for work of equal value 🏠	impact	+	actual and potential
Training and skills development 🏠	impact	+	actual
Measures against violence and harassment in the workplace 🏠	impact	—	actual and potential
Diversity 🏠	impact	+	actual
Privacy 🏠	impact	+ —	actual actual and potential
S3 Affected communities			
Security-related impacts 🏠 ⬇️	impact	+	actual and potential
Security of affected communities (specific) 🏠 ⬇️	impact	+	actual and potential
Donations and sponsorships 🏠 ⬇️	impact	+	actual

- Legend:
- + Positive impact, opportunity
  - Negative impact, risk
  - 🏠 Own operations
  - ⬇️ Downstream value chain
  - ⬆️ Upstream value chain





Subtopic	Impact, risk, opportunity		Actual, potential
S4 Consumers and end-users			
Privacy  	impact	<div><div>+</div><div>—</div></div>	actual actual and potential
Freedom of expression  	impact	<div><div>+</div></div>	actual
Access to (quality) information  	impact	<div><div>+</div></div>	actual
Health and safety  	impact	<div><div>+</div></div>	actual
Access to products and services  	impact	<div><div>+</div></div>	actual
Responsible marketing practices  	impact	<div><div>+</div></div>	actual

Legend:

+

 Positive impact, opportunity

—

 Negative impact, risk

⌆

 Own operations

⬇

 Downstream value chain

⬆

 Upstream value chain

Subtopic	Impact, risk, opportunity		Actual, potential
Governance G1			
Corporate culture   	impact		actual
Protection of whistleblowers   	impact		actual
Management of relationships with suppliers, including payment practices  	impact		actual
Corruption and bribery: prevention and detection including training   	impact		actual and potential
Long-term stability and profitability (specific)   	impact		actual and potential
Innovative products and digital transformation (specific)   	impact	 	actual actual and potential
Personal data protection   	risk and opportunity	 	actual and potential
Operation and robustness of IT systems   	risk and opportunity	 	actual and potential
Statutory stakeholder notification   	risk and opportunity	 	actual and potential

## IRO-2 – Disclosure Requirements in ESRS covered by the sustainability report<sup>64</sup>

A list of disclosure requirements that have been met in preparing the sustainability report, based on the materiality assessment results, including the sections of the sustainability report where the related disclosures can be found, is presented in [appendix A – ESRS index](#).

The disclosures required by Regulation (EU) 2020/852 and related delegated acts are presented in section [3 “Environmental Information”](#).

The material information required to be disclosed concerning material impacts, risks and opportunities has been determined based on the requirements of ESRS 2 – General Disclosures and the ESRS topical standards. We have provided additional disclosures specific to our Group if a material sustainability matter is either not covered by the ESRS standards or not sufficiently detailed within them. The information disclosed is included where, in our double materiality assessment, we have determined that it is material from one or more of the following perspectives: whether the information is significant in relation to the matter it is intended to present or clarify, or whether the information can meet the decision-making needs of users, including primary users of general-purpose financial reporting and/or users primarily interested in impact-related information about our Group.



### 3 Environmental information

#### Disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation)

In 2020, Regulation (EU) 2020/852 was adopted as the regulatory framework for promoting sustainable investments (EU Taxonomy). The regulation aims to promote transparency of sustainability disclosures for financial market participants and the rest of the business community. The EU Taxonomy is a classification system that helps companies and investors identify “environmentally sustainable” economic activities and make sustainable investment decisions. Environmentally sustainable activities are those that make a significant contribution to at least one of the EU’s six environmental goals, without significantly harming the other five, are carried out in compliance with minimum safeguards and meet technical screening criteria. An economic activity that meets the above requirements is considered to be Taxonomy-aligned.

The EU’s environmental goals are:

- climate change mitigation,
- climate change adaptation,
- the sustainable use and protection of water and marine resources,
- the transition to a circular economy,
- pollution prevention and control,
- the protection and restoration of biodiversity and ecosystems.

KPIs of insurance and reinsurance undertakings, as defined in annexes X and XII to the Delegated Regulation (EU) 2021/2178 – EU Taxonomy, are disclosed below.







Disclosures – non-life insurance and reinsurance

► Annex X – Template: The underwriting KPI for non-life insurance and reinsurance undertakings

	Substantial contribution to climate change adaptation			DNSH (Do No Significant Harm)					
Economic activities	Absolute premiums, year t	Proportion of premiums, year t	Proportion of premiums, year t – 1	Climate change mitigation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards
	Currency	%	%	yes/no	yes/no	yes/no	yes/no	yes/no	yes/no
A.1 Non-life insurance and reinsurance underwriting Taxonomy-aligned activities (environmentally sustainable)	38,956,756	4.91%	69.54%	yes	yes	yes	yes	yes	yes
A.1.1 Of which reinsured	13,088,490	1.65%	3.98%	yes	yes	yes	yes	yes	yes
A.1.2 Of which stemming from reinsurance activity	0	0.00%	9.07%	yes	yes	yes	yes	yes	yes
A.1.2.1 Of which reinsured (retrocession)	0	0.00%	1.67%	yes	yes	yes	yes	yes	yes
A.2 Non-life insurance and reinsurance underwriting Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)	479,935,991	60.55%	0.60%						
B. Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities	273,764,558	34.54%	29.86%						
Total (A.1 + A.2 + B)	792,657,305	100.00%	100.00%						

Values for 2023 (t – 1) are not audited. The indicator is calculated on the basis of gross written premiums.





► Taxonomy-aligned non-life insurance activities\*

EUR	Gross premiums written	
	2024	Share
Medical expense insurance	0	0.00%
Income protection insurance	0	0.00%
Workers' compensation insurance	0	0.00%
Motor vehicle liability insurance	0	0.00%
Other motor vehicle insurance	0	0.00%
Marine, aviation and transport insurance	0	0.00%
Fire and other damage to property insurance	38,040,401	4.80%
Assistance	916,354	0.12%
Total (1–8)	38,956,756	4.92%
Other non-life	753,700,550	95.08%
Total non-life	792,657,305	100.00%
Life insurance	206,661,737	
Total	999,319,043	

\* The baselines for compliance with the technical screening criteria set out in Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 and the methodology for calculating compliance have been updated for 2024 in line with the positions on the conditions for compliance with (all) the technical screening criteria set out in chapter 10 of that Regulation.







Disclosures – investments

► Annex X – Template: The proportion of the insurance or reinsurance undertaking’s investments that are directed at funding, or are associated with, Taxonomy-aligned activities in relation to total investments

The proportion of the insurance or reinsurance undertaking’s investments that are directed at funding, or are associated with, Taxonomy-aligned activities in relation to total investments		
1.	The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities <b>relative to the value of total assets covered by the KPI</b> , with following weights for investments in undertakings per below:  Turnover-based: 2.63% Capital expenditures-based: 4.51%	The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities, with following weights for investments in undertakings per below:  Turnover-based: EUR 39,738,092.04 Capital expenditures-based: EUR 68,070,754.42
2.	The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings (total AuM). Excluding investments in sovereign entities.  Coverage ratio: 98.33%	The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.  Coverage EUR 1,508,802,041.98
Additional, complementary disclosures: breakdown of denominator of the KPI		
3.	The percentage of derivatives relative to total assets covered by the KPI: 0.00%	The value in monetary amounts of derivatives: EUR 213.43
4.	The proportion of <b>exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU</b> over total assets covered by the KPI:  For non-financial undertakings: 3.00% For financial undertakings: 0.27%	Value of <b>exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU</b> :  For non-financial undertakings: EUR 45,266,575.97 For financial undertakings: EUR 4,003,690.27
5.	The proportion of <b>exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU</b> over total assets covered by the KPI:  For non-financial undertakings: 0.45% For financial undertakings: 0.00%	Value of <b>exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU</b> :  For non-financial undertakings: EUR 6,795,814.60 For financial undertakings: EUR 0.00
6.	The proportion of <b>exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU</b> over total assets covered by the KPI:  For non-financial undertakings: 10.84% For financial undertakings: 0.87%	Value of <b>exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU</b> :  For non-financial undertakings: EUR 163,517,511.58 For financial undertakings: EUR 13,118,086.37
7.	The proportion of <b>exposures to other counterparties and assets</b> over total assets covered by the KPI: 84.58%	Value of <b>exposures to other counterparties and assets</b> : EUR 1,276,100,149.76
8.	The proportion of the insurance or reinsurance undertaking’s investments other than investments held in respect of life insurance contracts <b>where the investment risk is borne by the policy holders</b> , that are directed at funding, or are associated with, Taxonomy-aligned economic activities: 53.67%	Value of insurance or reinsurance undertaking’s investments other than investments held in respect of life insurance contracts <b>where the investment risk is borne by the policy holders</b> , that are directed at funding, or are associated with, Taxonomy-aligned economic activities: EUR 809,801,064.94
9.	The value of all the investments that are funding <b>economic activities that are not Taxonomy-eligible</b> relative to the value of total assets covered by the KPI:  Turnover-based: 89.10% Capital expenditures-based: 87.81%	Value of all the investments that are funding <b>economic activities that are not Taxonomy-eligible</b> :  Turnover-based: EUR 1,344,303,300.51 Capital expenditures-based: EUR 1,324,950,411.30
10.	The value of all the investments that are funding Taxonomy-eligible economic activities, <b>but not Taxonomy-aligned relative to the value</b> of total assets covered by the KPI:  Turnover-based: 6.32% Capital expenditures-based: 5.75%	Value of all the investments that are funding Taxonomy-eligible economic activities, <b>but not Taxonomy-aligned</b> :  Turnover-based: EUR 95,307,594.82 Capital expenditures-based: EUR 86,743,785.67
Additional, complementary disclosures: breakdown of numerator of the KPI		
11.	The proportion of <b>Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU</b> over total assets covered by the KPI:  <b>For non-financial undertakings:</b> Turnover-based: 1.96% Capital expenditures-based: 3.48%  <b>For financial undertakings:</b> Turnover-based: 0.01% Capital expenditures-based: 0.01%	Value of <b>Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU</b> :  <b>For non-financial undertakings:</b> Turnover-based: EUR 29,543,672.34 Capital expenditures-based: EUR 52,532,621.27  <b>For financial undertakings:</b> Turnover-based: EUR 119,339.77 Capital expenditures-based: EUR 177,916.86
12.	The proportion of the insurance or reinsurance undertaking’s investments other than investments held in respect of life insurance contracts <b>where the investment risk is borne by the policy holders</b> , that are directed at funding, or are associated with, Taxonomy-aligned economic activities:  Turnover-based: 16.83% Capital expenditures-based: 15.51%	Value of insurance or reinsurance undertaking’s investments other than investments held in respect of life insurance contracts <b>where the investment risk is borne by the policy holders</b> , that are directed at funding, or are associated with, Taxonomy-aligned economic activities:  Turnover-based: EUR 6,688,515.19 Capital expenditures-based: EUR 10,558,363.15
13.	The proportion of <b>Taxonomy-aligned exposures to other counterparties and assets</b> over total assets covered by the KPI:  Turnover-based: 0.67% Capital expenditures-based: 1.02%	Value of <b>Taxonomy-aligned exposures to other counterparties and assets</b> over total assets covered by the KPI:  Turnover-based: EUR 10,075,079.92 Capital expenditures-based: EUR 15,360,216.29
Breakdown of the numerator of the KPI per environmental goals		
Taxonomy-aligned activities – provided “do-not-significant-harm” (DNSH) and social safeguards positive assessment		
(1) Climate change mitigation	Turnover: 71.85% Capital expenditures: 74.47%	Transitional activities: 3.89% (Turnover) 3.06% (CapEx) Enabling activities: 46.20% (Turnover) 35.68% (CapEx)
(2) Climate change adaptation	Turnover: 0.74% Capital expenditures: 8.18%	Enabling activities: 0.64% (Turnover) 2.88% (CapEx)
(3) The sustainable use and protection of water and marine resources	Turnover: 0.05% Capital expenditures: 0.09%	Enabling activities: 0.03% (Turnover) 0.08% (CapEx)
(4) The transition to a circular economy	Turnover: 0.75% Capital expenditures: 0.11%	Enabling activities: 0.49% (Turnover) 0.09% (CapEx)
(5) Pollution prevention and control	Turnover: 0.13% Capital expenditures: 0.02%	Enabling activities: 0.00% (Turnover) 0.00% (CapEx)
(6) The protection and restoration of biodiversity and ecosystems	Turnover: 0.00% Capital expenditures: 0.00%	Enabling activities: 0.00% (Turnover) 0.00% (CapEx)





Annex XII – Template 1

Template 1: Nuclear energy and fossil gas related activities		
Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	yes
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	yes
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	yes
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	yes
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	yes
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	yes

► Consolidated key performance indicators

Category	Revenue 2024	Percentage (A)	KPI turnover based (B)	KPI CapEx based (C)	KPI turnover based weighted (A*B)	KPI CapEx based weighted (A*C)
Asset management	24,193,174	2.49%	0.00%	0.00%	0.00%	0.00%
Investments	137,114,030	14.14%	2.63%	4.51%	0.37%	0.64%
Non-life insurance and reinsurance	725,769,172	74.85%	4.92%	4.92%	3.68%	3.68%
Life insurance	74,911,624	7.73%	0.00%	0.00%	0.00%	0.00%
Other	7,699,599	0.79%	0.00%	0.00%	0.00%	0.00%
Total	969,687,599	100.00%			4.05%	4.32%



# Annex XI

## Qualitative disclosures for insurance and reinsurance undertakings

### General description of the approach to sustainable business operations

The Sava Insurance Group strives to integrate sustainability factors into its business strategy, products and investment decisions. Our business activities support the goals of the EU Taxonomy, particularly regarding climate change mitigation. We regularly monitor the exposure of our investment portfolio to environmental risks through an investment exclusion list, as defined in our sustainability investment policy, which identifies industries in which the Group does not wish to invest, thereby pursuing the goal of climate change mitigation and achieving ESG criteria. We have implemented internal processes to assess the impacts of insured risks on climate change and, in line with the Group’s sustainable development strategy, we are promoting an increase in the share of ESG investments, which is growing year on year.

In accordance with Article 8 of the Taxonomy

Regulation, companies subject to this Article must disclose the proportion of exposure to EU Taxonomy-aligned economic activities for the financial year 2024, together with other sustainability-related investment information, which the Group follows, as shown in the tables above in accordance with the Delegated Taxonomy Regulations.

The product acceptability analysis has been carried out at the level of all Group insurance companies, while the compliance assessment has so far only been based on our largest portfolio, that of Zavarovalnica Sava. In this regard, we have begun to systematically integrate sustainability principles into the design of our insurance products, and we manage the integration of sustainability factors into insurance products through the assessment of such sustainability factors and the implementation of solutions that follow the technical screening criteria. The first selection of products according to the Taxonomy-aligned assessment consisted of a motor liability insurance product and a home insurance product. The nature of the first of these products follows

the rule of the driver’s liability for damage incurred by third parties in an event, so we consider that the technical criterion relating to the modelling of the product in relation to climate change is rather uncharacteristic of this product. Therefore, we did not focus our activities on assessing the potential impact of climate change on motor liability insurance (see the “Restrictions” section for more details). Instead, assessing the compliance of home insurance products was considered more relevant and appropriate. Based on analyses and the ability to apply all technical criteria to individual products, home insurance is the only product that has been recognised as being in line with the Taxonomy.

Our strategy includes the gradual reduction of exposure to carbon-intensive sectors and the promotion of products that support the transition to a low-carbon economy. We assess the alignment of our operations with the EU Taxonomy based on internal analyses and external standards. In calculating the EU Taxonomy key performance indicators for investments, we have used data from the external provider, MSCI

Inc., while for insurance products we have used data obtained directly from subsidiaries and the strategic planning and controlling department.

One of the main challenges in implementing the EU Taxonomy is the availability and quality of data required to assess the compliance of our products. In the future, we plan to improve our reporting and stakeholder engagement processes to obtain more accurate data on the sustainability impacts of our activities, and we expect to see the development and standardisation of (international) practices in this area, as we have not yet seen any detailed standardisation of positions and interpretations of product and underwriting regulations regarding the Taxonomy that take into account the specifics of the (re)insurance business. For investments, our main challenge is low data coverage, while for insurance products, we are addressing the challenges mainly through product upgrades to meet the technical screening criteria, thereby increasing the proportion of alignment.



**Alignment with the EU Taxonomy**

The content and presentation of the information that companies are required to disclose on environmentally sustainable economic activities and the methodology for fulfilling these disclosure obligations are set out in Delegated Regulation (EU) 2021/2178 (the Disclosures Delegated Regulation). In this respect, the Group discloses below one of its key performance indicators, the proportion of EU Taxonomy-aligned investments, which is the weighted average of the value of all investments aligned with the EU Taxonomy over the so-called covered assets. The covered assets consist of the following items in the statement of financial position: financial investments and investment property. However, exposures to central governments, central banks and supranational issuers and cash are excluded from the covered assets in accordance with Article 7 of the Disclosures Delegated Regulation. The covered assets relate to portfolios covering non-life insurance liabilities, traditional life insurance liabilities, life insurance liabilities where the investment risk is borne by the policyholders and the company’s own funds. In 2024, the assets covered amounted to 98.33% of the total amount of assets under management. For investments in mutual funds, exchange-traded funds (ETFs)

and alternative funds (infrastructure funds, real-estate funds and private debt funds), the Group implemented a look-through approach to ensure that the EU Taxonomy alignment is calculated for each investment in these funds. The look-through approach was applied to level 1 investments. The alignment of investments with the EU Taxonomy in 2024, based on revenue, was 2.63% of the assets covered, or EUR 39.7 million. Meanwhile, the alignment of investments with the EU Taxonomy in 2024, based on capital expenditure, was 4.51% of the assets covered or EUR 68.1 million. The proportion of investments where the investment risk is borne by the policyholders that are directed at funding, or are associated with, Taxonomy-aligned economic activities, amounted to 53.67% or EUR 809,801,064.94 million in 2024. This KPI has been calculated by subtracting from the total portfolio considered in the EU Taxonomy the investments intended to cover the liabilities of policyholders who bear the investment risks (equity mutual funds, bond mutual funds, mixed mutual funds, money market funds, other mutual funds, convertible mutual funds, real-estate funds and infrastructure funds). Information on the alignment of investments with the EU Taxonomy for the financial year 2024 was obtained from the external data provider, MSCI

Inc., which collects data directly from companies. In October 2024, the Sava Insurance Group switched from its previous ESG data provider, Moody’s Analytics, to MSCI Inc. The report includes the latest available data from MSCI Inc.

The disclosures arising from annex XII to the Delegated Regulation on EU Taxonomy were made in this year’s report only for template 1 of annex XII – Nuclear energy and fossil gas related activities. The Group did not identify this area as material and does not consider this industry to be crucial to the conduct of its core business. The Group plans to make disclosures for all five templates from annex XII to the Delegated Regulation on the EU Taxonomy in its next annual report.

With regard to the alignment of non-life products with the Taxonomy, we highlight home insurance, where (in contrast to motor insurance) the assessment of the product’s link to climate change was much more relevant and the fulfilment of the criteria and the use of modelling techniques more meaningful, as mentioned above. In view of the above, the conclusion on the alignment of home insurance with the Taxonomy was all the more reasonable. In its assessment and

design processes for the home insurance (Dom) product, the insurance company takes into account the risks associated with climate change, which we disclose in this annual report in line with the requirements of the EU Taxonomy. These risk monitoring processes are present in a number of areas (notably development, claims and actuarial), particularly through the adjustment of risk assessment models, which are then used to determine premiums. We analyse both our own historical data on weather events and data from meteorological agencies to track forecasts of future climate risks such as floods, storms, hail and landslides. In this context, it is important to note that we have integrated the assessment of sustainability elements into our non-life product oversight and governance (POG) framework, taking into account the requirements of compliance with the EU Taxonomy, with a focus on the coverage of climate-related perils, while each underwriting process is also based on an individual assessment of the requirements and needs of our customers. Given the design of the home insurance (Dom) product, which is primarily aimed at insuring the property of individuals, we do not yet offer certain coverages (e.g. business continuity) that are primarily aimed at insuring legal entities.



**Restrictions**

The low percentage of alignment is due to the discrepancy between the investments included in the numerator and denominator of the KPI. The numerator, unlike the denominator, does not include exposures to companies not subject to the requirements of Articles 19a and 29a of Directive 2013/34/EU (the Accounting Directive) and exposures to derivatives, but consequently includes a smaller number of investments than the denominator. The calculation is also limited by the low coverage of the investment portfolio with data on the companies' alignment with the EU Taxonomy. The limited database of companies for which the external provider provides data is one of the reasons for this. In addition to large companies that are already subject to Taxonomy-alignment reporting, the investment portfolio also includes small and medium-sized companies that are not yet subject to such reporting. In addition, a significant part of the investment portfolio consists of non-EU companies, for which data are not yet available from the external data provider. The Group did not assess the alignment

with the EU Taxonomy for the investment property portfolio, the value of which, in relation to the total portfolio, is not significant. In view of the above, it is reasonable to expect that data coverage will improve as regulatory requirements are extended to more companies and information on the alignment of investments with the EU Taxonomy becomes more relevant. In the area of insurance products, in addition to the aforementioned process improvements related to the fulfilment of technical screening criteria for products in general, challenges remain in particular in obtaining data related to the principle of 'do no significant harm' (DNSH). In premium rating systems, the categories related to fossil fuels do not contain data exclusively related to fossil fuels but also cover other risk categories (e.g., the transport of hazardous substances). Therefore, we also relied on official databases (Statistical Office of the Republic of Slovenia) to collect data and based the compliance with the category or condition on these databases.

Other restrictions relate to the motor liability insurance product. It should be noted that, due to the baselines outlined for this product in the section [“General description of the approach to sustainable business operations”](#), the claims process does not capture data or indirect circumstances of events (related to climate change-driven causes). As a result, the insurance company does not conduct such analyses in this context. Therefore, although we believe that the alignment of the product could be built without applying the technical criterion of modelling the product, we have decided to hold off on this approach for the time being and focus only on eligibility. For this purpose, we used public records (data from the Slovenian police) on the circumstances of road traffic accidents, in which “accompanying circumstances” can also be linked to the effects of weather phenomena on the occurrence of traffic accidents. Since the insurance company does not yet have precise data on the relationship between the premium structure and the specific climate-related peril in the case of motor liability insurance (as

opposed to casco insurance, where the effect of weather phenomena on the occurrence of a traffic accident is much more relevant and is systematically monitored by the company), the assessments of the eligibility of the motor liability insurance product were based on an external source. According to this source, 24.57% of road traffic accidents were related to weather phenomena, which was also the basis for the assessment of the motor liability insurance product's eligibility. A review of the data reveals a low exposure to controversial weapons, which arises only from investments intended to cover the liabilities to policyholders who bear the investment risks. The exposure is less than 0.2% and is therefore classified as immaterial by the Group. The Group has a zero-tolerance policy for investment portfolios that it manages itself, and no exposure to controversial weapons was detected on these investments.

We also promote sustainability aspects by offering sustainable unit-linked life insurance products, which are mostly based on excluding or limiting exposure to controversial activities.





# ESRS E1 – Climate change

## GOV-3 – Integration of sustainability-related performance in incentive schemes<sup>65</sup>

The management of climate-related impacts is one of the strategic priorities of the management board. The way in which climate-related considerations are taken into account in the remuneration of members of the administrative, management and supervisory bodies is disclosed in section [ESRS 2 GOV-3](#).

## E1-1 – Transition plan for climate change mitigation<sup>66</sup>

In the Sustainable Development Strategy of the Sava Insurance Group for 2023–2027, we have defined key goals for a successful transition to a climate-neutral economy in line with limiting global warming to 1.5°C as set out in the Paris Agreement. We have committed to reducing our scope 1 and 2 greenhouse gas emissions from our own operations by 55% by 2030 and to reducing the carbon footprint of our investment portfolio. This commitment also includes a target to increase the proportion of sustainable investments to at least 20% of the portfolio by 2027, compared with 2022, and to decarbonise the investment portfolio.

In line with the sustainability strategy, we adopted a transition plan for climate change mitigation in 2024, covering the period up to 2030, which was approved by the management board in early 2025. The plan sets out actions to mitigate climate change by reducing greenhouse gas emissions and considering excluded sectors in both the insurance and investment portfolios. As the Group does not have any greenhouse gas emissions associated with its key assets and products, they are not discussed further in this report.

The key document that outlines the Group’s approach to integrating environmental, social and governance (ESG) factors into investing activities and managing sustainability risks in such investing activities is the Group’s sustainability investment policy. This policy was first adopted in June 2021. The Group aims to decarbonise the investment portfolio by limiting the sectors in which investments can be made (so-called excluded sectors). Even before the initial adoption of the sustainability investment policy and the exclusion criteria, the Group had taken a more balanced approach to its investment portfolios, divesting most of its investments in the thermal coal production sector where a significant part of revenues exceeds 10%.

The Group also supports sustainability and the green transition by investing in debt securities issued to finance environmental projects (so-called green bonds) and sustainability bonds, which are intended to finance the issuers’ green and social sustainability targets and are issued by most governments and local authorities. As at 31 December 2024, the Group’s ESG investments represented 23.6% of its total assets, exceeding the Group’s strategic sustainability target of 20% ESG investments in its investment portfolio.

The Group will continue to actively pursue such investments in the future.

We disclose the specific targets and progress achieved in section [ESRS E1-4](#).

## SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model<sup>67</sup>

The strategic management of the Sava Insurance Group includes identifying material impacts, risks and opportunities and incorporating them into our strategy and business model.

By introducing new (re)insurance products and services related to climate change adaptation, we positively impact customers and end-users of our products and services.

The carbon footprint of our operations has a negative impact on the environment; however, due to the nature of our operations, this impact is relatively small. In line with our business strategy, we are implementing measures and activities to reduce our carbon footprint. In Group companies, we are gradually transitioning to renewable energy sources, implementing energy efficiency measures in our operations, optimising business travel, reducing paper consumption, etc. In the long term, we aim to reduce our carbon footprint throughout the value chain through our investment and (re)insurance portfolios. A positive impact on climate change mitigation is achieved through the development of insurance products for e-mobility, solar panels and renewable energy production. In the medium and long term, we will also have a positive impact on the environment through investments in renewable energy production, which will benefit the entire value chain.

We have identified both risks and opportunities that have a material financial impact on our operations in the area of climate change adaptation and mitigation.

<sup>65</sup> ESRS E1.GOV-3 paragraph 13.  
<sup>66</sup> ESRS E1-1 paragraphs 14, 16 (a), 16 (b), 16 (d), 16 (h), 16 (i), 16 (j), 17, and E1-4 paragraphs 34 (e) and 34 (f).  
<sup>67</sup> ESRS E1.SBM-3 paragraphs 18, 19 (a), 19 (b), AR 7 (b), 19 (a), 19 (b) and 19 (c), and E1-4 paragraph AR 30 (c).



Across all operating segments, we consider the following physical risks to be material:

- the risk of widening credit spreads on government bonds of countries exposed to the physical effects of climate change,
- the risk of declining property values due to natural catastrophes,
- the risk of increased costs and/or business interruption due to natural catastrophes affecting the assets of Group companies.

The concentration of risk in our investment portfolio is low due to its strong diversification, which we expect to maintain in the future. For more information on the sectoral and geographical diversification of the Group's investment portfolio, see section [C.3.6.4.3 "Credit risk"](#).

We see financial opportunities primarily in investing in sustainable projects and assets that support the green transition.

In non-life (re)insurance, the main physical risks are:

- the risk of an increase in the number and/or severity of non-life (re)insurance claims due to natural catastrophes,
- the risk of reduced availability and/or high prices of reinsurance protection due to the increasing frequency and severity of natural catastrophes,

- the risk of loss of income and poor diversification due to non-life (re)insurance underwriting restrictions.

These risks are primarily concentrated in Slovenia, with some exposure in the former Yugoslav countries where several Group companies operate. Our reinsurance operations are global, with limited exposure to individual regions. For more information on the insurance portfolio's exposure, see section [C.3.6.3.1 "Non-life underwriting risks"](#).

In this operating segment, we see opportunities to introduce new innovative (re)insurance products and services, raise customer awareness and provide assistance services.

Climate change mitigation across all operating segments includes the risk of a decrease in the value of investments in companies and countries that have a negative impact on climate change, and the risk of higher interest rates due to economic instability resulting from an inadequate or delayed transition to a green economy. The concentration of risk is low due to the well-diversified investment portfolio and the implementation of a sustainability investment policy.

Climate change mitigation in the non-life (re) insurance segment presents the following transition risks with material financial implications:

- the risk of an inadequate non-life underwriting strategy and/or rules that do not take sufficient account of climate change,
- the risk of insufficient insurance premiums for new products covering green technologies,
- the risk of deteriorating credit ratings of reinsurance partners due to their inadequate adaptation to climate change.

At the same time, we see opportunities in this operating segment, such as developing new innovative (re)insurance products and services, fostering innovation and adaptation among customers and business partners, and exploring new business cooperation models. Material financial opportunities include reducing the Group's carbon footprint and managing sustainable investments in line with international guidelines. Through our strategy and business model, we seek to ensure that the positive impact of financial and environmental opportunities outweighs the potential negative impact of risks that may materialise.

**Effects of material impacts, risks and opportunities on the business model, value chain, strategy and decision-making**

The Group is already experiencing the effects of climate change, particularly in non-life (re)insurance. During the transition period, we anticipate potential impacts on the investment portfolio. To ensure a timely response, the Sava Insurance Group and its companies are incorporating these changes into their business plans. We do not foresee any changes to our business model, but we are implementing the necessary measures and adjustments within individual operating segments. In non-life insurance, we have already adjusted premiums, coverage and terms to ensure adequate coverage for customers and sufficient premiums to cover losses from natural catastrophes.

With an innovative approach to product development, we are tailoring our offering to market needs and raising consumer awareness about health and property protection.

Through insurance, the Group has a positive impact on people, for example, by providing non-life insurance cover against natural catastrophes.





**Financial effects of material risks and opportunities**

In recent years, the Sava Insurance Group has experienced the impact of climate change on certain non-life insurance products as both the frequency and severity of natural catastrophes have increased.

In 2023, Slovenia was affected by large-scale flooding characterised by prolonged and intense rainfall. In 2024, a major hailstorm was among major loss events. Multi-year trends indicate an increase in the volume of hailstorms, which cause greater property damage.

The Group ensures that its insurance companies adapt their product and service offering by identifying environmental (stakeholder) changes in a timely manner, adapting to new legislation and aligning with new sustainability strategies.

**Expected financial effects of material risks and opportunities on financial position, financial performance and cash flows**

We expect the frequency and severity of natural catastrophes to increase in the future, which is reflected in our business plan. Group companies will monitor developments and ensure appropriate diversification of insurance portfolios. In response to changing conditions, we will

maintain appropriate reinsurance and retrocession protection and analyse the impact of climate risks. There may also be some future financial impact on the investment portfolio from both transition and physical risks. We will mitigate these impacts through portfolio diversification and a sustainability investment policy.

**Resilience of strategy and business model**

The resilience of the business model to various climate risks is tested through our annual own risk and solvency assessment (ORSA). For all business lines significantly affected by climate risks, ORSA includes analyses to assess key exposures and the effect of different climate scenarios. ORSA includes both qualitative and quantitative assessments of climate change risks. The qualitative assessment covers the likelihood and severity of these risks over the long term. Our ORSA risk assessment showed that the most significant impacts of climate change on the Group and its companies are likely to be in non-life insurance and the investment portfolio. We therefore conducted additional analyses of physical and transition risk exposures in these areas.

Based on the risk assessments, we developed three scenarios for the ORSA resilience analysis using the shared socioeconomic pathways (SSP) scenarios defined by the Intergovernmental Panel on Climate Change (IPCC). These scenarios incorporate greenhouse gas emission projections together with socio-economic global change assumptions up to 2100.

We have analysed the following scenarios:

- The medium-term transition climate scenario SSP1-1.9, which is consistent with limiting the global average temperature increase to 1.5°C (with at least a 50% probability) and achieving climate neutrality by 2050 (Net Zero 2050). In this scenario, we have analysed the transition risks of the investment portfolio.
- The medium-term climate scenario SSP2-4.5, or the delayed transition scenario, which assumes that greenhouse gas emissions continue to rise slowly at first and then decline in the middle and towards the end of the 21st century, but remain relatively high. In this scenario, in addition to the transition risk in the investment portfolio, we have also analysed the materialisation of physical risks in the insurance portfolio.
- The long-term climate scenario SSP5-8.5, which assumes little success in limiting emissions and takes into account current

policies (no future change), predicts that emissions will increase rapidly in the 21st century, leading to high physical risks (hot house world). In this scenario, we have analysed the impact of physical risks from climate change on the investment and insurance portfolios.

For non-life insurance, we used these scenarios to assess the impact of an increase in the number and severity of natural catastrophes in the medium and long term. The medium-term period covers the years 2030 to 2050, and the long-term period 2071 to 2100. In assessing the impact of physical risks in the medium- and long-term climate scenario, we considered events such as hailstorms and floods that our materiality analysis identified as having the most significant impact on the geographical area in which the Group operates.

The analysis of the climate scenarios showed that each scenario could have a material impact on the financial results in a given year, while the Group's solvency, and hence its business model, remain resilient even if these scenarios materialise.

The Group's actions to adapt to the identified impacts of climate change are set out in section [ESRS 2 SBM-3](#).





**IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities<sup>68</sup>**

We disclose the procedures for identifying and assessing material impacts, risks and opportunities in section [ESRS 2 IRO-1](#).

The assessment and identification of physical risks throughout the value chain that could have a material impact on the Group’s operations and business results are carried out as part of ORSA and the assessment of emerging risks, which we describe in section [C.3.6.6.1 “Emerging risks”](#). In identifying material climate risks, we have also considered EIOPA’s proposal on defining climate risks<sup>69</sup>. A materiality analysis was carried out as part of ORSA to assess the materiality of individual climate risks. This analysis, which is detailed in section [ESRS 2 SBM-3](#), served as the basis for defining scenario analyses, which we use to assess risks that could have a material financial impact on the Group’s operations in the future. For the scenario analysis, we relied on EIOPA’s guidance<sup>70</sup> on scenario implementation in relation to climate change. The scenario analysis assesses

the impact on both the insurance and investment portfolios, helping us to assess risks that may have a financial impact on these parts of the value chain. The scenario analysis also includes a high emissions scenario and a scenario that considers the global average temperature increase to a maximum of 1.5°C. For more details, see section [ESRS 2 SBM-3](#) in the resilience analysis of the strategy and business model.

In the scenario analysis, we consider the geographical exposures that are most relevant to the Group. Therefore, when assessing physical risks, assuming an increase in the frequency of natural catastrophes, we calculate the impact for Slovenia and several other countries in which the Group operates.

We qualitatively assess risks over the next ten years in the risk register, where physical and transition risks are assessed separately. In the short term, we monitor climate risks by tracking loss events and their subsequent financial impact on insurance portfolios and investment valuations.

Based on these analyses and the potential future impact of climate change, the Group is identifying business opportunities across various lines of business.

**E1-2 – Policies related to climate change mitigation and adaptation<sup>71</sup>**

The Group manages the impact of its companies on climate change through its sustainable development strategy, sustainable business policy, guidelines for responsible underwriting of environmental, social and governance risks in non-life insurance, and sustainability investment policy.

The sustainability investment policy provides guidelines for the investment portfolios of Group companies, with the exception of portfolios where policyholders’ benefits are linked to movements in the net asset value per unit (NAVPU) of the investment funds of the policyholders’ choice and investments covering liabilities under investment contracts of Sava Pokojninska Družba and Sava Penzisko Društvo.

These guidelines restrict investments in industries such as alcohol, tobacco, adult entertainment, gambling, thermal coal production, shale oil, military industries and the production of controversial weapons. By implementing these policies, the Group is reducing its carbon footprint and making a positive contribution to the environment, society and stakeholders.

The Group has adopted the UN Principles for Responsible Investment and is a signatory to the UN Global Compact, which promotes responsible business practices in the areas of human rights, labour, the environment and anti-corruption. As part of the investment process, the Group monitors potential violations of the UNGC and OECD principles and actively works to integrate these principles into the investment process.

The Group supports the collective efforts of the global investment community to develop common standards for incorporating environmental, social and governance considerations into investment decisions. When making investment decisions, we focus primarily on risks related to greenhouse gas emissions and social risks.

Sava Re, as the parent company of the Group, has entered into an agreement with a data provider to provide data on the principal adverse impacts (PAIs) of the assets managed by Group companies. Currently, the Group addresses PAIs through exclusions as defined in its sustainability investment policy.

68 ESRS E1.IRO-1 paragraphs AR 8 (b), 20 (a), 20 (b), 20 (c), AR 11 (a), AR 11 (b), AR 11 (c), AR 11 (d), 21, AR 12 (a), AR 12 (b), AR 12 (c), AR 12 (d), 21 and AR 15.  
69 EIOPA – Opinion on the supervision of the use of climate change risk scenarios in ORSA, [https://www.eiopa.europa.eu/document/download/f984b53b-3549-49a4-9beb-7fe5057ecd94\\_en?filename=Opinion%20on%20climate%20change%20risk%20scenarios%20in%20ORSA.pdf](https://www.eiopa.europa.eu/document/download/f984b53b-3549-49a4-9beb-7fe5057ecd94_en?filename=Opinion%20on%20climate%20change%20risk%20scenarios%20in%20ORSA.pdf).  
70 EIOPA – Application guidance on climate change materiality assessments and climate change scenarios in ORSA, [https://www.eiopa.europa.eu/publications/application-guidance-climate-change-materiality-assessments-and-climate-change-scenarios-orsa\\_en](https://www.eiopa.europa.eu/publications/application-guidance-climate-change-materiality-assessments-and-climate-change-scenarios-orsa_en).  
71 ESRS E1-2 paragraphs 24 and 25.





At the Group level, climate-related issues are managed by the office of the management board and of compliance, the insurance, sales and Group governance business centre, the financial operations and financial investment management business centre and the risk management and asset-liability management department. Depending on their organisational structure and the materiality of climate-related impacts, individual Group companies may engage external experts in climate risk management and participate in national and international industry associations. In addition, funds are allocated for education, training and other measures aimed at increasing positive climate impacts.

Climate-related targets are defined in the Group’s sustainable development strategy for 2030, while subsidiaries are responsible for implementing and achieving these targets in line with the Group’s strategic priorities.

E1-3 – Actions and resources in relation to climate change policies<sup>72</sup>

To implement climate change policies and strategy, the Group has adopted actions in six key areas, which are detailed in the transition plan for climate change mitigation.

Actions to reduce the carbon footprint of its own operations include electricity supply, energy efficiency in buildings, property consolidation and use of space optimisation, sustainable mobility and employee behaviour. The company provides the necessary financial and other resources for all planned actions.

Actions to reduce the carbon footprint of the investment portfolio (scope 3 emissions) are based on the sustainability investment policy.

In the area of responsible (re)insurance underwriting, Sava Re, on behalf of the Sava Insurance Group, has joined the Partnership for Carbon Accounting Financials (PCAF), an organisation committed to aligning the financial industry with the goals of the Paris Agreement. We have used a simplified methodology to calculate the carbon footprint of the investment portfolio for 2024. The calculations are based solely on data and the MSCI methodology derived from the SFDR Regulation. We will seek to improve the methodology for future reporting periods.

E1-4 – Targets related to climate change mitigation and adaptation<sup>73</sup>

For scope 1 and 2 emissions, our carbon footprint per employee, calculated using the location-based method, was 1.15 tonnes. This represents a reduction of 21% compared to the baseline year (2022: 1.47 tonnes) (unaudited).

This reduction is mainly due to the transition to renewable electricity sources and lower total consumption of electricity and heat.

Greenhouse gas emissions of the Sava Insurance Group<sup>74</sup>

► Emission reductions in 2024 compared to baseline 2022 – absolute value (unaudited)

tCO <sub>2</sub> e	2024
Reduction of total GHG emissions*	-557,921.13
Reduction of scope 1 GHG emissions	218.85
Reduction of scope 2 GHG emissions – location-based method	429.26
Reduction of scope 2 GHG emissions – market-based method	589.89
Reduction of scope 3 GHG emissions*	-558,569.24

\* A negative value indicates an increase in GHG emissions.

► Emission reductions in 2024 compared to baseline 2022 – percentage (unaudited)

As % of total	2024
Reduction of total GHG emissions*	-13,632.15
Reduction of scope 1 GHG emissions	17.41
Reduction of scope 2 GHG emissions – location-based method	15.79
Reduction of scope 2 GHG emissions – market-based method	20.00
Reduction of scope 3 GHG emissions*	-377,386.15

\* A negative value indicates an increase in GHG emissions.

72 ESRS E1-3 paragraphs 28, 29 (a), 29 (b) and 29 (c).

73 ESRS E1-4 paragraphs 32 and 33.

74 ESRS E1-4 paragraphs 34 (a) and 34 (b).





The increase in the carbon footprint is mainly due to the expansion of the scope of emissions categories measured and included in scope 3. Together, these additional categories account for 99% of all emissions measured.

The key performance indicators and targets that our Group monitors in relation to climate change mitigation and adaptation include:

- reducing scope 1 and 2 greenhouse gas emissions at the Group level in terms of number of employees and consolidated revenue, with a target of 55% reduction per employee and per consolidated revenue by 2030 compared to 2022;
- reducing greenhouse gas emissions in the investment portfolio, with a target of a 10% annual reduction compared to 2022.

We also monitor and assess:

- the share of (re)insurance premiums that follow the principle of ‘do no significant harm’;
- the share of premiums aligned with the EU Taxonomy;
- the share of ESG investments in the consolidated portfolio;
- the alignment of investments with the sustainability investment policy;
- the share of investments aligned with the EU Taxonomy;
- the number of financial products that comply with Articles 8 and 9 of the SFDR Regulation.

Climate change is one of the greatest challenges our world is facing, and reducing global greenhouse gas emissions is one of the most important goals in mitigating climate change.

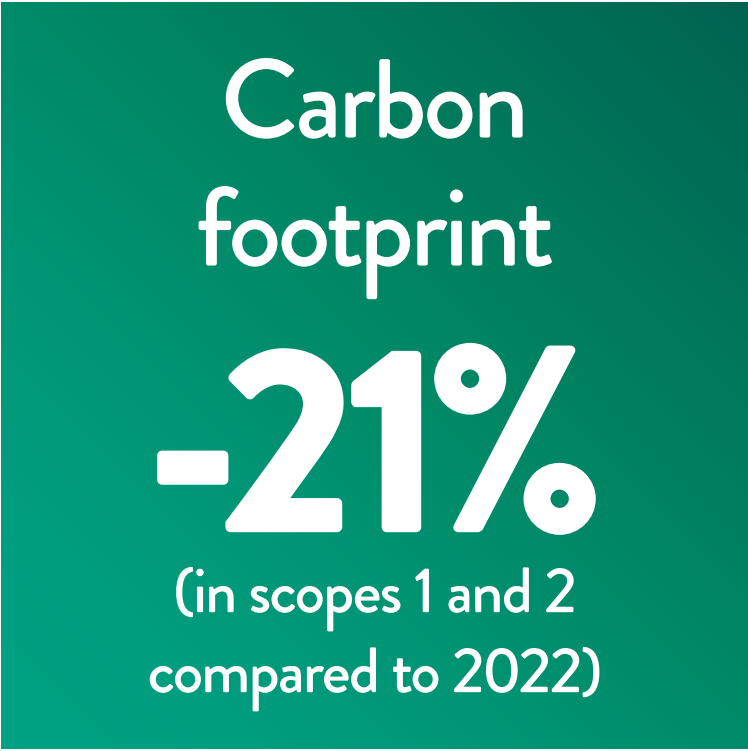
E1-5 – Energy consumption and mix<sup>75</sup>

Unit of measurement	Unit	2024
Total energy consumption related to own operations	kWh	10,352,446.99
Total energy consumption from fossil sources	kWh	9,268,797.55
Total energy consumption from renewable sources	kWh	1,083,649.44
Total energy consumption from nuclear sources	kWh	n/a
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	kWh	794,250.90
Consumption of self-generated non-fuel renewable energy	kWh	289,398.54
Consumption from coal fuel and coal products	t	0.00
Fuel consumption from crude oil and petroleum products	l	335,080.25
Fuel consumption from natural gas	kWh	790,204.25
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	kWh	9,268,797.55
Production of renewable energy	kWh	338,863.43

Renewable energy is produced at two locations of Zavarovalnica Sava in Maribor – Ulica Eve Lovše 7 and Zagrebška Cesta 83, where solar power plants are installed.

► Energy consumption and mix in shares

As % of total	2024
Share of renewable sources in total energy consumption	10.47
Share of fossil sources in total energy consumption	89.53



75 ESRS E1-5 paragraphs 37, 37 (a), 37 (c), 37 (c) ii, 37 (c) iii, AR 34, 38 (a), 38 (b), 38 (c), 38 (e) and 39.





E1-6 – Gross scopes 1, 2, 3 and total GHG emissions<sup>76</sup>

► Greenhouse gas emissions<sup>77</sup>

tCO <sub>2</sub> e	2024
Gross scope 1 GHG emissions	1,038.11
Direct emissions from stationary combustion – heating	194.36
Direct emissions from stationary combustion – diesel for power generators	1.44
Direct emissions from mobile combustion – fuels	837.11
Process emissions	0.00
Fugitive emissions from HVAC and refrigeration systems	5.19
Gross scope 2 GHG emissions – location-based method	2,288.70
Indirect emissions – electricity use	1,492.30
Indirect emissions – thermal energy use	796.40
Gross scope 2 GHG emissions – market-based method	2,360.09
Indirect emissions – electricity use	1,563.69
Indirect emissions – thermal energy use	796.40

Our goal  
**-55% emissions**  
by 2030  
(compared to 2022)

<sup>76</sup> ESRS E1-6 paragraphs 47, AR 39 (b), AR 42 (c), 46 (h) and 46 (i).  
<sup>77</sup> ESRS E1-6 paragraphs 44, 48 (b), 49 (b), 52 (b), 51, AR 41, AR 45 (d) and AR 45 (e).

tCO <sub>2</sub> e	2024
Gross scope 3 GHG emissions	558,717.25
Purchased goods and services – water	2.71
Purchased goods and services – paper	49.77
Waste management – waste water	3.29
Business travel – cars owned by others	81.62
Business travel – taxi	1.37
Business travel – local shuttle services	0.15
Business travel – bus	0.09
Business travel – rail	0.03
Business travel – air	189.73
Employee commuting – motorcycle	8.69
Employee commuting – bus	138.59
Employee commuting – rail	14.95
Employee commuting – tram	2.23
Employee commuting – car	1,137.74
Upstream leased assets	73.12
Downstream leased assets – electricity	342.20
Downstream leased assets – heating	353.30
Financed emissions – investment portfolio	556,317.66
Total GHG emissions – location-based method	562,044.06
Total GHG emissions – market-based method	562,115.45





► Greenhouse gas emission<sup>78</sup>

As % of total	2024
Percentage of scope 1 GHG emissions from regulated emission trading schemes	0.00
Percentage of contractual instruments, scope 2 GHG emissions (location-based method)	11.14

The calculation of scope 2 greenhouse gas emissions is based on green electricity purchase agreements.

The Group does not generate any biogenic CO<sub>2</sub> emissions from the combustion or biodegradation of biomass (0 t CO<sub>2</sub>).

The organisational boundaries of the carbon footprint calculation include all 15 companies of the Sava Insurance Group and their subsidiaries operating in 253 locations.

- The carbon footprint calculation includes:
- direct emissions from the use of fossil fuels for space heating and electricity generators, fuel combustion in vehicles owned or controlled by the company and fugitive refrigerant gases (scope 1 emissions);
  - indirect emissions from the consumption of electricity and district heating (scope 2 emissions);
  - indirect emissions from paper and water purchases, waste water management, business travel with vehicles not owned or managed by the company, employee commuting, leased assets

(including electricity and heating consumption at leased locations) and financed emissions – investment portfolio (scope 3 emissions).

The Sava Insurance Group’s carbon footprint calculation for 2024 follows the GHG Protocol and is prepared in accordance with the proposed approach for carbon footprint calculation. Scope 2 emissions from purchased electricity and district heating are calculated using both the location-based and market-based methods.

For the first time, the 2024 carbon footprint calculation includes employee commuting, investment portfolio emissions and leased locations not used for own operations.

Details are presented in the report [Calculation of the Sava Insurance Group’s Carbon Footprint for 2024](#), approved by the management board of Sava Re. The report also provides details on currently excluded categories of greenhouse gas emissions. The main reason for excluding specific categories is the unavailability or poor quality of data.

Emissions intensity<sup>79</sup>

The emissions intensity is calculated based on the Group’s total revenue, as shown in section [ESRS 2 SBM-1](#).

tCO <sub>2</sub> e per EUR million	2024
Emissions intensity – location-based method	5.5
Emissions intensity – market-based method	5.6

The calculation of the investment portfolio’s carbon footprint includes government bonds.

tCO <sub>2</sub> e per EUR million of GDP	2024
Emissions intensity for government bonds	290.83

Financed emissions

The calculations are based solely on the MSCI methodology derived from the SFDR Regulation, specifically two PAI indicators measuring greenhouse gas emissions (for companies) and greenhouse gas emissions intensity for countries. In the calculation shown (scopes 1, 2 and 3), we have taken into account all the Group’s investments. Government bonds, property, and cash and cash equivalents are excluded. Of the data analysed, 85% of the data for scope 1 were reported, while 13% were estimated by MSCI. For scope 2, 83% of the data were reported, while 14% of the data were estimated by MSCI. For scope 3, 97% of the data were estimated by MSCI, and no reported data were available.

We calculate and report the greenhouse gas emissions intensity of the countries in which we invest. In the calculation of the emissions intensity for government bonds, 86% of the data were

reported, while the data estimated by MSC were not used in the calculations.

The Group uses a simplified method to calculate the carbon footprint of financed emissions. The calculations are based solely on the MSCI methodology derived from the SFDR Regulation. We have used last quarter data for 2024. We will seek to improve the methodology for future reporting periods. The Group does not currently use the PCAF data quality score for greenhouse gas emissions. Instead, we rely solely on the quality, accuracy and valuation of the data provided by an external data provider, MSCI Inc. In our analysis of greenhouse gas emissions, we have considered the Group’s total consolidated portfolio and investments where the investment risk is borne by the policyholders (unit-linked), using a look-through approach).

78 ESRS E1-6 paragraphs 23 (b) and AR 45 (d).  
79 ESRS E1-6 AR 53.



## 4 Social information

### ESRS S1 – Own workforce

#### SBM-2 – Interests and views of stakeholders

The Group's own workforce consists of individuals who have signed an employment contract with one of the Group companies. As there are no unemployed individuals in the Group, the sustainability report focuses only on the Group employees and does not report on the non-employee workers in the Group's own workforce.

At the Sava Insurance Group, we have set five priorities for our human resource strategy for the 2023–2027 strategy period:

- **Attracting and retaining the best talent.** We are committed to justifying the trust of our employees and taking care of the image and reputation of the Sava Insurance Group in the labour market..
- **Developmental orientation.** We continuously

identify and develop the potential of our employees.

- **Performance management.** We enable the development of a high-performance culture in which successful employees are supported and rewarded, can advance and are effectively managed.
- **Sustainable working.** We promote a values-based culture with a focus on diversity, inclusion, well-being and sustainable business.
- **Digitalisation and optimisation.** We adapt the organisation, processes, positions and ways of working towards the future of business.

As part of our sustainability work, we are building a culture that focuses on diversity, equality, inclusion, employee well-being and the prevention of discrimination and psychosocial risks.

By adopting sustainability guidelines, we focus on the long-term responsible management of our

employees, the development of the Group and the creation of a socially responsible community. We encourage individuals and groups to take part in socially responsible projects and activities. We are building a reputation as a trusted employer, modernising our recruitment methods and ensuring a quality employee experience to attract and retain the best talent.

Our sustainability guidelines support the long-term success of the Group, the satisfaction of our employees and our responsibility to the wider community and the environment in which we operate.

We recognise our employees as a key stakeholder group whose interests, views and rights are fundamental to our business. All Group companies ensure that the interests and rights of our employees are integrated into strategic decisions and business processes.







**SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model<sup>80</sup>**

The strategic directions and policies apply equally to all employees of all Group companies.

The Group considers all its employees under the own workforce category, regardless of the type or duration of their contract. Most employees work on permanent contracts. The Group’s own workforce is not exposed to any material risk of harm, nor does it operate in industries that have material negative impacts. We also do not identify workplaces where employees would be exposed to a higher material risk. A systematic approach ensures safe working conditions for all.

As a result, we do not identify material risks and opportunities arising from impacts on specific groups of employees. Group companies focus their activities on promoting equal opportunities and preventing discrimination for all employees.

We have a number of initiatives in place to improve working conditions and foster positive interactions among the Group’s employees. In 2024, our human resource management was focused on the following goals and activities:

- 1. **Digitalisation and process optimisation**, which included a comprehensive review and improvement of HR processes, including:
  - **analysing and planning** – review of existing HR processes and IT support, market analysis and selection of a new IT system to support HR processes in the Group companies,
  - **introducing a new IT system for human resource management** – the implementation project is progressing according to the project plan. Key milestones include the successful set-up and launch of the project, the completion of the roll-out of the HR administration modules and the preparation for the implementation of the broader HR processes and priority integrations.
- 2. **Strengthening employee satisfaction and engagement**, including the following key activities:
  - **measuring** the organisational climate, employee satisfaction and engagement,
  - **analysing results** – the data collected was thoroughly analysed to identify key areas for improvement,
  - **developing action plans** – based on our analysis, we have developed concrete action plans to improve working conditions, boost motivation and improve overall employee satisfaction.

- 3. **Establishing ESRS-compliant reporting** and defining key performance indicators for human resource management, which are regularly monitored and adjusted to achieve the goals set.
- 4. **Developing a competency model** to identify potential and support employee development. We are currently in the process of developing a Group-wide generic competency model.
- 5. **Promoting health and well-being**, including the running of workshops and programmes to manage stress and promote healthy lifestyles.
- 6. **Promoting sustainable practices and raising employee awareness** of the importance of sustainability through training programmes, workshops, information on sustainability issues, corporate volunteering and other sustainability programmes.
- 7. **Reviewing and updating Sava Insurance Group’s policies** to ensure continuous adaptation to market changes and to ensure alignment with the strategic goals and business requirements of the Group as a whole.

The Group has not identified any material risks in the area of human resource management. One potential risk is a shortage of suitably qualified professionals, so the Group has established

links with the labour market and universities to develop potential employees at the level of individual companies and according to the needs of the local market. We also continually strive to implement activities that contribute to a positive working environment and employee well-being: we promote a culture of sustainability, protect employee rights and have zero tolerance for misconduct.

**S1-1 – Policies related to own workforce<sup>81</sup>**

The Group has put in place the following policies with regard to the human resource management:

- Remuneration Policy of the Sava Insurance Group,
- Fit and Proper Policy for Relevant Persons of the Sava Insurance Group,
- Human Resource Development and Succession Planning Policy of the Sava Insurance Group.

The **remuneration policy** aims to establish a remuneration system that is competitive and efficient, as well as transparent and internally fair. The key principles of the policy incorporate the main principles of ethical and sustainable practices and operations.

80 ESRS S1 SMB-3 paragraphs 14, 14 (a), 14 (b), 14 (c), 14 (d), 15 and 16, S1-1 paragraphs 22 and 24 (c), and S1-4 paragraph 38 (c).  
81 ESRS S1-1 paragraph 19, S1-2 paragraph 27 (d).





The aims of this remuneration policy are:

- clear and transparent governance,
- reliable and efficient risk management,
- compliance with regulatory requirements and principles of sound management,
- monitoring of and adapting to market trends and practices,
- sustainable pay for sustainable performance,
- employee motivation and retention.

In line with our policy, we have designed a remuneration package that includes a base salary, variable pay and additional financial and non-financial benefits. The types and level of potential additional benefits and incentives are laid down in the companies' internal regulations. The basic and variable parts of the remuneration are properly balanced in order to encourage sound and efficient work and appropriate risk management.

Group companies observe the following guidelines when designing remuneration systems and schemes:

- designing of a balanced remuneration structure,
- establishing a direct link between pay and performance,
- adopting a multi-annual approach to performance evaluation and aligning variable pay with sustainable business performance over time,

- ensuring that the incentive system remains consistent with its mechanisms, organisational processes and the activities and behaviours being rewarded.

The **fit and proper policy** ensures that persons who effectively manage and supervise the company or who hold key or important positions meet the requirements set out in applicable law and the policy. These requirements include:

- **fitness:** they have the appropriate professional qualifications, knowledge and experience for the sound and prudent conduct of business,
- **propriety:** they are of good repute and act with a high degree of integrity.

The policy ensures continued compliance with standards of responsible management and oversight.

The **human resource development and succession planning policy** sets the foundations and guidelines for the planning and implementation of all forms of personal and professional human resources development and succession planning in all Group companies.

The aims of the policy are to:

- continually encourage the regular acquisition of new knowledge, skills and competencies to do the work effectively,

- continually identify and develop the potential of our employees,
- ensure succession planning for key roles in each company and the Group.

**Human rights<sup>82</sup>**

The Group strictly respects and protects internationally proclaimed human rights and fundamental freedoms. We require our business partners to do the same. We have a zero-tolerance approach to illegal and unethical behaviour and violence in the workplace.

Ensuring the integrity and protection of the personal dignity of employees and other persons involved in the work and business processes of the companies is one of the Group's key priorities.

Every employee has the right to equal treatment, dignity and personal integrity in the workplace.

The inviolability and protection of the personal dignity of individuals is ensured by mechanisms and actions that provide for a clear, transparent, rapid and pre-defined process for detecting and sanctioning misconduct. At the Group level, we have an independent external arbitration body that operates according to key principles such as independent decision-making, professionalism, autonomy, decision-making outside the Group and strict confidentiality of both whistleblowers and infringers.

We have procedures for reporting and addressing violations, including protecting the identity of whistleblowers and sanctioning retaliation, as detailed in section [ESRS G1-1](#).

We have reaffirmed our commitment to human rights and sustainable development by joining the United Nations Global Compact (UNGC).

We provide appropriate working conditions and equipment for our employees. In accordance with applicable legislation, we regularly refer employees for health checks and periodic training in occupational health and safety.

All principles, commitments and core values are further defined in the Policy on Ensuring the Inviolability of the Person and Protection of Personal Dignity in the Sava Insurance Group, which is described in more detail in section [ESRS G1-1](#).





**S1-2 – Processes for engaging with own workforce and workers’ representatives about impacts<sup>83</sup>**

The Group has various mechanisms in place to engage with employees, and we strive for open communication and close collaboration. We keep our staff regularly informed of all major issues by email and have an internal employee portal (intranet) where we publish important news.

Some Group companies have organised trade unions, works councils and employee representatives. Through them, we actively promote open social dialogue. The management and professional services of the companies provide the trade unions, employee representatives and works councils with all relevant data, information and facts about the work, business and development of the company that have an impact on the financial and social situation of the employees.

In companies where there is a works council and/or a trade union, employee representatives meet regularly with management to discuss proposals for improvements and actions in the area of cooperation with the employees. Annual performance assessment interviews and surveys are used to allow structured discussion and develop actions to improve conditions for employees.

**S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns<sup>84</sup>**

The process for protecting the personal integrity of individuals, in particular sexual integrity, is conducted outside the companies with a view to independent and impartial decision-making and with the aim of building trust in the mechanism and preventing internal abuse. The procedural rules are governed by the Act on the Procedure for Dealing with Violations of the Rights to Inviolability of the Person and Personal Dignity in the Sava Insurance Group (the Act).

The channels for raising concerns are described in detail in section [ESRS G1-1](#).

The reporting procedure is managed by an arbitration body, which makes decisions in ad hoc panels of three members. The members of the arbitration panel are appointed from among the nine permanent members drawn from the legal and other professions (psychology, psychiatry, social work, medicine, etc.). Each panel is composed of at least two legal experts, one of whom is the chairperson, who are to ensure legal certainty, due process and a high level of professionalism for the outcome of the proceedings. The procedure for the functioning of the arbitration body is set out in more detail in the Act. The Act is designed to ensure transparency and clarity in the procedures for reporting violations.

An independent body dealing with the reports prepares a comprehensive factual and legal justification for further action and proposes specific measures (immediate protection of the victim, request to the infringer to immediately cease the violation, discussion with the infringer, referral of the infringer to an interview with a relevant professional, formal notice to the infringer in accordance with the applicable legislation, issuance of a formal notice or initiation of proceedings for ordinary or extraordinary termination of the employment contract in accordance with the law, etc.).

The Act is published on the Group’s intranet, together with other internal regulations adopted and important information, which employees are made aware of when they start working for one of the Group companies. This information (acts and internal regulations), along with other relevant news, is available to employees at all times. Any changes to the internal rules and regulations are communicated to employees through newsletters and monthly updates.

The Group has measures in place to protect whistleblowers, in particular by:

- protecting the identity of the whistleblower,
- sanctioning attempts to identify the whistleblower,
- sanctioning retaliation.

Any employee, posted worker, student, pupil, apprentice or third party (customer, visitor, family member and others) can make a report. Reports must be submitted in writing by email.

**S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions<sup>85</sup>**

Based on the business strategy, the Group’s human resource departments prepare an annual recruitment plan, which is approved by the companies’ management boards. This plan defines the key actions to be taken in relation to the Group’s own workforce. The Group has a system of internal controls, as part of which we maintain a risk register. The purpose of the risk register is to assess the operational risks arising from failures in the implementation of internal processes or from inappropriate behaviour by employees.

Adverse events are recorded monthly and are supported by IT. This enables those responsible to record and manage adverse events.

The internal control system is based on five key elements:

- **Internal control environment:** the system is based on professionalism, ethical values and a vision of leadership. Through its policies, management influences target-setting, risk assessment, control activities, communication systems and monitoring.

<sup>83</sup> ESRS S1-2 paragraphs 27, 27 (a), 27 (b), 27 (c) and 27(d), S1-4 paragraph 38 (d), and S1-5 paragraph 47 (c).

<sup>84</sup> ESRS S1-3 paragraphs 32 (a), 32 (b), 32 (c), 32 (d), 32 (e) and 33.

<sup>85</sup> ESRS S1-4 paragraphs 37, 38 (a), 38 (b), 38 (c), 39, 40 (a), 40 (b), 41 and 43.





- **Risk identification and assessment:** the system allows for the continuous identification and analysis of risks that could affect the achievement of goals, and for the ongoing adaptation to new business, regulatory and market changes.
- **Control activities:** procedures to ensure that risk management activities are properly implemented are embedded in all key business processes.
- **Keeping employees informed:** timely and reliable information enables employees to perform their jobs effectively and manage risk. Communication channels provide access to internal policies and procedures.
- **Supervision activities:** ongoing monitoring and evaluation of the system, including periodic reviews, internal audits and ongoing adjustments where necessary.

We act in accordance with the guidelines of relevant institutions and ensure that the system of internal controls supports efficient, compliant and secure operations.

We invest in the continuous training and development of our employees, which we believe is key to achieving our strategic goals. Training programmes are tailored to the needs of individuals, supporting their professional development and contributing to the innovation and competitiveness of each company.

We also strive to create an inclusive work environment that values diversity and encourages collaboration among employees. This contributes to a better understanding of customer needs and improves the company's flexibility and responsiveness to market changes.

By integrating the interests, views and rights of our own workforce into our strategy and business model, we reinforce our commitment to sustainable development and long-term success while contributing to employee satisfaction and motivation.

We focus on developing a culture of sustainability through professional development programmes, promoting diversity, inclusion and mentoring programmes, and recruiting young talent and scholarship students.

We actively integrate the principles of sustainable development, respect for human rights and strengthening social responsibility into our business practices, reducing the risk of negative impacts on our own workforce. Policies in this area are described in more detail in section [ESRS S1-1](#).

All Group companies have human resource departments in place to manage material impacts or employ people who carry out the human resources function. Depending on the organisation of each company, external experts in the fields of human resource management, psychology, law

and medicine may also be involved. Funding is also provided for the implementation of training and employee health and well-being programmes and other actions to increase positive impacts on employees.

**S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities<sup>86</sup>**

Targets related to own employees are defined at the level of individual companies and are not consolidated. At the Group level, the human resource management function is responsible for monitoring and managing the key performance indicators.

The most important key performance indicators that we monitor in the Group are related to engagement with our own employees:

- the number of employees on long-term sick leave, with a view to reducing or at least not increasing it,
- the number of employees participating in promotional activities (such as the health day), with the aim of maintaining or increasing this number,
- the number of awareness-raising activities to prevent discrimination and psychosocial risks,

- with a view to preventing such risks,
- employee satisfaction and engagement, which measures the organisation's internal potential, employee satisfaction and engagement,
  - promoting a culture of sustainability, measured by employee participation in organised corporate volunteering activities, with the aim of maintaining engagement levels,
  - training hours per employee, with a view of maintaining or increasing the number of hours,
  - staff turnover, with the aim of maintaining staff numbers at current levels.

In terms of employee engagement, the Group also monitors:

- the ratio of men to women in a company's governance bodies,
- the ratio of men to women at the B-1 level (and B-2 level in large companies),
- the ratio of men to women in management – the management board / board of directors plus the first management level and the supervisory boards of the Group.

We actively involve the Group's employees and their representatives in the goal-setting phase.

The results are generally published in annual reports, and some results are also communicated to employees through internal communication channels, such as the intranet and email, to ensure that all employees are involved and that reporting is transparent.





S1-6 – Characteristics of the undertaking’s employees<sup>87</sup>

The Sava Insurance Group recruited new staff in 2024. The recruitment process is based on timely identification of needs, careful planning and the recruitment of qualified and motivated workers. We integrate employees into the workplace through induction and training.

In 2024, we recruited new staff due to increased workload, internal transfers, departures and maternity leave. Within the Group, sales and IT were the main areas where new employees were recruited. The recruitment approach described above is aimed at long-term success and effective adaptation to the needs of individual companies and the Group.

► Number of employees in the Sava Insurance Group

Year	2024		2023	
Gender	Number	As % of total	Number	As % of total
Women	1,825	60.0	1,803	59.9
Men	1,219	40.0	1,206	40.1
Total	3,044	100.0	3,009	100.0

► Number of employees in the Sava Insurance Group by country

Year	2024	
Country	Number	As % of total
Slovenia	1,430	47
Croatia	186	6
Serbia	603	20
Kosovo	290	10
North Macedonia	274	9
Montenegro	261	9
Total	3,044	100.0

► Average number of employees in the Sava Insurance Group in 2024

Year	2024
Month	Number
January	3,007
February	3,011
March	3,020
April	3,021
May	3,009
June	2,996
July	3,012
August	3,011
September	3,017
October	3,032
November	3,048
December	3,044
Average number of employees in 2024	3,019

► Average full-time-equivalent in the Group in 2024

Year	2024
Month	Number
January	2,907.2
February	2,904.0
March	2,890.8
April	2,881.2
May	2,881.4
June	2,869.3
July	2,877.7
August	2,860.8
September	2,873.5
October	2,883.2
November	2,901.1
December	2,892.9
Average number of FTEs in 2024	2,885.3

87 ESRS S1-6 paragraphs 50 (a), 50 (b), 50 (c), 50 (d), 50 (d) i, 50 (d) ii and 51.





► Full-time equivalent on last day of year

Year	2024	
Gender	Number	As % of total
Women	1,696	58.6
Men	1,197	41.4
Total	2,892.9	100.0

The following is an overview of some characteristics of Sava Insurance Group employees.

► Number of Group employees by type of contract on last day of year

Year	2024			
Type of employment	Permanent contracts		Temporary contracts	
Gender	Number	As % of total	Number	As % of total
Men	991	32.6	240	7.9
Women	1,481	48.7	332	10.9
Total	2,472	81.2	572	18.8

► Number of Group employees by type of employment relationship on last day of year

Year	2024			
Type of employment relationship	Full-time		Part-time	
Gender	Number	As % of total	Number	As % of total
Men	1,096	36.0	123	4.0
Women	1,537	50.5	288	9.5
Total	2,633	86.5	411	13.5

At the Group level, the turnover rate has decreased compared to the previous year and stands at 16.2%.

Year	2024	2023	
	Number	Number	Difference
Number of employees who left	492	506	-14.0
Number of employees as at last day of year	3,044	2,944	100.0
Employee turnover rate (%)	16.2	17.2	-1.0

► Formula for calculating turnover:

Employee turnover rate ( %) = 
$$\frac{\text{* Number of staff who left during the year}}{\text{** Total number of employees as at last day of year}} \times 100$$





S1-8 – Collective bargaining coverage and social dialogue<sup>88</sup>

Social dialogue is organised in different ways across the Group, reflecting the specificities of each country and its legal framework. We recognise that good quality social dialogue is the cornerstone for creating a supportive and inclusive working environment, and we encourage regular, open and constructive communication at all levels.

To strengthen the bond between management and employees, we organise team-building activities that contribute to closer cooperation, better relationships and greater employee loyalty. At the Group level, we organise sports games to bring together employees from all Group companies. The aim of the event is to promote team spirit, strengthen mutual relationships and build closer ties between colleagues from different backgrounds.

► Group employees covered by collective bargaining agreements on last day of year

Year	2024	
	Number	As % of total
Employees covered by the collective bargaining agreement	2,151	70.7
Employees not covered by the collective bargaining agreement	893	29.3
Total	3,044	100.0

The Group has various forms of association that enable employees to participate and protect their rights. Seven companies have at least one of the forms of association listed:

- trade unions: in companies with trade unions, employees can voluntarily join a trade union to represent their interests, campaign for better working conditions, wages and other employee rights, and bargain collectively with the company’s management;
- works council: the works council is a body that enables employees to participate directly in decision-making on important company matters that affect them;
- employee representatives: the role of employee representatives is to represent the interests of employees, protect their rights and promote good working conditions; they act impartially, protect confidential information and safeguard employee interests.

These forms of association give employees a voice in shaping their working conditions and securing their rights. In companies where legislation or the size of the company does not yet require an association, we organise various meetings for employees to provide them with key information about the business, to involve them in discussions and to take their views into account in business decisions.



88 ESRS S1-8 paragraphs 60 (a) and AR 70.





S1-9 – Diversity metrics<sup>89</sup>

The Group has put in place a comprehensive system of procedures and policies to promote diversity, eliminate discrimination and ensure equal opportunities for all employees. In 2024, Zavarovalnica Vita became a signatory of the diversity charter and received the “Include.All” award from the Managers’ Association of Slovenia. This underlines its commitment to promoting diversity and creating an inclusive work environment, in line with the values of the entire Sava Insurance Group.

► Members of management body by gender

Year	2024		2023	
Gender	Number	As % of total	Number	As % of total
Number of men	34	68.0	36	72.0
Number of women	16	32.0	14	28.0
Total	50	100.0	50	100.0

► Employees at management levels 1 and 2 by gender

Year	2024		2023	
Gender	Number	As % of total	Number	As % of total
Number of men at management levels 1 and 2	146	57.7	153	56.0
Number of women at management levels 1 and 2	107	42.3	120	44.0
Total	253	100.0	273	100.0

The age structure shows that the largest group of employees is between 31 and 50.

89 ESRS S1-9 paragraphs 66 (a) and 66 (b), and AR 71.  
90 ESRS S1-10 paragraphs 69 and 70.  
91 ESRS S1-12 paragraphs 79 and 80, and AR 76.

► Employees by age group on last day of year

Year	2024			
	Women	Men	Total	
Age group	Number	Number	Number	As % of total
Up to 30 years	241	117	358	12.0
From 31 to 50	1,104	748	1,852	61.0
51 years and over	477	357	834	27.0
Total	1,822	1,222	3,044	100.0

S1-10 – Adequate wages<sup>90</sup>

All Sava Insurance Group employees are paid more than the national minimum wage required by law.

Year	2024	
	Number	As % of total
Employees paid less than the minimum wage	0	0.0
Employees paid more than the minimum wage	3,044	100.0
Total	3,044	100.0

S1-12 – Persons with disabilities<sup>91</sup>

► Number of persons with disabilities employed by gender on last day of year in Group

Year	2024	
Gender	Number	As % of total
Women	23	1.3
Men	15	1.2
Total	38	2.5





S1-13 – Training and skills development metrics<sup>92</sup>

At the Sava Insurance Group, we are aware of the importance of monitoring the progress of our employees and providing them with feedback through regular annual performance appraisal interviews. Most companies conduct annual performance appraisal interviews, at least for employees up to the B-1 level.

Performance appraisal interviews are held in an open and constructive spirit, focusing on the following key aspects:

- reviewing achievements and potential challenges,
- agreeing on the goals for the next period,
- identifying training or additional support needs,
- obtaining feedback from employees on their satisfaction and suggestions for improvement.

Employees are actively involved in the process of setting the company’s goals. Annual performance appraisal interviews provide an opportunity to gain a deeper insight into long-term goals, support employee development, monitor the achievement of goals and suggest improvements based on the results achieved.

We provide professional and personal development opportunities for our employees by:

- engaging in work and projects in a culturally diverse international environment,
- promoting and integrating a wide range of training and development programmes that are relevant to the needs of the workplace and the business, taking into account the individual’s personal and career development,
- designing e-learning programmes and

selecting the most appropriate platform to make e-learning effective and accessible to all employees,

- encouraging intergenerational cooperation between young talent and experienced employees,
- identifying promising professional and managerial talent and involving them in targeted development programmes.

We promote the development and transfer of knowledge and skills throughout the Sava Insurance Group. To this end, we organise professional meetings of all companies in the form of events or professional conferences to share experiences, knowledge, results and plans. In 2024, we organised internal conferences for the managers in charge of data protection, compliance, human resources, procurement, sustainability, internal audit, information technology, actuarial and risk management, sales

and Group governance, finance, controlling and accounting.

We also held an international Group strategy conference, bringing together senior management and other key employees from across the Group. The main objective was to address current issues, challenges and opportunities.

For the second year in a row, Zavarovalnica Sava received the Top Investor in Education certificate, awarded by Planet GV to organisations that systematically invest in the development and training of their employees. It also won the title of Styria’s (northeast Slovenia) Employer of the Year 2023. They impressed the jury with their innovative programmes, socially responsible practices and comprehensive approach to employee development, health and well-being, which also reflects the wider practices of the Sava Insurance Group.

► Employees involved in annual performance appraisal interviews in the Group

Year	2024	
Gender	Number of participants	Share of participants (%)
Women	847	27.8
Men	835	27.4
Total	1,682	55.3

► Average number of hours of employee education/training in current year

	2024			
Gender	Number of participants	Hours of training/ education	Average hours per participant	Average hours per employee
Women	1,325	36,205	27.3	19.8
Men	908	25,806	28.4	21.2
Total	2,233	62,011		

92 ESRS S1-13 paragraphs 83 (a), 83 (b) and 84.





S1-14 – Health and safety metrics<sup>93</sup>

At the Sava Insurance Group, we ensure the health and safety of our employees through a variety of actions that promote a healthy lifestyle, physical health, work-life balance and safe work. We take all the necessary actions for occupational safety, health and fire protection, as required by law and internal regulations. We provide our employees with pre-recruitment and periodic occupational health assessments, as well as to new and periodic training in occupational safety, health and fire protection.

In 2024, most companies offered employees the opportunity to participate in so-called health days, which included collective and sporting events (such as hiking, cycling and skiing), lectures (on healthy eating, stress management and healthy living) or similar individual activities of their choice.

► Employees covered by the health and safety management system in accordance with legal requirements and/or recognised standards or guidelines

Year	2024	
	Number	As % of total
Employees covered by the health and safety management system	3,044	100.0
Employees not covered by the health and safety management system	0	0.0
Total	3,044	100.0

Throughout the year, the company also offers employees the opportunity to participate in various sports activities (volleyball, basketball and tennis), take short active breaks or participate in individual sports activities (yoga, gymnastics and fitness) at a reduced cost. Some companies also offer their employees healthy snacks or fruit at work.

The Slovenia-based companies also offer employee assistance programmes (EAP) and similar support.

The following provides information on the involvement of employees in the health and safety management system in accordance with legal requirements and/or recognised standards and guidelines, as well as information on work-related injuries and absenteeism.

► Work-related injuries

Year	2024
Injuries	Number
Number of injuries in the workplace	8
Number of fatalities as a result of work-related injuries	0
Total	8

► Absenteeism rate

Year	2024	2023	Difference
	Number	Number	
Number of working days lost	25,988	28,576	-2,588.6
Average number of employees	3,019	2,988	30.8
Number of working days per year	6,887	5,064	1,823.0
Absenteeism rate (%)	0.12	0.19	

► Formula for calculating absenteeism:

Absenteeism rate ( %) = 
$$\frac{\text{* Number of working days lost (all employees) per year}}{\text{** Average number of employees} \times \text{total number of working days per year}} \times 100$$

\* Number of working days lost = number of working days lost due to diseases/illness, injuries at and away from work, occupational diseases, care, function of guardian, etc.

\*\* Average number of employees = (number of employees31 January + ... + number of employees31 December) / 12





S1-15 – Work-life balance metrics<sup>94</sup>

At the Sava Insurance Group, we are committed to promoting work-life balance, improving employees’ mental and physical health, reducing stress and preventing burnout.

Our work-life balance activities include:

- clearly defined working hours,
- flexible working,
- health days,
- teambuilding events,

- measuring internal potential, employee satisfaction and employee engagement,
- delivering mental health programmes and training,
- raising awareness of the right to disconnect,
- training for managers to ensure that the right to disconnect is respected.

All employees are entitled to take family-related leave in accordance with collective agreements and internal company rules.

Year	2024	
Employees on family-related leave	Number	As % of total
Women	247	13.5
Men	127	10.4
Total	374	24.0



94 ESRS S1-15 paragraphs 93 (a), 93 (b) and 94.





S1-16 – Remuneration metrics (pay gap and total remuneration)<sup>95</sup>

At the Sava Insurance Group, we strive for gender balance at all levels of management and provide equal opportunities for advancement. We select our staff on the basis of professionalism and competence and without regard to gender, race, religion or nationality.

The base salary of women is the same as the base salary of men in all employee categories. The pay gap at the Group level is 20.1, calculated using the following formula:

Pay gap =

(Average gross hourly pay of male employees minus the average gross hourly pay of female employees)

Average gross hourly pay of male employees

× 100

To calculate the annual total remuneration ratio, we took into account all employees in the Group.

The following formula was used to calculate the ratio:

Annual total remuneration ratio =

Annual total remuneration of the highest-paid individual

median annual total remuneration for all employees (excluding the highest-paid individual)

► Annual total remuneration ratio in the Group

Gender	Annual total remuneration ratio
Men	5.0
Women	4.9

95 ESRS S1-16 paragraphs 97 (a), 97 (b) and 97 (c).  
96 ESRS S1-17 paragraphs 103 (a), 103 (b), 103 (c), 104 (a) and 104 (b).

S1-17 – Incidents, complaints and severe human rights impacts<sup>96</sup>

In order to prevent bullying and harassment in the workplace, the Sava Insurance Group has the necessary mechanisms in place to ensure that an employee who believes he or she is a victim of such acts can be adequately protected. The Group had no human rights incidents related to its own workforce. In 2024, one employee concern was submitted to external arbitration body at the Group level..

Year	2024
	Number
Number of incidents of discrimination	0
Number of complaints filed through channels for employees to raise concerns	1
Number of severe human rights incidents involving employees	0
Total	1

► Total amount of fines, penalties and compensation for damages as a result of incidents and complaints

Year	2024
	Amount (EUR)
Total amount of fines, penalties and compensation for damages as a result of serious human rights issues and incidents related to employees	0
Total	0.0





ESRS S3 – Affected communities

SBM-2 – Interests and views of stakeholders<sup>97</sup>

At the Sava Insurance Group, we monitor the interests and views of local people and communities in a variety of ways and try to integrate them into our business process in a meaningful way that is consistent with the goals of the company.

- **In most cases, we receive offers of cooperation directly or indirectly (through our employees) from interested stakeholders via publicly available email or postal addresses,** which we then consider.
- **The Sava Insurance Group also conducts its own screening of local community interests** in cases where we identify opportunities that can have a direct positive impact on enhancing or strengthening our reputation in the (local) environment and our employer brand. These opportunities are mainly related to socially responsible activities and projects, such as corporate volunteering and cooperation with educational institutions.

Many partnerships are long-term – companies enter into long-term contracts or agree to renew them on an annual basis.

Our primary objective is to improve safety and quality of life, either through financial contributions or other forms of engagement with the local community. Through the partnerships with communities, the Group companies primarily pursue interests, such as:

- higher levels of safety and prevention, loss prevention (prevention activities),
- improving conditions for the development of sport, culture and talent (sponsorship, donations and volunteering),
- promoting sport as a good way to improve health and well-being (partnerships with local sports associations),
- improving the living conditions of vulnerable groups in the local community (fundraising campaigns, donations and volunteering),
- restoring the natural environment (reforestation and landscaping),
- education, awareness and skills development (financial literacy and capital market development),
- youth development, support for young talent and science development (scholarships),
- intergenerational cooperation,
- improving animal welfare (zoos and sanctuaries),
- co-creating sustainability communities (environment and society).

We are continuously expanding and adapting our community partnerships to meet the needs of the local environment.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model<sup>98</sup>

In the area of material impacts on affected communities, we did not identify any negative impacts, but we did identify some positive impacts.

Through the Group’s slogan, “Among Good People”, we communicate the increasing collaboration between Group companies and, more importantly, our focus on people as an overarching value and key approach. We work with communities at a national level in all markets, with a particular focus on communities in local areas where we have a physical presence, as this is where we can best and most easily identify the needs and potential of individual groups. It also provides opportunities to promote the company as a responsible employer and to attract local talent.

All Group companies have a strong positive impact on various stakeholders in the communities in which we operate, creating

jobs and ensuring the financial stability of our employees. We also support community development through our involvement in sports, the arts, education, prevention and volunteering. We support vulnerable and marginalised groups through donations and charitable activities. We also promote sustainable development, care for the natural environment and infrastructure development.

We place a strong emphasis on safety, increasing awareness of the importance of safety through preventive activities, raising awareness of the importance and appropriateness of insurance cover and investment opportunities, contributing to improving the overall safety of people and property through preventive measures and partnerships, contributing to road safety and raising awareness of safety issues.

As the largest company in the Group, Zavarovalnica Sava carries out the largest volume of activities related to community support projects. Most of these are long-term sponsorship and donation programmes. The company’s commitment to the community is also demonstrated by its long-term support of projects such as the Call of Loneliness (Klic osamljenosti) and You’ve Got It! (Maš to!), which raise awareness of the importance of mental health.

97 ESRS 2 SBM-2 paragraph 45 (b), ESRS S3-1 paragraph 16 (b), and ESRS S3-2 paragraph 21 (a).  
98 ESRS 2 SBM-3 paragraph 48, and ESRS S3 paragraphs 9, 9 (a), 9 (b), 9 (c), 9 (d), 10 and 11.





Zavarovalnica Sava continues to develop the SavaFit incentive programme to encourage its policyholders and the wider community to spend their leisure time actively. It offers a pay-as-you-live discount on insurance premiums and additional benefits from selected partners to encourage policyholders to be more physically active. SavaFit is also used as a platform for charity programmes involving policyholders.

The Group companies are also receiving awards and recognition for their work in engaging with affected communities, confirming our positive impact on affected communities. It is worth mentioning Zavarovalnica Sava's TOP Investor in Education certificate and the award for the You've Got It! (Maš To!) project for the best content and innovation.

A key function of insurance companies is to bear risk and provide the insured with an adequate (desired) level of security. Through the Group's prevention activities, we also encourage stakeholders to identify various risks and thus contribute to the protection of health, life and property.

We also see opportunities:

- networking through projects, sponsorships, donations, volunteer initiatives and prevention campaigns,
- raising awareness and educating the wider

community on sustainable development and best sustainable practices,

- improving technical performance by investing in preventive activities,
- investing in projects to implement preventive measures, protect against the effects of climate change and improve safety.

All Group companies have community involvement plans that include activities to improve the local environment and projects to help vulnerable groups such as children, the elderly and people with disabilities. These mainly take the form of sponsorship, donations and volunteering.

**S3-1 – Policies related to affected communities<sup>99</sup>**

Group companies regulate their engagement with communities through a code of ethics and a communications policy and/or a sponsorship and donations policy.

The code of ethics is a guide for companies to act in accordance with our Never Alone promise, the Group's mission, vision and culture. Through the code of ethics, the Group companies have committed themselves to, among other things, sustainability and respect for human rights. The Group does not fund political parties,

organisations that promote racial, sexual, religious or other forms of discrimination, or projects that are offensive or ethically or morally questionable. Our donations and prevention funds are primarily used for health, social welfare, ecology, scientific development, education and protection of life (disaster relief). The code also states that sponsorship must be proportionate to the economic purpose.

The sponsorship and donations policy sets out the procedures and rules for companies to plan the costs of donations and sponsorship, make donations, allocate sponsorship funds, ensure the traceability and monitoring of donation and sponsorship agreements and report on donations and sponsorship. We recognise that by investing in sponsorship and donations, we can strengthen our brand while supporting the development of the local environment.

We communicate our sponsorship and donation activities primarily through our web portals and social media.

The larger Group companies also have a communications strategy in place to ensure consistent and coordinated communication with stakeholders and target audiences. A communications strategy can have a positive impact on building trust and is important in differentiating the Group from its competitors,

as well as helping to build reputation and targeted brand positioning.

Group companies determine annually the financial volume of resources to be allocated to prevention activities. In the insurance companies, the allocation and use of funds for prevention activities is governed by internal rules.

**Human rights<sup>100</sup>**

The main human rights commitments related to working with local communities include promoting equality, improving education and access to basic necessities, and social inclusion of vulnerable groups.

All Group companies engage with communities in an ethical manner, ensuring an equal dialogue and providing feedback. Community representatives have available the means to complain in the event of potential violations of their rights, and all complaints are handled in accordance with the corporate approach (as described in section [ESRS G1-1](#)).

Our policies are also aligned with international human rights principles, such as:

- the UN Guiding Principles on Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises,
- the international Sustainable Development Goals (SDGs).

99 ESRS S3-1 paragraphs 14 and 16 (a).  
100 ESRS S3-1 paragraphs 16, 16 (c) and 17.





We have not identified any cases of non-compliance by Group companies with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises involving affected communities.

**S3-2 – Processes for engaging with affected communities about impacts<sup>101</sup>**

At the Sava Insurance Group, we are in favour of long-term partnership programmes because our ongoing support enables the long-term development of the programmes we support, thus achieving better results for both parties. At the same time, we are open to new partnerships and are ready to submit proposals for cooperation to interested community representatives.

Regular dialogue with affected communities enables us to understand their interests and views and to integrate them into our activities in a meaningful way. We disclose our approach in this area in section [ESRS 2 SBM-2](#).

The companies support communities continuously throughout the year, with more intensive campaigns at certain times of the year. For the projects in which the companies are involved, we monitor both the impact and the success of the project.

At the Group level, the community engagement area is managed by the office of the management board and of compliance. Each company has two designated people, one responsible for managing the area and the other responsible for overseeing it, depending on how the company is organised. However, in most cases, the area is covered by communications, marketing or public relations.

To assess the success of engagement with affected communities, we regularly monitor projects at all stages of the engagement. Depending on the nature of the engagement, feedback on the success of the project may include:

- feedback from the communities and organisations supported,
- any coverage in the media or other information channels,
- internal analysis of the results achieved,
- monitoring of project implementation.

**S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns<sup>102</sup>**

At the Sava Insurance Group, we strive to continuously improve the quality of our work, including in the area of community engagement. We are aware that in the course of our business, situations may arise where our actions or decisions differ from the expectations of external stakeholders. To this end, the companies have various communication channels in place through which concerns or complaints can be raised.

As the majority of our activities have a positive impact on the communities in which we operate, the Group companies have not identified any instances where community representatives have sought to raise concerns about negative impacts. Therefore, there are no specific mechanisms in place to address the concerns of affected communities, but channels are available to communicate them. In such cases, companies would address the concerns and protection of individuals in the process in the same way as they would address complaints from consumers and end-users ([ESRS S4-3](#)) or concerns from other affected stakeholders ([ESRS G1-1](#)).

**S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions<sup>103</sup>**

Although the Sava Insurance Group has not identified any direct negative impact on communities as a result of its activities, we closely monitor the substance of our community involvement.

We also strengthen our role in the community by working with schools and colleges, and through financial education for young people and presentations on careers in the areas we cover. We also participate in careers fairs and, depending on the activity, with schools and colleges covering professions that are also relevant to us in terms of potential recruitment. We are aware of our responsibility to develop our professional workforce and are therefore strengthening our role as an attractive potential employer.

In the area of prevention, we are particularly concerned with supporting the most vulnerable groups in society, and some of our projects are aimed at improving the quality of life for animals and preserving the natural environment.

101 ESRS S3-2 paragraphs 21 (a), 21 (b), 21 (c) and 21 (d).  
102 ESRS S3-3 paragraphs 27 (a), 27 (b), 27 (c) and 27 (d).  
103 ESRS S3-4 paragraphs 32 (a), 32 (b), 32 (c), 32 (d), 33 (a), 33 (b), 33 (c), 34 (b), 35, 36 and 38.



**Sponsorships and donations**

In the communities where we operate, we are committed to community development in the areas of sport, culture, infrastructure improvement, education and skills development, particularly financial literacy. At the Group level, we sponsor the ABA basketball league and the ACH Volley Ljubljana volleyball club. The Group has also joined the Green Heart of Carst project, which aims to reforest the Slovenian Carst forests affected by forest fires. In addition, the Group companies allocate available resources and actively implement projects to support communities, in line with their financial plans, opportunities and market needs.

**Prevention projects**

A key focus is to raise awareness among policyholders and the wider community of the importance of asset protection, health protection, and fire and road traffic safety. Through prevention activities, we aim to prevent and reduce the number of claims while raising awareness of the importance and appropriateness of insurance coverage and investment opportunities.

Our insurance companies set up special funds for such projects in accordance with local legislation.

In the area of prevention, the insurance companies of the Sava Insurance Group focus mainly on:

- health protection (physical and mental health),
- road safety (in Slovenia in cooperation with the national automobile association AMZS, otherwise with local organisations working in this area),
- fire safety (cooperation with fire brigades),
- hail protection and other actions to protect property.

In order to prevent and eliminate risks to insured property and persons directly related to the insurance business, the Group's insurance companies participate directly or in partnership in the financing of programmes with a preventive content or preventive purpose. Forms of such cooperation include:

- making available own staff and funds directly with insured persons,
- financing of prevention programmes outside the insurance company,
- making financial contributions to preventive investments or investments that help reduce losses.

**Corporate volunteering – Heart for the World**

The Heart for the World initiative is a volunteering programme that engages employees in a wide range of community activities. The programme focuses on helping vulnerable groups, improving animal welfare, preserving and revitalising the natural environment, health education and other social issues.

In 2024, a total of 6,574 hours of corporate volunteering was provided in collaboration with employees of Group companies.

**Commitment to external initiatives**

We participate in initiatives that promote ethical conduct and sustainable business practices. We comply with the fundamental standard of professional business conduct as set out in the Insurance Code of the Slovenian Insurance Association. We follow the recommendations of the Ljubljana Stock Exchange for listed companies on disclosure of information and have signed the Slovenian Corporate Integrity Guidelines. At Sava Re, we follow the Slovenian Corporate Governance Code for Listed Companies as a reference code for corporate governance.

**Membership in associations**

All Group companies are active in national and local associations and take a proactive role in the development of their industry and other social developments.

We regularly monitor and evaluate the implementation of actions in a variety of ways, depending on the nature of the action, by:

- keeping records of funds in each category of sponsorship and donation,
- tracking media coverage and announcements through other channels,
- keeping a record of the hours of corporate volunteering by employees,
- tracking the number of scholarship students employed in our companies,
- tracking feedback from the communities and organisations we support (not measurable),
- conducting an internal analysis of the results achieved.

We communicate regularly with affected communities and have not identified any negative impacts based on the responses to date. In the event of potential negative impacts, we follow the approach described in sections [ESRS S3-4](#) and [S3-3](#).

We describe our approach to managing risks and identifying opportunities in section [ESRS 2 SBM-3](#). On this basis, we implement the actions described in section [S3-4](#).





We follow the policies set out in section [S3-1](#) when planning activities and projects to engage with affected communities to ensure that our practices do not cause material negative impacts.

To date, we have not been involved in any serious human rights issues or adverse events relating to affected communities.

The following is a breakdown of the financial resources we committed to sponsorships, donations and prevention activities in 2024.

► Sponsorships and donations by substance

EUR	2024	2023	Index
Charity	294,812	47,420	621.7
Arts	162,685	137,731	118.1
Sports	2,203,151	2,922,675	75.4
Education, training	128,456	67,981	189.0
Science	1,400	500	280.0
Social care	11,249	7,600	148.0
Disability	4,600	2,693	170.8
Health	24,664	40,226	61.3
Other	649,846	522,829	124.3
Total	3,480,863	3,749,655	92.8

► Resources allocated to prevention

EUR	2024	2023	Index
Zavarovalnica Sava	679,322	507,979	133.7
Sava Osiguranje (MNE)	205,500	134,371	152.9
Sava Neživotno Osiguranje (SRB)	209,099	65,580	318.8
Total giving back to the community	1,093,921	707,930	154.5

**S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities<sup>104</sup>**

The main objectives of the Group companies are to promote social responsibility and to enhance brand awareness and reputation in the local environment.

On this basis, our goals in terms of promoting positive impacts on affected communities are not aimed at measuring specific outcomes but are focused on:

- carrying out activities in line with the annual financial plan in the areas of donations, sponsorship and prevention,
- maintaining the same level of volunteer activities as in the previous year,
- strengthening the reputation of the Sava Insurance Group as a respected partner of the local community.

ZWe do not have specific metrics to track and monitor our goals in relation to the affected communities, except for measuring the reputation of Zavarovalnica Sava in Slovenia (brand reputation monitoring survey) and keeping records of investments in sponsorship, donations and prevention activities. Indirectly, the effectiveness of our activities in the affected communities

is monitored against targets and metrics set in relation to other stakeholders, mainly consumers and end-users, who are also mostly stakeholders in affected communities. These targets and metrics include, for example, customer satisfaction, market share by geographic location, building a company’s profile as a good employer, monitoring media coverage and social media posts.

We engage in regular dialogue with affected communities to identify their interests and views, which are then taken into account in the achievement of our goals. Our cooperation with them is described in section [ESRS 2 SBM-2](#).

**Sector-specific topics**

In the double materiality assessment, we have identified the safety of affected communities and donations and sponsorship as sector-specific topics. We have included information on these topics in the core generic standard disclosures and therefore do not disclose them again.

Promoting  
social  
responsibility

104 ESRS S3-5 paragraphs 41, 42 (a), 42 (b) and 42 (c), and MDR-T paragraph 81 (b) ii.





ESRS S4 – Consumers and end-users

SBM-2 – Interests and views of stakeholders<sup>105</sup>

At the Sava Insurance Group, we put our customers at the centre of everything we do. We also disclose how we take into account the interests and views of our consumers and end-users in our strategy and business model in section [ESRS 2 SBM-2](#).

In companies regulated by the European Union and carrying on insurance and reinsurance activities within the Group, we regularly assess compliance with sustainability factors as part of the approval process for new or renewed insurance products and services in the following areas:

- non-life and health insurance,
- life insurance,
- pension insurance.

All insurance policies have sustainability factors that are published on the insurer’s website for customers to see.

The Group companies carry out one or more of the following activities in the course of their business:

1 Non-life insurance

Non-life insurance products are designed to provide individuals, families and businesses with comprehensive protection against a wide range of risks, as well as financial security and peace of mind in everyday life.

A Personal sector

The Group’s insurers offer a wide range of non-life insurance products tailored to the different needs of individuals and families.

B Commercial sector

Our commercial insurance products offer businesses protection against the financial risks associated with their operations. With flexible products, we offer our customers the insurance they need to protect their property, liability and employees. Our flexibility allows us to develop tailored solutions in response to economic changes and emerging trends.

When underwriting non-life insurance, the Group companies follow guidelines for the responsible underwriting of environmental, social and governance risks. This allows us to monitor the profile of policyholders from a sustainability risk perspective during due diligence. As a result, the

Group’s insurers may decline coverage for certain policyholders if the insured interest is identified as a high or immediate risk.

2 Life insurance

The Group’s insurance companies offer a wide range of life insurance products, including term insurance, endowment insurance and flexible combinations of insurance products with an investment component. The product range also includes life insurance policies where the policyholder bears the investment risk. Policyholders can choose from among a range of investment funds and potentially achieve higher returns while bearing the investment risk themselves. Policies are designed to provide financial security for families, to accumulate savings for future use or to meet the specific needs of individuals at different stages in their lives. The product development and control process includes actions and procedures that take sustainability factors into account. Before purchasing a policy, the customer completes a needs and requirements questionnaire, which provides us with an insight into the customer’s sustainability orientation.

The savings under a unit-linked life insurance policy are linked to the performance of the

selected funds. Customers of Zavarovalnica Sava and Zavarovalnica Vita can also choose funds that promote environmental and social characteristics but do not have ESG goals as a core objective, which are considered Article 8 funds under the SFDR Regulation. The promotion of environmental and social characteristics in the context of unit-linked life insurance is linked to the choice of at least one fund promoting environmental and social characteristics at the time the policy is taken out or during the policy term, or to the share of these funds in the premium or in the assets under the policy during the policy term.

3 Reinsurance

At Sava Re, we are building a globally diversified reinsurance portfolio.

Guidelines for the responsible underwriting of environmental, social and governance risks are also taken into account in the reinsurance business. Based on these guidelines, we monitor exposure to ESG criteria when accepting reinsurance business, especially for non-Group facultative business.

In the non-Group treaty reinsurance, we seek reinsurance opportunities that have a positive impact on sustainability.

105 ESRS 2 SBM-3 paragraphs 10, 10 (a), 10 (a) i, 10 (a) ii, 10 (a) iii and 10 (a) iv.



**4 Asset management**

The Group’s asset management company manages client assets in 19 Infond sub-funds, 12 of which are considered Article 8 funds under the SFDR Regulation. This means that they promote environmental and social characteristics. The other seven sub-funds do not invest in industries considered to be harmful.

**5 Pension insurance**

We offer a comprehensive range of supplementary pension products in the EU markets, as well as mandatory and voluntary pension fund management activities outside the EU.

**6 Assistance services**

We complement our core insurance business with assistance services, providing motor, home, travel and other assistance services to our policyholders. The EU-based insurers offer health insurance with assistance services to help policyholders book and organise treatment in the event of an illness or injury.

**SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model<sup>106</sup>**

The insurance and investment industry is intrinsically linked to the dynamic changes in society and the economy and therefore requires constant adaptation. Our business strategy is based on understanding the needs of different groups of consumers and end-users, protecting their rights and responding to environmental, technological, demographic and regulatory changes. The primary purpose of insurance is to provide security and financial protection to policyholders in case of unforeseen events.

Material impacts that may pose risks to consumers and end-users include climate change adaptation and mitigation, policyholder privacy issues and the associated vulnerability to potential cyberattacks. In response and in line with our strategy and business model, we offer products linked to climate change adaptation, we work to reduce our carbon footprint over the long term, we have a strong consumer privacy policy and good security systems in place, and we train and sensitise our employees to handle our customers’ personal data as securely as possible. We also continually invest in improving IT processes,

the control environment and the availability of products and services.

In addition to activities related to the development of sustainability elements in products, we focused in 2024 on the implementation of new legal requirements in the area of sustainable business, including ensuring a higher level of data quality, preparing internal bases and formalising rules in this area. In line with the existing criteria for defining sustainability factors, insurers in markets regulated by EU legislation have started activities to adapt and update the documents related to the assessment of sustainability elements in individual products.

We also follow the responsible market practice of not abusing the vulnerable position of the insured. In this case, we take an even more prudent approach and disclose all material information.

In the non-life segment, insurance products with a particularly strong social component are personal accident and health insurance.

**Negative impacts<sup>107</sup>**

There may be material negative impacts on the privacy of policyholders. We collect a large amount of personal data in the course of underwriting insurance policies, making investments or engaging in other forms of

business relationships with consumers, and we also process and use this data for reporting and disclosure purposes, particularly in the personal lines of business, where the majority of the Group’s business is written. We recognise the broader societal implications of potentially irresponsible management of personal data, especially given the development of artificial intelligence, smart devices and other modern digital technologies. To minimise any negative impact, and in line with the Group’s commitment to high ethical standards, we pay particular attention to the protection of personal data in conjunction with ensuring cybersecurity, going beyond the minimum requirements of the law (for more information, see section [ESRS G1 “Protection of personal data”](#)).

**Positive impacts<sup>108</sup>**

Our products and services have a positive impact on our consumers and end-users in many ways.

All companies have complaint mechanisms in place to ensure freedom of expression. At the Group level, we maintain a register of complaints and, in addition to the Group’s guidelines and rules, the companies have internal rules, procedures and instructions for receiving and resolving complaints, all in accordance with applicable law.

<sup>106</sup> ESRS 2 SBM-3 paragraph 48.  
<sup>107</sup> ESRS 2 SBM-3 paragraph 10 (b).  
<sup>108</sup> ESRS 2 SBM-3 paragraphs 10 (c) and 10 (d).



We provide consumers and end-users with access to quality information relevant to their decision-making. In the area of unit-linked insurance and the underlying investment options (funds), we provide access to sustainability-related information in accordance with the SFDR Regulation. We are committed to the financial education of our customers and develop advanced digital solutions that provide users easy and fast access to information – anytime, anywhere. The Slovenia-based companies use the SavaNet personal portal, which makes it easier for users to access information and manage insurance services. There is also a call centre staffed by trained advisers.

Consumer health and safety are fundamental elements of most of our products and services. We play an important role in promoting healthy habits among our insureds through appropriately designed offers (e.g., the SavaFit incentive programme). Health and life insurance products increase the possibility of taking care of one’s health and security in case of unforeseen events or illness. In Slovenia and North Macedonia, we are expanding our activities in the area of hospital and healthcare services. We provide financial security for our policyholders with a wide range of non-life insurance products. We are also adding a security element to our assistance services.

Our activities with consumers and end-users are based on responsible marketing practices, where we take a responsible approach to marketing and advertising, adhering to the principles of clear, transparent and accountable communication. Within our Group companies, we promote transparency and clear communication of product terms, rights and obligations. We promote financial inclusion and protect consumers and vulnerable groups by introducing simple and accessible insurance products. We have established a net promoter score (NPS) system to measure customer satisfaction and invest in green technologies and sustainable projects that have a long-term positive impact on community well-being.

Certain insurance products are tailored to specific customer segments, such as the protection of children. These include pre-school and school accident insurance, supplementary accident insurance and unit-linked scholarship policies. Life insurance is also an important protection for children and is taken out to provide financial security for dependants in the event of death. The companies’ assistance segment also offers tailor-made services for children.

We disclose the material risks and opportunities arising from the impact on consumers and end-users in sections [ESRS G1 “Protection of personal data”](#) and [ESRS G1 “Statutory stakeholders notification”](#), under the “Impacts, risks and opportunities” subsection.

**S4-1 – Consumer and end-user policies<sup>109</sup>**

All Group companies have adopted rules, protocols or instructions to manage our service delivery processes, which are essential to ensure quality and hence customer satisfaction. They cover underwriting, claims handling, recourse procedures and complaints handling. Our engagement with consumers and end-users is governed by documents adopted at the Group level:

- the Group’s business strategy,
- the Group’s sustainable development strategy for 2023–2027,
- the Group’s sustainable business policy,
- guidelines for responsible underwriting of environmental, social and governance risks in non-life insurance.

On an individual basis, depending on their business and applicable local laws or regulations, the companies have adopted additional internal strategies, policies and rules for considering sustainability factors, managing consumer processes, distributing insurance products, implementing after-sales processes and managing investments.

The heads of each business function in the parent company draft proposals for Group policies or guidelines, and the final decision on these proposals is taken by the parent company’s management board (in certain cases the approval of the supervisory board is required). The policies or guidelines thus drafted serve as reference documents for the formulation of policies or guidelines in the subsidiaries. The subsidiary’s management or supervisory bodies, as part of their responsibilities for implementing the Group’s policies and guidelines, consider any necessary amendments to adapt to local law or any other necessary adaptations and, in accordance with the procedures set out in the Group’s policies and guidelines, determine their own amendments to such policies and guidelines and ensure that the subsidiary’s amendments do not violate any applicable laws, regulations or prudential rules.



**Human rights<sup>110</sup>**

The Group companies strive to respect all fundamental human rights, such as privacy, non-discrimination, physical accessibility, access to information, personal safety, inclusion of vulnerable groups, and protection of personal data and others, in the conduct of their non-life, life and pension insurance, asset management and assistance services businesses. Through the implementation of our product oversight and governance (POG) policy, we ensure that our products are consistent with our customers' interests, sustainability goals and international standards. We pay particular attention to inclusive practices and accessibility for diverse customer groups.

We also ensure respect for the human rights of consumers and end-users, who are individuals, by adhering to the Group's policy on the responsible underwriting of environmental, social and governance risks in non-life insurance, by implementing a sustainability investment policy for life insurance and unit-linked products, and by implementing internal rules on respect for privacy and the protection of personal data.

On an individual basis, depending on the nature of their business and applicable local laws or regulations, some Group companies have adopted additional internal strategies, policies and rules

relating to the integration of sustainability factors, the management of customer processes, the distribution of insurance products, the implementation of after-sales processes and the management of investments. We disclose our approach to consumer and end-user engagement in section [ESRS S4-2](#).

We have strengthened our commitment to human rights by joining the UN Global Compact and focusing on the UN Global Sustainable Development Goals. The Group's policies are aligned with international standards such as the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and data protection legislation. We are committed to transparency and compliance in all markets in which we operate.

**Remediation<sup>111</sup>**

The Group's insurers assess the potential impacts on customers' privacy, personal security and social inclusion as part of the product development process. Any potential risk of violating the rights of individuals is managed in accordance with the Group's code of ethics, the Group's policy on ensuring the inviolability of the person and protection of personal dignity and other internal policies governing the conduct of companies and employees in relation to consumers and end-users.

The insurance ombudsman is responsible for protecting the interests of policyholders and ensuring fair and transparent business operations in Slovenia and strives to achieve fair solutions for the benefit of policyholders.

We did not identify any violations or non-compliance with the UN Guiding Principles on Business and Human Rights in the Group companies' dealings with consumers and end-users.

**S4-2 – Processes for engaging with consumers and end-users about impacts<sup>112</sup>**

The Group companies have organised and opened up a number of distribution channels to consumers in order to meet different market needs as efficiently as possible, depending on the type of product and consumer group. In addition, we regularly monitor consumer and end-user satisfaction in a variety of ways, and based on the feedback, we adjust our products and services as necessary and build long-term relationships with our customers.

We engage with consumers and end-users mainly directly, through a variety of communication channels that enable two-way communication:

- personal contact at the company's headquarters or offices,
- written communication (email or traditional mail),
- telephone contact / call centre,
- internal network of in-house insurance agents,
- external network of insurance agents, agencies, banks as distribution channels and other contractual partners,
- external network of insurance intermediaries (agents),
- social networks,
- corporate websites and other digital platforms such as mobile applications, which, in addition to their function as distribution channels, provide comprehensive support to our customers.

We also communicate with consumers and end-users in a one-way manner by providing documentation (electronically or by post), legally required communications and information, sales and promotional material, or informative or educational content.

We engage with consumers and end-users at all key stages, such as the development of new products and services, sales activities, contractual relationships and after-sales activities, with particular emphasis on services during the claims-handling phase.

<sup>110</sup> ESRS S4-1 paragraphs 16, 16 (a) and 16 (b).  
<sup>111</sup> ESRS S4-1 paragraph 16 (c).  
<sup>112</sup> ESRS S4-2 paragraphs 20, 20 (a), 20 (b), 20 (c), 20 (d), 21 and 26.





At Zavarovalnica Sava, we have also developed a “design thinking” approach where new product concepts are based on ongoing validation and feedback from target groups. Similarly, insurers in other markets conduct pre-launch product testing to assess alignment with the needs of the target market.

The head of the insurance, sales and Group governance business centre is responsible for developing and supporting the development of the relevant business function at the subsidiary level, whose role is to engage with consumers and end-users. His work is overseen by the parent company’s management board. The responsibility for implementing the activities and ensuring that they are adequately funded lies with the management board of each company.

The effectiveness of the cooperation is measured through metrics such as net promoter score (NPS), customer satisfaction score (CSAT) and customer effort score (CES). Data are collected through call centres, online platforms and regular surveys.

Insurance companies also use specific market approaches, including target market needs assessments, to develop tailored products for children or other specific target groups, such as those based on age or other categories.

We have processes in place in the major Group companies to keep up to date with customer feedback, enabling us to be immediately aware of customer opinions and take proactive action.

**S4-3 – Processes to remediate negative impacts and channels for consumers and end-users to raise concerns<sup>113</sup>**

In dealing with complaints from policyholders and other beneficiaries of insurance policies, each Group company follows its rules and procedures for handling complaints, which are in line with local law and the guidelines of the European Insurance and Occupational Pensions Authority (EIOPA). In addition to the applicable law and implementing regulations in the area, the Group’s asset management company also complies with the guidelines of the European Securities and Markets Authority (ESMA).

In accordance with the Group’s governance rules, Sava Re keeps a record of complaints made regarding the conduct of its subsidiaries. After a complaint has been investigated, it is submitted to the relevant subsidiary for resolution. Sava Re’s Group governance department maintains an internal online register of such complaints.

In 2024, five complaints were lodged against two companies domiciled outside the EU. All complaints were referred to the two companies concerned for resolution in accordance with a protocol.

The Group companies have established a number of channels through which customers can express their concerns, dissatisfaction and complaints. This information is collected through the sales network, the call centre, email, the website, the complaints and grievance management system or other channels. Customers can also submit their concerns or complaints at the companies’ headquarters and business offices by telephone or post. Consumers may also lodge complaints anonymously.

Consumers and end-users are informed of the available complaints procedures at the time of the conclusion of the contract, in the contract documents, on the website and in other information material.

All subsidiaries also have internal rules, prescribed procedures and instructions in place for monitoring and handling complaints in accordance with applicable laws. Details are provided in section [ESRS S4-4](#).

**S4-4 – Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions<sup>114</sup>**

In our dealings with consumers and end-users, we work in a variety of ways to prevent and address potentially material negative impacts on their privacy. The Group companies consistently follow the requirements of the General Data Protection Regulation (GDPR) and local data protection laws to ensure consumer privacy, as described in sections [G1 “Protection of personal data”](#) and [G1 “Operation and robustness of IT systems and cyber intrusions”](#).

113 ESRS S4-3 paragraphs 25 (a), 25 (b), 25 (c) and 25 (d).  
114 ESRS S4-4 paragraphs 30, 31 (a), 31 (b), 31 (c), 31 (d), 32 (a), 32 (b), 32 (c) and 33 (a).

We pay particular attention to responsible marketing practices to build trusting, long-term relationships with consumers and end-users and to positively influence their choices. We promote responsible marketing practices through actions such as:

- regular training of distribution network staff and all employees (face-to-face or distance training, visits to points of sale, marketing materials and other information and guidance),
- availability during normal working hours – in person, by telephone, through electronic media, website and call centres,
- clearly defined content that sales representatives must disclose to customers when concluding contracts (both before and after the conclusion of a contract),
- full public presentation of products and services on company websites,
- the publication of frequently asked questions and answers on company websites,
- the promotion of sustainability and attention to the sustainability aspect of products (guidelines for responsible underwriting of sustainability risks and sustainability investment policies),
- the development of loyalty programmes and personalised insurance products tailored to the specific needs of consumers and making products and services more accessible (and affordable).

The effectiveness of the actions taken is verified by measuring consumer response to the actions taken. Our approach to assessing effectiveness in relation to consumers and end-users is explained in section [ESRS S4-2](#).

The Group seeks to minimise any actual or potential negative impacts on consumers. To achieve this, we have a number of processes in place to identify potential negative impacts and, where necessary, to identify and implement measures to reduce or eliminate them. These processes include complaint analysis, input from internal audit, feedback from the distribution network and guidance from regulators.

The handling of consumer complaints is systematic throughout the Group and is carried out in accordance with internal complaints handling rules, which govern the handling of all complaints received and internal observations. The Group companies maintain complaint records that document communications with consumers.

Complaints about more serious breaches by larger companies are handled by a multi-member panel to ensure impartiality and thoroughness. A customer can submit a complaint without having to comply with format requirements, which is more convenient. In addition, the customers of Slovenian insurers can initiate a mediation or out-

of-court consumer dispute resolution with the Slovenian Insurance Association. In other markets, insurers protect consumer rights in accordance with local laws.

Criteria used by the complaints committee:

- compliance with legal requirements (legislation, insurance code and EIOPA or ESMA guidelines),
- principles of impartiality and good business practice,
- internal rules and policies to protect consumer rights and avoid conflicts of interest.

Where we identify material negative impacts on consumers or end-users, we investigate the situation thoroughly to develop a remedial action plan. Depending on the nature of the negative impact, an action plan is developed that includes key actions and goals, metrics and timelines for implementing the actions. We review whether the implementation of the actions is effective and whether the goals are being met using various metrics defined in section [S4-2](#).

We report on our approach to ensuring that remediation procedures are in place in the event of material negative impacts on consumers and end-users in section [ESRS S4-3](#).

The Group companies have a strong interest in ensuring that our consumers are satisfied with the quality of the products and services we provide, including the treatment of consumers, the protection of privacy and the provision of adequate insurance cover and/or investment returns. Negative consumer experiences can lead to loss of trust, reputation and sales, while positive experiences strengthen long-term relationships and increase market share. We therefore have a number of measures in place to mitigate consumer and end-user privacy risks.

The effectiveness of these measures in practice is primarily reflected in customer loyalty, increased sales and shareholder value, consumer and end-user satisfaction, and regulatory compliance.

In line with the nature of their business and market practices, the Group companies have developed a number of positive incentives that offer significant opportunities in relation to consumers and end-users.





**Actions for positive incentives<sup>115</sup>**

**New products:** in response to the growing need for affordable and quality healthcare and financial security in retirement, as well as to demographic changes and increasing life expectancy, the Group companies are developing health and pension products that include advanced services such as coverage for scientific treatments or various assistance services related to consumers' health and medical needs. This type of product offering can help ensure that consumers have financial security in retirement and adequate protection in the event of a claim. An appropriate insurance proposal also strengthens consumer confidence in the Sava Insurance Group's reliability, which contributes to its reputation.

**Protecting children and vulnerable groups:** the Group companies are committed to the inclusion of vulnerable groups and to strengthening social inclusion in general. To improve the accessibility of insurance products, we are introducing specific insurance products that protect children and adapting existing products to make them suitable for vulnerable groups.

**Strengthening the range of products with a sustainability element:** in line with the Group's sustainability strategy, we are expanding our range of products and services that promote sustainable practices. Across all sectors, we are developing a

range of products and services that meet modern needs and support environmental and social goals. We are encouraging our insurance customers to improve road traffic safety and fire safety for property and reward more sustainable practices. This gives consumers the opportunity to actively contribute to their sustainability commitments through the use of modern products while strengthening the market offering and raising awareness of the wider societal impacts of climate change. The Group's sustainable products and services are used to raise the Group's profile as a socially responsible community partner.

**Digitalisation:** customer expectations and demand for simpler, faster and paperless services are increasing. The Group companies are therefore introducing new digital solutions and online platforms (e.g., SavaNet) for claims reporting, underwriting, remote damage assessment, access to claim status information and resolution of other consumer queries. This also reduces the administrative burden, improves the user experience and increases the transparency of processes. As a result, customers have greater insight into the status of their claims.

**An innovative approach to product development:** we involve all employees in the process of finding ideas for innovation – through innovation support systems and training. Employees can make

suggestions to improve processes. We provide training in the use of digital solutions and artificial intelligence to train and empower employees in the use of new technologies. We also provide training for our external partners involved in our sales processes.

**Communication and optimisation:** the Group recognises the need to develop multi-channel access, not only for underwriting and claims reporting but also for providing information on other products and special customer benefits. To this end, we are developing new digital solutions in our businesses to improve the quality of communication between the Group companies and their customers. In addition, we are raising customer awareness of the potential benefits of becoming a long-term partner of the Group.

**Loyalty rebates:** to reinforce the positive relationship with customers who have been long-term partners of Group companies, we are developing loyalty rebate schemes and strengthening our bundled service offerings. Insurance companies typically offer package and volume discounts to customers for a larger number of policies, a longer period of cover or coverage for a group of people. This helps increase customer satisfaction and the long-term stability of the business.

Zavarovalnica Sava has developed the SavaFit bonus scheme to encourage its policyholders to spend their leisure time actively. To encourage more physical activity, we offer a pay-as-you-live payment scheme and additional benefits from selected partners. The scheme is also used as a platform for charitable activities involving policyholders.

We are seeking an open and transparent relationship with consumers. In the process of developing and monitoring insurance products, we ensure that both the development of new insurance products, or the redesign or modification of existing ones, and the distribution of such products take due account of the goals, interests and characteristics of the target market, including sustainability goals. This process also ensures that conflicts of interest and negative impacts of marketing practices on consumers are avoided. We monitor our marketing practices for compliance with legislation, internal policies and rules, and ethical principles, and respond quickly to complaints, with zero tolerance for greenwashing and human rights abuses.

We allocate financial, human and other resources to carry out the business activities defined in our strategic plan. The allocation of resources is derived from the companies' annual business plans, which set out the planned activities and the financial means to implement the planned actions.

115 ESRS S4-4 paragraphs 33 (b), 34 and 37.



**S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities<sup>116</sup>**

In the area of customer privacy, our overarching goal is to have zero valid claims of privacy violations or misuse of data. This is in line with the Group’s code of ethics, the Group’s policy on ensuring the inviolability of the person and protection of personal dignity and the internal rules on respect for privacy and the protection of personal data.

The Group companies are constantly working to communicate effectively and professionally with customers and to ensure that the highest possible level of customer satisfaction is achieved while minimising the potential for any abuse of privacy. One of the ways in which we have begun to do this in 2024 is by gradually implementing a Group-level customer relationship management system for use in our call centres, with the aim of:

- improving data structuring and insight into our customer relationships,
- increasing efficiency and automating processes,
- improving customer satisfaction and the experience of those who use our products and services.

We monitor key performance indicators to achieve our strategic goals for consumers and end-users. Goals are set at the level of the Group companies and are not consolidated at the Group level. Each company sets its goals according to its own customer group and the specificities of the national market where it operates. At the Group level, the insurance, sales and Group governance business centre is responsible for monitoring key performance indicators.

The most important key performance indicators we monitor in the Group relate to consumers and end-users:

- the proportion of customers who have given their consent to communicate electronically, with the aim of increasing this proportion of customers,
- the proportion of claims reported online, with a view to increasing online reporting,
- the number of policies taken out online (or by email) – paperless business,
- the proportion of consumers who have made a complaint, with the aim of reducing the proportion of complaints,
- the average number of policies per customer, with a view to increasing the average number of policies per customer,
- customer satisfaction, or the adequacy of processes to meet customer expectations, with the aim of maintaining or improving the customer satisfaction measurement score.

We set our consumer and end-user targets based on trends or benchmarks in our industry and by measuring customer satisfaction using internationally comparable methods. We also incorporate customer feedback into our target setting, which we receive through the various channels established to communicate with consumers and end-users, depending on how the business is organised. When setting targets, we take care to ensure that all our targets are consistent with legal requirements.

The Group companies regularly train their employees and external partners on appropriate customer contact.

To monitor and improve customer satisfaction, we carry out regular checks at various touch points. All the Group companies use a standard metric, the net promoter score, which allows us to make comparisons across the Group and the industry. However, in the larger Group companies we also use other common metrics, such as customer satisfaction and customer effort scores, to monitor customer experience.

We analyse all customer responses received and use the information gathered to address any weaknesses, improve the customer experience in the future and set or improve targets.

As part of our normal business operations, we also monitor customer response to new developments. Where customer feedback leads to product improvements, this reflects the effectiveness of the cooperation.

The sales and commercial performance of products is verified by measuring sales and claims performance.

We measure the effectiveness of our services through metrics such as:

- the number of complaints submitted,
- the number of complaints resolved,
- the speed with which complaints are resolved,
- monitoring satisfaction scores (NPS method),
- customer churn, including comparisons with previous periods.

This reduces the risk of customer dissatisfaction and poor service while creating sales opportunities.

We use customer satisfaction surveys and other customer communication channels to incorporate our findings into the improvement of existing products and services or the development of new ones.





5 Governance information

ESRS G1 – Business conduct

GOV-1 – The role of the administrative, supervisory and management bodies

We disclose the role of the administrative, supervisory and management bodies in section [A.5 “Corporate governance statement”](#).

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities

We disclose the procedures for identifying and assessing material impacts, risks and opportunities in section [ESRS 2 IRO-1](#).

G1-1 – Business conduct policies and corporate culture<sup>117</sup>

At Sava Re and the companies of the Sava Insurance Group, we have established a corporate culture that we continuously develop, promote and assess. We have also defined standards of business conduct.

The basic documents governing business conduct and corporate culture include:

- the Group’s code of ethics, which regulates the values and principles of ethical and business conduct,
- the policy on ensuring the inviolability of the person and protection of personal dignity in the Group,
- the diversity policy, which governs gender and age balance in the management and supervisory boards (applicable only to Sava Re),
- the rules on conflict of interest management, which aims to mitigate and manage conflicts of interest that may arise in the course of performing duties and tasks within the company (applicable only to Sava Re),
- the policy on establishing an internal reporting procedure, adopted in accordance with the applicable legislation on whistleblower protection,
- the Group’s and Sava Re’s compliance policy,
- the Group’s fit and proper policy for relevant persons.

We have fraud prevention and detection systems in place in all Group companies.

In addition to the aforementioned documents developed within the Group, we also adhere to established guidelines and codes:

- the Group’s insurance companies comply with the provisions of the adopted insurance code to ensure business development, professional underwriting and professional conduct,
- by signing the corporate integrity guidelines, Sava Re has committed itself to creating a work environment based on a culture of corporate integrity, zero tolerance for illegal and unethical conduct by its employees, and compliance with legislation, rules and values while maintaining high ethical standards,
- at Sava Re we comply with the corporate governance code for listed companies.

Sava Re and our Group companies pay special attention to the following areas:

- anti-corruption conduct, in accordance with the corporate integrity guidelines and the Group’s procurement policy,
- personal data protection, where Sava Re has set up a support function for privacy and personal data protection and adopted a Group privacy and personal data protection policy,

- cybersecurity, through continuous strengthening of internal system controls with information and organisational solutions, as well as training and education of employees in information security,
- human rights, where, in line with the Group’s sustainable business policy, we ensure respect for human rights in accordance with international conventions and applicable legislation. Our commitment to human rights, labour standards, climate change and anti-corruption is further reinforced by our membership in the UNGC.

Key documents governing corporate culture and standards of business conduct also include measures to promote and assess such conduct.

117 ESRS G1-1 paragraphs 9, 10 (a), 10 (c), 10 (e), 10 (h), ESRS S1-1 paragraph 24 (b), and S1-2 paragraph AR 24 (c).

The values and principles of ethical conduct are defined in the **Group's code of ethics**, which was also adopted by the Group's subsidiaries. The general principles of the code of ethics are the Group's core values, which are binding on all our employees and include, among others, business compliance, protection of reputation, respect for the dignity and integrity of the individual, protection of trade secrets and other confidential information, honest and fair business practices, respect for market rules, professionalism and care for employees, equal information to all shareholders, transparency and integrity of information, avoidance of conflicts of interest, sustainability orientation and respect for human rights.

Employees who become aware of violations of the code of ethics or other binding rules must report them to the compliance function holder. The compliance function reviews each report and investigates any alleged irregularities. Each Group member takes appropriate action against any person who violates the code, depending on the seriousness of the violation. In accordance with the Group's and Sava Re's compliance policy, the compliance function holder in each Group company holds a position that ensures independence, sufficient authority and necessary powers. The independence of the compliance function from other key and business functions is ensured by the senior management of each company.

The compliance function holder of each company prepares annual and semi-annual (periodic) reports on the adequacy of controls implemented to manage compliance risks. These reports include a summary of any instances of non-compliance reviewed, any material adverse events or irregularities, their consequences and the actions taken. The compliance function holders in Group companies report periodically to the management and supervisory bodies or, where applicable, to the audit or other supervisory board committees and, in specific cases, also to sectoral committees and local regulators, in accordance with the national legislative framework and the internal regulations of each company. The periodic reports from subsidiaries are also shared with the Group compliance function holder.

No violations of the code of ethics were observed in 2024.

Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law was transposed into Slovenian law with the adoption of the Slovenian Reporting Persons Protection Act (ZZPri), which entered into force on 22 February 2023.

At Sava Re and other Group subsidiaries that are subject to the provisions of ZZPri, we fully comply with all sectoral regulatory requirements. We have put in place appropriate mechanisms within

the Group to ensure that employees are properly encouraged to safely raise any concerns they may have about possible misconduct in the workplace. We have a vested interest in ensuring that all reports are thoroughly investigated and that violations are remedied while ensuring that a system is in place to protect employees from retaliation.

The internal reporting procedure for violations is set out in the policy for establishing the internal reporting procedure under ZZPri.

In most of our subsidiaries, we have already integrated the Group's internal regulations into their operations, while in some this has been done only partially or in different ways due to different local legislation (e.g., North Macedonia and Montenegro).

At Sava Re, we have appointed a confidential adviser and a deputy confidential adviser to receive and handle reports. The confidential adviser works independently and is not subject to any instructions or policies in any particular case, as defined in the policy. The confidential adviser at Sava Re is an executive employee within the meaning of the Slovenian Employment Relationships Act and holds the key compliance function at the Group level.

We have established a secure and confidential reporting procedure. Employees can make reports in writing to the confidential adviser's email address, by post to the Company's address, or verbally by calling the confidential adviser's telephone number

or meeting him or her in person. Violations may also be reported anonymously without disclosing personal data.

In accordance with the policy, the confidential adviser reviews and processes each report following the prescribed procedure. He or she advises the whistleblowers, informs them of the reporting procedures and provides assistance in case of retaliation. If the confidential adviser determines that the report is substantiated, he or she takes all necessary steps to stop the violation. If the confidential adviser is not authorised to take such action, he or she notifies the responsible organisational unit and makes recommendations for corrective action.

The confidential adviser provides written reports to the company's management board on handled cases and prepares an annual statistical report on the previous year's reported cases.

The confidential adviser may consult an advisory group to support him or her when assessing and handling reports. This group consists of experienced professionals who are not employed within the Sava Insurance Group. The advisory group is organised and operates in a manner and according to a procedure that ensures that it is independent and separate from the management board of any company in the Sava Insurance Group. The advisory group submits an annual statistical report on its activities to the management board.



The confidential advisers in each Group company have the opportunity to receive training to improve their expertise and understanding of whistleblowing procedures.

Sava Re's confidential adviser participated in training sessions during the preparation of ZZPri, where proposed legislative amendments and employer obligations regarding whistleblower protection were discussed. In addition, the confidential adviser attended the European Institute of Compliance and Ethics (EICE) conference, where the challenges of implementing ZZPri in companies were addressed. The confidential adviser also develops his or her knowledge independently through professional materials and by following current sources and research on the subject. Such continuous development ensures that the confidential adviser is able to effectively deal with reports of irregularities and protect whistleblowers in accordance with sectoral legislation and internal rules.

Sava Re employees were informed of the adoption of the policy and the rules. Both internal regulations were presented to them in a webinar, a recording of which is available to them on the Company's intranet.

Beyond the whistleblower reporting procedures at Sava Re, we adhere to the principles and policies

of the rules on the management of conflicts of interest and the policy on ensuring the inviolability of the person and the protection of personal dignity.

The **rules on the management of conflicts of interest** aim to mitigate the effects of conflicts of interest and manage conflicts of interest that may arise in the performance of the duties and tasks of individuals in the Company by establishing and implementing procedures and measures to be applied when a conflict of interest arises. If a person subject to the disclosure requirements fails to disclose a conflict of interest, the compliance function initiates a review of the circumstances and, if necessary, provides opinions, recommendations or policies on the specific case or in general. If the review process reveals that damage has been done to the company, the compliance function prepares a report for the management board. According to the policy, any violation of its provisions is considered a breach of employment or contractual obligations, while an intentional violation or a violation due to gross negligence is considered a serious breach of employment or contractual obligations and constitutes the basis for extraordinary dismissal of the employment relationship. For more information, see section [A.5 "Corporate governance statement"](#).

In 2023, we established a **policy on ensuring the inviolability of the person and the protection of personal dignity** at the Group level. Under this policy, we are committed to ensuring equal treatment irrespective of nationality, race or ethnic origin, national and social origin, gender, colour, medical condition, disability, religion or belief, age, sexual orientation, marital status, trade union membership, financial standing or any other personal circumstances. Ensuring the inviolability and protection of the personal dignity of employees and others involved in work and business processes is one of the Group's key priorities, and we strive to provide and maintain a safe workplace in which no one is subjected to violence (in particular sexual violence) or harassment, discrimination and bullying. The inviolability of the person and protection of personal dignity are guaranteed by mechanisms and measures that provide for a clear, transparent, swift and predefined procedure for detecting and sanctioning undesirable conduct, independent decision-making, professionalism, autonomy and independence of the arbitration body, decision-making at a level outside the Group, and the strictly protected principle of confidentiality for whistleblowers and infringers.

Every employee has the right to equal treatment, dignity and personal integrity in the workplace. The act on the procedure for dealing with

violations of the rights to inviolability of the person and personal dignity in the Group establishes a protocol for identifying and resolving such risks. In 2024, we have initiated two proceedings for violations of inviolability of the person and personal dignity within the Group. By the end of 2024, these proceedings were still pending. There were no other reports of bullying, harassment or other forms of workplace violence in 2024.

We are committed to the highest standards of ethical business conduct and compliance. As part of our efforts to prevent corruption and bribery, we identify specific functions and activities where potential risks are higher. These include functions with direct contact with external customers and partners, functions responsible for selecting external service providers and suppliers or managing the companies' or Group's financial assets, and functions that manage the Group's assets and resources.

We actively seek to prevent corruption and bribery through training programmes, the establishment of clear procedures, codes of conduct for employees and reporting procedures for violations. We have also put in place internal control systems, such as audits, compliance reviews, adherence to the four-eyes principle and similar mechanisms.



**G1-2 – Management of relationships with suppliers<sup>118</sup>**

Supplier relationships within the Sava Insurance Group are governed by the Procurement Policy of the Sava Insurance Group (the procurement policy) and the General Terms and Conditions of Business Cooperation with the Sava Insurance Group (the general terms and conditions).

At the Group level, there are no specific rules in place to prevent late payments. At Sava Re and its subsidiaries, we generally fulfil our obligations in accordance with the agreed payment terms, ensuring support for suppliers through long-term contracts and regular payments.

In 2024, there were no proceedings against any Group company for late payments.

As part of our procurement policy, we regularly monitor key suppliers and assess supplier relationships, from both a business risk and sustainability perspective. Key suppliers are those who have a material impact on the company’s business and, because they are embedded in the company’s business processes, cannot be replaced at short notice in the event of operational difficulties. These suppliers include information technology (IT) service providers.

For IT services, supplier monitoring is established in accordance with the requirements of Regulation

(EU) 2022/2554 of the European Parliament and of the Council of 14 December 2022 on digital operational resilience for the financial sector and amending Regulations (EC) No 1060/2009, (EU) No 648/2012, (EU) No 600/2014, (EU) No 909/2014 and (EU) 2016/1011 (the DORA Regulation). We are currently developing internal rules and procedures for monitoring and managing third-party risks related to IT procurement and IT-related goods and services.

We also review the sustainable practices and dimensions of our suppliers. The sustainability questionnaire is sent to all existing and new suppliers whose estimated annual turnover with any Group company exceeds EUR 5,000, including VAT. These are providers of goods and services in a competitive market, insurance intermediaries, loss adjustment service providers and assistance service providers. We do not include in the collection of responses to the sustainability questionnaire entities that are not providers of goods and services in a competitive market, i.e., state authorities, autonomous local authorities, public service providers, public authority holders, concessionaires (e.g., utility services) and others that provide goods and services to the organisation under public law (e.g., fees, costs of administrative procedures, etc.).

When selecting suppliers based on the questionnaire, we assess the following social and environmental criteria:

- Regular and timely fulfilment of obligations under employment contracts and other contracts with workers working for them in other forms of employment, in accordance with legal and contractual deadlines.
- Provision of a healthy and safe working environment for employees and workers working for them in other forms of employment in accordance with legal requirements.
- Implementation of measures to protect employees and other workers working for them in other forms of employment from verbal, physical and sexual harassment and other acts against their dignity.
- Compliance with national laws and regulations in their countries of operation, as well as international human rights instruments (particularly on prohibition of child labour, forced labour, undeclared work and discrimination).
- Adherence to environmental regulations in all countries in which they operate.
- Regular and timely fulfilment of payment and tax obligations.

If a supplier fails to meet the minimum sustainability requirements, the Group companies have the right to withdraw from the procurement process or terminate an existing contract by unilateral declaration and without notice.

**G1-3 – Prevention and detection of corruption and bribery<sup>119</sup>**

We have a zero-tolerance policy in the Sava Insurance Group towards all forms of bribery and corruption, which applies to all employees of the Group and our customers and business partners. In accordance with the provisions of the corporate integrity guidelines, the Group’s procurement policy and internal regulations of the Slovenia-based Group members, all contracts establishing legal relations must include an anti-corruption clause, general terms and conditions of business cooperation, which are communicated to suppliers, and provisions on confidential data and personal data protection. Anti-corruption provisions are also part of the Group’s code of ethics.

Sava Re’s rules on the management of conflicts of interest set out procedures and rules relating to receiving gifts, entertainment and hospitality. This approach helps us to mitigate the risk of unfounded allegations and the spread of distrust regarding the integrity of employees in the performance of their duties.

Group employees have access to reporting mechanisms for corruption and bribery as described in section [ESRS G1-1](#) (reporting procedures for violations of the code of ethics, whistleblower protection procedures, etc.).

<sup>118</sup> ESRS G1-2 paragraphs 14, 15 (a) and 15 (b).  
<sup>119</sup> ESRS G1-3 paragraphs 18 (a), 20, 21 (a), 21 (b) and 21 (c).





No cases of corruption were detected within the Group in 2024.

We inform employees of the adopted internal regulations through various channels, including intranet postings and monthly updates on recent developments. Each employee is also briefed on these policies when he or she joins a Group company.

We inform our customers and business partners of these policies through a variety of means, including our website, contractual agreements and face-to-face consultations. Suppliers are specifically made aware of the anti-corruption clause when signing the contract.

All employees and persons holding office at Sava Re are required to familiarise themselves with the rules on conflict of interest management and sign a conflict of interest avoidance statement upon assuming their position or function. Through this statement, they undertake to avoid situations that could lead to conflicts of interest and affect their impartiality in performing their duties or making decisions, and to immediately disclose in writing any circumstances related to their duties or functions where a conflict of interest with Sava Re or the Sava Insurance Group is foreseeable. This obligation remains valid throughout the duration of their employment contract or function at Sava Re.

The rules are available to all employees at all times through internal communication channels. We do not organise regular training for members of management and supervisory bodies on the prevention and detection of corruption and bribery.

The rules on conflict of interest management (applicable to Sava Re) prohibit persons subject to the disclosure requirement from accepting gifts or other benefits in connection with the performance of their duties or functions, with the exception of symbolic or promotional gifts of small value (the threshold is defined in the rules). Under no circumstances is the acceptance of a gift permitted if its giving or acceptance constitutes a criminal offence, is prohibited by law or related regulations, involves cash, securities, gift certificates, vouchers, gift tokens or precious metals, or has the appearance of influencing the recipient's impartial performance of duties or functions within the company. Employees must disclose gifts that exceed the threshold defined in the rules or are otherwise prohibited by completing a gift disclosure form. The rules also include a protocol for handling gifts received, which outlines the procedure for handing over gifts to the company.

**G1-4 – Confirmed incident of corruption or bribery<sup>120</sup>**

In 2024, Sava Re and its subsidiaries were neither convicted nor fined for violations of legislation related to corruption and bribery. At Sava Re, we strive to comply with all applicable regulations and ethical standards in the fight against corruption.

As there were no confirmed incidents of corruption or bribery during the reporting period, it was not necessary to implement measures to address violations of anti-corruption and anti-bribery procedures and standards.

**G1-5 – Political influence and lobbying activities<sup>121</sup>**

In accordance with the adopted code of ethics and the rules on sponsorship, Sava Re and other Group companies do not finance political parties. Our activities are limited exclusively to professional engagement within industry associations, and we do not participate in political campaigns, influencing or lobbying. Therefore, the function of overseeing political influence and lobbying activities has not been delegated to members of the administrative, management or supervisory bodies in the Group companies.

**G1-6 – Payment practices<sup>122</sup>**

As payment terms are agreed upon in each procurement process in accordance with the general terms and conditions, there is no need for standard payment terms. The timing of payments is recorded in each company's accounting system but is not monitored at the Group level.

Sava Re and its subsidiaries are not involved in any pending litigation for late payment.

Our code of ethics sets out our values and principles for the entire Group

120 ESRS G1-4 paragraphs 24 (a) and 24 (b).  
121 ESRS G1-5 paragraphs 29 (a) and 29 (b).  
122 ESRS G1-6 paragraphs 33 (a), 33 (b), 33 (c) and 33 (d).



## Sector-specific topics

### G1 – Operation and robustness of IT systems and cyber intrusions

#### Governance

We have identified the effective operation of the IT system, which enables the execution of our business processes and protection against cybersecurity breaches as one of the Group’s key areas in our industry, closely linked to the large volume of our customers’ data.

The strategic management of IT systems is the responsibility of the IT steering committee (ITSC), which ensures a comprehensive overview of strategy implementation and interim tactical-level decisions through collaboration with the relevant committees responsible for IT architecture and security and the committee responsible for projects and business processes.

The steering committee has been established to:

- align IT development with other business areas within the Group by coordinating ICT and IT projects / development tasks,
- ensure that the IT strategy is developed and implemented in line with the Group’s business goals,

- coordinate decision-making on the development and use of human and financial IT resources within the Group,
- monitor IT risks effectively (as part of a line IT process) within the Group,
- guide the development and allocation of resources based on strategic directions and decide on the distribution of resources between different areas within the Group.

Information security is managed at two levels:

1. The Group has established the function of chief information security officer (CISO), who holds primary responsibility for the strategic management of information security and reports to the management board. CISO leads the overall security framework and works with key stakeholders such as IT departments, internal audit, risk management, compliance, privacy and personal data protection, and legal affairs.
2. A cyber resilience team has been established within the IT department, with primary responsibility for operational management and execution of day-to-day security operations, including monitoring and management of security systems, incident response and implementation of security policies.

The management boards and senior management of the Group companies are responsible for adopting, overseeing and directing the information security strategy in line with the Group’s vision, business goals and EU regulations.

At the operational and execution level, tasks are carried out by the relevant IT departments in collaboration with content owners, project teams and specialists responsible for implementing IT-related developments. In addition, we have established an internal audit function that continuously assesses IT operations and governance.

#### Strategy and business model

In 2023, we adopted a new strategy of the Sava Insurance Group and a set of execution plans for the 2023–2027 period. We have two key objectives in optimising the Group’s business processes – to speed up and to simplify customer service and internal processes. This will also help us achieve cost efficiency, which will play a more important role in the next strategy period than in the past, given the changed macroeconomic environment.

To achieve strategic goals in specific areas, we are replacing certain business solutions on a large scale, which involves a thorough review of processes and the identification of opportunities for improvement. Going forward, processes will be restructured and, where necessary, the organisation will be adapted to the new processes. Particular attention is given to IT security and enhancements of technological, process and organisational capabilities in this area.

As part of this effort, we have developed an information security strategy for the Group as a subset of the IT strategy. This strategy defines six key operational goals that will serve as the foundation for achieving the overarching goal of establishing a high level of cybersecurity resilience.

We continue our practice of conducting IT process maturity audits, combined with independent external peer reviews of operational performance, architecture and implementation of system and solution configurations. We use the feedback to plan upgrades and improvements to the IT processes we use.





**Impacts, risks and opportunities**

Due to continuous changes and innovations in IT architecture, the Group operates in a dynamic and evolving environment that requires us to continuously adapt the IT security procedures and business continuity measures. The ability to respond in this way must be ensured regardless of the scale and scope of changes introduced in response to business needs.

While we do not have a material direct impact on the resilience of IT systems in our industry, we do identify key risks and opportunities.

We have identified the following risks across all major operating segments:

- the risk of reduced functionality or system failure due to a cyberattack,
- the risk of data loss due to IT system malfunction or failure,
- the risk of security vulnerabilities or deficiencies in IT systems,
- the risk of security vulnerabilities or deficiencies in external service providers,
- the risk of unauthorised disclosure of confidential information,
- the risk associated with the increased use of cloud services and the introduction of new digital solutions.

Our EU-based companies are most exposed to these risks, as this is where our largest operating segments are concentrated. These risks affect the entire value chain.

We have identified several opportunities in this segment, including the development of process support, the use of advanced technologies, the transfer of best practices within the Group, the education, training and development of employees, the sales networks and the encouragement of stakeholders to adopt digitalised products and services.

**Effects of material impacts, risks and opportunities on the business model, value chain, strategy and decision-making**

The operation and robustness of IT systems is critical for delivering services to our customers and executing all back-office processes in Group companies. We provide efficient underwriting of policies, claims handling and other services to our customers while maintaining the security of their databases. Given that our services rely on ICT technologies, a robust IT system is essential to the functioning of our companies. The Group also places great importance on selecting appropriate service providers responsible for the security of the network and ICT solutions provided to us.

The most important aspect of IT system operation and robustness is security, as vulnerabilities leading to cyberattacks can arise in several areas, as shown by the identified risks. Due to digitalisation, these risks are already material in the short term and will become even more so in the medium and long term with the emergence of new technologies and artificial intelligence. Cybersecurity has therefore been one of the Group's key strategic priorities for several years, and we integrate it into business and strategic planning. Actions implemented in this area include the operation of an information security committee, the development of a cyber incident response plan, the integration of a multi-factor user authentication system and the establishment of a database protection system. As of 2025, the DORA Regulation came into effect, introducing new network and information security requirements for financial institutions.

Key opportunities in the area of cybersecurity and IT system functionality include the training and development of employees and the sales network, thereby improving protection against external cyber intrusions. The development of appropriate process support and the use of advanced technologies will further strengthen resilience and spread best practices across the Group.

**Financial effects of material risks and opportunities**

In 2024, there were no negative financial impacts on the Group's financial results from these risks. By implementing appropriate measures, we ensure the seamless operation of IT systems and maintain a high level of cybersecurity.

We increase efficiency at the Group level and mitigate operational risks by further automating and optimising business processes.

**Expected financial effects of material risks and opportunities on financial position, financial performance and cash flows**

The potential financial effects may materialise in the medium term in the event of a cyber incident or other business disruption. As a result, the Group will continue to invest in upgrading IT systems to strengthen security and resilience.

We increase efficiency at the Group level and mitigate operational risks by further automating and optimising business processes.

**Resilience of strategy and business model**

In recent years, we have made significant investments in developing IT systems and enhancing security at the Group level, thereby increasing resilience to potential cyber incidents and other IT system operational issues. This also improves the customer experience.



**Policies**

The overarching policy is the Sava Insurance Group’s business strategy, which defines information technology as one of the six key pillars of the Group’s strategic development. Our focus areas include:

- business solutions and data warehouse: we are gradually replacing core business information solutions, expanding capacity and improving processes;
- IT processes and organisation: we plan to establish a competence centre, upgrade the IT environment at the Group level and recruit new IT personnel;
- infrastructure: we will improve the internal cloud infrastructure and integrate it more closely with external cloud services;
- security: we will strengthen crisis response procedures in IT security while continuing to invest in organisational and technical safeguards.

Our other IT and cybersecurity policies include:

- **Information security policy of Sava Re**, which aims to ensure business continuity and minimise business losses by preventing and mitigating the effects of security incidents. The information system is of immeasurable

value to the Company, and the confidentiality, integrity and availability of information are critical to achieving the Company’s competitive advantage, efficiency and reputation. The purpose of information security is to enable us to fulfil our mission and achieve our goals by setting up an information security management system to ensure:

- **availability:** information or services are accessible whenever needed,
- **integrity:** information remains unchanged from its original form during processing, transmission or storage,
- **confidentiality:** information is accessible only to authorised recipients.

An appropriate level of security awareness and a culture of information protection should be fostered in all employees of the Company. All employees are required to comply with relevant sectoral legislation, standards, policies and internal rules related to information security.

- **General security policies of Sava Re**, which include provisions on:
  - proper use of all IT resources,
  - management of IT resources,
  - electronic business operations,
  - protection of equipment and IT resources.

These rules apply to all employees and other users of IT resources.

As part of the Sava Insurance Group’s business strategy, we also adopted the following two operational plans:

- cyber incident response plan,
- business continuity plan.

We regularly update our policies on the operation of IT systems to reflect the latest guidelines and best practices. We have also improved our operational plans for implementing our strategy for 2024–2025 in the areas of IT development, security, and infrastructure. Independent security testing and security system analyses are carried out on a regular basis.

**Actions**

We are continuously taking a number of actions to implement our strategic priorities and policies in IT systems and cybersecurity:

- We have set up an IT steering committee (ITSC) at the Group level. For more information, see the governance subsection.
- We focus on establishing and enforcing technical and organisational standards that ensure the consistent and effective use of

modern technologies. This approach aims to standardise the use of technology, improve compliance with best practices and ensure higher levels of security, reliability and efficiency in the operation of IT systems.

- We are implementing and expanding the IT service management (ITSM) platform as the core IT governance process and database, with automation and artificial intelligence capabilities to address internal IT efficiency.
- We update our security policies on a regular basis (once a year).
- We continuously raise awareness of key security policies and best practices for the secure use of IT across all Group companies.
- We have technical security controls and proactive safeguards (detection mechanisms and response procedures) in place).

In connection with the IT system upgrade, which is being implemented based on the feedback from the process maturity audit, we have undertaken activities in 2024 to replace the core reinsurance, non-life, life and HR solutions. In 2024, we have paid particular attention to IT architectural planning, with an expansion of both internal and external resources dedicated to this area.



In terms of IT infrastructure and security, we are upgrading systems and expanding cloud computing capabilities to meet business needs.

In addition, organisational and procedural improvements have been introduced to support IT-related committees, improving integration with supporting processes for more effective decision-making at all levels. The companies have adequate resources for all the actions planned.

**Goals**

Our primary objective with regard to the operation and robustness of IT systems and cyber intrusions is to ensure operational IT support for the uninterrupted conduct of core business and a stable, robust IT environment that is resilient to cyber intrusions, enabling rapid and effective recovery and maximum protection of personal data for all our stakeholders. Accordingly, we provide appropriate IT infrastructure, security and support for the development and enhancement of business applications. Particular emphasis is placed on optimising business processes to improve the end-customer experience.

We regularly evaluate the effectiveness of the actions implemented against defined targets. Our strategic goal for information security is a high level of cyber resilience. This underpins our strategic operational goals, which include:

- establishing coordination of cybersecurity implementation across the Group,
- improving the robustness of infrastructure security and the resilience of key IT infrastructure,
- expanding technical cybersecurity defences,
- improving incident response procedures,
- developing information security training programmes for employees across the Group,
- establishing partnerships with external partners in the area of cybersecurity defence.

We are developing key performance indicators to measure effectiveness in achieving all operational goals. In addition, performance indicators have already been introduced in the IT systems processes, such as:

- cybersecurity protection ratio,
- implementation of the annual staff establishment plan,
- execution of contingency plans: in accordance with regulatory requirements, we regularly carry out mandatory business continuity tests, supported by additional internal business continuity tests.

All key performance indicators are measured at the level of individual companies and are not aggregated to the Group level.

**G1 – Innovative products and digital transformation**

**Governance**

We monitor social developments and follow current trends at the Group level, with the aim of becoming a long-term partner for its customers in the area of insurance, financial and assistance services. We are developing our offering in terms of both content and accessibility, with the aim of providing customers with a high level of accessibility across multiple channels. To improve the customer experience, we are continuously investing in innovation and digital transformation of our products and services.

The area of innovative products for the entire Group is managed by Sava Re’s insurance, sales and Group governance business centre, while oversight of this area is carried out by the Company’s management board. The area of digital transformation is managed by both the business centre and the IT department working together.

**Strategy and business model**

Our innovative products and digital transformation strategy is based on proactively developing innovative solutions, automating processes and improving responsiveness to market changes. We focus on improving customer experience, sustainability and automation. We support digital transformation by introducing

new technologies, automating processes, collaborating with verified external partners, and implementing environmentally friendly solutions that are paperless and readily available. Market trends are monitored through research, surveys and workshops, including regular stakeholder engagement. We make decisions based on data from internal analyses and external market research.

Our key strategic goals in this area are:

- **Digital transformation of products**  
The digitalisation of processes and the gradual adoption of advanced technologies, such as the use of geographic information system (GIS) data and the automation of underwriting processes, enable insurers to improve risk management. This allows us to segment and tailor our products to the specific needs of our customers.
- **Development of new products linked to sustainability-related market changes**  
In response to sustainability-related market changes, we develop new products and services, which we build on with innovative services or sustainable solutions, as described in more detail in section [ESRS S4](#).
- **Innovative approach to product development**  
Group companies are adapting to market needs with new approaches, including modular product structures, in order to offer more flexible insurance products.



We use innovative product development methods where internal sales teams, either independently or in collaboration with external stakeholders, identify current customer needs and preferences and, based on feedback, continuously update the offering and adapt insurance products accordingly.

**Impacts, risks and opportunities**

Through innovation in sustainable solutions and digitalisation, we are creating new opportunities for growth while supporting the adoption of green technologies and the development of digital solutions. In the area of sustainable products, we have introduced insurance for electric vehicles, photovoltaic power plants and energy storage systems, and enabled investments in sustainable funds. This strengthens our customer support and ensures flexible solutions in line with modern trends.

By providing additional customer support, we mitigate risks such as a lack of understanding of new technologies. Our aim is to enhance the competitiveness and reliability of our services based on a sustainable and innovative approach.

Within the Group, we are expanding our portfolio of digitally accessible products. By integrating products and services through portals, call centres and communication channels, we ensure a 360-degree customer view. Group companies

use data analytics and predictive models to improve service quality. We recognise that digitalisation increases the risk of vulnerability to cyberattacks and the possibility that new digital products and services may not be adequately integrated with existing systems or may not fully support key business functions, which could affect operational reliability. For this reason, our companies are continuously improving internal and customer processes through the use of advanced IT technology to ensure secure, fast and information-rich communication with consumers. It is also important that consumers and employees understand the complexity of new technologies. We address this through tailored solutions, training and support.

Despite these challenges, digital transformation offers many opportunities for the Group. The development of advanced solutions for customer support and the optimisation of internal processes, as well as investments in employee training in new technologies, strengthen the Group’s resilience. By supporting sustainable development, we facilitate the transition to environmentally friendly business practices and thus increase our attractiveness to sustainability-oriented customers. In addition, the introduction of innovative digital and sustainable solutions provides access to specific market segments and further strengthens the Group’s market position.

**Policies**

All Group companies follow the policy of focusing on the development of innovative digital solutions and processes, adapting to specific market needs and expectations and local legislation.

Policies aimed at the development of insurance products and processes, innovative approaches and the digitalisation of operations are either embedded in the internal rules of each subsidiary or reflected in the Group’s predefined strategic goals. These internal regulations are independently adopted and implemented by the respective business line managers in each subsidiary. In this way, the policy direction is effectively translated into practice.

**Actions**

Actions are implemented in three segments linked to key strategic goals: digital transformation of products, development of new products linked to sustainability-related market changes and an innovative approach to product development.

We present these actions in section [ESRS S4-4](#).

Digitalisation measures are being implemented across all business services in all Group companies and for all markets. Digitalisation projects follow the strategic plans for the 2023–2027 period. Each company implements its digital services step by step, based on financial capabilities, market needs or expectations, and the portfolio

of products and services offered. Our goal is for all Group companies to be recognised in their respective markets for a high-quality and extensive range of digital solutions, enabling customers to access fast, efficient and always-available services and to communicate securely with the companies.

To improve the quality of service, enhance the customer experience and thus increase customer satisfaction, Zavarovalnica Sava is introducing a questionnaire for reporting changes to an insured building prior to policy renewal. This will contribute to more accurate risk management and appropriate coverage. The companies have adequate resources for all the actions planned.

**Goals**

Our goals focus on increasing the number of electronic insurance policies written, expanding the use of e-assistance, improving customer satisfaction with digital solutions and increasing the share of sustainable products.

In the area of e-mobility, Zavarovalnica Sava aims to increase its presence and market share, striving to meet customer expectations and follow industry development trends through innovative approaches.

The key performance indicators we measure in this area are set out in section [ESRS S4-5](#).





G1 – Protection of personal data

Governance

Responsible handling of personal data is the duty of every employee. At the Group level, the management board of the parent company has appointed the holder of the supporting business function for privacy and personal data protection in the Group. In the directly controlled Group companies, the senior management has appointed a data protection officer (DPO) who reports directly to the senior management of that company and to the holder of the Group’s supporting business function. Oversight is provided by the DPO and internal audit. The risks of personal data breaches are included in the operational risk register.

Strategy and business model

Personal data protection is deeply embedded in all our business processes and development priorities for the 2023–2027 period. Therefore, in all activities involving the personal data of our employees, business partners, consumers and end-users, we act in compliance with the law, handle personal data with care and implement solutions to make the systemic environment as secure as possible for data protection.

Impacts, risks and opportunities

We have identified risks of personal data breaches in all major operating segments, both in EU and non-EU countries. Due to regulatory requirements, the highest exposure is in EU-based companies. This risk also affects the downstream value chain.

The provision of life and pension insurance services, assistance services, a large part of non-life insurance and asset management is intrinsically linked to the processing of individuals’ personal data, which affects individuals and poses risks to their rights, as well as financial and reputational risks to the Group.

We also recognise opportunities in this area, such as the development of process support, the use of advanced technology, the transfer of best practices across the Group and the training of employees to mitigate risks and capitalise on opportunities.

Effects of material impacts, risks and opportunities on the business model, value chain, strategy and decision-making

Due to extensive regulation, particularly in the EU, and the need to maintain a proper relationship with internal and external stakeholders whose personal data we process, the protection of personal data is already a very important issue

and will remain so in the medium and long term. Personal data protection is important both for our own operations and internal stakeholders (e.g., employees) as well as for customers who use our services (downstream value chain). It affects strong stakeholder relationships and, in the long term, our reputation, which is why we pay particular attention to this area. In today’s environment, characterised by the extensive use of new technologies, digitalisation and artificial intelligence, data protection is becoming an increasingly complex task and is crucial to the Group’s business model. We therefore regularly address this area in various aspects of business strategy development.

We recognise that there are significant long-term financial benefits to be gained from the proper management of this business segment. As a result, we continue to work with all employees and provide appropriate support in our business processes to ensure adequate data protection at all times.

Financial effects of material risks and opportunities

In 2024, we did not experience any adverse financial effects in the Sava Insurance Group related to the protection of personal data. By implementing appropriate measures, we ensure

responsible handling of personal data in the Group.

The development of process support and the use of advanced technologies are part of the Company’s regular activities to ensure compliance within the EU markets, allowing other Group companies to efficiently transfer best practices into their operations, thereby increasing their competitive advantage in their respective markets.

Expected financial effects of material risks and opportunities on financial position, financial performance and cash flows

This risk remains relevant in the medium and long term, and the Group will continue to focus on it as it can affect relationships with customers, employees and other stakeholders whose data we store and process. In addition, breaches can have material financial impacts due to the high potential fines.

By continuously developing process support and deploying advanced technologies, we will ensure compliance with personal data protection legislation, thereby maintaining and increasing consumers’ trust, upholding a strong reputation and building resilience. We expect these efforts to deliver positive financial impacts that exceed the investment in development.



**Resilience of strategy and business model**

Through all measures implemented within the Group, we seek to minimise the likelihood of breaches as much as possible. The Group invests in new technologies, implements internal controls and audit trails in IT systems, and trains employees. Designated data protection officers are appointed in EU-based companies and at the Group level, where a designated data protection business function is in place. The Group has also implemented privacy and personal data protection policies, security policies and data protection rules in its companies. Going forward, the Group companies will continue to improve processes and systems to mitigate this risk and thus further enhance the Group’s resilience.

**Policies**

At the Group level, we have adopted a policy on privacy and personal data protection and area-specific internal regulations of the parent company and individual subsidiaries. The policy defines the Group’s principles of personal data protection (qualitative objectives) and reporting criteria (metrics).

**Actions**

To ensure diligent and effective protection of personal data, we implement various actions, including risk assessments (quarterly, annually and as needed), record keeping (regularly), reporting (semi-annually, annually), integration of measures into IT and process solutions (regularly and as needed), organisational actions (regularly and as needed), mandatory employee training (bi-annually and as needed), contractual commitments from external partners (regularly) and transparency towards individuals (regularly). The companies have adequate resources for all the actions planned.

**Goals**

At the Group level, our overarching personal data protection goal is zero personal data breaches.

The personal data protection metrics we monitor include the number of breaches, the number of proceedings before supervisory authorities, the number of requests received from individuals and the resources allocated to the activities of data protection officers.

**G1 – Statutory stakeholder notification**

**Governance**

Information is provided in section [A.3.1 “Responsibility to investors”](#) and in section [ESRS S4](#).

**Information to customers in pre-contractual disclosures in the distribution of financial products**

In accordance with the SFDR Regulation, the Group’s financial service providers give detailed information on investment decisions and their impact on sustainability. This information is made available to customers on company websites and through pre-contractual and contractual disclosures on financial products.

**Information to customers about sustainability factors in insurance products**

In accordance with legislation, the Group’s insurance companies operating in relevant markets (Slovenia and Croatia) consider sustainability factors and goals in their processes of developing or approving an insurance product and determining its target market, distribution, management and control. These insurance companies regularly publish documents on their websites detailing the sustainability factors of their products.

**Strategy and business model**

The primary interest of stakeholders is to ensure compliance with legal requirements and to receive accurate and timely information that affects their rights and obligations. Such communication helps to build trust and maintain good relationships between insurance companies and their customers.

**Investors**

The Group’s overarching goal in its statutory notification of stakeholders is to establish an open channel of communication with investors. We aim to increase the recognition of the true value of the Sava Re and Sava Insurance Group brands, thereby improving the understanding of investment in Sava Re shares. In 2024, we continued our efforts to improve the liquidity of the share. Our responsibility to investors is reflected in our cooperation and in setting up a two-way relationship using various communication tools.

In 2024, we reached out to investors through investor and analyst conferences, webcasts held by the Ljubljana Stock Exchange, a press conference to announce unaudited results, a letter to shareholders, an invitation to the general meeting of shareholders, an e-mail newsletter and through similar means. We also sponsored the Ljubljana Stock Exchange’s capital market development and financial literacy project.





We also use our official website, in particular the Investors section, to ensure that investors, shareholders and other members of the financial community receive the same information in a timely manner.

Investor relations at Sava Re are managed by the office of the management board and of compliance.

**Consumers**

Customers of insurance companies receive written communication of all legally required information related to insurance products and other important updates on the insurers’ operations and offerings. The Group’s insurance companies are committed to maximising the use of digital communication channels, enabling customers to track their insurance status, access necessary information and manage their data. We follow environmental guidelines that reduce paper consumption and mitigate negative environmental impacts. The use of digital communication channels also makes it easier and faster for customers to access important information.

Customers of the Group’s insurance companies receive annual updates on their insurance product benefits, as required by applicable regulations and insurance policy terms and conditions, depending on the type of insurance products offered.

**Impacts, risks and opportunities**

We have identified reputational risk for the Group in all major operating segments in the event of non-transparent or inadequate reporting. Our EU-based companies are most exposed to this risk, as this is where our largest operating segments are located. This risk also affects the downstream value chain. Other risks include potential delays and errors or ineffective communication and unforeseen legislative changes. These factors can have a negative impact on customer satisfaction and business compliance.

At the same time, we see numerous opportunities in this area, such as increasing trust among customers, business partners, investors and other stakeholders, promoting sustainable practices among stakeholders in the value chain, increasing transparency of sustainable practices, improving process optimisation and digitalising communication. Regulatory reporting requirements also provide opportunities for developing insurance products that support corporate compliance with applicable legislation, such as sustainability risk insurance or cybersecurity insurance. By ensuring compliance with regulatory reporting requirements, we strengthen the trust of stakeholders, particularly investors, regulators, customers and employees, who have access to transparent financial and sustainability information about the Group and its subsidiaries.

In the coming years, stakeholder awareness of sustainability issues will continue to grow, accompanied by increased demands for transparent disclosure of each company’s sustainable business operations. This may have a material impact on the reputation of the Sava Insurance Group and, as a result, indirect financial effects that could affect specific operating segments in the long term.

Through transparent and timely reporting on our sustainable operations, which goes beyond regulatory requirements, we maintain a high level of trust with investors, consumers and other key stakeholders.

**Financial effects of material risks and opportunities**

In 2024, there were no material adverse financial effects related to statutory notification of stakeholders. The Group invests in developing best reporting practices by participating in voluntary international initiatives and publishing reports. This strengthens the Group’s reputation and encourages the adoption of sustainable practices by key stakeholders and the wider business community.

In the medium to long term, increased stakeholder expectations or regulatory changes may result in direct and indirect financial effects.

The Group is committed to ensuring transparent reporting to stakeholders on the sustainability aspects of its operations, recognising the importance of stakeholder communication, and proactively managing the associated risks to the greatest extent possible. To this end, we have established internal controls in Group companies. We also monitor the development of voluntary reporting frameworks and participate in international organisations and initiatives.

**Goals**

We aim to maintain a high level of compliance with regulations in our reporting to stakeholders. Our communication and information approach ensures the appropriate and timely dissemination of all key information.

Group companies take consistent action to ensure the highest standards, as described in the subsection on strategy and business model.

The Group’s insurance companies aim to achieve 100% compliance with regulatory reporting requirements and to increase the use of digital communication channels.

Measures of success in digitalising reporting processes, developing innovative approaches and improving the customer experience include customer response tracking, notification delivery times and improvements in customer satisfaction indices.



G1 – Long-term stability and profitability

The Sava Insurance Group pursues a policy of long-term stability and profitability of its operations. We have no negative impact in this area, but do have several positive one, since our approach of putting long-term prospects before short-term results ensures a stable business environment for employees, security and reliable protection for the insured, and a stable and fair return for investors in the long term. In this way, we connect our sustainability goals, as defined in our sustainability strategy, to our financial statements.

The long-term stability policy covers the growth and development of the Group in terms of its employees, which includes new job opportunities, career development opportunities and increased financial security for employees. Long-term stability provides an opportunity for business cooperation with suppliers and compliance with payment deadlines. We also ensure long-term stability by investing in the improvement of all processes, increased quality of our products and services, and by ensuring adequate profitability

and (re)insurance cover, which is reflected in a stable market share, high customer satisfaction and healthy financial statements. We ensure long-term financial stability and profitability through a diversified portfolio of insurance and reinsurance services in different markets and an investment portfolio focused on safe and profitable investments, taking into account sustainability guidelines. We adapt our business model to this policy, which is reflected in our business strategy.

Key areas where we are taking action to ensure stability and profitability include engagement with employees and customers, and investments in digitalisation to improve accessibility, quality and security of services, as detailed in sections [ESRS S1](#), [ESRS S4](#) and [G1 – Sector-specific topics](#). Long-term stability and profitability are measured by both non-financial (employee training and satisfaction, market share, customer satisfaction, etc.) and financial metrics and indicators.

The Group’s stability and profitability are also confirmed by our financial results, as we have recorded an increase in revenue and profit in recent years. The existing business model and management approach create a solid foundation for further growth and the expectation of strong profitability in the future.

The long-term stability of the system is also ensured by the high solvency ratio, which was 191% at the end of 2023 and is estimated to be even higher in 2024, as the Group and the parent company generated a profit in 2024, while Sava Re issued an additional EUR 50.0 million of subordinated debt, which is included in the solvency calculation.

Our strategic direction, plans and achievements are presented in more detail in the business report part, while the Group’s key performance indicators are presented in more detail in the notes to the financial statements.

EUR	2022	2023	2024
Insurance revenue and non-insurance revenue	630,392,310	723,113,891	832,573,569
Net profit or loss for the period	46,923,441	64,657,171	87,846,542





## 6 Sustainability performance indicators of the Sava Insurance Group and Sava Re

► Select Sava Insurance Group sustainability performance indicators

Environmental aspect	2024	2022	Index 2024/2022
CO <sub>2</sub> e emissions per employee (tonnes) – scope 1 and 2 (location-based method)	1.15	1.47	78.2
	2024	2023	Index 2024/2023
Number of paperless claims reported	300,120	243,106	123.5
Percentage of ESG-integrated investments as at 31 December	23.6%	16.9%	139.6
Social aspect	2024	2023	Index 2024/2023
Percentage of employees involved in annual performance appraisal interviews	55.3%	47.9%	115.4
Women as a percentage of all employees as at 31 December	60.0%	59.9%	100.2
Employee turnover rate	16.2%	17.1%	94.7
Number of injuries in the workplace	8	8	100.0
Average hours of training per employee	20.5	22.5	91.1
Heart for the World – corporate volunteering (hours)	6,574	5,114	128.5
Governance aspect	2024	2023	Index 2024/2023
Percentage of women in management positions	32.0	28.0%	114.3
Percentage of women on Group companies’ supervisory boards	20.0	19.7%	101.5
Business volume (EUR)	1,035,134,973	910,113,382	113.7

We compare CO<sub>2</sub> emissions to 2022, our baseline year for monitoring the strategic decarbonisation target.

The carbon footprint data for 2022 and 2023 are verified but are not subject to audit as part of this year’s audit process, and may differ from the publicly available data in the 2022 and 2023 annual reports. The data for 2022 and 2024 cover all locations where Group companies conduct their business operations.

► Select Sava Re sustainability performance indicators

Environmental aspect	2024	2022	Index 2024/2022
CO <sub>2</sub> e emissions per employee (tonnes) – scope 1 and 2 (location-based method)	1.02	1.31	77.9
Annual electricity consumption per employee (kWh)	1,296	1,485	87.3
Social aspect	2024	2023	Index 2024/2023
Percentage of employees involved in annual performance appraisal interviews	90.5%	86.3%	104.9
Women as a percentage of all employees as at 31 December	64.9%	63.1%	102.9
Employee turnover rate	4.2%	6.1%	68.9
Number of injuries in the workplace	2	0	
Average hours of training per employee	22.0	26.8	82.1
Governance aspect	2024	2023	Index 2024/2023
Percentage of women in management positions	25%	25%	100.0
Percentage of women on supervisory boards	16.67%	17%	98.1
Percentage of independent members on Sava Re’s supervisory board	100%	100%	100.0

We compare CO<sub>2</sub> emissions to 2022, our baseline year for monitoring the strategic decarbonisation target.

The carbon footprint data for 2022 and 2023 are verified but are not subject to audit as part of this year’s audit process, and may differ from the publicly available data in the 2023 and 2022 annual reports.



# 7 Appendices to the sustainability report

## Appendix A – ESRS index<sup>123</sup>

Footnote	ESRS disclosures	Page
3	ESRS 2 SBM-1 paragraphs 40 (a) i, 40 (a) ii and 42	14
4	ESRS 2 SBM-1 paragraph 40 (a) ii	15
8	ESRS 2 GOV-1 paragraph 22 (c)	39
9	ESRS 2 GOV-1 paragraphs 22 (c) i, 22 (c) ii and 22 (c) iii	39
10	ESRS 2 GOV-1 paragraph 21 (d)	41
11	ESRS 2 GOV-1 paragraph 22 (b)	41
12	ESRS 2 GOV-1 paragraph 22 (d), and ESRS 2 GOV-2 paragraphs 26 (a), 26 (b) and 26 (c)	41
13	ESRS 2 GOV-2 paragraph 26 (c)	41
14	ESRS 2 GOV-1 paragraph 21 (a)	42
15	ESRS 2 GOV-1 paragraph 22 (a)	44
16	ESRS 2 GOV-1 paragraph 21 (b)	44
17	ESRS 2 GOV-1 paragraph 23 (a)	44
18	ESRS 2 GOV-1 paragraph 21 (c)	44
19	ESRS 2 GOV-1 paragraph 23 (a)	44
20	ESRS 2 GOV-1 paragraph 21 (e)	44
21	ESRS G1-5 paragraph 30	44
22	ESRS 2 GOV-1 paragraph 22 (c)	46
23	ESRS 2 GOV-1 paragraph 22 (c) ii and ESRS 2 GOV-2 paragraph 26 (a)	46
24	ESRS 2 GOV-1 paragraph 21 (a)	47
25	ESRS 2 GOV-1 paragraph 21 (a)	48

123 ESRS 2 IRO-2 paragraph 56.

Footnote	ESRS disclosures	Page
26	ESRS 2 GOV-1 paragraph 21 (c)	48
27	ESRS 2 GOV-1 paragraph 23 (a) and ESRS G1.GOV-1 paragraph 5 (b)	48
28	ESRS G1-5 paragraph 30	48
29	ESRS 2 GOV-1 paragraph 23 and ESRS G1-1 paragraph 10 (g)	49
30	ESRS 2 GOV-1 paragraphs 23 (a) and 23 (b)	49
31	ESRS 2 GOV-1 paragraphs 22 (a), 22 (b), 22 (c) and 22 (c) ii	49
32	ESRS 2 SBM-1 paragraph 40 (g)	56
45	ESRS 2 BP-1 paragraphs 5 (a), 5 (b) i, 5 (b) ii, 5 (c) and 5 (d)	113
46	ESRS 2 BP-2 paragraphs 9 (a), 9 (b), 10 (a), 10 (b), 10 (c), 10 (d) and AR 1 (c)	113
47	ESRS 2 BP-2 paragraphs 15 and 16	114
48	ESRS 2 GOV-1 paragraphs 21 to 23	116
49	ESRS 2 GOV-2 paragraphs 26 (a), 26 (b), 26 (c) and 26 (c) ii	116
50	ESRS 2 GOV-3 paragraphs 29, 29 (a) and 29 (b)	116
51	ESRS 2 GOV-4 paragraphs 30, 32 and AR 48	117
52	ESRS 2 GOV-5 paragraphs 36 (a), 36 (b), 36 (c), 36 (d) and 36 (e)	117
53	ESRS 2 SBM-1 paragraphs 40 (a) i, 40 (a) ii and 40 (b)	118
54	ESRS 2 SBM-1 paragraphs 40(e), 40 (f) and 40 (g)	118
55	ESRS 2 SBM-1 paragraph 41	119
56	ESRS 2 SBM-1 paragraphs 42 and 42 (a)	119
57	ESRS 2 SBM-1 paragraph 42 (b)	119





Footnote	ESRS disclosures	Page
58	ESRS 2 SBM-1 paragraph 42 (c)	120
59	ESRS 2 SBM-1 paragraphs 45, 45 (a), 45 (a) i, 45 (a) ii, 45 (a) iii, 45 (a) iv, 45 (a) v, 45 (b), 45 (c), 45 (c) i, 45 (c) ii, 45 (c) iii and 45 (d)	121
60	ESRS 2 SBM-3 paragraph 48	123
61	ESRS 2 IRO-1 paragraph 53 (a)	123
62	ESRS 2 IRO-1 paragraph 53 (b)	124
63	ESRS 2 IRO-1 paragraphs 53 (c), 53 (d), 53 (e), 53 (f) and 53 (g)	124
64	ESRS 2 IRO-2 paragraphs 56 and 59	126
65	ESRS E1.GOV-3 paragraph 13	135
66	ESRS E1-1 paragraphs 14, 16 (a), 16 (b), 16 (d), 16 (h), 16 (i), 16 (j), 17, E1-4 paragraphs 34 (e) and 34 (f)	135
67	ESRS E1.SBM-3 paragraphs 18, 19 (a), 19 (b), AR 7 (b), 19 (a), 19 (b) and 19 (c), and E1-4 paragraph AR 30 (c)	135
68	ESRS E1.IRO-1 paragraphs AR 8 (b), 20 (a), 20 (b), 20 (c), AR 11 (a), AR 11 (b), AR 11 (c), AR 11 (d), 21, AR 12 (a), AR 12 (b), AR 12 (c), AR 12 (d), 21 and AR 15	138
71	ESRS E1-2 paragraphs 24 and 25	138
72	ESRS E1-3 paragraphs 28, 29 (a), 29 (b) and 29 (c)	139
73	ESRS E1-4 paragraphs 32 and 33	139
74	ESRS E1-4 paragraphs 34 (a) and 34 (b)	139
75	ESRS E1-5 paragraphs 37, 37 (a), 37 (c), 37 (c) ii, 37 (c) iii, AR 34, 38 (a), 38 (b), 38 (c), 38 (e) and 39	140
76	ESRS E1-6 paragraphs 47, AR 39 (b), AR 42 (c), 46 (h) and 46 (i)	141
77	ESRS E1-6 paragraphs 44, 48 (b), 49 (b), 52 (b), 51, AR 41, AR 45 (d) and AR 45 (e)	141
78	ESRS E1-6 paragraphs 23 (b) and AR 45 (d)	142
79	ESRS E1-6 AR 53	142
80	ESRS S1 SMB-3 paragraphs 14, 14 (a), 14 (b), 14 (c), 14 (d), 15 and 16, S1-1 paragraphs 22 and 24 (c), and S1-4 paragraph 38 (c)	144

Footnote	ESRS disclosures	Page
81	ESRS S1-1 paragraph 19, S1-2 paragraph 27 (d)	144
82	ESRS S1-1 paragraphs 20, 20 (a), 20 (c), 21, 23, 24 (a), 24 (b), 24 (c) and 24 (d)	145
83	ESRS S1-2 paragraphs 27, 27 (a), 27 (b), 27 (c) and 27(d), S1-4 paragraph 38 (d), and S1-5 paragraph 47 (c)	146
84	ESRS S1-3 paragraphs 32 (a), 32 (b), 32 (c), 32 (d), 32 (e) and 33	146
85	ESRS S1-4 paragraphs 37, 38 (a), 38 (b), 38 (c), 39, 40 (a), 40 (b), 41 and 43	146
86	ESRS S1 MDR-T paragraphs 46 and 81, and S1-5 paragraphs 47 (a), 47 (b) and 47 (c)	147
87	ESRS S1-6 paragraphs 50 (a), 50 (b), 50 (c), 50 (d), 50 (d) i, 50 (d) ii and 51	148
88	ESRS S1-8 paragraphs 60 (a) and AR 70	150
89	ESRS S1-9 paragraphs 66 (a) and 66 (b), and AR 71	151
90	ESRS S1-10 paragraphs 69 and 70	151
91	ESRS S1-12 paragraphs 79 and 80, and AR 76	151
92	ESRS S1-13 paragraphs 83 (a), 83 (b) and 84	152
93	ESRS S1-14 paragraphs 88 (a), 88 (b) and 88 (c)	153
94	ESRS S1-15 paragraphs 93 (a), 93 (b) and 94	154
95	ESRS S1-16 paragraphs 97 (a), 97 (b) and 97 (c)	155
96	ESRS S1-17 paragraphs 103 (a), 103 (b), 103 (c), 104 (a) and 104 (b)	155
97	ESRS 2 SBM-2 paragraph 45 (b), ESRS S3-1 paragraph 16 (b), and ESRS S3-2 paragraph 21 (a)	156
98	ESRS 2 SBM-3 paragraph 48, and ESRS S3 paragraphs 9, 9 (a), 9 (b), 9 (c), 9 (d), 10 and 11	156
99	ESRS S3-1 paragraphs 14 and 16 (a)	157
100	ESRS S3-1 paragraphs 16, 16 (c) and 17	157
101	ESRS S3-2 paragraphs 21 (a), 21 (b), 21 (c) and 21 (d)	158
102	ESRS S3-3 paragraphs 27 (a), 27 (b), 27 (c) and 27 (d)	158
103	ESRS S3-4 paragraphs 32 (a), 32 (b), 32 (c), 32 (d), 33 (a), 33 (b), 33 (c), 34 (b), 35, 36 and 38	158





Footnote	ESRS disclosures	Page
104	ESRS S3-5 paragraphs 41, 42 (a), 42 (b) and 42 (c), and MDR-T paragraph 81 (b) ii	160
105	ESRS 2 SBM-3 paragraphs 10, 10 (a), 10 (a) i, 10 (a) ii, 10 (a) iii and 10 (a) iv	161
106	ESRS 2 SBM-3 paragraph 48	162
107	ESRS 2 SBM-3 paragraph 10 (b)	162
108	ESRS 2 SBM-3 paragraphs 10 (c) and 10 (d)	162
109	ESRS S4-1 paragraphs 15 and 17	163
110	ESRS S4-1 paragraphs 16, 16 (a) and 16 (b)	164
111	ESRS S4-1 paragraph 16 (c)	164
112	ESRS S4-2 paragraphs 20, 20 (a), 20 (b), 20 (c), 20 (d), 21 and 26	164
113	ESRS S4-3 paragraphs 25 (a), 25 (b), 25 (c) and 25 (d)	165
114	ESRS S4-4 paragraphs 30, 31 (a), 31 (b), 31 (c), 31 (d), 32 (a), 32 (b), 32 (c) and 33 (a)	165
115	ESRS S4-4 paragraphs 33 (b), 34 and 37	167
116	MDR-T paragraphs 80 and 81 (b) ii, and ESRS S4-5 paragraphs 41 (a), 41 (b) and 41 (c)	168
117	ESRS G1-1 paragraphs 9, 10 (a), 10 (c), 10 (e), 10 (h), ESRS S1-1 paragraph 24 (b), and S1-2 paragraph AR 24 (c)	169
118	ESRS G1-2 paragraphs 14, 15 (a) and 15 (b)	172
119	ESRS G1-3 paragraphs 18 (a), 20, 21 (a), 21 (b) and 21 (c)	172
120	ESRS G1-4 paragraphs 24 (a) and 24 (b)	173
121	ESRS G1-5 paragraphs 29 (a) and 29 (b)	173
122	ESRS G1-6 paragraphs 33 (a), 33 (b), 33 (c) and 33 (d)	173
123	ESRS 2 IRO-2 paragraph 56	184
127	ESRS 2 SBM-3 paragraph 48 (a) and ESRS E1 SBM-3 paragraph 18	247
135	ESRS 2 SBM-3 paragraph 48 (a) and ESRS E1 SBM-3 paragraph 18	282
140	ESRS E1.IRO-1 paragraph 20 (b) (AR 11)	298







Appendix B – GRI index

The GRI index is unaudited.

GRI 1 used		GRI 1: Foundation 2021		
GRI 1: Foundation 2021		GRI 1-07 Publication of GRI list		Appendix B – GRI index
GRI 2: General disclosures		The organisation and its reporting practices		
	GRI 2-1	Organisational details	A.2.1, A.2.5, A.2.6, A.2.7	Sava Insurance Group and Sava Re
	GRI 2-2	Entities included in the organisation’s sustainability reporting	A.2.5, A.2.6, A.2.7, B.ESRS 2, C.3	Sava Insurance Group
	GRI 2-3	Reporting period, frequency and contact point	A.2.7, B.ESRS 2	Sava Insurance Group
	GRI 2-4	Restatements of information	B.ESRS 2	Sava Insurance Group
	GRI 2-5	External assurance	B.1, C.1	/
	Activities and workers			
	GRI 2-6	Activities, value chain and other business relationships	A.2.5, A.2.7, A.2.8, B.ESRS 2	Sava Insurance Group
	Governance			
	GRI 2-9	Governance structure and composition	A.2.7, A.5, B.ESRS 2	Sava Insurance Group
	GRI 2-10	Nomination and selection of the highest governance body	A.4	Sava Re
	GRI 2-12	Role of the highest governance body in overseeing the management of impacts	A.5.3, B.ESRS 2	Sava Insurance Group
	GRI 2-13	Delegation of responsibility for managing impacts	A.5.3, B.ESRS 2	Sava Insurance Group
	GRI 2-14	Role of the highest governance body in overseeing the management of impacts	A.5.3, B.ESRS 2	Sava Insurance Group
	GRI 2-15	Conflict of interest	ESRS G1-3	Sava Insurance Group
	GRI 2-16	Mechanisms for managing internal and external risks	A.10, B.ESRS 2, C.3.6	Sava Insurance Group and Sava Re
	GRI 2-17	Collective knowledge of the highest governance body	A.5.3, B.ESRS 2	Sava Insurance Group and Sava Re
	GRI 2-18	Evaluation of the performance of the highest governance body	A.5.4, B.ESRS 2	Sava Insurance Group
	GRI 2-19	Remuneration policies	B.ESRS 2 GOV-3	Sava Insurance Group
	GRI 2-20	Process to determine remuneration	A.5.3	Sava Re
	Strategy, policies and practices			
	GRI 2-22	Statement on sustainable development strategy	B.ESRS 2	Sava Insurance Group
	GRI 2-23	Policy commitments	A.5, A.6.1, A.10, B.ESRS 2	Sava Insurance Group
	GRI 2-24	Corporate culture and values	A.6, B.ESRS 2	Sava Insurance Group
	GRI 2-27	Reducing the negative impact of the operations on the environment	B.ESRS 2 in B.ESRS E1	Sava Insurance Group
	GRI 2-28	Membership in associations	B.ESRS G1	Sava Insurance Group and Sava Re
	Approach to stakeholder engagement			
	GRI 2-29	Approach to stakeholder engagement	A.3, B.ESRS 2	Sava Insurance Group
	GRI 2-30	Collective bargaining agreements	B.ESRS S1-8	Sava Insurance Group
GRI 3: Material Topics 2021		Disclosures on material topics		
	GRI 3-3	Management of material topics	A.5, A.10, B.ESRS 2, C.3.5	Sava Insurance Group
	GRI 3-1	Process to determine material topics	B.ESRS 2	Sava Insurance Group
	GRI 3-2	List of material topics	B.ESRS 2	Sava Insurance Group
ECONOMIC IMPACTS				
GRI 201: Economic performance	GRI 3-3	Management of material topics	A.6.4, A.8	Sava Insurance Group
	201-01	Direct economic value generated	A.8.1	Sava Insurance Group
	201-02	Financial implications and other risks and opportunities due to climate change	B.ESRS E1.SBM-3, C.3.6.3.1, C.3.6.4.3	Sava Insurance Group
	201-04	Donations and sponsorships	B.ESRS S3	Sava Insurance Group
GRI 202: Market presence	GRI 3-3	Management of material topics	B.ESRS S1	Sava Insurance Group
	202-01	Creating direct employment opportunities	B.ESRS S1-6	Sava Insurance Group
GRI 203: Indirect economic impacts	GRI 3-3	Management of material topics	B.ESRS S3	Sava Insurance Group
	203-01	Infrastructure investments and services supported	B.ESRS S3	Sava Insurance Group
GRI 205: Prevention of corruption	GRI 3-3	Management of material topics	B.ESRS G1	Sava Insurance Group
	205-01	Operations assessed for risks related to corruption	B.ESRS G1-1	Sava Insurance Group
	205-02	Anti-corruption training	B.ESRS G1-3	Sava Insurance Group
	205-03	Confirmed incidents of corruption and actions taken	B.ESRS G1-4	Sava Insurance Group
ENVIRONMENTAL STANDARDS				
GRI 302: Energy	GRI 3-3	Management of material topics	B.ESRS E1-2, E1-3	Sava Insurance Group
	302-01	Energy consumption within the organisation	B.ESRS E1-5	Sava Insurance Group
GRI 305: Emissions	GRI 3-3	Management of material topics	B.ESRS E1-3	Sava Insurance Group
	305-01	Direct GHG emissions	B.ESRS E1-4, E1-6	Sava Insurance Group
	305-02	Indirect GHG emissions	B.ESRS E1-4, E1-6	Sava Insurance Group
	305-03	Other indirect GHG emissions	B.ESRS E1-4, E1-6	Sava Insurance Group
GRI 308: Supplier environmental assessment	308-01	Suppliers that were screened using environmental criteria	B.ESRS G1-2	Sava Insurance Group



GRI 1 used				
GRI 1: Foundation 2021				
SOCIAL IMPACTS				
GRI 2 and GRI 3: Recruitment	GRI 3-3	Management of material topics	B.ESRS S1 SBM-3, S1-1, S1-2	Sava Insurance Group
	401-02	Work-related injuries	B.ESRS S1-14	Sava Insurance Group
	2-7	Recruitment, staffing levels	B.ESRS S1-6	Sava Insurance Group
	2-21	Responsibility for ethical practices	B.ESRS S1-16	Sava Insurance Group
	2-23	Respect for human rights of employees	B.ESRS S1-1	Sava Insurance Group
	2-24	Implementation of organisation's commitments with and through its relationships with employees; training that the organisation provides on implementing the commitments	B.ESRS S1-4	Sava Insurance Group
	2-29	The organisation's commitment to provide for, or cooperate in, the remediation of adverse impacts in the employee area	B.ESRS S1-1	Sava Insurance Group
	2-25	The organisation's approach to identifying and addressing complaints, including grievance mechanisms	B.ESRS S1-1, S1-3, S1-17	Sava Insurance Group
	2-12	Description of the governance bodies' engagement with employees in the organisation's due diligence and other processes to identify the organisation's impacts	B.ESRS S1-2	Sava Insurance Group
	2-26	Mechanisms for raising concerns regarding employees	B.ESRS S1-3	Sava Insurance Group
GRI 202	2-30	Collective bargaining	B.ESRS S1-8	Sava Insurance Group
	2-27	Collective bargaining agreements	B.ESRS S1-17	Sava Insurance Group
	202-1	Adequate wages	B.ESRS S1-10	Sava Insurance Group
GRI 401: Recruitment	GRI 3-3	Management of material topics	B.ESRS S1 SBM-3	Sava Insurance Group
	401-1	Employee turnover	B.ESRS S1-6	Sava Insurance Group
	401-3	Work-life balance	B.ESRS S1-15	Sava Insurance Group
GRI 403: Health and safety at work	GRI 3-3	Management of material topics	B.ESRS S1 SBM-3	Sava Insurance Group
	403-01	Occupational health and safety management system	B.ESRS S1-1	Sava Insurance Group
	403-02	Hazard identification, risk assessment and incident investigation for employees	B.ESRS S1-3	Sava Insurance Group
	403-08	Occupational health and safety programmes for employees	B.ESRS S1-14	Sava Insurance Group
	403-09	The work-related hazards that pose a risk of injury, including measures	B.ESRS S1-4, S1-14	Sava Insurance Group
	403-10	The work-related hazards that pose a risk of ill health, including measures	B.ESRS S1-4, S1-14	Sava Insurance Group
GRI 404: Education and training	GRI 3-3	Management of material topics	B.ESRS 2 SBM-3	Sava Insurance Group
	404-01	Employee training and development	B.ESRS S1-13	Sava Insurance Group
	404-03	Performance and career development reviews	B.ESRS S1-13	Sava Insurance Group
GRI 405: Diversity and equal opportunities	GRI 3-3	Management of material topics	B.ESRS SBM-3	Sava Insurance Group
	405-01	Employee characteristics	B.ESRS S1-6, S1-9	Sava Insurance Group
	405-1	Persons with disabilities	B.ESRS S1-12	Sava Insurance Group
	405-02	Remuneration metrics, ratio of basic salary of women to men	B.ESRS S1-16	Sava Insurance Group
GRI 406	GRI 3-3	Management of material topics	B.ESRS SBM-3	Sava Insurance Group
	406-01	Discrimination	B.ESRS S1-17	Sava Insurance Group
Local communities	GRI 3-3	Management of material topics	B.ESRS S3	Sava Insurance Group
	GRI 2-23	Respect for human rights of community representatives	B.ESRS S3-1	Sava Insurance Group
	GRI 2-25	Processes to remediate negative impacts	B.ESRS S3-1, S3-3, S3-4	Sava Insurance Group
	GRI 2-26	Grievance mechanisms for local communities	B.ESRS S3-3	Sava Insurance Group
	GRI 2-29	Approach to local community engagement	B.ESRS S3-2	Sava Insurance Group
	203-02	Significant indirect economic impacts on local communities	B.ESRS S3-4	Sava Insurance Group
GRI 413: Local communities	413-01	Operations with local community engagement, impact assessments, and development programs	B.ESRS S3 SBM-3	Sava Insurance Group
	413-02	Operations with negative impacts on local communities	B.ESRS S3 SBM-3 (not identified)	Sava Insurance Group
Consumers and end-users	GRI 3-3	Management of material topics	B.ESRS S4	Sava Insurance Group
	2-23	Respect for human rights of customers	B.ESRS S4-1	Sava Insurance Group
	2-29	The organisation's commitment to provide for, or cooperate in, the remediation of adverse impacts in the customer area	B.ESRS S4-1, S4-2	Sava Insurance Group
	2-25	The organisation's approach to identifying and addressing customer complaints, including grievance mechanisms	B.ESRS S4-1, S4-3, S4-4	Sava Insurance Group
	2-12	Role of the highest governance body in overseeing and managing sustainability topics in relation to customers	B.ESRS S4-2	Sava Insurance Group
	2-26	Grievance mechanisms	B.ESRS S4-3	Sava Insurance Group
GRI 417: Marketing and labelling	417-01	Requirements for product and service information and labelling	B.ESRS S4-2	Sava Insurance Group
GRI 418: Consumer privacy and data protection	418-01	Complaints concerning customer privacy and personal data protection	B.ESRS S4-3, G1 – Protection of personal data	Sava Insurance Group
GOVERNANCE IMPACTS				
GRI 2 and GRI 3	GRI 3-3	Management of material topics	B.ESRS G1	Sava Insurance Group
	2-9	Organisational structure	B.ESRS G1-5	Sava Insurance Group
	2-16	Corporate governance and responsibility for sustainability	B.ESRS G1-1	Sava Insurance Group
	2-23	Methods and extent of control over the organisation	B.ESRS G1-1	Sava Insurance Group
	2-24	Relations with stakeholders	B.ESRS G1-1	Sava Insurance Group
	2-26	Grievance and feedback mechanisms	B.ESRS G1-1	Sava Insurance Group
	2-27	Compliance with laws and regulations	B.ESRS G1-4	Sava Insurance Group
GRI 204: Procurement practices	204-01	Proportion of spending on local suppliers	B.ESRS G1 (proportion not disclosed)	Sava Insurance Group
GRI 205: Corruption	205-1	Anti-corruption in the company	B.ESRS G1-3	Sava Insurance Group
	205-2	Anti-corruption procedures	B.ESRS G1-3	Sava Insurance Group
GRI 308: Suppliers' environmental impacts	308-1	Screening of suppliers for environmental impacts	B.ESRS G1-2	Sava Insurance Group
GRI 401: Suppliers' social impacts	414-1	Screening of suppliers for social impacts	B.ESRS G1-2	Sava Insurance Group
GRI 415: Contributions to political parties	405-01	Contributions to political parties	B.ESRS G1-5	Sava Insurance Group