Board of Directors' Report and Financial Statements

2024

SAMPO GROUP

Contents

REPORTS FOR THE YEAR 2024
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Board of Directors' Report 2024

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Review of the 2024 financial year

Sampo Group sustained strong top-line growth in 2024, fuelled by solid performance in the Group's growth areas, such as the UK, personal insurance, and digital sales. Strong growth, combined with positive underlying trends, drove underwriting result growth of 13 per cent.

Gross written premiums (GWP) and brokerage income increased by 12 per cent on a currency adjusted and a reported basis to EUR 9,931 million (8,870) in 2024. If enjoyed 6.7 per cent currency adjusted GWP growth, driven by high and stable retention and price actions to mitigate claims inflation. Private saw 6.5 per cent currency adjusted growth, as strong development in growth areas such as personal insurance and private property, offset slower growth in motor lines due to weak new car sales. Commercial delivered a healthy 5.6 per cent currency adjusted growth despite sluggish economic activity, while Industrial achieved 9.5 per cent currency adjusted growth, supported by rate action, increased values, and a good renewals outcome. Topdanmark reported GWP growth of 16 per cent driven by the acquisition of Oona Health, rate actions, and organic growth of 8 per cent.

The Group's UK operations had a strong year with 23 per cent GWP growth on local currency basis. The top-line growth was driven by an increase in policy count and higher average premiums. In total, the policy count increased by 12 per cent to 3.9 million at the end of 2024, driven by 8 per cent growth in motor, and 34 per cent growth in home. Policy growth in motor was supported by strong development in new products, such as telematics, bike and van insurance, as well as selective growth in the core portfolio.

Claims experience was mixed in 2024 as the harsh Nordic winter in the first quarter was followed by more typical weather conditions and an elevated large claims outcome, particularly in the second and third quarter. In total, severe weather and large claims had a 3.3 percentage points negative effect on the Group combined ratio. Nevertheless, the Group combined ratio improved to 84.3 per cent (84.6), and combined with strong top-line growth, led to a 13 per cent increase in the underwriting result on a currency adjusted basis and on a reported basis, reaching EUR 1,316 million (1,164).

Underlying margin development remained positive throughout the year with the Group underlying combined ratio improving by 1.5 percentage points. The improvement was driven by particularly strong performance in the UK, while the Nordics also experienced a steady positive trend. If reported an undiscounted adjusted risk ratio improvement of 0.3 percentage points year-on-year, supported by disciplined underwriting and rate actions to cover Nordic claims inflation, which stood at around 4 per cent at the end of 2024. Further, If improved its cost ratio by 0.3 percentages points, slightly ahead of the 0.2 percentage points annual ambition. In the UK, motor prices were in a downtrend towards the end of the year, while loss costs continued to benefit from favourable claims frequency trends.

The net financial result amounted to EUR 636 million (560). Net investment income declined to EUR 888 million (1,006), following weaker market performance in the fourth quarter than in the prior year, which benefited from exceptionally favourable market conditions. The Group fixed income running yield was 3.9 per cent, while the mark-to-market yield amounted to 4.2 per cent at the end of 2024. Insurance finance income or expense (IFIE) amounted to EUR -252 million (-446), including a negative effect from unwind of discounting of EUR -238 million (-248). Changes in discount rates had a negative effect of EUR -25 million (-160) on IFIE.

Profit before taxes was EUR 1,559 million (1,481), including non-recurring costs of around EUR 150 million related to the Topdanmark integration. Excluding this, profit before taxes would have been EUR 1,709 million. Operating EPS grew 13 per cent to EUR 2.33 (2.07) driven by increased underwriting profit. Sampo targets more than 7 per cent operating EPS growth on average over 2024–2026.

The Group Solvency II ratio, net of the proposed dividend, amounted to 177 per cent at the end of 2024, down from 182 per cent at the end of 2023. Financial leverage stood at 26.9 per cent at the end of 2024, up from 25.3 per cent at the end of 2023. Sampo targets a solvency ratio of 150–190 per cent and a financial leverage of below 30 per cent.

On 6 February 2025, Sampo plc's Board of Directors proposed a regular dividend of EUR 1.70 per share for

2024 to the Annual General Meeting to be held on 23 April 2025. This represents growth of 6 per cent from the prior year regular dividend of EUR 1.60 per share. On 5 February 2025, the Board resolved upon a share split so that 4 new shares will be issued for each existing share. Adjusted for the share split, the proposed regular dividend is EUR 0.34 per share.

On 17 June 2024, Sampo announced that Sampo and Topdanmark have entered into a combination agreement, pursuant to which Sampo will make a recommended best and final public exchange offer to acquire Topdanmark. The acquisition was successfully completed in October 2024. The new Sampo shares were listed on Nasdaq Copenhagen and the trading commenced on 18 September 2024. The exchange offer is summarised in section Other developments.

To reduce the dilution effect from the Topdanmark exchange offer, Sampo allocated EUR 800 million to share buybacks and the squeeze-out of Topdanmark minority shares. As a result, EUR 475 million were used to buybacks and EUR 325 for the squeeze-out. In total, Sampo repurchased and cancelled 11,747,690 of its own A shares in 2024.

In its outlook for 2025, Sampo expects the deliver insurance revenue of EUR 8.7 - 9.0 billion, representing growth of 4 - 7 per cent, and an underwriting result of EUR 1,350 - 1,450 million, implying an increase of 3 - 10 per cent. The outlook is consistent with Sampo's financial targets of achieving a combined ratio below 85 per cent annually and operating EPS growth of more than 7 per cent on average over 2024-2026.

Key figures

Sampo Group, 2024

EURm	1–12/2024	1–12/2023	Change, %
Profit before taxes	1,559	1,481	5
If	1,256	1,358	-8
Topdanmark	137	162	-15
Hastings	193	129	49
Holding	-29	-160	—
Net profit for the equity holders	1,154	1,323	-13
Operating result	1,193	1,046	14
Underwriting result	1,316	1,164	13
			Change, %
Earnings per share (EUR)	2.25	2.62	-14
Operating EPS (EUR)	2.33	2.07	13
Return on equity own funds, %	29.5	24.7	—

Net profit for the equity holders and earnings per share for 2023 include result from life operations.

Financial targets

Sampo Group, 2024-2026

Target	2024
Operating EPS growth: over 7% (period average)	13%
Group combined ratio: below 85%	84.3%
Solvency ratio: 150-190%	177%
Financial leverage: below 30%	26.9%

Outlook

Operating environment and assumptions

The acquisition of Topdanmark in 2024 completed Sampo's transition into a fully integrated P&C insurance group. Sampo has an attractive operational footprint as the leader in the consolidated Nordic P&C insurance market, and a leading operator in the growing digital UK P&C insurance market, positioning the Group to deliver both stability and growth.

Competitive dynamics remain rational across the Group's areas of operation going into 2025, while demand for P&C insurance is stable despite limited economic growth. Sampo expects claims cost to continue to grow above the long-term trend over the year, driven by factors including rising repair costs for new cars and continued wage and service inflation. At Group level, underlying claims cost is expected to see a mid-single digit per cent increase in 2025, and the Group remains firmly committed to conservatively reflecting this in its pricing.

The strategic and operational investments made by Sampo over recent years have substantially strengthened its competitive position. The Group has unique digital capabilities across distribution, pricing, underwriting and claims handling that enable it to deliver superior service and efficiency. Further, the integration of Topdanmark into the Group is expected to enable financial benefits through the delivery of scale benefits and synergies.

Outlook for 2025

The outlook for Sampo Group's 2025 financial performance is:

- Group insurance revenue: EUR 8.7–9.0 billion, representing growth of 4–7 per cent year-on-year.
- Group underwriting result: EUR 1,350–1,450 million, representing growth of 3–10 per cent year-on-year.

The outlook for 2025 is consistent with Sampo's 2024–2026 financial targets of delivering a combined ratio below 85 per cent annually and Operating EPS growth of more than 7 per cent annually on average.

The outlook is subject to uncertainty related to occurrence and estimation of the cost of P&C claims, investment performance, foreign exchange rates and competitive dynamics. Revenue forecasts, in particular, are subject to competitive conditions, which may change rapidly in some areas, such as the UK motor insurance market. The revenue and underwriting profit figures in the outlook are based on 31 December 2024 currency exchange rates.

A full explanation of the alternative performance metrics used in the Outlook can be found in the section **Calculation of key figures**.

The major risks and uncertainties for the Group in the near-term

In its current day-to-day business activities Sampo Group is exposed to various risks and uncertainties, mainly through its major business units. Major risks affecting the Group companies' profitability and its variation are market, credit, insurance, and operational risks. At the Group level, sources of risks are the same, although they are not directly additive due to the effects of diversification.

Uncertainties in the form of major unforeseen events may have an immediate impact on the Group's profitability. The identification of unforeseen events is easier than the estimation of their probabilities, timing, and potential outcomes. Macroeconomic and financial market developments affect Sampo Group primarily through the market risk exposures it carries via its insurance company investment portfolios and insurance liabilities. Over time, adverse macroeconomic effects could also have an impact on Sampo's operational business, for example, by reducing economic growth or increasing claims costs.

Inflation continued to fall in 2024 with euro-area headline inflation being already close to the central bank target. However, the fall in inflation has largely come from lower goods inflation and a decline in energy prices. Whereas the fall in goods inflation has been supported by supply-chain normalisation, it may rise if trade restrictions increase import prices, and energy prices continue to be vulnerable to geopolitical events. Furthermore, rapid wage growth has kept services inflation high and could continue to keep price pressures elevated unless labour markets loosen as currently expected. This creates uncertainty on whether central banks will be willing to cut interest rates as swiftly as expected. This may lead to both a significant slowdown in economic growth and a deterioration in the debt service capacity of businesses, households and governments, raising the risk of abrupt asset repricing in financial markets. Furthermore, the potential escalation of wars in Ukraine and the Middle East represent a major economic risk. Combined with historically high equity market valuations in the US in particular, these developments are currently causing significant uncertainties in economic and capital market development. At the same time, rapidly evolving hybrid threats create new challenges for states and businesses. There are also a number of widely identified macroeconomic, political, and other sources of uncertainty which can, in various ways, affect the financial services industry in a negative manner.

Sampo Group's insurance exposures in Russia or Ukraine are limited to certain Nordic industrial line clients, with coverage subject to war exclusions. On the asset side, Sampo has no material direct investments in Russia or Ukraine. Given the limited direct exposure, the biggest risk from the war in Ukraine to Sampo relates to the second order capital markets and macroeconomic effects outlined above.

Other sources of uncertainty are unforeseen structural changes in the business environment, and already identified trends and potential wide-impact events. These external drivers may have a long-term impact on how Sampo Group's business will be conducted. Examples of identified trends are demographic changes, climate change, and technological developments in areas such as artificial intelligence and digitalisation, including threats posed by cybercrime.

Dividend proposal

Sampo plc's dividend policy is to pay a stable and sustainable regular dividend that grows in line with Sampo Group's operating result over time. In addition to this, excess capital is returned through share buybacks and/or extra dividends, to the extent that it is not utilised to support business development.

Pursuant to Sampo plc's dividend policy applicable to the distribution of 2024 earnings, total annual dividends paid shall represent at least 70 per cent of Sampo Group's operating result for the year. The Group's operating result for the financial year 2024 amounted to EUR 1,193 million. The parent company's distributable capital and reserves totalled EUR 7,851 million, of which profit for the financial year 2024 was EUR 1,863 million.

Based on the policies outlined above, the Board proposes to the Annual General Meeting that a total dividend of EUR 1.70 per share be paid, except for any shares held by Sampo plc on the dividend record date of 25 April 2025. However, if the share issue without consideration in proportion to shares owned by shareholders (share split), as announced by Sampo plc on 5 February 2025, is successfully carried out and effected after the date of this proposal but prior to the dividend record date, the proposed total dividend shall instead be EUR 0.34 per share, except for any shares held by Sampo plc on the dividend record date of 25 April 2025.

The Board proposal to the Annual General Meeting corresponds to a total dividend of EUR 915 million in the aggregate, equating to a payout ratio of 77 per cent of the Group's operating result for the financial year 2024.

The remainder of the distributable funds are left in the company's equity capital. After adjusting for the proposed dividend, the parent company's 2024 year-end distributable funds amounted to approximately EUR 6,936 million and Group Solvency II ratio to 177 per cent. The Group's 2024 year-end financial leverage was 26.9 per cent.

Dividend payment

The dividend is proposed to be paid to the shareholders registered in the company's shareholders register maintained by Euroclear Finland Oy, as at the record date of 25 April 2025. The Board proposes that the dividends be paid on 6 May 2025.

The issuer of the Swedish depository receipts shall ensure that the dividend is paid to the depository receipt holders registered in the securities depository and settlement register maintained by Euroclear Sweden AB, as at the record date of 25 April 2025, with payment made in Swedish Krona.

The dividend payment for shares registered in the form of share entitlements book-entered in VP Securities A/S in Denmark, as at the record date of 25 April 2025 will be administered by VP Securities A/S subsequent to receipt of the dividend by Euroclear Finland.

Financial position

No significant changes have taken place in the company's financial position since the end of the financial year. The company's liquidity position is good and, in the view of the Board, the proposed distributions do not jeopardise the company's ability to fulfil its obligations.

Operating environment

Nordic countries

During the year, the Nordic P&C industry experienced further consolidation, which, combined with new ambitious financial targets among major players, is expected to strengthen existing financial discipline. The four largest players now account for approximately 80–90 per cent of the markets in Norway, Finland, and Sweden, respectively. In Denmark, the top four insurers control nearly 70 per cent of the market. Several insurers are also established in more than one Nordic country.

In 2024, Nordic claims inflation stabilised from the elevated levels of recent years. Although inflation generally declined across the Nordics, there were some local and segment variations in claims inflation. In the property segment, claims inflation remained moderate, while motor claims inflation stabilised at a somewhat elevated level, partly due to pressure from weak currencies. For If P&C, claims inflation slowed to around 4 per cent toward the end of the year.

Throughout the year, price increases aimed at mitigating claims inflation persisted, with some players reporting significant hikes in areas where rate adequacy had previously been insufficient.

The private market experienced intense competition, while price increases continued to be generally accepted by customers. In the corporate market, larger players focused on select growth areas, with the SME segment being a key priority for several. The competitive landscape in the large corporate segment was impacted by the withdrawal of certain local competitors, which limited the effect of rate increases on retention. Over recent years, substantial rate increases have been implemented, driving significant profitability improvements in the segment. The renewal outcome in both the corporate and large corporate segments at the start of 2025 appears favourable so far with continued rate increases generally observed throughout the market.

Historically, the Nordic P&C market has achieved higher and more stable retention levels than other European P&C markets with retention rates ranging between 85 and 90 per cent. Despite ongoing premium increases throughout the year, the demand for insurance remained broadly stable, and retention rates in 2024 continued to be strong.

In the first quarter of 2024, the Nordic countries experienced a more extreme winter season than usual. The increase in weather-related claims was primarily driven by prolonged cold weather, heavy snowfall, storms, and freeze-thaw cycles with high precipitation, impacting both the motor and property segments. For the remainder of the year, weather conditions were relatively benign in the Nordics, with some localised storms and instances of heavy rainfall.

The trend of modest new car sales continued in 2024, with a 5 per cent decline compared to the previous year. In Sweden, new car registrations in 2024 reached the lowest level in ten years, driven by the economic downturn, high interest rates, and the government's announced policies, which did not fully stimulate demand. Among the four Nordic countries, only Norway saw growth in new car sales during the year.

United Kingdom

The UK motor claims environment has been broadly positive during 2024 with both reduced frequencies and a lower rate of inflation than the previous year. Claims cost inflation, whilst remaining elevated compared to historical average trends, has continued to reduce from the peak seen in early 2023. Claims frequency reductions have been seen across most heads of damage, that is accidental damage, third party property damage, and bodily injury. This development is partially due to driving behaviour and favourable weather conditions in both first and fourth quarter.

As result, premiums in the competitive UK market have softened during 2024, as insurers pass on the benefits of these claims dynamics to consumers. Price comparison websites ('PCW'), Hastings' primary distribution channel, remain by far the largest sales channel for UK car and home insurance customers. Whilst consumer switching rates are now slowing in line with falling market prices, the overall size of the PCW market has continued to grow, with Hastings as a beneficiary given our business model.

Government and regulatory activity has continued across a range of topics. A government taskforce has been created with the intention of tackling the causes of rising motor insurance prices seen in previous periods, and the FCA continues to be active across many fronts. Hastings is supportive of efforts to address the causes of high claims costs, including tackling fraud, so that customers can benefit from lower prices.

Business areas

If

If P&C is the leading property and casualty insurer in the Nordic region, where it offers solutions in all major lines of business through its four business areas; Private, Commercial, Industrial and Baltic. If P&C's business model is based on high customer satisfaction, best in class underwriting and leveraging the scale benefits that its unified Nordic model offers. Excellent digital sales and service capabilities are a core part of If's strategy, particularly in the Private and SME Commercial market segments.

Underwriting performance

If reported an insurance service result of EUR 890 million (842) and a combined ratio of 83.1 per cent (83.1) in 2024. The underlying margin trend remained positive with an undiscounted adjusted risk ratio improvement of 0.3 percentage points and a cost ratio reduction of 0.3 percentage points year-on-year. Although the fourth quarter was affected by some elevated large claims and severe weather claims, the impact was less pronounced than during the same period last year.

Premium development

If reported GWP of EUR 5,860 million (5,468) in 2024. Excluding currency effects, premiums grew by 6.7 per cent year-on-year. Growth was robust across business areas and countries, and driven primarily by re-pricing, increased values, and stable retention levels.

Currency adjusted GWP growth in 2024 in Private was 6.5 per cent driven mainly by price increases covering claims inflation. The positive GWP development during the year was supported by 12 per cent growth in personal insurance, and 6 per cent growth in Private property insurance. Growth in the Private motor products was dampened by low new car sales volumes and stood at 5 per cent. Geographically, all countries contributed to growth with the Norwegian business being particularly strong.

Results

If, 2024

EURm	2024	2023	Change, %
Gross written premiums	5,860	5,468	7
Insurance revenue, net	5,258	4,996	5
Claims incurred, net	-3,267	-3,093	6
Operating expenses and claims handling costs	-1,101	-1,061	4
Insurance service result / underwriting result	**890**	**842**	**6**
Net investment income	652	871	-25
Insurance finance income or expense, net	-188	-331	-43
Net financial result	**464**	**539**	**-14**
Other items	-98	-24	315
Profit before taxes	**1,256**	**1,358**	**-8**

Key figures

EURm	2024	2023	Change
Combined ratio, %	83.1	83.1	-0.1
Cost ratio, %	20.9	21.2	-0.3
Risk ratio, %	62.1	61.9	0.2
Large claims	1.7	1.3	0.4
Severe weather	2.6	3.4	-0.8
Risk adjustment and other technical effects, current year %	1.3	1.2	0.1
Prior year development, %	-5.1	-5.3	0.2
Adjusted risk ratio, current year, %	61.5	61.3	0.2
Discounting effect, current year, %	-2.8	-3.4	0.5
Undiscounted adjusted risk ratio, current year, %	64.4	64.7	-0.3
Loss ratio, %	67.6	67.6	0.0
Expense ratio, %	15.5	15.6	-0.1

All the key figures in the table above are calculated on a net basis. Key ratios are based on SEK figures.
Large claims measured against budget but severe weather claims are reported in full; negative figures indicate a positive outcome. Severe weather includes natural catastrophes.
Negative figures for prior year development indicate positive reserve run-off. The discounting effect represents the impact of discounting of current year claims reserves on the risk ratio.

In 2024, new car sales remained weak with numbers down by 5 per cent year-on-year for the Nordics and 7 per cent for If's largest market, Sweden. Excluding the Swedish mobility business, currency adjusted GWP growth in 2024 was 7.6 per cent in Private and 7.2 per cent for If P&C.

Despite rate increases during the year, Private retention rate was stable at 89 per cent. The development of digital services and digital engagement in the Private business area remained strong in 2024, following consistent investments in this area over many years. Digital sales increased by 10 per cent during the year, and online claims continued to increase and stood at 64 per cent (61) at the end of the year.

Currency adjusted GWP growth in Commercial for 2024 was 5.6 per cent. The positive development was supported by successful renewals, continuous rate increases in line with claims inflation, and strong retention. Throughout the year, the SME segment grew by more than 5 percent, with growth accelerating towards the end of the year.

In 2024, digital sales in Commercial increased by 24 per cent year-on-year. Strong momentum in online sales and accelerated expansion of the digital offering with increased usage of self-service solutions contributed to the positive development.

Industrial reported GWP growth of 9.5 per cent on a currency adjusted basis in 2024 mainly driven by rate actions, increased values, and a good renewals outcome. Industrial continued to reduce exposures to specific large property risks to ensure lower large claims volatility.

The Baltic business delivered currency adjusted GWP growth of 4.8 per cent in 2024. The development was driven by repricing initiatives but impacted by rising competition in the second half of the year.

Combined ratio development

If reported combined ratios of 83.1 per cent (83.1) for the year 2024.

After a favourable large claims outcome in the first quarter of the year, the subsequent quarters saw adverse large claims development in both Industrial and Commercial. Large claims in the year were mainly driven by large property claims and had a 1.7 percentage points negative effect on the combined ratio.

During the year, severe weather events had a negative impact of 2.6 percentage points on the combined ratio. The first quarter of the year was the most severely affected due to an unusually harsh Nordic winter and Storm Ingunn. If's large claims outcome is reported as a deviation against budget, while severe weather and natural catastrophe effects are disclosed in full.

Prior year gains in the year stood at 5.1 per cent (5.3) and the risk adjustment and other technical effects had an impact of 1.3 percentage points (1.2).

The discounting effect reduced to 2.8 per cent (3.4) for the full year as a result of lower discount rates.

In total, the risk ratio deteriorated by 0.2 percentage points year-on-year to 62.1 per cent (61.9) in 2024. The undiscounted adjusted risk ratio improved by 0.3 percentage points year-on-year.

The 2024 cost ratio improved to 20.9 per cent (21.2), which is in line with If P&C's target for 2024–2026 of a ~20 basis point yearly cost ratio reduction. Education and development costs are included in the cost ratio.

	Combined ratio, %			Risk ratio, %		
	2024	**2023**	**Change, %**	**2024**	**2023**	**Change, %**
Private	82.2	83.1	-0.9	61.5	62.1	-0.6
Commercial	83.6	81.9	1.7	61.9	60.0	1.9
Industrial	88.7	87.3	1.5	69.2	68.3	0.9
Baltic	86.0	85.9	0.0	60.2	59.8	0.4
Sweden	81.2	83.2	-2.0	61.0	63.8	-2.8
Norway	79.9	87.2	-7.3	60.3	66.8	-6.5
Finland	81.0	75.7	5.3	59.2	53.5	5.7
Denmark	108.3	88.4	19.9	83.2	62.9	20.3

Net financial result

For 2024, If's net financial result fell to EUR 464 million (539), as the prior year benefited from exceptionally favourable conditions in the fourth quarter, but the mark-to-market return on investments remained at a respectable 6.0 per cent (8.3).

At the end of December, the fixed income running yield was 4.3 per cent (4.2). However, as a result of increased fixed income instruments' market values, the mark-to-market yield decreased to 4.1 per cent from 4.9 per cent at the end of 2023.

In 2024, the unwind of discounting amounted to EUR -169 million (-180) and changes in discount rates had an impact of EUR -15 million (-136).

Profit before taxes

In total, If reported profit before taxes of EUR 1,256 million (1,358) for 2024, representing a decrease of 8 per cent year-on-year. The profit before taxes was supported by improved underwriting profit and a strong investment result, but offset by lower net investment income and non-recurring costs of EUR 76 million related to the Topdanmark integration that were booked to the fourth quarter.

Topdanmark

Topdanmark is one of the largest P&C insurance companies in Denmark. It focuses on the private, agricultural, and SME markets. In 2024, Sampo acquired the remaining minority interest in Topdanmark, thereby becoming its sole owner.

Topdanmark delivered GWP of EUR 1,553 million (1,339) in 2024, representing an increase of 16 per cent year-on-year driven by the acquisition of Oona Health and organic GWP growth of 8 per cent. The organic growth was driven by rate increases across all major product areas, positive net customer inflow, and specific rate adjustments on workers' compensation effective from 1 July 2024 following the implementation of new legislation affecting the calculation of awarded compensations. The organic GWP growth rate trended positively over the year, rising to 8 in the third quarter and 11 in the fourth quarter as several actors on the Danish P&C insurance market increased prices to reflect higher claims costs.

The combined ratio improved to 84.2 per cent (85.0), largely as a result of weather and large claims falling back into line with expected levels, following an adverse outcome in the prior year. The underlying claims trend deteriorated for the full year, but turned slightly positive in the fourth quarter as rate increases caught up with elevated motor claims inflation, while motor claims frequency stabilised, albeit at a high level. The insurance service result increased to EUR 233 million (194) driven by the strong growth and an improved combined ratio. Topdanmark's net financial result more than doubled to EUR 60 million (27), mainly as a result of mark-to-market effects on liabilities.

The 2024 result was affected by several one-off charges, including EUR 73 million for the integration with If and EUR 15 million of other transaction costs related to the acquisition of Topdanmark minority interests by Sampo in October (further details available in Other developments). Consequently, profit before taxes declined to EUR 137 million (162) despite the strong development in the insurance service and net financial results.

Results

Topdanmark, 2024

EURm	2024	2023	Change, %
Gross written premiums	1,553	1,339	16
Insurance revenue, net	1,470	1,288	14
Claims incurred and claims handling costs, net	-970	-862	13
Operating expenses	-267	-233	15
Insurance service result / underwriting result	**233**	**194**	**20**
Net investment income	93	107	-13
Insurance finance income or expense, net	-33	-79	-59
Net financial result	**60**	**27**	**120**
Other items	-155	-59	163
Profit before taxes	**137**	**162**	**-15**

Key figures

	2024	2023	Change
Combined ratio, %	84.2	85.0	-0.8
Loss ratio, %	66.0	66.9	-0.9
Expense ratio, %	18.1	18.1	0.1

All the key figures in the table above are calculated on a net basis.

Hastings

Hastings is one of the leading digital P&C insurance providers in the UK, serving nearly 4 million car, van, bike, and home insurance customers, with a strong focus on price comparison distribution, pricing and anti-fraud sophistication and digital customer service.

Results

Hastings, 2024

EURm	2024	2023	Change, %
Gross written premiums	2,161	1,706	27
Brokerage revenue	404	357	13
Insurance revenue, net (incl. brokerage)	1,659	1,251	33
Claims incurred and claims handling costs, net	-938	-714	31
Operating expenses	-532	-409	30
Underwriting result	**190**	**128**	**49**
Net investment income	72	79	-8
Insurance finance income or expense, net	-31	-35	-11
Net financial result	**41**	**44**	**-6**
Other items	-39	-42	-7
Profit before taxes	**193**	**129**	**49**

Key figures	2024	2023	Change
Operating ratio, %	88.5	89.8	-1.2
Live customer policies (millions)	3.9	3.5	0.4

All key figures in the table above are calculated on a net basis.

Hastings' gross written premiums for 2024 increased by 23 per cent year-on-year on a constant currency basis to EUR 2,161 million (1,706), reflecting higher earned premiums from rate increases implemented mainly during 2023, alongside increases in live customer policies ('LCP'). Total LCP increased to 3.9 million, up 12 per cent year-on-year, largely due to new business competitiveness. Motor LCP increased by 8 per cent year-on-year, whilst home LCP grew by 34 per cent year-on-year.

During the year, Hastings has observed a moderate slow-down in overall claims inflation, from around the 12 per cent level seen during 2023, to the high single digit range. Claims frequencies in 2024 tracked below historically observed levels, reflecting specific underwriting and claims actions taken by Hastings, alongside favourable weather conditions and other market wide trends.

The underwriting result increased by 49 per cent to EUR 190 million (128) in 2024, reflecting a stronger loss ratio of 61.6 per cent (63.3). Operating expenses increased in line with revenue growth, driven by higher acquisition expenses related to new business volume growth and by sustained investment into digital capabilities and customer servicing initiatives. As such Hastings' operating ratio for the period improved to 88.5 per cent (89.8).

The net financial result decreased slightly to EUR 41 million (44), as a result of both lower interest rates and more modest rate changes that reduced both net investment income and the offsetting unwind of discount on insurance claim liabilities.

As a result of the higher underwriting result, Hastings' profit before taxes increased 49 per cent to EUR 193 million (129). Included within other items is EUR 47 million (41) of non-operational amortisation related to intangible assets identified on acquisition of the Hastings Group by Sampo plc in 2020, without which profit before taxes would have been EUR 239 million (171).

Holding

Sampo plc is the parent company of Sampo Group and responsible for the Group's strategy and capital management activities. In addition to the Group's insurance subsidiaries, a small number of direct investments are held in the holding company.

Results

Holding, 2024

EURm	2024	2023	Change, %
Net investment income	78	-37	—
Other income	2	1	124
Other expenses	-43	-57	24
Finance expenses	-66	-66	1
Profit before taxes	**-29**	**-160**	**82**

Holding segment's profit before taxes for 2024 was EUR -29 million (-160).

Net investment income increased to EUR 78 million (-37), largely due to stable interest yields. The holding company's investment portfolio includes short-term money market investments and short-term bonds, as well as Sampo's financial investments Nexi and NOBA.

The prior year saw mark-to-market losses on holding company's financial investments.

The holding in Saxo Bank was sold to Mandatum at EUR 302 million on a transaction finalised in May 2024. Further details on the transaction are available in **Other developments**.

Financial position

Group solvency

Sampo Group's Solvency II ratio, net of proposed dividend of EUR 1.70 per share, amounted to 177 per cent (182) at the end of 2024, based on own funds of EUR 5,368 million (5,849) and solvency capital requirement of EUR 3,040 million (3,217).

The decrease in own funds was driven by the capital deployment of EUR 800 million into buybacks and squeeze-out in connection with the Topdanmark exchange offer. Also, the restructuring charge of approximately EUR 150 million related to the Topdanmark integration had a negative effect on own funds. The decrease in solvency capital requirement, on the other hand, was driven by the adoption of the Group Partial Internal Model in solvency calculation as of 30 June 2024.

Sampo targets a Solvency II ratio of 150–190 per cent.

Financial leverage position

Sampo Group's financial leverage is calculated as Group financial debt divided by the sum of IFRS shareholders' equity and financial debt. The Group targets financial leverage of below 30 per cent.

The Group's shareholders' equity amounted to EUR 7,059 million (7,687) and financial debt to EUR 2,596 million (2,604) at the end of 2024, translating into a financial leverage of 26.9 per cent, up from 25.3 per cent at the end of 2023. The increase from the prior year was driven mainly by capital deployment of EUR 800 million into buybacks and squeeze-out in connection with the Topdanmark exchange offer. Financial debt remained broadly unchanged during 2024.

More information on Sampo Group's outstanding debt issues is available at **www.sampo.com/debtfinancing**.

Financial debt

Sampo Group, 31 December 2024

EURm	Sampo plc	If	Topdanmark	Hastings	Eliminations	Group total
Sub/hybrid	1,491	131	147	0	-127	1,642
Senior bonds	954	0	0	0	0	954
Total	**2,445**	**131**	**147**	**0**	**-127**	**2,596**

Ratings

Relevant ratings for Sampo Group companies on 31 December 2024 are presented in the table below.

Rated company	**Moody's**		**Standard & Poor's**	
	Rating	**Outlook**	**Rating**	**Outlook**
Sampo plc – Issuer Credit Rating	A2	Stable	A	Stable
If P&C Insurance Ltd – Insurance Financial Strength Rating	Aa3	Stable	AA-	Stable
If P&C Insurance Holding Ltd (publ) - Issuer Credit Rating	-	-	A	Stable

On 25 April 2024, Moody's upgraded Sampo plc's Issuer Credit Rating to A2 with stable outlook and If P&C Insurance Ltd's Insurance Financial Strength Rating to Aa3 with a stable outlook.

Other developments

Public exchange offer for Topdanmark

On 17 June 2024, Sampo announced that Sampo and Topdanmark have entered into a combination agreement, based on which Sampo made a recommended best and final public exchange offer to acquire all of the outstanding shares in Topdanmark not already owned by Sampo. Under the terms of the offer, Topdanmark shareholders received 1.25 newly issued Sampo A shares in exchange for each share held in Topdanmark.

On 8 July 2024, Sampo announced that all necessary regulatory approvals had been obtained for the exchange offer. Sampo's Extraordinary General Meeting (EGM), held on 9 July 2024, authorised the Board to resolve on a share issue to acquire Topdanmark shares.

The offer period began on 9 August 2024 and expired on 9 September 2024. Based on the final result announced on 16 September 2024, Sampo received acceptances representing approximately 92.6 per cent of the entire share capital and total number of voting rights in Topdanmark, excluding Topdanmark's treasury shares.

Based on the final result, the Board resolved to issue 48,198,710 new Sampo A shares to Topdanmark non-controlling shareholders, based on the authorisation received from Sampo EGM. The subscription price for the new A shares was EUR 41.50 per share. The price was determined based on the closing price for the new A shares on Nasdaq Helsinki, at the last full trading day prior to the Sampo Board resolving upon the directed issuance of shares. The new Sampo shares were listed on Nasdaq Copenhagen and the trading commenced on 18 September 2024. The Topdanmark share was delisted from public trading on Nasdaq Copenhagen on 18 October 2024.

On 20 September 2024, Sampo commenced a compulsory acquisition of the 6,613,865 Topdanmark shares held by the remaining minority shareholders of Topdanmark, in accordance with the Danish Companies Act and the VP rule book. The compulsory acquisition was completed on 25 October 2024, Topdanmark thus becoming wholly-owned by Sampo plc. The total acquisition cost of the minority shares amounted to EUR 325 million.

The price per Topdanmark share offered in both the exchange offer and the compulsory acquisition of the minority shares was DKK 366.38, corresponding to 1.25 times the Sampo closing share price of EUR 39.29 on Nasdaq Helsinki on 14 June 2024. The price thereby reflected the valuation of the Topdanmark shares (including the premium of 27 per cent) indicated in the announcement published on 17 June 2024.

The total annual pre-tax run-rate cost and revenue synergies are expected to amount to approximately EUR 95 million, and expected to drive EPS accretion of approximately 6 per cent, based on 2025 consensus earnings expectations. Additional potential net savings from lower one-off IT investments related to Topdanmark's ongoing digital transformation (not included in run-rate synergies), may also be possible. The realisation of synergies is expected to be phased in until 2028, and one-off integration costs are estimated at approximately EUR 150 million and expected to be incurred upfront. Sampo will begin reporting on the delivery of synergies from the first quarter of 2025.

As an internal transaction, Sampo plc sold its Topdanmark shares to If P&C Insurance Holding Ltd on 1 November 2024. The sales price of EUR 4,659 million, equivalent to approximately DKK 34.7 billion, was paid in full by way of a loan agreement and a shareholder's contribution between Sampo and If P&C Insurance Holding Ltd.

Further information on the Topdanmark transaction is available in **Appendix** 28 Acquisition of Topdanmark's non-controlling interest and at **www.sampo.com/topdanmark.**

Proposals to the AGM of 2025

On 9 December 2024, the Nomination and Remuneration Committee of Sampo plc's Board of Directors made its proposals for number, members and remuneration of the Board of Directors.

The Nomination and Remuneration Committee proposes to the AGM, to be held on 23 April 2025, that the number of Board members is decreased by one and that eight members be elected to the Board. The Committee proposes that the current members of the Board Christian Clausen, Steve Langan, Risto Murto, Antti Mäkinen, Markus Rauramo, Astrid Stange and Annica Witschard be re-elected for a term continuing until the close of the next AGM. Of the current members, Georg Ehrnrooth and Jannica Fagerholm are not available for re-election.

The Committee proposes that Sara Mella be elected as a new member to the Board. Sara Mella brings with her more than three decades of banking experience, and she has worked as the Head of Personal Banking and as a member of Nordea's Group Leadership Team since 2019.

The Committee proposes that the Board members elect Antti Mäkinen from among its number as the Chair of the Board and Risto Murto as the Vice Chair.

The Nomination and Remuneration Committee proposes that the following annual fees be paid until the close of the next AGM:

- EUR 243,000 for the Chair of the Board (prev. EUR 235,000);
- EUR 140,000 for the Vice Chair of the Board (prev. EUR 135,000);
- EUR 108,000 for each member of the Board (prev. EUR 104,000);
- EUR 30,000 for the Chair of the Audit Committee as an additional annual fee (prev. EUR 29,000);
- EUR 6,800 for each member of the Audit Committee as an additional annual fee (prev. EUR 6,600).

A Board member must acquire Sampo plc A shares at the price paid in public trading with 50 per cent of his/her annual fee after the deduction of taxes, payments and potential statutory social and pension costs. Notwithstanding this, a Board member is not required to purchase any additional Sampo plc A shares if the Board member owns such amount of said shares that their value is equivalent to twice the respective Board member's gross annual fee.

A Board member shall be obliged to retain the Sampo plc A shares purchased pursuant to this proposal under his/her ownership for two years from the purchasing date. The disposal restriction on the Sampo shares shall, however, be removed earlier in case the director's Board membership ends prior to the release of the restricted shares, i.e. the shares will be released simultaneously when the term of the Board membership ends.

The proposals and the CV of Sara Mella are available at **www.sampo.com/boardproposals**.

Sale of holding in Saxo Bank

On 13 May 2024, Sampo completed the sale of its 19.8 per cent stake in Saxo Bank to Mandatum, as agreed in connection with the partial demerger completed in 2023. The transaction price was EUR 302 million, representing the price agreed in the demerger adjusted for dividends received. Mandatum opted to settle the transaction in cash rather than to utilise the vendor loan of EUR 280 million offered by Sampo.

Group Partial Internal Model

On 2 May 2024, Sampo received approval for its Group Partial Internal Model (PIM) from the Swedish FSA (Finansinspektionen). Sampo adopted the Group PIM in its solvency calculation as of 30 June 2024. The Group PIM recognises the risk profile of Sampo's P&C operations better than the Standard Formula and has reduced the group-level solvency capital requirement (SCR) by EUR 0.3 billion.

Shares, share capital and shareholders

Shares and share capital

At the end of 2024, Sampo's total share count stood at 538,247,772 shares, which were divided into 538,047,772 A shares and 200,000 B shares. The total number of votes attached to the shares was 539,047,772. Each A share entitles the holder to one vote and each B share entitles the holder to five votes at the General Meeting of Shareholders.

During 2024, the share count increased by 36.5 million shares, driven by new shares issued in connection with the Topdanmark exchange offer, but partly offset by share buybacks.

In September 2024, Sampo issued 48,198,710 new Sampo A shares to Topdanmark shareholders. The new shares represented approximately 8.76 per cent of all Sampo shares and approximately 8.75 per cent of the votes conferred by all Sampo shares immediately following the completion of the share issue.

In December 2024, Sampo cancelled 11,747,690 of its own A shares that were repurchased under the buyback programme launched in June 2024.

At the end of 2024, Sampo plc's share capital amounted to EUR 98 million (98) and the Group's equity capital in total to EUR 7,059 million (7,687).

Sampo A shares have been listed on Nasdaq Helsinki since 1988 and on Nasdaq Copenhagen since September 2024. All of the Sampo B shares are held by Kaleva Mutual Insurance Company. B shares can be converted into A shares at the request of the holder.

Sampo's Swedish Depositary Receipts (SDR) have been traded on Nasdaq Stockholm since 2022. Helsinki-listed A shares can be converted into SDRs and vice versa. Approximately 2.7 million SDRs were issued at the end of 2024.

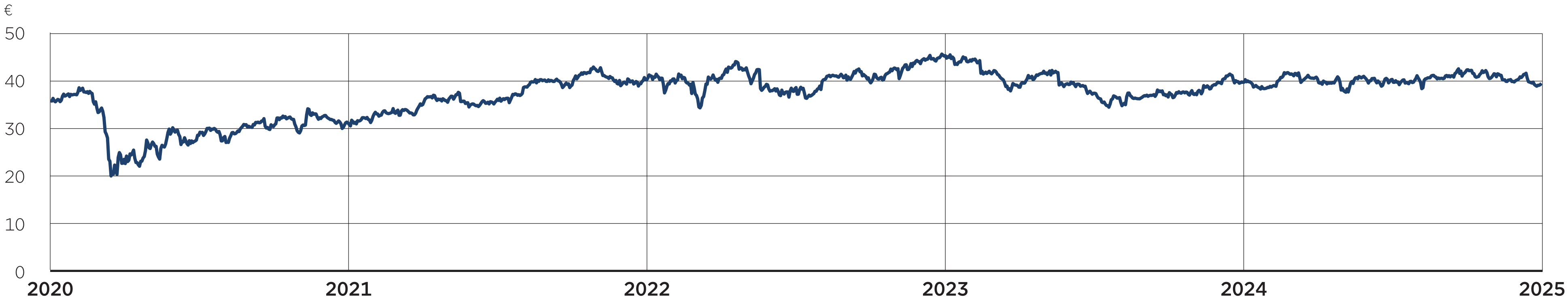
Shareholders by the number of shares held

Sampo plc, 31 December 2024

Number of shares	Shareholders, number	Share-holders, %	Shares, number	Shares, %	Voting rights, number	Voting rights, %
1–100	103,735	53.07	4,352,451	0.81	4,352,451	0.81
101–500	62,590	32.02	15,168,210	2.82	15,168,210	2.81
501–1,000	14,104	7.21	10,499,131	1.95	10,499,131	1.95
1,001–5,000	12,664	6.48	26,503,938	4.92	26,503,938	4.92
5,001–10,000	1,377	0.70	9,615,851	1.79	9,615,851	1.78
10,001–50,000	823	0.42	16,042,890	2.98	16,042,890	2.98
50,001–100,000	90	0.05	6,578,084	1.22	6,578,084	1.22
100,001–500,000	65	0.03	12,465,633	2.32	12,465,633	2.31
500,001–	34	0.02	437,021,584	81.19	437,821,584	81.22
Total	**195,482**	**100**	**538,247,772**	**100**	**539,047,772**	**100**
of which nominee registered	11		346,421,982	64.36	346,421,982	64.27

Share price performance

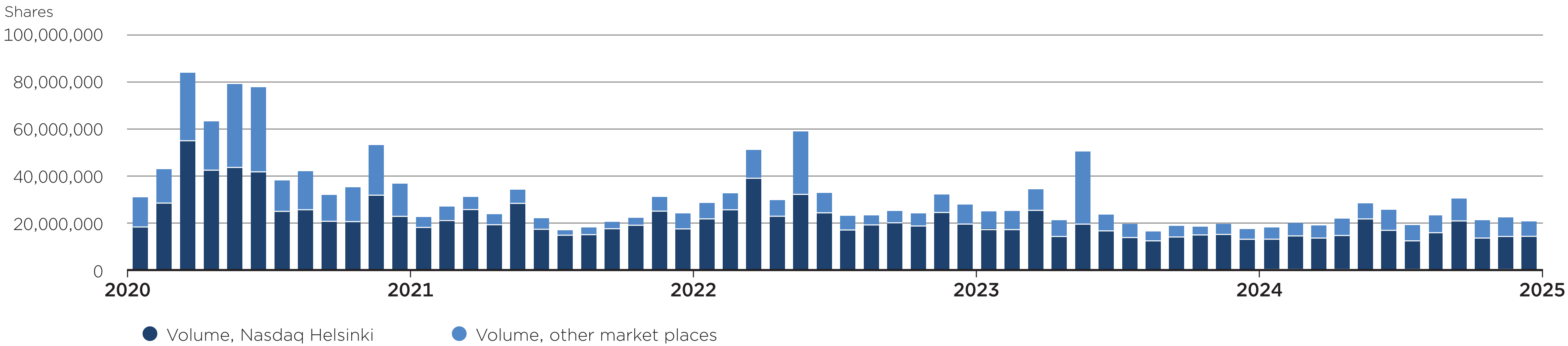
Sampo plc, 2020–2024



Share price performance adjusted for the partial demerger in 2023.

Monthly trading volume

Sampo plc, 2020–2024



Shareholders

The number of Sampo's Finnish-registered shareholders decreased during 2024 by 11,510 shareholders to 195,482, as at 31 December 2024. The holdings of nominee and foreign shareholders increased to 64.5 per cent (60.3) of the shares, driven by the Topdanmark exchange offer. Sampo did not hold any own shares at the end of 2024.

In 2024, Sampo received one (1) flagging notification of change in holding pursuant to Chapter 9, Section 5 of the Securities Markets Act, according to which the total number of Sampo A shares or related voting rights owned by BlackRock, Inc. and its funds directly or through financial instruments is above 5 per cent of Sampo's total shares and voting rights. The reason for the notification by BlackRock, Inc. was the Group restructure following the acquisition of Global Infrastructure Management LLC ("GIP") on 1 October 2024. The latest notifications are available at **www.sampo.com/flaggings**.

Shareholders by sector

Sampo plc (A and B shares), 31 December 2024

Sector	Number of shares	%
Corporations	18,244,564	3.39
Financial institutions and insurance corporations	15,284,027	2.84
Public institutions	71,919,043	13.36
Non-profit institutions	12,612,212	2.34
Households	72,817,450	13.53
Foreign ownership and nominee registered	347,370,476	64.54
Total	**538,247,772**	**100**

Shareholders

Sampo plc, the largest shareholders registered in Finland, 31 December 2024

A and B shares	Number of shares	% of share capital	% of votes
Solidium Oy	33,278,580	6.18	6.17
Varma Mutual Pension Insurance Company	22,248,420	4.13	4.13
Ilmarinen Mutual Pension Insurance Company	6,941,083	1.29	1.29
Oy Lival AB	4,220,000	0.78	0.78
Elo Mutual Pension Insurance Company	4,010,000	0.75	0.74
The State Pension Fund	2,900,000	0.54	0.54
OP Life Assurance Company Ltd	1,527,291	0.28	0.28
Svenska litteratursällskapet i Finland r.f.	1,454,150	0.27	0.27
Nordea Nordic Fund	1,270,000	0.24	0.24
Nordea Pro Finland Fund	1,174,415	0.22	0.22
OMX Helsinki 25 Exchange Traded Fund	1,114,925	0.21	0.21
Keva	1,009,300	0.19	0.19
Samfundet folkhälsan i Svenska Finland rf	864,065	0.16	0.16
Nordea Life Assurance Finland Ltd.	830,243	0.15	0.15
OP-Finland Fund	812,251	0.15	0.15
Evli Finland Select Fund	750,000	0.14	0.14
OP Finland Index Fund	743,623	0.14	0.14
Nordea Suomi	719,984	0.13	0.13
Kaleva Mutual Insurance Company	670,430	0.12	0.12
Sigrid Jusélius Foundation	664,150	0.12	0.12
Foreign and nominee registered total	347,370,476	64.54	64.44
Other total	103,674,386	19.26	19.23
Total	**538,247,772**	**100**	**100**

Holdings of the Board and Executive Management

The Board's holdings of Sampo A shares and **Group Executive Committee's holdings of Sampo A shares** are presented in the Corporate Governance Statement section.

At the end of 2024, members of Sampo plc's Board of Directors and their close family members owned either directly or indirectly 200,039 (197,429) Sampo A shares. Their combined holdings constituted 0.04 per cent (0.04) of shares and related votes.

Members of the Group Executive Committee and their close family members owned either directly or indirectly 235,053 (227,321) Sampo A shares representing 0.04 per cent (0.04) of shares and related votes.

Share buyback programmes

In 2024, Sampo repurchased and cancelled 11,747,690 of its own A shares, corresponding to 2.1 per cent of the total share count.

To reduce the dilution effect from the public exchange offer for Topdanmark announced in June 2024, Sampo allocated EUR 800 million to share buybacks and the squeeze-out of Topdanmark minority shares, as announced on 17 June 2024.

As the first step of this capital deployment, Sampo launched a buyback programme of EUR 400 million, which started on 18 June 2024. Following the announcement of the result of the exchange offer on 16 September 2024, the programme was increased to EUR 475 million and extended to end no later than 30 November 2024 from the original end date of 31 October 2024, as the total acquisition cost the Topdanmark minority shares amounted to EUR 325 million.

The programme was completed on 29 November 2024. The average purchase price was EUR 40.43 per share. All repurchased shares were cancelled on 10 December 2024.

Further details on the company's share buyback programmes are available at **www.sampo.com/sharebuyback**.

Events after the end of the reporting period

Share split

On 5 February 2025, the Board of Directors of Sampo plc resolved on a share split by way of a share issue without consideration in proportion to shares owned by shareholders. In the share split, Sampo issued four (4) new A shares for each existing A share and four (4) new B shares for each existing B share to shareholders in proportion to their existing holdings on the record day of the share issuance on 12 February 2025. In total, 2,152,191,088 new Sampo A shares and 800,000 new Sampo B shares were issued. Following the registration of the new shares, Sampo's total share count amounts to 2,691,238,860 shares.

The resolution was based on the authorisation granted by Annual General Meeting held on 25 April 2024. The share split does not require any action from shareholders nor holders of Swedish depository receipts. Further information is available at **www.sampo.com/sharesplit**.

Composition of the Sampo Group Executive Committee

Peter Hermann, the CEO Topdanmark and Deputy CEO of If P&C, has notified Sampo that he plans to pursue opportunities outside the Group and that he will therefore not join the Sampo Group Executive Committee, as previously indicated. Mr Hermann will continue as the CEO of Topdanmark until the planned merger of Topdanmark and If P&C Insurance Ltd (publ) is completed in the summer of 2025.

Corporate Governance Statement

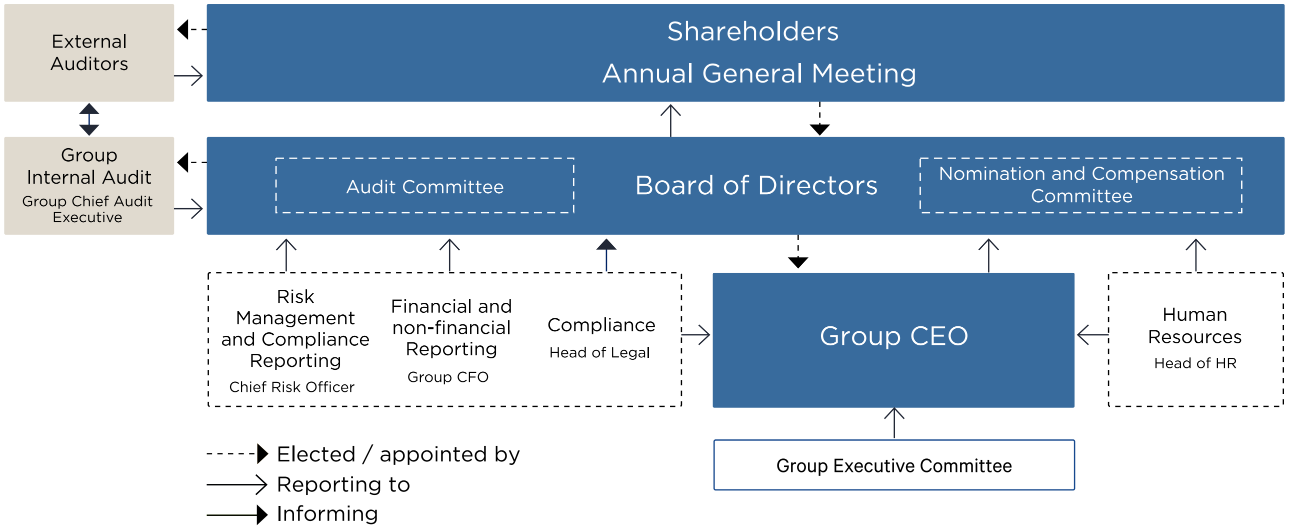
This Corporate Governance Statement, as provided by Chapter 7 Section 7 of the Finnish Securities Market Act (746/2012), has been prepared in accordance with the Finnish Corporate Governance Code 2025 issued by the Securities Market Association on 19 December 2024, which became effective from 1 January 2025 (the "CG Code"). This statement is presented as part of the Board of Directors' Report.

Governance in Sampo plc

Sampo plc complies with applicable legislation as well as the Helsinki, Stockholm, and Copenhagen stock exchange rules to issuers of shares. In addition, Sampo plc complies, in full, with the CG Code.[1] The CG Code can be viewed in full on the website of the Finnish Securities Market Association at **www.cgfinland.fi**.

Sampo's governance is based on a clear division of duties between general meetings, the Board of Directors, and the executive management. The articles of association define the general principles of division of powers between the key corporate organs.

Sampo plc's governance structure



[1] *Sampo plc complies with the CG Code of its domicile and therefore deviates in certain aspects from the Swedish Corporate Governance Code (Svensk kod för bolagsstyrning, the "Swedish Code") and the Danish Recommendation on Corporate Governance (Anbefalinger for god Selskabsledelse, the "Danish Code"). Applying the Swedish Code or Danish Code could lead to contradictions due to differences between Finnish and Swedish or Danish legislation, corporate governance codes, and corporate governance practices. The main deviations from the Swedish Code relate to not having a nomination committee comprised of members appointed by the company's owners and to the handling of certain tasks which under the Swedish Code would belong to the nomination committee. The Swedish Code issued by the Swedish Corporate Governance Board (Kollegiet för svensk bolagsstyrning) is available at* ***www.corporategovernanceboard.se****.*

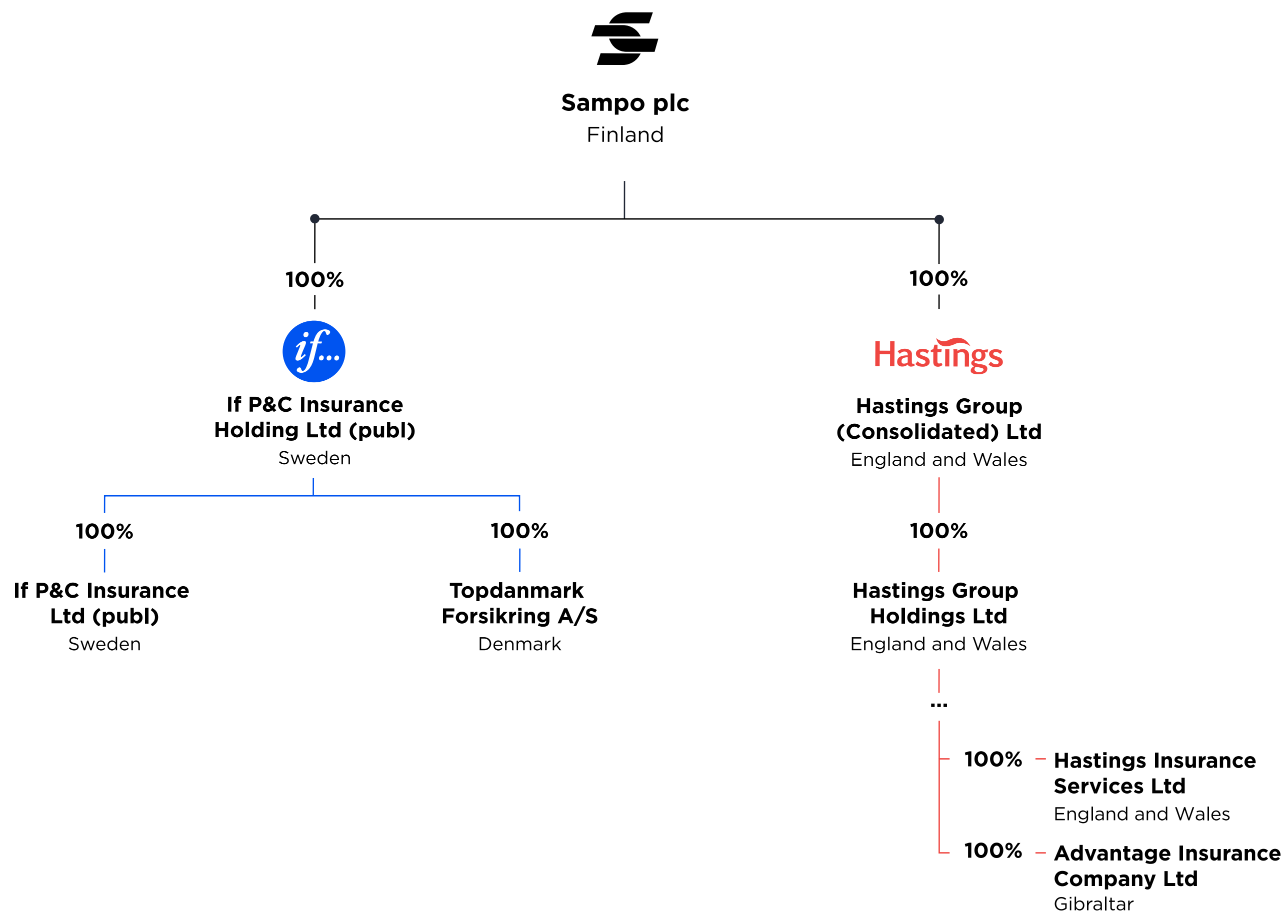
The main deviations from the Danish Code relate to the possibility for shareholders to follow general meetings through digital transmission, as well as guidelines related to take-over bids and tax practices. Sampo plc's Board of Directors does not include employee representatives and the members of the Board are elected in a bundle. However, the Board of If Group does include employee representatives. In addition, Sampo deviates from the Danish Code in certain aspects of executive remuneration. The Danish Code issued by the Danish Committee on Corporate Governance (Komitéen for god Selskabsledelse) is available at ***https://corporategovernance.dk/recommendations-corporate-governance****.*

Changes in Group structure

On 17 June 2024, Sampo announced that Sampo and Topdanmark A/S have entered into a combination agreement, pursuant to which Sampo will make a recommended best and final public exchange offer to acquire all of the outstanding shares in Topdanmark not already owned by Sampo. The Board of Directors of Topdanmark unanimously recommended Topdanmark shareholders to accept the offer. As a result of the offer, Sampo held approximately 92.6 per cent of the shares in Topdanmark (excluding treasury shares) and initiated a compulsory acquisition of the Topdanmark shares held by the remaining minority shareholders. Following completion of the offer in late 2024, Sampo began the planned integration of Topdanmark's P&C operations into If's pan-Nordic business organisation.

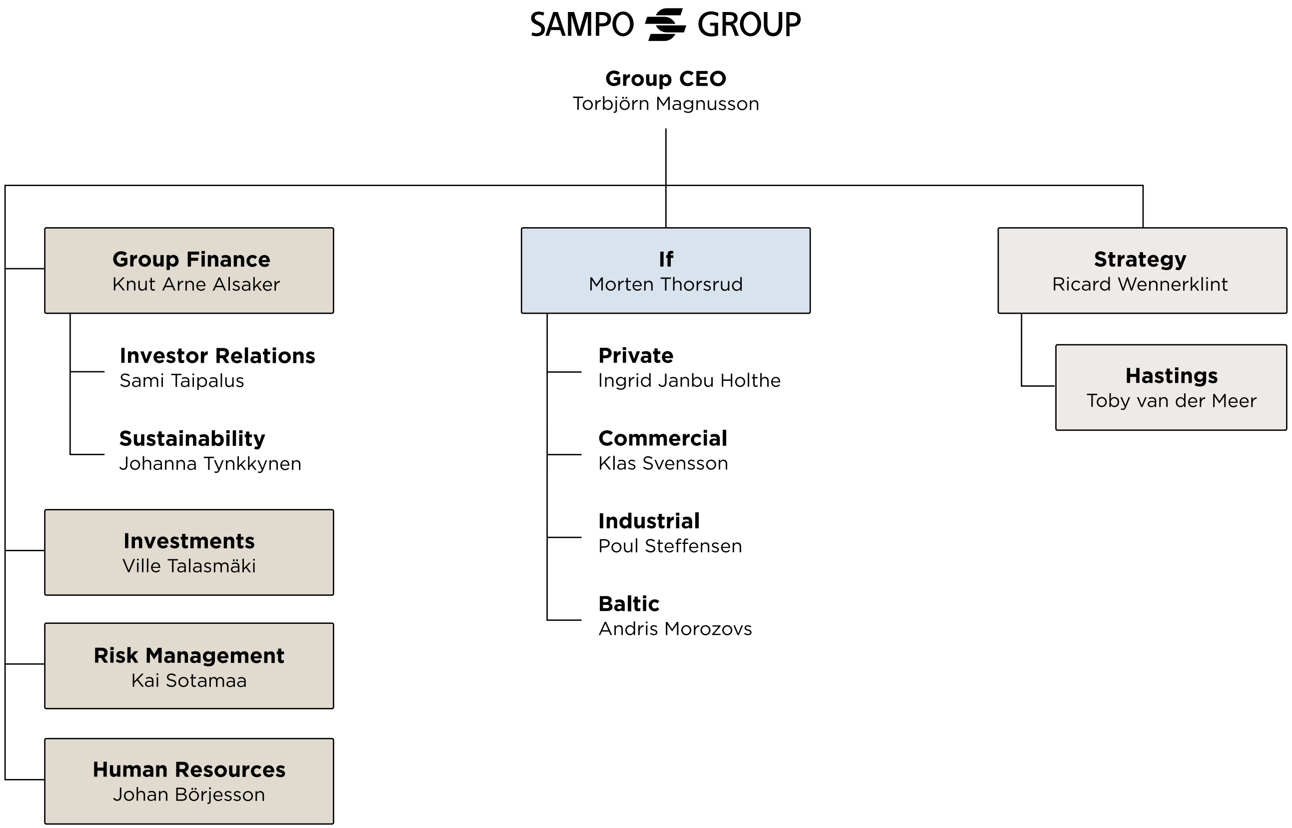
Sampo Group structure

31 December 2024



Sampo Group organisation

31 December 2024



General meeting

The highest decision-making body of Sampo plc is the general meeting, where the shareholders participate in the supervision and control of the company by using their right to speak and vote.

The Finnish Companies Act and Sampo plc's articles of association determine the issues that have to be dealt with at a general meeting (competence of a general meeting).

Customarily, a general meeting deals with, in addition to issues determined by law and the articles of association, the issues presented by the Board of Directors. Furthermore, according to the Finnish Companies Act, a shareholder has the right to require a certain issue to be dealt with at a general meeting, providing the issue falls within the scope of competence of a general meeting.

The Board of Directors convenes a general meeting by publishing a notice of the meeting on Sampo plc's website at least three weeks before the general meeting and no later than nine days before the record date of the general meeting. The notice of a general meeting shall also be published by a stock exchange release.

Annual General Meeting

The AGM must be held within six months of the end of the financial year on a date specified by the Board of Directors. The AGM shall discuss matters assigned to it in accordance with the articles of association and any other business referred to in the notice of the meeting.

The notice and other documents of the AGM, including the proposals of the Board of Directors and its Committees, as well as the Financial Statements, the Board of Directors' Report and the Remuneration Report for Governing Bodies, will be made available on Sampo plc's website at least three weeks before the AGM.

In 2024, Sampo plc's AGM was held on 25 April at the Helsinki Expo and Convention Centre and a total of 3,188 shareholders representing 320,218,518 shares and 321,018,518 votes were represented at the meeting.

The Annual General Meeting decided to distribute a dividend of EUR 1.80 per share for 2023. The record date for the dividend payment was 29 April 2024 and the dividend was paid to Sampo shareholders on 7 May 2024 and to Sampo SDR holders on 10 May 2024. The Annual General Meeting adopted the financial accounts for 2023 and discharged the Board of Directors and the CEO from liability for the financial year. The AGM accepted Sampo plc's Remuneration Report for Governing Bodies. The resolution was advisory.

The minutes of the Annual General Meeting are available for viewing at **www.sampo.com/agm** and at Sampo plc's head office at Fabianinkatu 27, Helsinki, Finland.

Main duties of the AGM

- Receives and accepts the Financial Statements.
- Receives the Auditor's Report.
- Resolves on the measures occasioned by the profit shown in the accepted Financial Statements.
- Releases the members of the Board of Directors and the Managing Director from liability.
- Resolves on the number and fees of the members of the Board of Directors.
- Resolves on the fees of the Auditor.
- Elects the members of the Board of Directors and the Auditor.
- Deals with any other business on the agenda, proposed by either a shareholder or the Board of Directors.
- Provides advisory resolutions on the Remuneration Policy for Governing Bodies and on the acceptance of the Remuneration Report.

The AGM of 2024 also authorised the Board of Directors to resolve to repurchase a maximum of 50,000,000 Sampo plc's A shares and to resolve upon a share issue without payment (share split) to all shareholders in proportion to their holdings so that a maximum of five new A shares would be issued for each current A share and a maximum of five new B shares would be issued for each current B share. The Board of Directors did not resolve upon a share issue without payment during 2024.

All resolutions of the AGM of 2024 were made without separate voting.

Extraordinary general meeting

An Extraordinary General Meeting (the "EGM") is convened when considered necessary by the Board of Directors. The Auditor, or shareholders together holding a minimum of one tenth of all the shares in the company may request in writing that an EGM shall be convened to discuss a specified matter raised by them.

In 2024, Sampo plc's EGM was held on 9 July at the Helsinki Hall of Culture and a total of 2,923 shareholders representing 319,844,802 shares and 320,644,802 votes were represented at the meeting.

The Board of Directors convened the EGM to authorise the Board of Directors to resolve upon the issuance of shares in connection with Sampo's recommended best and final public exchange offer to the shareholders of Topdanmark A/S, as announced on 17 June 2024.

The EGM of 2024 authorised the Board of Directors to resolve on a share issue of up to maximum of 57,468,782 new Sampo A shares which corresponded to approximately 11.5 per cent of all Sampo A shares on the date of the EGM notice in deviation from the shareholders' rights (directed share issue).

Attending a shareholders' meeting

By attending shareholders' meetings shareholders may, either personally or through representatives, exercise their voting rights, request information, and participate in the decision-making process of Sampo plc.

At a shareholders' meeting, each Sampo plc A share carries one vote, while each Sampo plc B share carries five votes.

Shares and shareholders

As at 31 December 2024, the total number of Sampo plc's shares, including both 538,047,772 A shares and 200,000 B shares, equalled to 538,247,772 shares. Each A share entitles its holder to one vote and each B share to five votes at a shareholders' meeting. The total number of votes attached to the shares was 539,247,772.

Sampo plc's articles of association define two different classes of shares in the company and determine that each A share entitles its holder to one vote and each B share entitles its holder to five votes at a general meeting. All of Sampo plc's B shares are owned by a shareholder independent from the company. Based on Sampo plc's articles of association, each B share can be converted into an A share at the request of the holder of the B share.

Moreover, subject to the Finnish Companies Act, the general meeting may resolve upon a directed acquisition of own shares, decide on the amendment of the articles of association to the effect that share classes are combined, or otherwise reduce share class rights only provided such a proposal is supported by at least two thirds of the votes and shares, per share class, represented at the meeting. Thus, the authority to decide on the combination of Sampo plc's share classes does not rest with the company.

As at 31 December 2024, a total number of 195,482 Finnish registered shareholders held 191,825,790 shares representing approximately 35.7 per cent of all shares. In addition, 11 nominee registers held 346,421,982 shares representing approximately 64.3 per cent of all shares.

Board of Directors

Sampo plc's Board of Directors, elected annually by the AGM, uses the highest decision-making power in Sampo Group between the AGMs. Sampo plc's Board of Directors is responsible for the management of the company in compliance with applicable laws, authority regulations, Sampo plc's articles of association, and the decisions of the shareholders' meetings.

Board of Directors' duties

The working principles and main duties of the Board of Directors have been defined in the Board's charter. To ensure the proper running of operations, Sampo plc's Board of Directors has approved internal rules concerning general corporate governance, risk management, remuneration, compliance, internal control, and reporting in Sampo Group.

Main duties of the Board of Directors

- ▶ Receives group-wide reporting.
- ▶ Supervises
  - the due organisation of functions and operations
  - the financial reporting systems, including the Sustainability Statement, and the efficiency of internal audit and risk management
  - related party transactions
  - the independence of and non-audit services provided by the Auditor
  - the adequacy and effectiveness of the governance, risk management, and internal control processes related to the Group Internal Model.
- ▶ Resolves on
  - the strategy and other major strategic or far-reaching decisions of Sampo Group
  - convening of the AGM
  - group-wide and Sampo plc level principles and policies including the Code of Conduct and the Group Internal Audit policies
  - the minimum requirements of capitalisation and the proposal on profit distribution
  - group level remuneration matters
  - significant changes to the Group Internal
- ▶ Prepares
  - consolidated financial statements
  - proposals for the AGM.
- ▶ Appoints, discharges/removes, and decides on the Group CEO's, Group Executive Committee members', and the Group Chief Audit Executive's terms of service and financial benefits within the framework of the valid Remuneration Policy.
- ▶ Discusses the annual performance evaluation of the Board of Directors.

Election and term of office of Board members

According to Sampo plc's articles of association, the company's Board of Directors comprises no fewer than three and no more than ten members elected by shareholders at the AGM. The term of office of the Board members ends at the close of the next AGM following their election. The members of the Board elect a chair and vice chair from among its members at their first Board meeting following the AGM.

Diversity of the Board

Sampo plc's Board Diversity Policy which was adopted in November 2024 aims to ensure that Sampo's Board of Directors embodies a well-balanced mix of knowledge, skills, diversity, and experience, fully in line with Sampo Group's values and Code of Conduct. Board members are to have professional experience and education relevant and appropriate to Sampo's scale and scope, including financial expertise, industry knowledge, international experience, risk management, strategic planning, and governance and leadership skills. Diversity is key, with consideration given to at least age, gender, geographical provenance, and educational and professional background. Further, each Board member is expected to be able to devote a sufficient time to the Board's work and the Board as a whole shall fulfil independence recommendations of the CG Code. More information on the skills and experience of the Board is available on Sampo's website.

To promote gender balance, both genders shall always be represented on the Board, with a target that women and men both shall be represented by at least 40 per cent of the members of the Board. However, some deviations may be applied if deemed reasonable due to the number of Board members:

Number of Board Members	Minimum number of both genders on the Board
3-4	1
5-6	2
7-8	3

The number of the Directors and the composition of the Board shall be such that they enable the Board of Directors to see to its duties efficiently. During the past ten years, Sampo plc's Board of Directors has, on average, reached its target for gender diversity and the Board continues its endeavours to reach the new minimum share of at least 40 per cent of the total number of members for both genders. In 2024, the target for each gender represented in the Board of Directors was 37.5 per cent. As at 31 December 2024, the share of women in Sampo plc's Board of Directors was 33 per cent and the share of men was 67 per cent. Regardless of a well prepared and performed executive search process, the proposed Board composition did not fulfil the target according to which each gender shall be represented by at least 37.5 per cent of the members of the Board. This is attributable to the limited number of suitable and available candidates. The Board remains committed to reaching its target of having both genders represented on the Board and will continue its endeavours to reach the target when proposing candidates for Board membership in the future.

Board members

As proposed by the Nomination and Remuneration Committee, the number of Board members remained unchanged at nine members at the AGM of 2024. **Christian Clausen**, **Georg Ehrnrooth**, **Jannica Fagerholm**, **Steve Langan**, **Risto Murto**, **Antti Mäkinen**, **Markus Rauramo**, and **Annica Witschard** were re-elected to the Board. In addition, **Astrid Stange** was elected as a new member to the Board. The members of the Board were elected for a term continuing until the close of the next AGM. All Board members have been determined to be independent of the company and its major shareholders under the rules of the Finnish Corporate Governance Code 2025.

The following persons served on Sampo plc's Board of Directors in 2024:

Antti Mäkinen

Chair of the Board
Male, born 1961, LL.M.
Finnish citizen

Chair of the Board since 17 May 2023. Also served as a member of the Board of Directors of Sampo plc in 2018–2021.

Jannica Fagerholm

Vice Chair of the Board
Managing Director, Signe and Ane Gyllenberg Foundation
Female, born 1961, M.Sc. (Econ.)
Finnish citizen

Positions of trust

Mandatum plc, Vice Chair
Solidium Oy, Board Member
Kesko Corporation, Board Member
Swedish Society of Literature in Finland, Board Member
Kelonia (Private Equity holding company), Board Member

Member of the Board of Directors of Sampo plc since 18 April 2013 and Vice Chair of the Board since 9 April 2019.

Christian Clausen

Member of the Board
Chair for the Nordics, BlackRock
Male, born 1955, M.Sc. (Econ.), MBA
Danish citizen

Positions of trust

BW Group, Board Member

Member of the Board of Directors of Sampo plc since 21 April 2016.

Information as at 31 December 2024. The CVs of members of the Board of Directors can be viewed at ***www.sampo.com/board****.*

Georg Ehrnrooth

Member of the Board
Male, born 1966, Studies in agriculture and forestry
Finnish citizen

Positions of trust

eQ Oyj, Chair of the Board
Byggmästare Anders J Ahlström Holding AB (publ), Board Member
Fennogens Investments S.A., Board Member
Topsin Investments S.A., Board Member
Geveles Ab, Chair of the Board
Neptunia Invest AB, Board Member
Louise and Göran Ehrnrooth Foundation, Chair of the Board
Anders Wall Foundation, Board Member
Paavo Nurmi Foundation, Board Member

Member of the Board of Directors of Sampo plc since 2 June 2020.

Steve Langan

Member of the Board
Male, born 1960, Master of Arts, Medieval and Economic History
British citizen

Positions of trust

The Kenneth Armitage Foundation, Chair
Hepworth Wakefield, Chair of the Board

Member of the Board of Directors of Sampo plc since 18 May 2022.

Risto Murto

Member of the Board
CEO and President, Varma Mutual Pension Insurance Company
Male, born 1963, Ph.D. (Econ.)
Finnish citizen

Positions of trust

Nordea Bank Abp, Board Member
Securities Market Association, Chair of the Board
e2 Research, Chair of the Board
The Finnish Cultural Foundation, Member of the Supervisory Board
The Finnish Pension Alliance TELA, Chair of the Board
Finnish National Opera and Ballet, Member of the Supervisory Board

Member of the Board of Directors of Sampo plc since 16 April 2015.

Information as at 31 December 2024. The CVs of members of the Board of Directors can be viewed at ***www.sampo.com/board***.

Markus Rauramo

Member of the Board
CEO, Fortum Corporation
Male, born 1968, M.Soc.Sc.
Finnish citizen

Positions of trust

Eurelectric, Vice President

Member of the Board of Directors of Sampo plc since 19 May 2021.

Astrid Stange

Member of the Board
CEO, ELEMENT Insurance AG
Female, born 1965, Doctorate in Economics
German citizen

Positions of trust

Moody's Investors Service, Independent Director of the EU/UK Supervisory Boards
Atos SE, Independent Director of the Board of Directors
Lufthansa Group, Member of the Supervisory Board

Member of the Board of Directors of Sampo plc since 25 April 2024.

Annica Witschard

Member of the Board
Female, born 1973, M.Sc. (Business & Economics)
Swedish citizen

Positions of trust

Viaplay Group, Board Member

Member of the Board of Directors of Sampo plc since 17 May 2023.

Fiona Clutterbuck

Member of the Board
Born 1958, LLB (Hons)
British citizen

Member of the Board of Directors of Sampo plc
9 April 2019 - 25 April 2024

Information as at 31 December 2024. The CVs of members of the Board of Directors can be viewed at www.sampo.com/board.

When elected, all current Board members were independent of the company. Furthermore, all Board members were independent of the company's major shareholders.

The Board convened fifteen times in 2024. The meeting attendance of Sampo plc's current Board members in Board meetings from 1 January–31 December 2024 is presented in the below table:

	Attendance (%)	Meetings attended
Antti Mäkinen (Chair of the Board)	100	14/14
Jannica Fagerholm	100	14/14
Christian Clausen	100	14/14
Fiona Clutterbuck (member until 25 April 2024)	100	4/4
Georg Ehrnrooth	100	14/14
Steve Langan	92.86	13/14
Risto Murto	100	14/14
Markus Rauramo	100	14/14
Astrid Stange (member since 25 April 2024)	90	9/10
Annica Witschard	92.86	13/14

Shares and share-based rights held by the Board members

On 31 December 2024, the members of the Board of Directors owned, directly or through legal entities controlled by them, Sampo plc's A shares as follows:

Shares owned by the Board of Directors

Sampo plc, 31 December 2024 and 31 December 2023

Board of Directors	31 Dec 2024	31 Dec 2023
Antti Mäkinen	8,550	7,010
Jannica Fagerholm	8,751	8,751
Christian Clausen	38,479	38,479
Fiona Clutterbuck[1]		3,678
Georg Ehrnrooth	130,345	129,532
Steve Langan	2,330	1,498
Risto Murto	5,869	5,169
Markus Rauramo	3,101	2,407
Astrid Stange[2]	889	—
Annica Witschard	1,725	905
Total	**200,039**	**197,429**
Board of Directors ownership of shares, %	0.04	0.04
Board of Directors share of votes, %	0.04	0.04

[1] *Member of the Board of Directors member until 25 April 2024*
[2] *Member of the Board of Directors since 25 April, 2024*

The Board members did not have holdings in any Sampo plc share-based rights.

The AGM decided to pay the following annual fees to the members of the Board of Directors until the close of the 2025 AGM:

- EUR 235,000 for the Chair of the Board
- EUR 135,000 for the Vice Chair of the Board
- EUR 104,000 for each member of the Board
- EUR 29,000 for the Chair of the Audit Committee as an additional annual fee
- EUR 6,600 for each Audit Committee member as an additional annual fee

A Board member shall, in accordance with the resolution of the AGM, acquire Sampo plc A shares at the price paid in public trading for 50 per cent of his/her annual fee after the deduction of taxes, payments, and potential statutory social and pension costs. Notwithstanding this, a Board member is not required to purchase any additional Sampo plc A shares if the Board member owns such amount of said shares that their value is equivalent to twice the respective Board member's gross annual fee. The company will pay any possible transfer tax related to the acquisition of the company shares.

Board-appointed committees

The Board may establish committees, executive committees, and other permanent or temporary bodies to deal with tasks prescribed by it. The Board confirms the charters of the committees of Sampo plc's Board and the Group Executive Committee, and also the guidelines and authorisations given to other bodies established by the Board.

The Board has an Audit Committee and a Nomination and Remuneration Committee, whose members it appoints from among its members in accordance with the charters of the respective committees. In accordance with the Charter of Sampo plc's Audit Committee, matters related to risk management belong under the scope of matters handled by Sampo plc's Audit Committee.

Audit Committee

According to its charter, the Audit Committee comprises at least three members elected from among those Board members who do not hold executive positions in Sampo plc and are independent of the company and of which at least one is independent of Sampo plc's significant shareholders. The responsible Auditor, Group CEO, Group CFO, Group Chief Audit Executive, and Group Chief Risk Officer also participate in the meetings of the Committee.

In 2024, the chair of the Audit Committee was **Jannica Fagerholm**, and the other members were **Fiona Clutterbuck**, **Georg Ehrnrooth**, **Steve Langan**, and **Annica Witschard** until 25 April 2024 and Steve Langan, **Markus Rauramo, Astrid Stange**, and Annica Witschard thereafter. As at 31 December 2024, the share of women in Sampo plc's Audit Committee was 60 per cent and the share of men was 40 per cent.

The Audit Committee convened four times in 2024. The meeting attendance of Sampo plc's current Audit Committee members in Committee meetings from 1 January–31 December 2024 is presented in the following table:

	Attendance (%)	Meetings attended
Jannica Fagerholm (Chair of the Committee)	100	4/4
Fiona Clutterbuck (member until 25 April 2024)	100	1/1
Georg Ehrnrooth (member until 25 April 2024)	100	1/1
Steve Langan	100	4/4
Markus Rauramo (member since 25 April 2024)	100	3/3
Astrid Stange (member since 25 April 2024)	67	2/3
Annica Witschard	100	4/4

Main duties of the Audit Committee

▶ Supervises and assesses
- Group financial and supervisory reporting processes
- the accuracy of Group financial statements
- statutory and external audit, the independence of the auditor, auditor's reporting, and purchases of non-audit services
- the capitalisation, profitability, and liquidity of Group companies and the Group itself
- the effective operation of the risk management system
- preparation of and compliance with risk management policies and other related guidelines
- the actions and processes of Sampo Group's compliance functions, significant litigations, and compliance with laws and regulations
- communications with authorities
- the company's tax position and tax risks
- the adequacy and effectiveness of the governance, risk management, and internal control processes related to the Group Internal Model

▶ Monitors and evaluates
- the preparation of non-financial reporting (Sustainability Statement)
- the internal audit's reporting and approves of the internal audit action plan and strategy
- the effectiveness and efficiency of Sampo Group's internal audit function
- the effectiveness of internal control and other elements of the system of governance
- related party transactions and reporting processes related thereto
- the Group's risks, risk management processes, and the quality and scope of risk management
- processes and risks regarding IT privacy and security
- compliance with risk management principles and other guidelines.

▶ Prepares proposals to the AGM concerning the auditor's election and its fees.

Nomination and Remuneration Committee

According to the Board Diversity Policy, Sampo plc's Nomination and Remuneration Committee shall identify, review and recommend candidates for the Board. The Nomination and Remuneration Committee shall take the following factors into consideration, including such other factors as the Board may determine:

(I) Regulatory requirements for the members of the Board
(II) Overall Board composition, taking into consideration the appropriate combination of professional experience, skills, knowledge, and variety of viewpoints and backgrounds
(III) Allocation and sufficiency of time
(IV) Other criteria (e.g. with respect to new directors, the integrity, judgment, and available time and with respect to current directors, their past performance).

At the AGM, the Nomination and Remuneration Committee gives an account of how it has conducted its work and explains its proposals.

According to its charter, the Nomination and Remuneration Committee comprises the chair of the Board (who acts as the committee's chair) and two to three members elected from among the members of the Board.

In 2024 the chair of the Nomination and Remuneration Committee was **Antti Mäkinen**, and the other members were **Christian Clausen**, **Risto Murto**, and **Markus Rauramo** until 25 April 2024 and Christian Clausen, **Georg Ehrnrooth**, and Risto Murto since 25 April 2024. As at 31 December 2024, the share of men in the Nomination and Remuneration Committee was 100 per cent.

The Committee convened seven times in 2024. The meeting attendance of Sampo plc's Nomination and Remuneration Committee members in Committee meetings from 1 January–31 December 2024 is presented in the below table:

	Attendance (%)	Meetings attended
Antti Mäkinen (Chair of the Committee)	100	6/6
Christian Clausen	83	5/6
Georg Ehrnrooth (member since 25 April 2024)	100	4/4
Risto Murto	100	6/6
Markus Rauramo (member until 25 April 2024)	100	2/2

Main duties of the Nomination and Remuneration Committee

- ▶ Monitors the implementation of the Group remuneration in general.
- ▶ Evaluates the appropriateness of the remuneration of the executive directors and their remuneration structure.
- ▶ Prepares and presents proposals to the AGM on the composition of the Board of Directors and the remuneration of its members as well as on the Remuneration Policy for Governing Bodies.
- ▶ Prepares and presents proposals to the Board of Directors pertaining to
  - the evaluation of independence of Board members, composition and chair of Board committees, and the Board Diversity Policy
  - succession planning of the Board of Directors and top management positions in Sampo Group
  - the appointment of the Group CEO, the Group Chief Audit Executive, and members of the Group Executive Committee, including their fitness and propriety assessments
  - the remuneration and terms of employment of the members of the GEC as well as the actual payments to be made to the GEC members
  - the launch of Sampo Group's long-term incentive schemes based on financial instruments of Sampo plc and the maximum pay-outs based on short-term programmes and long-term incentive schemes
  - Sampo Group Remuneration Principles and Sampo Remuneration Policy for Personnel.
- ▶ Prepares the annual performance evaluation of the Board of Directors.

Sampo Group CEO

Sampo plc has a managing director who is simultaneously the Group CEO of Sampo Group. The Board of Directors elects and releases the Group CEO and decides on the terms of service and other remuneration.

The Group CEO is in charge of the daily management of Sampo plc, subject to the instructions and control of the Board of Directors. The Group CEO is empowered to take extraordinary and broad ranging actions, taking into account the scope and nature of Sampo plc's operations, only upon authorisation by the Board of Directors. The Group CEO ensures the legal compliance of Sampo plc's accounting and the trustworthy organisation of asset management.

Mr. **Torbjörn Magnusson**, licentiate of engineering, is the managing director of the company and the Group CEO. His Group CEO contract is in force until further notice. The Group CEO contract may be terminated by the company with a notice period of 12 months, for which period the Group CEO is entitled to receive salary. In addition, Magnusson is, due to the terms applied in his previous position in Sampo Group as the CEO of If P&C Insurance Holding Ltd, entitled to a severance compensation corresponding to a maximum of 24 months' fixed salary, should i) Sampo plc terminate his service contract or ii) the Group CEO terminate the contract based on either material breach of the contract from the company's part, or based on material changes in the Group CEO's responsibilities due to significant changes in Sampo Group structure or ownership.

Sampo Group Executive Committee

The Board of Directors has appointed the Sampo Group Executive Committee to support the Group CEO in the preparation of strategic issues relating to the Group, in the handling of operating matters that are significant or involve questions of principle, and in ensuring a good internal flow of information.

The Group Executive Committee addresses especially the following matters: Sampo Group's strategy, profit development, large purchases and projects, the Group's structure and organisation, as well as key strategic issues pertaining to administration and personnel. In 2024, the Group Executive Committee convened 13 times at the invitation of the Group CEO.

As at 31 December 2024, the share of women in the Group Executive Committee was 14 per cent and the share of men was 86 per cent.

The following persons served on the Group Executive Committee in 2024:

Torbjörn Magnusson

Group CEO, Sampo Group
Male, born 1963, Licentiate of Engineering
Swedish citizen

Positions of trust

Hastings Group, Board Member
If P&C Insurance Holding Ltd, Chair of the Board

Member of Sampo Group Executive Committee since 2004.

Knut Arne Alsaker

Group CFO, Sampo Group
Male, born 1973, M.Sc. (Econ.)
Norwegian citizen

Positions of trust

Topdanmark Forsikring A/S, Board Member
Hastings Group, Board Member
If P&C Insurance Holding Ltd, Board Member

Member of Sampo Group Executive Committee since 2014.

Ingrid Janbu Holthe

Head of BA Private, If P&C Insurance Holding Ltd (publ)
Female, born 1982, M.Sc. (Econ.), CEMS MIM
Norwegian citizen

Positions of trust

Finance Norway (Finans Norge), Member of the Executive Committee of P&C Insurance

Member of Sampo Group Executive Committee since 2019.

Information as at 31 December 2024. The CVs of members of the Group Executive Committee can be viewed at ***www.sampo.com/management***.

Klas Svensson

Head of Business Area Commercial , If P&C Insurance Holding Ltd (publ)
Male, born 1985, MBA
Swedish citizen

Member of Sampo Group Executive Committee since 2024.

Ville Talasmäki

Group CIO, Sampo Group
Male, born 1975, M.Sc. (Econ.)
Finnish citizen

Positions of trust

Topdanmark Forsikring A/S, Board Member
Finance Finland, Board Member
Varma Mutual Pension Insurance Company, Deputy Board Member
If P&C Insurance Holding Ltd, Board Member
If P&C Insurance Ltd, Board Member

Member of Sampo Group Executive Committee since 2023.

Morten Thorsrud

President & CEO, If P&C Insurance Holding Ltd
Male, born 1971, M.Sc. (Econ.)
Norwegian citizen

Positions of trust

Topdanmark Forsikring A/S, Deputy Chair of the Board
Hastings Group, Board Member
Euronext, Member of the Supervisory Board
Finance Norway (Finans Norge), Member of the Executive Committee

Member of Sampo Group Executive Committee since 2006.

Information as at 31 December 2024. The CVs of members of the Group Executive Committee can be viewed at ***www.sampo.com/management***.

Ricard Wennerklint

Chief of Strategy, Sampo Group
Male, born 1969, Executive Education, Advanced Management Programme
Swedish citizen

Positions of trust

Topdanmark Forsikring A/S, Chair of the Board
Hastings Group, Chair of the Board
NOBA Bank Group AB (publ) (former Nordax Bank AB (publ)), Chair of the Board
If P&C Insurance Holding Ltd, Board Member

Member of Sampo Group Executive Committee since 2005.

*Information as at 31 December 2024. The CVs of members of the Group Executive Committee can be viewed at **www.sampo.com/management**.*

Shares and share-based rights held by the Group CEO and the members of the Executive Committee

On 31 December 2024, the Group CEO and other members of the Executive Committee owned, directly or through legal entities controlled by them, Sampo plc's A shares as follows:

Shares owned by the Group Executive Committee

Sampo plc, 31 December 2024 and 31 December 2023

Group Executive Committee	31 Dec 2024	31 Dec 2023
Torbjörn Magnusson	48,355	46,268
Knut Arne Alsaker	49,449	43,412
Ingrid Janbu Holthe	10,867	5,588
Klas Svensson	4,761	0
Ville Talasmäki	20,449	17,801
Morten Thorsrud	73,570	65,788
Ricard Wennerklint	27,602	48,464
Total	**235,053**	**227,321**
Group Executive Committee's ownership of shares, %	0.04	0.04
Group Executive Committee's share of votes, %	0.04	0.04

The Group CEO and the other members of the Executive Committee did not have holdings in any Sampo plc share-based rights.

Remuneration

The Board of Directors has established the Sampo Group Remuneration Principles, which apply to all Sampo Group companies. The Remuneration Principles describe the remuneration structure and the principles for setting up remuneration systems in Sampo Group. The Remuneration Principles may apply to the Group CEO, insofar as they do not conflict with Sampo plc's Remuneration Policy for Governing Bodies.

The core of the Remuneration Principles is that all remuneration systems in Sampo Group shall safeguard the long-term financial stability and value creation of Sampo Group and shall comply with regulatory and ethical standards. They shall also be aligned with the risk management framework and thus be designed in parallel with the risk management principles and practices.

Remuneration mechanisms shall encourage and stimulate employees to consistently do their best and exceed their targets. Remuneration packages shall be designed to reward fairly for prudent and successful performance. At the same time, however, in order to safeguard the interest of other stakeholders, compensation mechanisms shall not generate conflicts of interest and shall not entice or encourage employees to engage in excessive or unwanted risk-taking.

The different forms of remuneration used in Sampo Group are the following:

(a) Fixed compensation
(b) Variable compensation
(c) Pension
(d) Other benefits

Fixed compensation is the basis of an employee's remuneration package. Fixed salary shall support financial stability by representing a sufficiently high share of the total remuneration. Variable compensation is used to ensure the competitiveness of total remuneration packages. Variable compensation can either be based on the contribution to the company's profitability and on individual performance (short-term incentive programs) or be linked to committing employees to Sampo Group for a longer period and aligning the employees' interests with those of the shareholders by linking the payout of the schemes to key performance criteria and, if applicable, to the positive development of Sampo's share price (long-term incentive schemes). The members of the Board of Directors do not participate in any short-term incentive programs or long-term incentive schemes.

The payment of variable compensation shall be based on the assessment of the incurred risk exposure and the fulfilment of solvency capital requirements. The payment of a certain portion of the variable compensation payable to the Senior Executive Management and to certain key persons shall be deferred for a defined period of time, as required in the regulatory framework applicable to each Sampo Group company.

After the deferral period, a retrospective risk adjustment review shall be carried out and the Board of Directors of each Sampo Group company shall decide whether the deferred variable compensation shall be paid/released in full, partly, or cancelled in whole. In 2024, a total of EUR 11 million (6.5) of short-term and long-term incentives have been deferred.

The Board of Directors decides on the launch of long-term incentive schemes based on financial instruments of Sampo plc. In March 2024, the Board of Directors decided to adopt a new performance-based long-term incentive scheme for the Group Executive Committee (including the Group CEO) and other senior leaders and key employees of Sampo Group. Please refer to Sampo plc's 2024 Remuneration Report for Governing Bodies for further information on the new Sampo Group long-term incentive scheme 2024.

Moreover, the second instalment of the long-term incentive scheme 2020:1 and the first instalment of the long-term incentive scheme 2020:1/2 vested in 2024. The vesting of the schemes is determined on the basis of Sampo's share price development and dividends paid over each instalment's performance period, starting from the issue of the schemes, and performance criteria related to return on capital at risk (RoCaR) applicable for each instalment. Both incentive schemes contain a cap for maximum payout. The terms and conditions of the incentive schemes are available at **www.sampo.com/incentiveterms**.

A deferral rule applies to incentive rewards paid to the Senior Executive Management and to certain key persons. Persons subject to the deferral rule shall at payout from the schemes acquire Sampo A shares with a certain part of the instalment after deducting income tax and other comparable charges. The shares are subject to disposal restrictions for three years, after which the Board of Directors shall decide on the possible release.

A total of EUR 62 million (71), including social costs, was paid as short-term incentives in January–December 2024 in Sampo Group. In the same period, a total of 43 million (38) was paid as long-term incentives. The long-term incentive schemes in force in Sampo Group produced a negative result impact of EUR -14 million (-10).

The Remuneration Report for Governing Bodies 2023 was presented to and adopted by the Annual General Meeting in 2024. Taking into account the advance votes as well as the advance voting instructions of the owners of nominee-registered shares and holders of SDRs, which were delivered to Sampo before the AGM, the proposal was supported in total by 96 per cent of votes represented at the meeting.

Sampo plc publishes the 2024 **Remuneration Report for Governing Bodies** in connection with the Board of Directors' Report at **www.sampo.com/year2024**. The Remuneration Report for Governing Bodies provides information on the remuneration of the Board of Directors and the Group CEO, and has been prepared in accordance with the Corporate Governance Code 2025. The Corporate Governance Code 2025 can be viewed in full on the website of the Securities Market Association at **www.cgfinland.fi/en**.

Sampo plc's Remuneration Policy defines how the remuneration of the Group CEO and the members of the company's Board of Directors has been arranged. The Remuneration Policy has been developed in accordance with the requirements set forth by the amended EU Shareholders' Rights Directive, as implemented into Finnish legislation. Sampo plc's Remuneration Policy was presented to the AGM in 2024. The updated Remuneration Policy is available at **www.sampo.com/agm**.

Personnel

Number of personnel

Sampo Group, 2024

The average number of employees (FTE) in Sampo Group's P&C operations in 2024 was 14,280 (13,272). On 31 December 2024, the total number of staff in the Group's P&C operations was 14,779 (13,450).

Sampo Group personnel	Average personnel (FTE) 2024	%	Average personnel (FTE) 2023	%
By company				
If	8,070	57	7,858	59
Hastings	3,736	26	3,200	24
Topdanmark	2,412	17	2,160	16
Sampo plc	61	0.4	54	0.4
Total	**14,280**	**100**	**13,272**	**100**
By country				
United Kingdom	3,710	26	3,176	24
Denmark	2,971	20,8	2,756	21
Finland	1,973	13,8	1,934	15
Sweden	2,486	17,4	2,446	18
Norway	1,680	11,8	1,613	12
Other countries	1,460	11,2	1,346	10
Total	**14,280**	**100**	**13,272**	**100**

**At the end of 2024, the total personnel (FTE) at Sampo plc amounted to 66 (58), of which 57 (49) worked at the headquarters in Finland and 9 (9) at the branch office in Sweden.*

Internal control in Sampo Group

The different sectors of Sampo Group's internal control system play a crucial role in ensuring the proper functioning of the Group's corporate governance system.

Internal control means all activities which ensure that Sampo Group's businesses are carried out towards desired targets in accordance with desired policies and practices and in compliance with applicable legal and regulatory requirements. Accordingly, the tasks of internal control are performed by different actors within the organisation starting from top management.

The organisation of internal control and safeguarding its functioning and viability play a key role in the activities of the Board of Directors of Sampo plc. In order to ensure the proper running of operations, Sampo plc's Board has approved Group level policies and guidelines concerning corporate governance, financial target setting, risk management, remuneration, compliance, reporting, and internal audit in conformity with and supplementing the existing legal and regulatory framework. With the policies and guidelines, Sampo plc's Board directs the Group's activities towards desired practices and, with appropriate control mechanisms provided by the policies, ensures that potential deviations are discovered without undue delay.

Thus, a successful internal control system presumes not only controlled steering processes for business management, but also appropriate control mechanisms. In Sampo Group, the internal control system includes managing risks as an integrated part of business activities, functions supporting the businesses, as well as control and steering functions, which are organised as independent from the businesses.

In addition to internal control activities within the financial reporting process and risk management, Sampo Group's compliance function, with insider administration supplementing it, together with a fully independent internal audit function form core parts of Sampo plc's internal control system.

Reporting

Financial reporting

The financial reporting process aims to ensure that Sampo plc's Board of Directors and executive management have timely and reliable information supporting their decision-making, and that external interest groups can also rely on the financial information provided to them.

To ensure the accuracy of all reporting, the used databases are reconciled on a monthly basis. Several systems and analytical tools are also applied to support efficiency and accuracy in the reporting process.

Group level financial reporting is based on information provided by the parent company as well as the Group companies according to formats and schedules defined by the Group's financial functions. Each Group company is responsible for its respective financial reporting and related internal controls. Consequently, the process ensures the accuracy of the information regarding different business segments prior to reporting to the parent company.

Sampo Group's financial reporting is organised under Group Control and Group Financial Reporting functions and it operates under the Group Chief Financial Officer. The Group Control function prepares and follows Group level and parent company's financial targets and forecasts, follows profit development and forecasts of the Group companies, and takes care of monthly reporting, Group level investment reporting, forecasting of profit development of the Group, as well as quantitative Solvency II reporting. It also produces different types of valuations, market analyses and reviews. The Group Control function is responsible for the Group's annual and quarterly quantitative Solvency II reporting to the supervisory authorities.

The Group Financial Reporting function prepares Sampo Group's quarterly and annual financial reports in accordance with International Financial Reporting Standards (IFRS). The financial reports of the parent company, Sampo plc, are prepared in accordance with Finnish accounting standards (the Finnish GAAP). Quarterly and annual reports are dealt with in the Group's administrative bodies in accordance with applicable procedural rules. In addition, the Group Financial Reporting function prepares the Group's monthly accounts, which form the basis of the monthly analysis prepared by the Group Control function.

A Management Report is distributed on a monthly basis to the members of the Group Executive Committee, and a summary of it is delivered to the members of Sampo plc's Board of Directors on a regular basis.

Profit forecasts are reported quarterly to the Group Executive Committee, the Board, and its Audit Committee. Group solvency calculations are also delivered on a quarterly basis to the Group Executive Committee, the Board, and its Audit Committee.

Non-financial reporting (Sustainability)

Sampo Group is committed to developing the sustainability activities and related reporting of the Group. This is in the interests of, and expected by, the Group's various stakeholders.

Sampo plc's Board of Directors has the ultimate oversight of Group level sustainability, covering the entire range of environmental, social, and governance (ESG) matters. The Board has assigned its Audit Committee to monitor Sampo Group's sustainability reporting and activities.

The Group CFO, who is a member of the Sampo Group Executive Committee, directs Sampo plc's Sustainability function. The Group CFO also ensures that adequate reporting on sustainability matters is provided to the Group CEO.

The Sustainability function of Sampo plc, led by the Head of Sustainability, is responsible for the development and coordination of sustainability at Group level. The function prepares the Group level sustainability reporting and the sustainability programme, which sets the direction for the Group's sustainability work. In addition, the function sets schedules, requests, and Group level guidance to the Group companies and organises regular sustainability meetings.

At each Group company, various business areas, operational departments, and functions are actively involved in the Group's sustainability endeavours and reporting. Group level sustainability reporting is largely based on information provided by the Group companies according to formats and schedules defined by Sampo plc's Sustainability function. Each Group company is responsible for its respective reporting to the parent company to ensure correctness of information.

Sampo Group's Sustainability Statement is published annually as a part of the Board of Directors' Report.

Risk management

The Board of Directors of Sampo plc is responsible for ensuring that the Group's risks are properly managed and controlled. The Board establishes both the risk management principles and closely connected remuneration principles and provides guidance on the risk management governance structure and internal control in the business areas. Working within the framework of these principles and guidelines, the Group companies tailor their risk management practices to take account of the special features of their respective business activities. The Board makes decisions on strategy, return targets, and overall guidelines regarding capital management.

The Board's Audit Committee is responsible, on behalf of the Board of Directors, for preparing Sampo Group's Risk Management Principles and related guidelines and, in turn, the Nomination and Remuneration Committee is responsible for preparing the Group's Remuneration Principles, which are closely connected with the Risk Management Principles.

The duty of Sampo Group's Risk Management function is to control the effective operation of the risk management system within the Group companies and to monitor, review, and report on Group level risks and risk management, including the parent company.

Risk management system

High-quality, comprehensive risk management facilitates that Sampo plc's executive management and Board of Directors are constantly aware of the Group companies' business-related risks and their ability to carry the financial and other risks related to business activities.

Sampo Group's business activities and therefore also their corresponding risk management activities are mainly performed in the Group's insurance and investment operations.

Sampo Group's risk management system is based on the Risk Management Principles established by the parent company. Sampo's business areas and insurance entities organise their risk management activities based on these Group level principles taking into account the business-specific characteristics as well as local laws and regulations.

To meet the key objectives of Sampo's risk management, the risk management system includes governance structure and authorisations and a clear division of responsibilities between business lines and independent functions. The insurance entities in the Group shall have prudent valuation, risk measurement and reporting procedures, in line with the companies' more detailed risk policies and instructions related to risk management.

Sampo Group's steering framework

Parent company's guidance

The Group's parent company steers its insurance businesses by setting targets for their underwriting performance and operating efficiency and by defining the main preconditions for their operations in the form of the group-wide principles. The parent company assesses the adequate level of capitalisation and the suitability of the capital structure on both Group level and insurance entity level.

Parent company's oversight and activities

Sampo's risk appetite defines the boundaries for what risk the Group is willing to accept in the pursuit of its objectives. Sampo reviews the performance of its business areas continuously and based on both the Group and business area level information, the Board of

Directors of Sampo decides on the Group's balance sheet targets and the parent company's liquidity reserve.

Activities and risk management in the business areas
Sampo's business areas and insurance entities organise their business activities to implement strategic decisions made by Sampo. They make decisions on specific risk-taking policies, capitalisation, risk limits and the delegation of authorisations considering the specific characteristics of their operations, within the framework provided by approved Sampo Guidelines or otherwise binding decisions by Sampo's Board of Directors. The business operations are monitored by the different governing bodies and ultimately by the Boards of Directors whose members are mainly in senior management positions in Sampo or in Sampo Group companies. The subsidiaries' line organisations are in charge of pricing their products and services and organising their sales and implementation processes, for ensuring the profitability, efficiency, quality, security, and continuity of their operations as well as the liability towards the clients. They are also responsible for the management of assets and liabilities and capitalisation on the insurance entity level.

Risk management consists of these continuous activities that are the responsibility of the personnel involved in business activities and being supported and controlled by independent risk management specialists. Parties independent of business activities provide complementary expertise, support, monitoring, and challenge related to the management of risk. This includes the development, implementation, and continuous improvement of risk management practices at a process, system, and entity level. Although the responsibilities of business lines and independent risk management are clearly segregated in Sampo Group, these functions are in continuous dialogue with each other. Sampo Group has defined the roles and responsibilities of different internal stakeholders in the Internal Control Policy, which applies on a group-wide basis.

Risk management process

The tasks included in the risk management process include the following:

Measuring and reporting of risks, capital, and earnings: Financial and risk management functions are explicitly responsible for preparing the above prerequisites for risk management and operationally they are responsible for independent measurement and control, including monitoring of operations in general as well as profitability, risk, and capitalisation calculations.

Continuous analysis of opportunities and risks: Business units and financial and risk management functions are both active in supporting the business with continuous analysis and assessment of opportunities. The insurance and investment business units assess business opportunities, especially their risk return ratios, on a daily basis. In the financial and risk management functions, on the other hand, a considerable amount of time is spent on risk analysis and reporting as well as capital planning.

Actions: Transactions representing the actual insurance and investment operations are performed in accordance with the given authorisations, risk policies, and other instructions. These actions are the responsibility of business and investment functions. Activities related to capitalisation and liquidity positions are included in this part of the process.

In Sampo Group, proactive profitability, risk, and capital management actions are seen as the most important phase in the risk and capital management processes. Hence, risk policies, limits, and decision-making authorisations are set up in a way that they, together with profitability targets, facilitate business and investment units to take carefully considered risks.

High-quality execution of the above-mentioned tasks contributes to the achievement of the key objectives of risk management:

1. Balance between risks, capital, and earnings:

- Risks affecting the profitability as well as other material risks are identified, assessed, and analysed.
- Underwriting risks are priced reflecting their inherent risk levels, expected returns of investment activities are in balance with their risks, and consequential risks are mitigated sufficiently.
- Capitalisation is managed in order to be adequate in terms of current risks inherent in business activities and business risks, taking into account the expected profitability of the businesses.
- Risk-bearing capacity is allocated into different business areas in accordance with the strategy.

2. Cost-efficient and high-quality processes:

- Client service processes and internal operational processes are cost efficient, sufficiently secured and of high quality.
- Continuity of operations is ensured and in case of discontinuity events, recovery is fast and comprehensive.
- Decision-making is based on accurate, adequate, and timely information.

3. Strategic and operational flexibility:
- External risk drivers and potential risks are identified and assessed, and the company is in good position, in terms of capital structure and management skills, to react to changes in business environment.
- Corporate structure, knowledge, skills, and processes in companies facilitate effective implementation of changes in the business environment.

When the above targets are met, risk management is contributing positively to return on equity and mitigating the yearly fluctuations in profitability.

Risk management reporting and governance framework

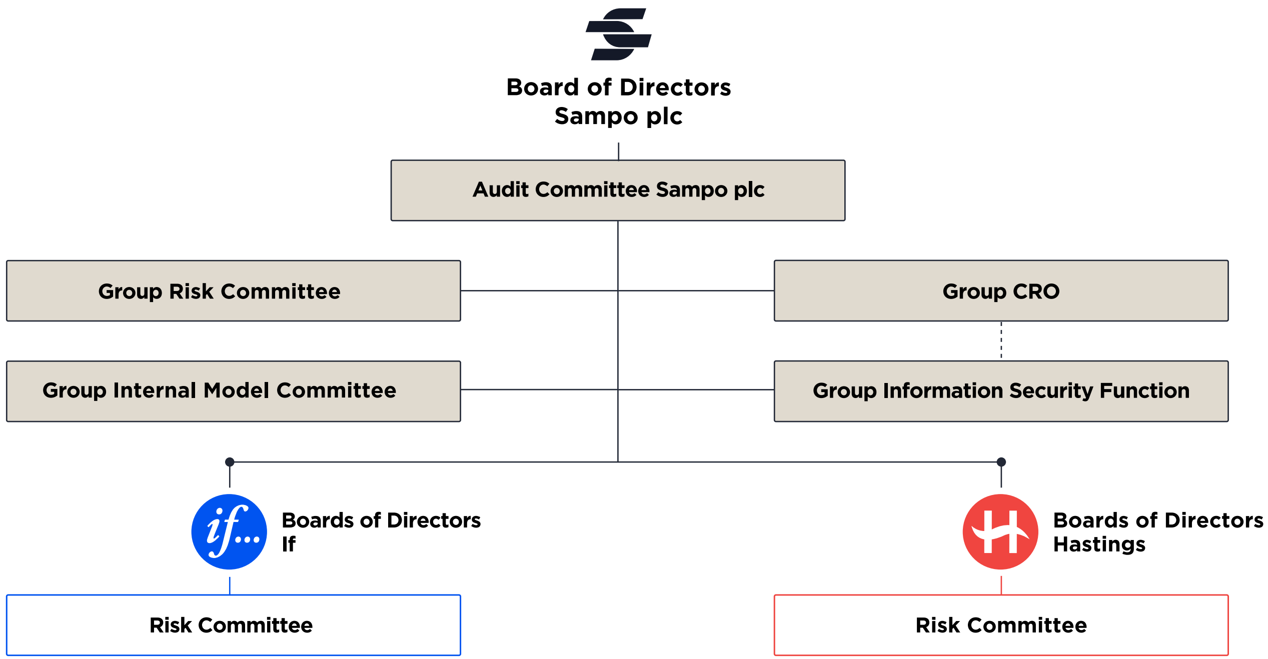
Sampo's profits, risks, and capital are reported to Sampo plc's Board of Directors at least quarterly. In addition to regular risk reports, Group CRO may ask Group companies to prepare an analysis/review on subjects that need special attention and in case of a severe incident, companies shall inform Sampo plc according to the defined process.

Sampo plc's Board of Directors and the Audit Committee, together with the boards of directors of the Group companies, share the overall responsibility for the Group's risk management system. The business units are responsible for day-to-day risk management decisions within the framework of the provided principles, guidelines, and authorisations (limits). The Sampo Group Risk Committee ensures effective communication and cooperation regarding risk management and risk reporting within Sampo Group. The Group Internal Model Committee is an advisory and preparatory body to the Board of Directors and the CEO of Sampo plc as well as for all Group companies' Boards of Directors and CEOs using the Group Internal Model to calculate the Solvency Capital Requirement.

In addition to these, Sampo has established a Sampo Group Reinsurance Committee, whose purpose is to discuss reinsurance related topics across various group companies and align interest on group level on reinsurance strategy and purchasing.

The risks in If and Hastings are monitored also by their Risk Committees.

Risk management governance framework in Sampo Group



More detailed information on Sampo's risk management is available in Sampo Group's Solvency and Financial Condition Report 2024 which will be disclosed in May 2025 at [www.sampo.com/year2024.](www.sampo.com/year2024)

Compliance

In Sampo Group, compliance is an activity supporting business activities while being independently administered, ensuring the compatibility with applicable norms of all Group activities.

The starting point of the Sampo Group Compliance Principles is that compliance with norms is an established part of Sampo plc's corporate culture. The principles ensure that compliance activities are properly organised in Group companies, and that the business organisation is capable of responding to the changing requirements of the business environment. The guidance contains the perceived common denominators of successful compliance activity – a set of general principles that describe essential features of effective compliance activities within the context of the business environment in which Sampo Group companies are operating. The principles do not, however, limit the flexibility of each Group company when addressing its own specific needs in relation to compliance.

Sampo Group Compliance Principles apply to all Sampo Group companies. It should, however, be noted that Sampo Group companies operate in several different jurisdictions, thus being under an obligation to abide with local legislation as well as authority rules and regulations. Consequently, the principles have been defined to facilitate the deployment of a set of tools and procedures serving best the individual needs for each company and local operating environment, and to ensure full compliance without jeopardising operational efficiency. The aforesaid obviously implies that the compliance function in each Group company must always meet the local standards and other requirements.

According to the approved principles all compliance activity is designed to ensure that all business activities, as well as the reporting of financial results and risks, are at all times compliant with laws, authority regulations, and internal guidelines and principles.

The compliance function also ensures that any applicable new legislation and regulation is fully enforced in Group companies' guidelines and day-to-day business activities.

According to the principles, the Group companies are permitted to organise their compliance activities operationally and organisationally as they deem pertinent and effective within the framework of applicable legislation.

Reporting of compliance activities is organised in each Group company as deemed appropriate and sufficient locally. Compliance matters are also regularly reported to the parent company's Board of Directors' Audit Committee, as determined in the Sampo Group Compliance Principles. Sampo plc's Compliance function is responsible for overseeing the compiling of these reports on the basis of the subgroup specific reports provided by the Group companies.

The CEO of Sampo Group is responsible for the proper organisation of the compliance function in the Group. The Board of Directors of each Group company ensures that the Group company has sufficient resources to organise effective internal control and compliance, while each Group company's Managing Director is responsible for arranging the respective Group company's compliance function.

Insider administration

Given the nature of Sampo Group's business areas, especially bearing in mind the extensive investment activities of Sampo Group companies, Sampo plc's Board of Directors has approved separate Guidelines for Insiders that is binding on all persons employed by Sampo Group as well as on members of Sampo plc's Board of Directors. In addition to current supranational law, such as the Market Abuse Regulation (Regulation (EU) No 596/2014 of the European Parliament and of the Council ("MAR")), applicable national law, including Nasdaq Helsinki's Guidelines for Insiders and the Financial Supervisory Authority's regulations, as well as statements and interpretations, have been taken into account in compiling the Guidelines for Insiders.

The Group Executive Committee, all Sampo plc's employees and other Group's employees working with interim statements and other financial announcements, and other persons who have access to such documents before publication thereof are under the following restrictions on trading:

- persons must not conduct any transactions relating to the financial instruments of Sampo Group during a closed window of 30 calendar days before the announcement of financial reports (so called extended closed window)
- persons are prohibited from having so called short-term positions in Sampo A shares (including depositary receipts and share entitlements), which refers to a situation where the period between the acquisition and disposal or the disposal and the acquisition of the shares is less than one month
- Group Executive Committee members and their closely associated persons must request for prior permission before trading in Sampo Group's financial instruments or in other separately defined financial instruments.

In addition to regulatory supervision, compliance with the obligations under the Guidelines for Insiders and the underlying legislation is supervised by the Insider Administration, which is a group function centralised in Sampo plc and led by the person in charge of insider matters.

Sampo Group's Guidelines for Insiders is available at **www.sampo.com/insiders**.

Whistleblowing

Sampo plc has a whistleblowing channel, which is based on the MAR.

In connection with the entering into force of the MAR, Sampo plc adopted an internal procedure for all employees to report infringements of both internal and external rules and regulations. All whistleblowing notifications are investigated promptly in a confidential manner while protecting the identity of the whistleblower as far as possible. During 2024, no whistleblowing notifications were reported.

Sampo Group companies have established their own whistleblowing channels designed to serve their personnel and relevant interest groups.

Principles for related party transactions

Sampo Group companies may not, as a general rule, enter into an agreement with related parties subject to terms and conditions that differ from those Sampo plc or its Group companies normally apply, or other agreements that are not commercially justified, with or for the benefit of certain individuals. All related party transactions shall be based on written agreements in accordance with the relevant local regulation and in the ordinary course of business and on arm's length terms.

Related party transactions in Sampo Group are traditionally purchases of internal services, or other services or products that are part of the ordinary business of a Group company.

Sampo Group's guidelines on related party transactions apply to all Group companies and they set the group-wide principles for monitoring and assessing as well as decision-making and reporting of related party transactions. The rules for the company level identification, decision-making, and reporting processes are set in the company level policies of each Group company, as approved by the Board of Directors of each Group company.

Related party transactions that are not part of the company's ordinary course of business or are made in deviation from customary commercial terms, require a decision of Sampo plc's Board of Directors to carry out the related party transaction. Such related party transactions shall be reported to the Group Compliance prior to entering into the transaction.

Each Sampo subgroup shall maintain a register of the related parties linked to the company within Sampo Group by close links and the reported related party transactions. An accumulated list concerning the agreements of the related parties of Sampo plc is sent to Sampo plc's Board of Directors or its committee annually. The Board of Directors or its committee must monitor and assess how agreements and other legal acts between the company and its related parties meet the requirements of ordinary activities and arm's length terms.

Additionally, in accordance with the Solvency II regulation, Sampo Group companies must report all significant related party transactions to the relevant supervisory authorities.

Internal audit

Internal Audit is a function independent of business operations, which evaluates the efficiency and effectiveness as well as the maturity of the internal control system within Sampo Group. The function helps the organisation to accomplish its objectives by a systematic, disciplined approach to evaluate and improve the effectiveness of the risk management, control, and governance processes. The Group function is organised under the Board of Directors of Sampo plc and it reports to Sampo plc's Board and Audit Committee. It is managed by the Group Chief Audit Executive, who is appointed by the Board of Directors of Sampo plc. Internal audit functions are established in each subgroup and legal entity as regulations demand and approved by the respective Board of Directors or equivalent.

The work is carried out in accordance with the Sampo Group Internal Audit Policy, approved by the board of directors of each Group company. According to the Policy, the Internal Audit applies the mandatory guidance of the Institute of Internal Auditors as applicable.

The Internal Audit establishes an internal audit plan for the regulated companies. A period for the audit plan may be defined in the subgroups. The plans are updated annually and approved by the board of directors in the respective legal entity. The plans of the subgroups are presented for Sampo plc's Audit Committee's information. The approach is risk based and it considers the focus areas of the business operations. The External Audit is informed about the internal audit plans.

The Internal Audit function reports on the audits and follow-up activities performed to the Board of Directors of the legal entities, and to Sampo plc's Audit Committee. Company-specific audit observations are reported to the respective companies' management. Furthermore, the function submits audit reports to Sampo plc's Audit Committee and the Board of Directors in all regulated entities at least twice a year. These reports include any significant deficiencies detected, including follow-up issues related to the risks not been mitigated or remedied according to the agreed action plans. In addition, an annual internal audit report is issued for Sampo Group.

The Group Chief Audit Executive is responsible for ensuring that a quality assurance and improvement programme is established in the internal audit functions. The results are reported to Sampo plc's Audit Committee.

External auditor

- **Deloitte Ltd**
  Authorised Public Accountant Firm
- **Jukka Vattulainen, APA ASA**
  Principally responsible auditor and sustainability reporting assurer

Audit firm Deloitte has acted as Sampo plc's as well as If Group's, Topdanmark's and Hastings Group's Auditor in 2024. Deloitte was elected as Topdanmark's Auditor in 2024.

The fees paid by Sampo Group companies to audit firm Deloitte for statutory audit services in 2024 totalled approximately EUR 4,322,000. In addition, Sampo Group companies paid audit firm Deloitte a total of approximately EUR 712,000 in fees for non-audit services, which is at most 16.5 per cent of the fees paid by Sampo Group companies to audit firm Deloitte for statutory audit services.

The fees paid by Sampo plc to Deloitte Ltd for statutory audit services invoiced in 2024 totalled approximately EUR 450,000 and approximately EUR 137,000 for sustainability reporting assurance. In addition, Sampo plc paid Deloitte Ltd a total of approximately EUR 204,000 in fees for non-audit services.

Sampo plc's AGM held on 25 April 2024 elected Deloitte Ltd to act as Sampo plc's Auditor with APA ASA Jukka Vattulainen as the auditor and sustainability reporting assurer with principal responsibility. APA ASA Jukka Vattulainen has acted as Sampo plc's principally responsible auditor since May 2021.

Sustainability Statement

General information

Basis for preparation

General basis for preparation of the sustainability statement

This Sampo Group Sustainability Statement 2024 has been prepared in accordance with the EU's Corporate Sustainability Reporting Directive (CSRD) and the related European Sustainability Reporting Standards (ESRS). The Statement covers Sampo plc (Sampo) and its subsidiaries If P&C Insurance Holding Ltd (publ) (If), including Topdanmark A/S (Topdanmark), and Hastings Group (Consolidated) Ltd (Hastings). The consolidation principles used in the Sustainability Statement follow those used in Sampo Group's financial reporting. The Statement includes Sampo Group's own operations as well as upstream and downstream value chain as described under the heading Strategy, business model and value chain (p. 61).

Sampo Group has not used the option to omit a specific piece of information corresponding to intellectual property, know-how, or the results of innovation. Neither has Sampo Group used the exemption as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU.

In accordance with ESRS 1 appendix C, Sampo Group has used the phase-in options that may be used by all reporting undertakings in the sustainability reporting for 2024.

Sampo Group has not marked this Sustainability Statement with digital XBRL sustainability tags in accordance with Chapter 7, Section 22 (1) (2) of the Accounting Act, as it has not been possible to comply with the provision due to the absence of the ESEF Regulation or other European Union (EU) legislation.

The comparative information (figures for the year 2023) reported in the Sustainability Statement related to the EU Taxonomy disclosures and greenhouse gas (GHG) emissions have not been assured by the assurance provider of this Sustainability Statement.

Disclosures in relation to specific circumstances

Sampo Group reports the disclosures in relation to specific circumstances (e.g. sources of estimation, outcome uncertainty) alongside the disclosures to which they refer (e.g. in the calculation principles of the respective metric), when applicable.

Governance

The role of the administrative, management, and supervisory bodies

Composition and diversity

Sampo Group's administrative, management and supervisory bodies consists of nine non-executive board members and the Group Chief Executive Officer (CEO). Sampo's Board of Directors does not have employee representatives. All Board members have been determined to be independent of the company and its major shareholders under the rules of the Finnish Corporate Governance Code 2025.

Sampo's Board Diversity Policy, which was updated in November 2024, aims to ensure that Sampo's Board of Directors embodies a well-balanced mix of knowledge, skills, diversity, and experience, fully in line with Sampo Group's values and Code of Conduct. Board members should have professional experience and education relevant and appropriate to Sampo's scale and scope, including financial expertise, industry knowledge, international experience, risk management and strategic planning expertise, and governance and leadership skills. Diversity is key, with consideration given to at least age, gender, geographical provenance, and educational and professional background. Further, each Board member is expected to devote sufficient time to the Board's work, and the Board as a whole shall fulfil the independence recommendations of the Corporate Governance Code.

To promote gender balance, both genders shall always be represented on the Board, with a target that women and men both shall be represented by at least 40 per cent of the members of the Board. However, some deviations may be applied if deemed reasonable due to the number of Board members. The number of the Directors and the composition of the Board shall be such that they enable the Board of Directors to perform its duties efficiently. During the past ten years, Sampo's Board of Directors has on average reached its target for gender diversity and the Board continues its efforts to reach the new minimum share of at least 40 per cent of the total number of members for both genders. As at 31 December 2024, the share of women on Sampo's Board of Directors was 33.3 per cent and the share of men was 66.7 per cent.

Roles and responsibilities

Sampo's Board of Directors is responsible for and has the ultimate oversight of group level sustainability, containing the entire range of environmental, social, and governance (ESG) matters. The board has assigned its Audit Committee to monitor Sampo Group's sustainability reporting and activities, such as reporting in accordance with the CSRD, the double materiality assessment, and Sampo Group's sustainability programme. Both the regulatory sustainability reporting and the Group sustainability programme enable the Board and the top management to monitor overall sustainability work and related targets. The annually published sustainability statement, including the double materiality assessment, and the annually updated Sampo Group Code of Conduct are reviewed by the Audit Committee and approved by the Board of Directors.

Sampo's Board of Directors elects and releases the Group CEO and appoints the Sampo Group Executive Committee (GEC). The Group CEO is in charge of the daily management of Sampo. The GEC supports the Group CEO in the preparation of strategic issues relating to Sampo Group, in the handling of operational matters that are significant or involve questions of principle, and in ensuring a good internal flow of information.

Sampo Group's Chief Financial Officer (CFO), who is a member of the GEC, directs Sampo's Sustainability unit. The CFO also ensures that adequate reporting on sustainability matters is provided to the Group CEO. Sampo's Sustainability unit is responsible for the development and coordination of sustainability at group level. The Group CFO and the Sustainability unit report to the Board of Directors and the Audit Committee on material impacts, risks, and opportunities and associated targets, when needed.

Skills and expertise

Sampo has identified materially important areas of expertise which have to be sufficiently covered by the Board members' range of skills and experience. These include business conduct, system of governance, and material impacts, risks, and opportunities related to the insurance industry. Sampo has a Board skills matrix, which shows the materially important areas of expertise, and the number and percentage of Board members who have strong experience in each area (self-assessment).

Non-financial experience has also been identified as a materially important area of expertise in the Board skills matrix. It is defined as the ability to interpret a company's non-financial information (including information related to ESG matters), identify key issues, set appropriate controls, and take necessary measures based on this information. In addition to the existing expertise, the Board of Directors has access to training on the topics identified as important, as needed. The Board members can also leverage knowledge, for example, through other positions they hold. Training on the CSRD was provided to Sampo's Board members in February 2024.

Sustainability organisation and reporting structure
Sampo Group

Board of Directors of Sampo plc	• Has the ultimate oversight of group level sustainability, covering the entire range of environmental (including climate change), social, and governance matters. • Approves the sustainability statement and the Code of Conduct of Sampo Group. • Completes an annual, independent self assessment, which includes sustainability-related questions.
Audit Committee of Sampo plc	• Assists the Board in overseeing sustainability. • Monitors group level sustainability reporting and activities, sustainability being a regular topic on the agenda of the Audit Committee meetings.
Group CEO	• Oversees the implementation of sustainability within Sampo Group.
Group CFO	• Directs the Sustainability unit of Sampo plc. • Ensures adequate reporting of sustainability matters to the Group CEO.
Sustainability unit of Sampo plc	• Develops and coordinates group level sustainability work and activities. • Prepares the group level sustainability statement and the sustainability programme including objectives and targets. • Sets schedules, requests, and provides group level guidance to subsidiaries.
Subsidiaries	• At each subsidiary, various business areas, operational departments, and units are actively involved in Sampo Group's sustainability endeavours. • Group level sustainability reporting is largely based on information provided by the subsidiaries according to formats and schedules defined by Sampo plc's Sustainability unit. • In addition to group level sustainability governance, each subsidiary has its own internal governance structures.

Information provided to and sustainability matters addressed by the undertaking's administrative, management, and supervisory bodies

Sampo Group's CFO and Sampo's Head of Sustainability report to the Board of Directors and the Audit Committee on sustainability matters at least twice a year, and more frequently when deemed necessary. During 2024, sustainability as a standalone topic was on the agenda at Board and/or Audit Committee meetings every quarter. The impacts, risks, and opportunities identified in Sampo Group's double materiality assessment were presented to the Board and its Audit Committee in 2024 as part of regular Board reporting. Going forward, the assessment will be reviewed annually, as required by the legislation.

In addition to Sampo's Sustainability unit, other units, such as Compliance, Risk Management, Investment Management and Operations, and Human Resources (HR), provide regular reporting to the Board and/or its committees and the Group Executive Committee. This reporting may also include sustainability matters, as sustainability is an integral part of operations. The Board and its committees receive meeting materials before each Board and/or committee meeting and have time to provide feedback. During a meeting, a presentation on the topic in question is provided before a decision is made.

At Sampo Group, sustainability is seen as a business risk driver, and sustainability-related risks are a part of Sampo Group's overall risk management. This means that sustainability considerations have been incorporated into overall business and business practices (e.g. insurance and investment operations). Sampo's Board of Directors is responsible for ensuring that the Group's risks are properly managed and controlled, while the Audit Committee prepares Sampo Group's risk management principles and other guidelines. Additionally, the Board of Directors oversees material impacts and opportunities related to strategy and major transactions together with the operative management.

A list of the material sustainability topics addressed by Sampo's Board of Directors is presented in this Sustainability Statement under the heading Material impacts, risks, and opportunities, and their interaction with strategy and business model (p. 66). In addition, examples of topics addressed at the Board meetings in 2024 include annual policy updates (e.g. Sampo Group Code of Conduct), regulatory development concerning sustainability (e.g. CSRD), sustainability reporting (e.g. climate-related work, EU Taxonomy, employee engagement, customer satisfaction), internal control, and regular compliance/governance/risk reporting.

Integration of sustainability-related performance in incentive schemes

Sampo's Board of Directors resolves all group level remuneration matters. The Nomination and Remuneration Committee supports the Board of Directors by preparing the proposals to the Board on the remuneration of the GEC members, Sampo Group's long-term incentive schemes (LTIs), maximum pay-outs based on short-term incentive programmes (STIs), as well as the actual payments to be made to the members of the GEC.

Sampo's Remuneration Policy for Governing Bodies states that the performance measures of the STIs and LTIs of the Group CEO may include, for example, shareholder value creation, financial or operative key performance indicators (KPIs), and sustainability performance criteria. The Board members are independent of the companies and do not participate in variable compensation programmes.

At Sampo Group, variable compensation is used to ensure the competitiveness of the total remuneration package and can be either short-term or long-term. Sampo's Board of Directors decides on one-year STI programmes separately each year and on cash pay-outs from the programmes in the following year. The Group CEO participates in a one-year STI programme, where the payout is triggered by an underlying performance criterion and the outcome is determined on the basis of key financial and non-financial performance criteria related to Sampo Group and its subsidiaries. The maximum amount that can be paid to the Group CEO from the 2024 programme corresponds to 12 months' fixed salary. Part of the payout shall be deferred for at least three years as required in the regulatory framework applicable to Sampo.

The Group CEO also participates in the LTI scheme 2024 for Sampo Group's key employees. The Group CEO has been allocated 37,909 performance incentive units with a value equivalent to 150 per cent of his annual base salary at the time of allocation. The number of performance incentive units that will vest ranges from 0–37,909 and is dependent on performance criteria related to the development of the total shareholder return, operational performance, and sustainability. In addition, the performance incentive units are subject to Sampo A share price movements over the performance period. The scheme has a three-year performance period and at pay-out from the 2024 scheme, the Group CEO is obliged to purchase Sampo A shares with 50 per cent of the pay-out after deducting income tax and other comparable charges. The shares are subject to disposal restrictions for three years, after which the Board of Directors shall decide on the possible release.

Sustainability performance criteria

In 2024, 10 per cent of the reward from the STI programme was subject to work related to sustainability. The sustainability performance criterion of the STI was the submission of the group level science-based climate targets (SBTs) to the Science Based Targets initiative (SBTi) for validation. Also, 10 per cent of the reward from the LTI scheme 2024 is subject to the performance of Sampo Group's work related to sustainability. The sustainability performance criterion consists of Group and subsidiary balanced scorecards relating to the development, implementation, and execution of the SBTs.

In addition to the above mentioned criteria, Sampo Group did not factor further GHG emission reduction targets into remuneration in 2024.

Statement on due diligence

The main aspects and steps of Sampo Group's due diligence process are described under the applicable disclosure requirements in this Sustainability Statement. The table Mapping of the main aspects and steps of the due diligence process (p. 60) lists the reported information.

Mapping of the main aspects and steps of the due diligence process

Sampo Group

Core elements of due diligence	Paragraphs in the Sustainability Statement		
	General disclosures and Governance information	**Environmental information**	**Social information**
Embedding due diligence in governance, strategy, and business model	• How sustainability matters are addressed in Sampo Group's management (**p. 58**) • STIs, LTIs, and the ESG criteria included in remuneration (**p. 59**) • Material impacts, risks, and opportunities (IROs), and their linkage to the Group's strategy and business model (**p. 66**) • Material IROs in relation to Business conduct (**p. 115**)	• STIs, LTIs and the ESG criteria-related to science-based targets (**p. 59**) • Material IROs in relation to climate change (**p. 77**) and resource use and circular economy (**p. 87**)	• Material IROs in relation to own workforce (**p. 90**), workers in the value chain (**p. 102**) and consumers and end-users (**p. 107**)
Engaging with affected stakeholders in all key steps of the due diligence	• How sustainability matters are addressed in Sampo Group's management (**p. 58**) • How interests and views of stakeholders are taken into account in the Group's strategy and business model (**p. 64**) • How the process to identify IROs and assessing materiality is informed by the due diligence process and includes consultation with affected stakeholders (**p. 68**) • Policies related to business conduct and corporate culture (**p. 116**)	• Process to identify and assess IROs related to climate change and resource use and circular economy, including how affected stakeholders have been considered (**p. 68**) • Policies related to climate change (**p. 80**) and resource use and circular economy (**p. 88**)	• How interests and views of own workforce, workers in the value chain, and consumers and end-users are taken into account in strategy and business model (**p. 64**) • Policies related to own workforce (**p. 91**), workers in the value chain (**p. 103**), and consumers and end-users (**p. 108**) • Processes for engaging with own workforce (**p. 92**), workers in the value chain (**p. 104**), and consumers and end-users (**p. 109**), including grievance mechanisms and remediation of negative impacts
Identifying and assessing adverse impacts	• Description of the double materiality assessment, including specific information on the process to identify and assess governance-related negative impacts (**p. 68**) • Identified material IROs, as well as how negative impacts interact with strategy and business model (**p. 66**)	• Description of the double materiality assessment, including additional description of the process to identify and assess climate and circular economy-related negative impacts (**p. 68**) • How negative impacts related to climate change interact with strategy and business model as well as additional information about climate-related risks (**p. 78**)	• Description of the double materiality assessment (**p. 68**) • How negative impacts related to own workforce (**p. 91**), workers in the value chain (**p. 103**), and consumers and end-users (**p. 108**) interact with strategy and business model
Taking actions to address those adverse impacts	• Management of supplier relationships and prevention and detection of corruption and bribery (**p. 116**)	• Actions and resources related to climate change (**p. 80**) and resource use and circular economy (**p. 88**) • Transition plan for climate change mitigation (**p. 79**)	• Actions and resources related to own workforce (**p. 93**), workers in the value chain (**p. 105**), and consumers and end-users (**p. 111**)
Tracking the effectiveness of these efforts and communicating	• Metrics and targets related to business conduct (**p. 118**)	• Metrics and targets related to climate change (**p. 82**) and resource use and circular economy (**p. 89**)	• Metrics and targets related to own workforce (**p. 95**), workers in the value chain (**p. 106**), and consumers and end-users (**p. 112**)

Risk management and internal controls over sustainability reporting

Sampo Group's risk management and internal control system in relation to the sustainability reporting process are a part of Sampo Group's overall risk management. As part of Sampo Group's internal control framework, the Group companies have comprehensive risk management procedures in place to ensure the functioning of the reporting process, including sustainability reporting. Risk management procedures include risk identification, assessment, measurement, monitoring, and reporting.

Sampo Group identifies and assesses risks related to operations on a regular basis. The process takes into account the causes and consequences of the risks and the existing controls. In addition to assessing the likelihood and impact of the risk realisation, Sampo Group assesses the need for possible additional measures. Based on the assessment, the risks are arranged in the order of their significance.

Risks related to the sustainability reporting process are mainly linked to ensuring the accuracy and completeness of the information. Sampo Group controls these risks, for example, through internal guidelines, well-defined responsibilities, the use of the four-eyes principle, and other controls.

During the risk identification and assessment, an owner is appointed for all identified risks. The owner is responsible for taking action and developing measures in relevant internal functions based on the findings.

The most significant risks and related mitigation measures are regularly discussed, for example, in the Group's risk committees. Chief Risk Officers (CROs) report risks to the respective senior management and the Board of Directors.

Strategy

Strategy, business model, and value chain

Sampo Group's strategy focuses on P&C insurance; investing in and developing its P&C insurance operations across the Nordic countries, the UK, and the Baltics. The strategy is based on disciplined underwriting, strong operational capabilities, and customer centricity. Combined with careful risk management, this enables Sampo Group to deliver attractive margins and strong financial resilience, both of which Sampo considers essential to value creation.

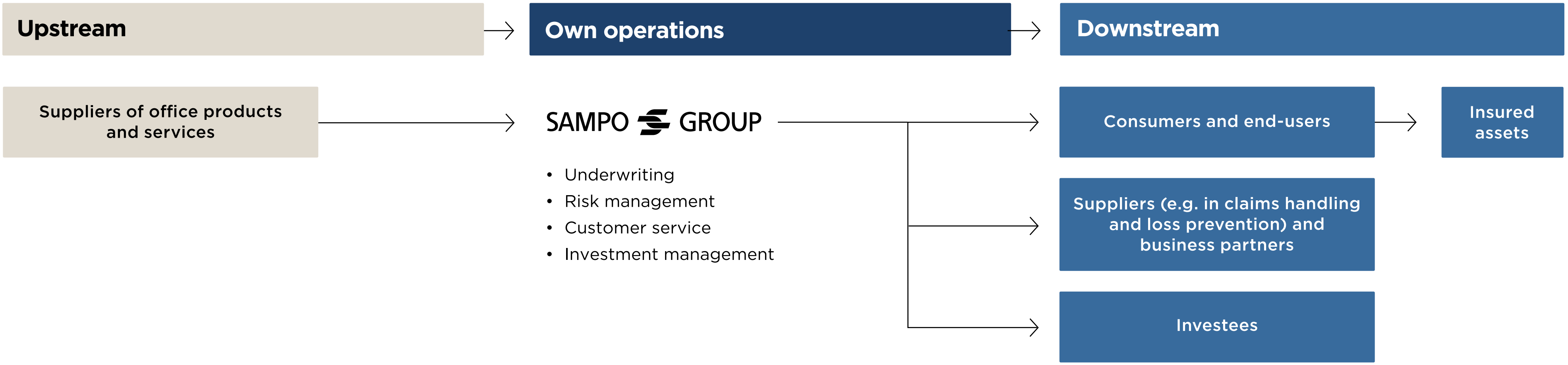
Sampo Group's insurance operations are conducted through If, Topdanmark (which is to be merged with If), and Hastings. The subsidiaries are responsible for pricing their products and services, organising their sales and implementation processes, ensuring the profitability, efficiency, quality, security, and continuity of their operations, as well as for liabilities towards their customers. The subsidiaries are also responsible for the management of assets and liabilities, risks, and capitalisation on the business area and company level.

Sampo Group provides safety to customers through its high-quality P&C insurance products. Safety is enabled by a detailed understanding of various risks that Sampo Group underwrites. By pooling risks, Sampo Group balances the various risks of the customer base and provides insurance coverage for events that can be complex for customers to prepare for without P&C insurance products.

Sampo Group accomplishes the safety and value creation through its teams of employed professionals and through cooperation with suppliers and other business partners. The value created for customers flows to fair compensation to Sampo Group's employees and suppliers, and shareholders. This safety also benefits society at large, enabling other sectors to continue creating value through their value chains, which are insured for perils with Sampo Group's P&C insurance solutions.

Sampo Group's activities are divided into own operations, and an upstream and downstream value chain. The Group's own operations are focused on P&C insurance operations, with an emphasis on underwriting and managing risk, customer support, and investment operations. Sampo Group's upstream value chain includes suppliers of office products and services (e.g. ICT suppliers and external data providers) who support the running of the business. In the downstream value chain, Sampo Group has a large network of suppliers and business partners, of which suppliers in claims handling and loss prevention (e.g. vehicle and property repair contractors), and partners in health and travel services form a major part. The main features of Sampo Group's value chain are described in the figure Value chain (p. 62).

Value chain
Sampo Group



Significant groups of products, services and markets
Sampo Group's largest customer group is private individuals. The largest product segments for private individuals are motor and home insurance, but Sampo Group also offers other insurance covers, such as travel insurance and personal accident covers. Sampo Group's second largest business area is commercial insurance. While property and motor insurance risks dominate in the commercial business area, certain liability covers are also prominent. In addition, Sampo Group is a leading provider of industrial lines P&C insurance in the Nordic region through If. In the United Kingdom (UK) P&C insurance market, Sampo Group operates through the digital insurer Hastings, which is one of the largest retail motor insurance providers in the UK and a challenger in the home insurance market with a fast-growing customer base.

Sampo Group's operations are diversified by geography, line of business, and customer group. The Group's main operating countries are Finland, Sweden, Norway, Denmark, the UK, and the Baltic countries.

As at 31 December 2024, Sampo Group's total employee headcount was 15,581. The number of employees by geographical areas is presented under the disclosures related to own workforce (p. 96).

Sampo Group's insurance revenue totalled EUR 9,450 million in 2024. For more information on the breakdown of revenue in accordance with operating segments, see Result by segment for twelve months ended 31 December 2024 in the Financial Statements.

Sustainability programme

Sampo Group

Strategic sustainability themes	Objectives	Key metrics and targets
Climate and environment Including topics such as: • Climate change • Biodiversity • Resource use and circular economy	**Protecting the environment and combatting climate change** • Sampo integrates environmental and climate considerations into its insurance and investment operations. • Sampo cooperates with stakeholders on environmental and climate-related matters.	• Science-based climate targets (SBTs) for own operations (Scope 1 and 2) and investments (Scope 3)
People and communities Including topics such as: • Human rights and labour practices • Diversity, equity, and inclusion • Health, safety, and well-being • Employee competence development • Customer needs and preferences • Sustainable sales and marketing practices • Stakeholder engagement	**Driving positive impact in society** • Sampo provides health, safety, and well-being in society. • Sampo offers the most appropriate insurance solutions for its customers' needs. • Sampo is a reliable partner for all stakeholders.	• Employee engagement targets (eNPS or similar) • Customer satisfaction targets (tNPS)
Business management and practices Including topics such as: • Anti-corruption and bribery • Anti-money laundering and counter-terrorist financing • Data privacy • Information security and cybersecurity • Whistleblowing and grievance procedures • Sustainable insurance operations • Sustainable partnerships and supply chain management • Responsible investment	**Ensuring sustainability in governance and business operations** • Sampo complies with applicable laws and regulations. • Sampo integrates sustainability considerations into its insurance and investment operations. • Sampo promotes the sustainability of its supply chain.	• Targets related to internal policies and guidelines • Supplier Code of Conduct and engagement targets

Integration of sustainability into business

Sampo Group integrates sustainability into its core business. In terms of insurance operations this means, for example, that Sampo Group takes ESG considerations into account in underwriting (e.g. sets expectations for corporate clients to respect international norms and standards as defined by the UN Global Compact, integrates sustainability into underwriting principles and/or other relevant policies), provides loss prevention services (e.g. risk management services), handles claims in a sustainable way, and develops products and services in accordance with relevant legal requirements (e.g. the EU Taxonomy). Sampo Group's sustainability-related goals apply to all Group operations rather than to specific customer groups and markets.

Sampo Group has a sustainability programme, which drives group level sustainability work. The programme consists of three strategic sustainability themes: Climate and environment, People and communities, and Business management and practices, which are in turn divided into more specific topics relevant for the Group's sustainability work. The group level programme is put into practice by the Sampo Group companies and the work is monitored continuously.

Sampo Group has set general objectives for each sustainability theme. Additionally, metrics and targets are in place to monitor the progress in more detail. Performance against the set targets is presented, for example, in this Sustainability Statement. Science-based climate targets are disclosed under the Climate change standard, employee engagement is covered under the Own workforce standard, customer satisfaction falls under the Consumers and end-users standard, and metrics related to supplier codes of conduct can be found under the Workers in the value chain standard. Compliance with internal policies and guidelines is discussed under multiple standards, as many of them focus on describing material policies and guidelines.

In 2024, Sampo Group's sustainability programme was reshaped to better address the regulatory demands, while also including areas that are critical especially for a company operating in the P&C insurance sector. In addition, the selected topics link to Sampo Group's overall business and strategy and are important to the Group's various stakeholders.

Interests and views of stakeholders

Sampo Group's primary stakeholder groups are customers, investors, employees, suppliers and other business partners, investee companies, and local communities. Each primary stakeholder group has several subcategories as described in the table Stakeholder engagement and dialogue (p. 65).

Sampo Group engages with all its stakeholder groups through a number of forums and on multiple topics. The intention is to engage in activities and dialogue that are best aligned with the needs of Sampo Group and its stakeholders. Sampo Group seeks to ensure meaningful engagement with stakeholders, for example, by identifying relevant stakeholders, ensuring continuous and regular communication, and providing suitable forums for dialogue.

The purpose of stakeholder engagement is to build trust between Sampo Group and its stakeholders and to seek common benefits. The stakeholder engagement helps Sampo Group to proactively consider the needs and wishes of its stakeholders. By focusing on stakeholder engagement, Sampo Group can mitigate potential risks, including uncertainty and dissatisfaction of its key stakeholder groups. Stakeholder engagement can help Sampo Group foster its reputation, trust, and buy-in for the company's key initiatives. In addition, Sampo Group considers stakeholder engagement to be a valuable source of information. The different stakeholders are experts in their own fields and can offer knowledge and expertise for the purposes of the Group. When relevant, Sampo Group can also offer its time and expertise to support the stakeholders.

As a result of the continuous dialogue, Sampo Group's key stakeholders support the Group's chosen strategy and business model. The views and interests of stakeholders are considered, where possible, when developing the strategy. As a result of stakeholder engagement, Sampo Group aims to advance its operations and relationship with stakeholders further. Examples of actions taken include improved external communications, customer service, and internal reporting. Sampo Group's Board of Directors is informed about the views and interests of stakeholders as part of regular reporting and when considered necessary.

Engagement with own workforce, workers in the value chain, and customers and end-users

The interests, views, and rights of Sampo Group's own workforce inform and support the company's strategic decisions. Sampo Group strives for a constructive, trustful, and open dialogue with employees and their elected representatives with the purpose of developing the company and safeguarding the correct treatment of all employees. Sampo Group recognises, for example, the importance of workforce engagement, health, safety, wellbeing, work-life balance, diversity, equity and inclusion (DEI), and professional development.

Sampo Group indirectly engages with its value chain workers on material topics through its suppliers, investee companies and corporate customers. The perspectives of value chain workers provide important insights for identifying and understanding the Group's impacts on human rights and labour practices across its activities and business relationships. Engagement with value chain workers is integrated into daily business operations, for example, through due diligence processes.

For Sampo Group, the needs, preferences, and wellbeing of consumers and end-users is a key input informing strategy, and the Group's business model is primarily shaped based on the interests of its customers. Sampo Group's employees who develop and deliver insurance products and services are constantly monitoring and taking customers' interests into consideration. The recognition of the interests of customers is complemented by the inputs and views of Sampo Group's employees, suppliers, and other business partners in shaping the Group business model and strategy.

Stakeholder engagement and dialogue

Sampo Group

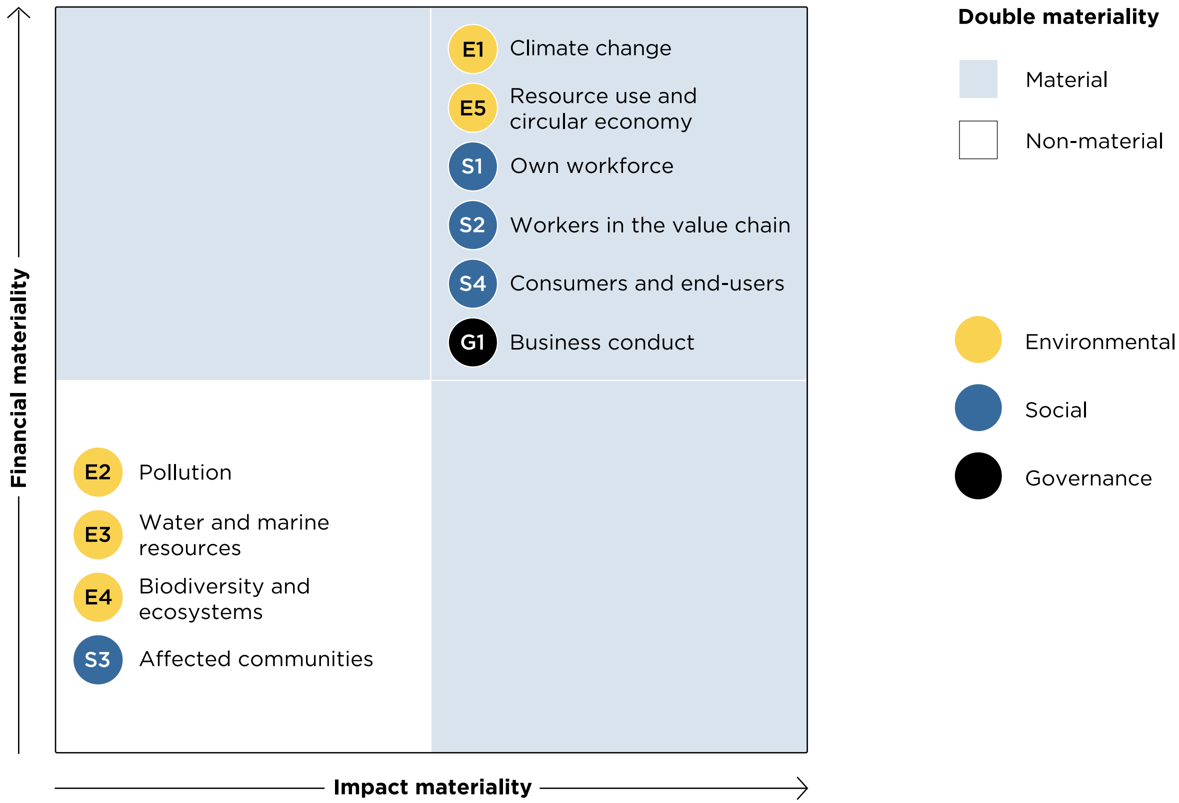
Key stakeholder group	Forum for dialogue and approximate frequency	Examples of discussion topics
Investors (current and potential shareholders and debt investors)	• Annual General Meeting (AGM) (annual) • Capital Markets Day (CMD) (annual or less frequent) • Roadshows (quarterly) • Seminars (quarterly) • Virtual and face-to-face meetings (weekly)	• Financial performance and targets • Strategy and Group structure • Regulatory development • Climate targets • Executive remuneration • Sustainability in general
Customers	• Regular customer contact points, e.g. website, chat, contact centre (24/7 or daily) • Customer feedback channels (24/7) • Customer satisfaction surveys (24/7 or daily) • Virtual and face-to-face meetings (daily) • Customer Ombudsman (daily) • Events (varying) • Company publications, e.g. magazines (varying)	• Products and services • Loss prevention and claims handling • Sustainability in general • Market situation in general • Responsible business practices
Employees	• Employee engagement surveys (biannual/annual) • Performance appraisals and dialogue with leaders (varying) • Work environment committees (varying) • Meetings with union and employee representatives (varying) • Employee representation and consultation forums (varying) • Employee roadshows (on a needs basis) • Social events (varying)	• Financial performance • Non-discrimination • Diversity and inclusion • Change in Group structure • Employee engagement surveys • Performance and development plans • Sustainable workplace
Suppliers and other business partners (e.g. analysts, rating agencies)	• Virtual and face-to-face meetings (daily) • Events (varying) • Company publications, e.g. magazines (varying)	• Financial performance • Supply chain management (e.g. targets, performance, sustainability considerations) • Change in Group structure • Future plans • Products and services
Investee companies	• Virtual and face-to-face meetings (varying) • AGMs of the investee companies (varying)	• Financial performance • Market situation in general • Regulatory development • Sustainability in general
Local communities (e.g. regulators, supervisors, industry associations, educational institutions, NGOs, general public, the media)	• Virtual and face-to-face meetings (weekly) • Events (varying) • Company publications, e.g. magazines (varying)	• Financial performance • Regulatory development • Sustainability in general • Climate change

Material impacts, risks, and opportunities, and their interaction with strategy and business model

Sampo Group has conducted a double materiality assessment as required by the CSRD. The results of the assessment are presented in the figure Double materiality matrix.

At Sampo Group, resilience to sustainability issues is ensured by continuous adaptation of risk assessment and pricing strategies to account for emerging sustainability factors, thereby ensuring long-term profitability and stability of the business. Adapting strategy and business model according to sustainability issues is critical for Sampo Group in terms of maintaining customer confidence and reducing financial risks, and the Group continuously invests in its people and technology to ensure that it maintains its competitive edge. Combined with careful risk management, this enables Sampo Group to deliver quality customer experience, attractive margins, and strong financial resilience. Resilience towards material impacts, risks, and opportunities is assessed as a part of Sampo Group's existing processes for sustainability management, risk management, and strategy development. For more information on how Sampo Group's strategy and business model interacts with material impacts, risks, and opportunities, see the Strategy section under each reported topical ESRS standard.

Double materiality matrix
Sampo Group



2024 is the first reporting year after conducting a double materiality assessment, and as such Sampo Group reports no changes to the material impacts, risks, and opportunities compared to the previous year. All the impacts, risks, and opportunities reported in the Sustainability Statement 2024 are covered by the ESRS disclosure requirements, as Sampo Group does not include additional, entity-specific disclosures in the statement. However, Sampo Group has introduced entity-specific metrics to complement the disclosure requirements related to the ESRS standards E5 Resource use and circular economy, S1 Own workforce, S2 Workers in the value chain, and S4 Consumers and end-users. Based on the identified risks and opportunities in the double materiality assessment, Sampo Group does not expect there to be material adjustments within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements.

A short summary of the material sustainability topics is presented next. A more thorough specification of the material topics, related impacts, risks, and opportunities, as well as Sampo Group's approach to managing them is presented at the beginning of each topical ESRS standard of this Sustainability Statement.

Climate change

The climate impact of Sampo Group's own operations is minor, as the direct GHG emissions are relatively low. When considering the whole value chain, including investments and suppliers, the negative impact of GHG emissions is more significant. Sampo Group has recognised both climate-related physical risks and transition risks. Physical risks include more frequent and severe natural disasters and changing weather patterns, which can translate into increased claims due to damages caused, for example, by storms and floods. Transition risks, on the other hand, emerge during the shift to a low-carbon economy. These risks are driven by changes in the regulatory environment, new technology, changing customer behaviour, and increased interest in and concern for environmental matters. There are also climate-related opportunities, for example, in underwriting, and Sampo Group can take advantage of the possibly increasing demand for insurance products and services which provide protection against physical risks and support climate change adaptation.

Resource use and circular economy

Sampo Group uses resources in its business operations, especially in claims handling. Resource use inherently causes negative environmental impact, which Sampo Group can mitigate by adopting and increasing circular practices in product development and claims handling. Circular practices can also lead to cost reductions for Sampo Group in the long-term due to reduced use of virgin materials.

Own workforce

Sampo Group strives to create an engaging work environment, which fosters creativity, innovation, and wellbeing, promotes DEI, and encourages employees on their career paths, thus creating positive social impact. When employees feel like they belong in an organisation, they are more likely to stay longer. Failing to meet these expectations can lead to increased employee turnover and difficulties in recruiting competent workforce, which in turn can create a financial risk.

Workers in the value chain

Sampo Group has an impact on workers in the value chain especially through its downstream suppliers (e.g. suppliers in claims operations), business partners, corporate customers, and investees. The risk of negative impacts related to labour practices and human rights can be mitigated with strong policies and governance structures, but they cannot be completely eliminated. Due to increasing regulation and possible reputational issues, negative impacts can also cause financial risks.

Consumers and end-users

Through careful risk management and disciplined underwriting, Sampo Group can have a positive impact on consumers and end-users' health and safety, which provides business opportunities for the Group. Failing to meet customer expectations related to topics such as data privacy or sales practices can impact Sampo Group's customers negatively and, therefore, create financial and reputational risks.

Business conduct

At Sampo Group, sustainable corporate governance and solid business practices are seen as a baseline. By promoting high standards related to topics such as anti-corruption and bribery and risk management, Sampo Group can contribute to the overall security of society.

Impact, risk, and opportunity management

Description of the process to identify and assess material impacts, risks, and opportunities

The purpose of Sampo Group's double materiality assessment was to identify sustainability matters, which could trigger risks or opportunities that influence Sampo Group's ability to create and protect value (financial materiality), as well as sustainability matters related to Sampo Group's business, which could have positive or negative impacts on society, people, or the environment (impact materiality). The double materiality assessment served as a source for identifying the information to be included in this Sustainability Statement. The assessment was conducted in collaboration with an external partner, and the work and its results were presented to Sampo's Board and its Audit Committee during the project. The methodology used in the double materiality assessment follows the legislative requirements and supporting guidance provided by the European Financial Reporting Advisory Group (EFRAG).

The double materiality assessment started with identifying an initial list of sustainability topics potentially material for Sampo Group. The list was compiled based on, for example, the ESRS standards, GRI, SASB standard for the insurance sector, industry benchmarking, media and megatrend analysis, Sampo Group's previous materiality assessment, ESG ratings and reports, information on Sampo Group's investments, and investor meetings and feedback.

Representatives from Sustainability, Risk Management, HR, Strategy, and Investor Relations functions participated in identifying the impacts, risks, and opportunities associated with the sustainability topics through workshops. The identified impacts, risks, and opportunities were mapped based on their expected location in Sampo Group's value chain. It was also defined during which time-horizons (short-term: less than 1 year, medium-term: 1–5 years, or long-term: over 5 years) it can be expected that the impacts, risks, and opportunities would materialise.

Each Sampo Group company conducted its own double materiality assessment in parallel with the group level assessment, and their results were reviewed against the group level results to ensure that all material topics are covered and group level alignment is ensured. In Sampo Group's double materiality assessment, the group level view is emphasised. Therefore, the exact results of individual group companies' own assessments may deviate from the group level assessment.

In the assessment of impacts, Sampo Group utilised regular dialogue with stakeholders, and documentation of affected stakeholders' perspectives collected continuously through the Group's existing channels. Regarding social impacts, findings from Sampo Group's human rights impact assessment were utilised in order to include perspectives from affected stakeholders. Sampo Group's main stakeholders and forums for stakeholder dialogue are presented as a part of this Sustainability Statement (p. 64).

When assessing impact materiality, each sustainability topic was categorised based on whether its impact on society, people, or environment is positive or negative, and whether it is actual or potential. The criteria used for defining the impact materiality score for each topic were scale and scope, and for negative impacts, irremediable character of the impact was included in the assessment. For potential positive and negative impacts Sampo Group estimated the likelihood of the impact occurring.

When assessing financial materiality, each sustainability topic was categorised based on whether it potentially causes more risks or opportunities to the business and value creation. The identified impacts and dependencies of Sampo Group's business model on sustainability topics acted as the starting point for the risk and opportunity identification. The criteria used for defining the financial materiality assessment for each topic were the potential magnitude of its financial effects, and likelihood of occurrence.

Thresholds were set based on the quantitative assessment of severity/financial effect and likelihood, using the expertise and perspectives of involved stakeholders. Sampo Group set thresholds separately for impact materiality and financial materiality. When assessing the threshold for financial materiality, for example, the scale of impact (whether the impact concerns all the Group companies) as well as the potential impact on Sampo Group's reputation and share price were considered. Sustainability topics were determined to be material if the severity/financial effect and the likelihood of the related impacts, risks, and opportunities exceeded the threshold values.

Sampo Group assessed each applicable criterion for a specific impact, risk, and opportunity on the same scale, and completed the quantitative assessment by qualitative descriptions. Impact, risk, and opportunity assessment was discussed in workshops with internal stakeholders, including representatives from the Sampo Group companies. Sampo's Board and its Audit committee validated the final results of the double materiality assessment as a part of the reporting on the Sustainability Statement.

Sustainability-related risks are a part of Sampo Group's overall risk management, and follow the same risk management process as the Group's other risks. The sustainability risks identified as part of the overall risk management were taken into consideration in the double materiality assessment. Identified impacts are considered and addressed indirectly through Sampo Group's risk management process when they are related to the Group's risks.

Sampo Group had already integrated the key risks and opportunities identified as a part of the double materiality assessment into the Group's overall risk management systems. Sampo Group's process for identifying, assessing, and managing sustainability opportunities is integrated into the Group's management protocols, ensuring strategic alignment with business objectives and operational decisions.

The double materiality assessment described in this Sustainability Statement was the first one Sampo Group has conducted and thus there have been no changes to how the assessment was conducted compared to previous reporting periods. Sampo Group's double materiality assessment will be reviewed annually, and any changes to the process or results will be reported in future sustainability statements.

Additional process description related to environmental and governance topics

Climate change

In addition to the double materiality assessment, Sampo Group uses GHG emissions calculations, climate-related scenario analyses, and different risk management practices, such as internal model, price analyses, stress tests, and sensitivity analysis, to identify and assess climate-related impacts, risks, and opportunities. Sampo Group has considered both its own operations and its value chain when identifying the climate-related impacts, risks, and opportunities.

Sampo Group assesses climate-related physical and transition risks in its own operations and value chain as part of the existing risk management practices. These include, for example, group level and company-specific stress tests and scenario analyses, in which the severity of natural catastrophes is assumed to increase. The scope, method, and results of the group level scenario analysis are described in this Sustainability Statement (p. 78). In the short term, physical climate risks arise in the form of changes in claims frequencies and/or severity of the climate-related events that are already relevant in the current climate in the Nordics, such as wind storms, floods, heavy rainfall, landslides, erosion, and heatwaves. In the medium to long term, increased weather-related losses will likely increase the exposure for P&C insurers.

Climate-related transition risks are associated with changes in the regulatory environment, new technology, changing customer behaviour, and increased stakeholder concern. Companies insured by Sampo Group may be exposed to litigation under new regulation related to climate change, leading, for example, to increased claims costs in liability insurance. Increased concern from stakeholders (e.g. from investors, customers, and reinsurers) can lead to increased costs for due diligence and a need to discontinue business relationships with certain suppliers and customers.

Sampo Group has noted that there are also opportunities related to climate change, such as underwriting opportunities and possibilities to invest in new green technologies. Increased climate-related physical risks can also lead to increased demand for insurance products and services providing protection against physical risks and supporting climate change adaptation. Development of new products and services is part of Sampo Group's normal business development and innovation. Risk management services are already part of Sampo Group's services to both corporate and private customers.

Pollution and Water and marine resources

Sampo Group has assessed that pollution and water and marine resources are not among the most material sustainability topics for a company operating in the P&C insurance industry. Therefore, Sampo Group has not comprehensively screened its assets, business activities, and site locations or conducted consultations with affected communities regarding these topics.

Biodiversity and ecosystems

Sampo Group has assessed that biodiversity and ecosystems is not among the most material sustainability topics for a company operating in the P&C insurance industry. Therefore, Sampo Group has not comprehensively screened its site locations and value chain or conducted consultations with affected communities regarding the topic. Sampo Group's most relevant impacts, dependencies, risks, and opportunities related to biodiversity and ecosystems are linked to its value chain, mainly underwriting and investment operations. Sampo Group has conducted an initial screening of its investment portfolio to assess its exposure to sectors connected to high biodiversity impacts and risks. Sampo Group aims to develop its data collection and reporting based on the findings of the assessment.

Resource use and circular economy

The process for identifying material impacts, risks, and opportunities related to resource use and circular economy has focused on information already existing within Sampo Group. Affected communities were not specifically identified in relation to resource use and circular economy due to Sampo Group's industry, business model, and limited use of resources in its own operations. Sampo Group has several channels for dialogue with stakeholders, where topics such as circular economy and resource use can be raised (p. 65). Sampo Group has assessed that resource use inherently has a negative impact on the environment, but the severity of the impact can be mitigated through the Group's actions.

Business conduct

When identifying and assessing material impacts, risks, and opportunities, Sampo Group has evaluated the geographical context of its operations, considering the regulatory landscape that may influence the impacts. The nature of Sampo Group's insurance services, including product offerings and service delivery methods, has been reviewed to identify actual and potential impacts. Operating within the P&C insurance sector, Sampo Group has recognised the industry-specific risks and opportunities.

Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

Based on the results of the double materiality assessment, Sampo Group reports material disclosure requirements related to the ESRS topical standards E1 Climate change, E5 Resource use and circular economy, S1 Own workforce, S2 Workers in the value chain, S4 Consumers and end users, and G1 Business conduct as part of this Sustainability Statement. In addition to the sustainability topics covered by the ESRS standards, Sampo Group has recognised responsible underwriting and investment management as material topics. Sampo Group does not report entity-specific disclosures related to these topics, but they are covered, where applicable, under the ESRS standards E1 Climate change, S2 Workers in the value chain, and S4 Consumers and end-users. A full list of disclosure requirements complied with in preparing this Sustainability Statement is presented in the ESRS content index in Annex 1 (p. 119).

According to the double materiality assessment, Sampo Group does not report disclosure requirements related to the ESRS standard E4 Biodiversity and ecosystems. Currently the topic is not amongst the most material based on Sampo Group's internal analysis and external stakeholder feedback. Additionally, the disclosure requirements laid out by the ESRS standard are in many cases not applicable to companies in the insurance sector. Nevertheless, biodiversity and ecosystems is a topic Sampo Group will closely follow and work on, and it is also connected to the Group's climate work and reporting. Sampo Group will re-evaluate the materiality and reporting requirements related to the topic in the coming years.

The disclosure requirements related to ESRS standard S3 Affected communities were also excluded from this Sustainability Statement. As a P&C insurance company operating mainly in the Nordic countries, Sampo Group's direct impacts on topics such as adequate housing and freedom of expression were considered limited. However, Sampo Group reports on its stakeholder management as part of the ESRS 2 standard, and considers topics related to affected communities where relevant.

Sampo Group does not report disclosure requirements related to the ESRS standards E2 Pollution and E3 Water and marine resources, as the impacts, risks, and opportunities related to these topics are not considered material for the Group.

Environmental information

EU Taxonomy

The EU Taxonomy is a classification system that translates the EU's climate and environmental objectives into criteria for specific economic activities for investment purposes. The basic principle of the Taxonomy is that for an economic activity to be recognised as environmentally sustainable (Taxonomy-aligned), it must make a substantial contribution to at least one of the EU's climate and environmental objectives, which are climate change mitigation; climate change adaptation; sustainable use and protection of water and marine resources; transition to a circular economy; pollution prevention and control; and protection and restoration of biodiversity and ecosystems. In addition, the economic activity cannot significantly harm any of these objectives and must meet the minimum safeguards criteria. The Taxonomy Delegated Acts establish and maintain criteria (i.e. technical screening criteria) for activities which have a substantial positive environmental impact.

Companies are required to report on Taxonomy eligibility (i.e. reporting on whether the economic activity is included in the Taxonomy Climate Delegated Act) and Taxonomy alignment (i.e. reporting on whether the economic activity meets the technical criteria for i) substantial contribution, ii) do no significant harm, and iii) comply with minimum safeguards).

Insurance companies are required to report KPIs on sustainable underwriting activities and sustainable investments. The first one refers to the proportion of the non-life gross written premiums (GWP) – in relation to total non-life GWP – corresponding to insurance activities identified as environmentally sustainable in the Taxonomy, and the second one to the proportion of the insurer's or reinsurer's investments – in relation to total insurer's or reinsurer's investments – that are directed at or associated with funding economic activities that qualify as environmentally sustainable.

In 2024, the weighted averages of Sampo Group's Taxonomy-aligned activities concerning both underwriting and investments were 1.3 per cent (turnover-based) and 1.3 per cent (capital expenditures-based).

Underwriting activities

Non-life insurance and reinsurance are recognised as enabling economic activities that can make a substantial contribution to the environmental objective of climate change adaptation. At the time of writing this statement, the EU Taxonomy does not define other environmental objectives for insurance activities.

The non-life insurance activities listed in the Taxonomy Delegated Acts are medical expense insurance, income protection insurance, workers' compensation insurance, motor vehicle liability insurance, other motor insurance, marine, aviation, and transport insurance, fire and other damage to property insurance, and assistance.

Methodology

To be Taxonomy-eligible, a non-life insurance activity must provide coverage against climate-related perils (e.g. floods, landslides, heat stress). Sampo Group follows in its methodology the European Commission Notice on the interpretation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation, published on 21 December 2023. This means that solely the share of insurance premiums that pertain to the coverage of climate-related perils is reported as eligible. The premiums for which Sampo Group has not been able to obtain the necessary data related to climate-related perils are reported as non-eligible.

For an eligible insurance activity to be classified as Taxonomy-aligned, it must fulfil the technical screening criteria of:

- Substantial contribution to climate change adaptation:
  - Leadership in modelling and pricing of climate risks
  - Product design
  - Innovative insurance coverage solutions
  - Data sharing
  - High level of service in post-disaster situation
- Do No Significant Harm (DNSH) climate change mitigation criteria: The activity does not include insurance of the extraction, storage, transport, or manufacture of fossil fuels or insurance of vehicles, property, or other assets dedicated to such purposes.

When assessing the Taxonomy alignment, Sampo Group has concentrated on the most relevant products in terms of climate change adaptation, which are mainly related to fire and other damage to property line of business. For the products where potential alignment with the technical screening criteria was identified, a more thorough and granular product-level analysis (e.g. based on a policy, country, or element) was conducted to identify the specific premiums that are in scope for Taxonomy-alignment. Only the part of the premiums that pertains to the coverage of climate-related perils was deemed to be aligned.

For assessing the DNSH-criteria, Sampo Group has used NACE codes to extract contracts that could be related to the extraction, storage, transport, or manufacture of fossil fuels, and those are excluded from the Taxonomy aligned premiums. This screening has been performed on Sampo Group's industrial and commercial customers.

For an economic activity to be considered as Taxonomy-aligned, a company carrying the activity must also meet the minimum safeguards, which are due diligence and remedy procedures implemented to ensure alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. Sampo Group has implemented the required policies and taken actions to be compliant with the safeguards. Sampo Group has, for example, conducted a human rights impact assessment, and continues to ensure that the adequate human rights due diligence processes are maintained and constantly developed. As part of the Taxonomy alignment assessment, the Group companies have also assessed their compliance with the minimum safeguards separately.

Underwriting KPIs

The analysis, which is based on the above-mentioned interpretations, shows that 3.0 per cent (2.2 in 2023) of Sampo Group's total non-life GWP were Taxonomy-eligible and 1.3 per cent (1.0 in 2023) of total non-life GWP were Taxonomy-aligned in 2024. All the Taxonomy-aligned premiums are related to fire and other damage to property insurance. In 2024, Sampo Group was able to increase the share of Taxonomy-aligned premiums due to increased alignment within If's property portfolio and customisation of Topdanmark's insurance for private houses.

Sampo Group continues to integrate the EU Taxonomy into its business strategy and product development processes while monitoring the market expectations and customer needs in this area. In the coming years, Sampo Group aims to increase the share of Taxonomy-aligned underwriting activities in its insurance portfolio.

Taxonomy-eligible and Taxonomy-aligned non-life insurance and re-insurance activities

Sampo Group

	Substantial contribution to climate change adaptation			DNSH (Do No Significant Harm)					
Economic activities	**Absolute premiums, 2024**	**Proportion of premiums, 2024**	**Proportion of premiums, 2023**	**Climate change mitigation**	**Water and marine resources**	**Circular economy**	**Pollution**	**Biodiversity and ecosystems**	**Minimum safeguards**
	(EURm)	**%**	**%**	**Y/N**	**Y/N**	**Y/N**	**Y/N**	**Y/N**	**Y/N**
A.1. Non-life insurance and reinsurance underwriting Taxonomy-aligned activities (environmentally sustainable)	**127**	**1.3%**	**1.0%**	**Y**	**Y**	**Y**	**Y**	**Y**	**Y**
A.1.1 Of which reinsured	—	—%	—%	Y	Y	Y	Y	Y	Y
A.1.2 Of which stemming from reinsurance activity	—	—%	—%	Y	Y	Y	Y	Y	Y
A.1.2.1 Of which reinsured (retrocession)	—	—%	—%	Y	Y	Y	Y	Y	Y
A.2 Non-life insurance and reinsurance underwriting Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)	**161**	**1.7%**	**1.2%**						
B. Non-life insurance and reinsurance underwriting Taxonomy-non-eligible activities	**9,216**	**97.0%**	**97.8%**						
Total (A.1 + A.2 + B)	**9,504**	**100.0%**	**100.0%**						

Investment activities

The EU Taxonomy requires insurance companies to report the proportion of underlying investments that are Taxonomy-eligible and -aligned. To facilitate this type of reporting at portfolio level, all holdings need to be screened and analysed in relation to the economic activities of the Taxonomy.

Methodology

Sampo Group analysed all underlying investments according to the Taxonomy reporting requirements, except for sovereign exposures that are to be excluded from the Taxonomy analysis. In Sampo Group's analysis, exposures to municipalities were not categorised as sovereign exposure. When analysing Taxonomy eligibility and alignment, derivatives and investments to undertakings not falling under the scope for publishing non-financial information under Directive 2013/34/EU (i.e. non-NFRD companies) were excluded from the numerator, in line with the reporting requirements set in the Taxonomy Disclosures Delegated Act. Reporting requirements also obligate insurance undertakings to distinguish the proportion of the investments held in respect of life insurance contracts, where the investment risk is borne by the policyholders, and the proportion of remaining investments. Sampo Group has no investments held in respect of life insurance contracts where the investment risk is borne by the policyholders.

The Taxonomy analysis of Sampo Group's investments was performed with the use of data from an external data provider, ISS ESG (ISS). ISS identified companies engaged in economic activities covered by the Taxonomy and produced all Taxonomy indicators directly based on the respective investee companies' own reporting of Taxonomy eligibility and alignment. The indicators were provided based on both underlying companies' revenue and capital expenditures. As security-specific (e.g. mortgage bonds) eligibility and alignment data is still scarce, most of the securities' eligibility and alignment data was matched to the issuer's reported data. Companies' reported eligibility and alignment data was not modified in any way by the data provider or by Sampo Group, and therefore it includes some discrepancies (e.g. breakdown of alignment to environmental objectives does not correspond to total alignment).

The relevant investment assets were further analysed according to the Taxonomy reporting requirements by using both data provided by ISS and data gathered based on each individual security's issuer. The investments in undertakings categorised as non-NFRD companies were identified by using data provided by ISS. As ISS does not cover all NFRD companies, some unidentified NFRD companies may have been included in the assets not covered by the analysis. Investments in undertakings from the EU and non-EU countries have been identified using the securities' issuers' country code. Similarly, investments in undertakings categorised as financial and non-financial have been identified using the securities' issuers' internal sector information to determine the main sector the companies operate in (e.g. NACE codes). Fund investments were analysed using look-through data where available. Some look-through data is updated in longer cycles and thus the most recent available look-through data was used for the EU Taxonomy calculations.

The underlying investments analysed also included Sampo Group's real assets (property, plant and equipment as well as investment property), cash and cash equivalents, investments in associated companies and intangible assets and they are included in the denominator of the Taxonomy calculations.

For Sampo Group's real assets, no activities with EU taxonomy eligibility or alignment were found. All investments in associated companies were in non-NFRD companies and thus included no EU Taxonomy eligibility or alignment figures. Cash and cash equivalents were analysed based on the counterparties but due to the nature of the instruments (e.g. cash and money market instruments), no EU Taxonomy eligibility or alignment was reported. The intangible assets of Sampo Group were also not found to have activities related to the EU Taxonomy.

Investment KPIs

According to the analysis, the turnover and capital expenditures-based Taxonomy eligibility of Sampo Group's covered assets as at 31 December 2024 was 3.1 per cent (3.5 in 2023) and 3.6 per cent (4.2 in 2023), respectively and the turnover-based and capital expenditures-based Taxonomy alignment of Sampo Group's covered assets was 0.7 per cent (0.7 in 2023) and 1.0 per cent (0.9 in 2023), respectively. As expected, the reported numbers are low, as most of the underlying companies are not subject to mandatory Taxonomy reporting, and reported eligibility and alignment are low in general.

Sampo Group reports the additional KPIs related to fossil gas and nuclear energy sectors, laid down by the Delegated Regulation (EU) 2022/1214, regarding its investment activities. The KPIs are presented in Annex 3 of this Sustainability Statement (p. 126). Due to minimal exposure to those sectors in its insurance activities, data limitations, and current market practices, Sampo Group does not consider the additional KPIs applicable to its underwriting activities.

Taxonomy-eligible and Taxonomy-aligned investment activities

Sampo Group, 31 December 2024
EURm

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 relative to the value of total assets covered by the KPI, with following weights for investments in undertakings per below:		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:	**0.7%**	Turnover-based:	**131**
Capital expenditures-based:	**1.0%**	Capital expenditures-based:	**201**
The percentage of assets covered by the KPI relative to total investments of insurance or reinsurance undertakings (total AuM). Excluding investments in sovereign entities.		The monetary value of assets covered by the KPI. Excluding investments in sovereign entities.	
Coverage ratio:	**94.4%**	Coverage:	**19,903**

Additional, complementary disclosures: breakdown of denominator of the KPI

The percentage of derivatives relative to total assets covered by the KPI:		The value in monetary amounts of derivatives:	
	0.0%		**1**
The proportion of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	**21.9%**	For non-financial undertakings:	**4,363**
For financial undertakings:	**28.1%**	For financial undertakings:	**5,591**
The proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	**12.0%**	For non-financial undertakings:	**2,390**
For financial undertakings:	**14.1%**	For financial undertakings:	**2,809**

Additional, complementary disclosures: breakdown of denominator of the KPI

The proportion of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:	**10.1%**	For non-financial undertakings:	**2,020**
For financial undertakings:	**20.1%**	For financial undertakings:	**4,008**
The proportion of exposures to other counterparties and assets over total assets covered by the KPI:		Value of exposures to other counterparties and assets:	
	19.7%		**3,921**
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities[1]:		Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities[1]:	
	100.0%		**19,903**
The value of all the investments that are funding economic activities that are not Taxonomy-eligible relative to the value of total assets covered by the KPI[2]:		Value of all the investments that are funding economic activities that are not Taxonomy-eligible[2]:	
	96.3%		**19,158**
The value of all the investments that are funding Taxonomy-eligible economic activities, but not Taxonomy-aligned relative to the value of total assets covered by the KPI[3]:		Value of all the investments that are funding Taxonomy-eligible economic activities, but not Taxonomy-aligned[3]:	
	3.1%		**614**

[1] The figure on the table equals the total amount of Sampo Group's investments covered by the KPI other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders. The turnover-based and capital expenditures-based alignment for these investments are 0.7 per cent and 1.0 per cent respectively.

[2] Turnover-based figure is reported on the table. Capital expenditures-based figure is 95.4 per cent.

[3] Turnover-based figure is reported on the table. Capital expenditures-based figure is 3.6 per cent.

Additional, complementary disclosures: breakdown of numerator of the KPI

The proportion of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:	
For non-financial undertakings:		For non-financial undertakings:	
Turnover-based:	**0.6%**	Turnover-based:	**121**
Capital expenditures-based:	**0.9%**	Capital expenditures-based:	**185**
For financial undertakings:		For financial undertakings:	
Turnover-based:	**0.1%**	Turnover-based:	**10**
Capital expenditures-based:	**0.1%**	Capital expenditures-based:	**16**
The proportion of the insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned:		Value of insurance or reinsurance undertaking's investments other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned:	
Turnover-based:	**0.7%**	Turnover-based:	**131**
Capital expenditures-based:	**1.0%**	Capital expenditures-based:	**201**
The proportion of Taxonomy-aligned exposures to other counterparties and assets in over total assets covered by the KPI:		Value of Taxonomy-aligned exposures to other counterparties and assets over total assets covered by the KPI:	
Turnover-based:	**—%**	Turnover-based:	**—**
Capital expenditures-based:	**—%**	Capital expenditures-based:	**—**

Breakdown of the numerator of the KPI per environmental objective

Taxonomy-aligned activities – provided 'do-no-significant-harm'(DNSH) and social safeguards positive assessment:

(1) Climate change mitigation	Turnover:	**0.6%**	Transitional activities:	Turnover:	**0.1%**
				CapEx:	**0.4%**
	CapEx:	**1.0%**	Enabling activities:	Turnover:	**0.1%**
				CapEx:	**0.5%**
(2) Climate change adaptation	Turnover:	**0.0%**	Enabling activities:	Turnover:	**0.0%**
	CapEx:	**0.0%**		CapEx:	**0.0%**
(3) The sustainable use and protection of water and marine resources	Turnover:	**0.0%**	Enabling activities:	Turnover:	**0.0%**
	CapEx:	**0.0%**		CapEx:	**0.0%**
(4) The transition to a circular economy	Turnover:	**0.0%**	Enabling activities:	Turnover:	**0.0%**
	CapEx:	**0.0%**		CapEx:	**0.0%**
(5) Pollution prevention and control	Turnover:	**0.0%**	Enabling activities:	Turnover:	**0.1%**
	CapEx:	**0.0%**		CapEx:	**0.1%**
(6) The protection and restoration of biodiversity and ecosystems	Turnover:	**—%**	Enabling activities:	Turnover:	**—%**
	CapEx:	**—%**		CapEx:	**—%**

Climate change

Topic	Impacts	Risks and opportunities	Strategy and actions
GHG emissions and climate-related risks	↓ GHG emissions cause actual negative impact on the environment. As an insurance company, Sampo Group's own direct emissions are not significant, but when considering the Group's entire value chain, including suppliers and investments, the impact is more material. Time-horizon: short, medium, and long term	↓ The increasing scale and frequency of physical climate-related risks, such as storms, floods, heavy rains, landslides, erosion, and heat waves, can increase Sampo Group's claims costs and cause financial risks for the Group. Climate-related physical risks are already relevant in the short term, and they are likely to grow in the medium to long term. ↓ Sampo Group can face potential reputational risks related to GHG emissions or not achieving the set emission reduction targets. ↓ Sampo Group can face financial and reputational risks arising from increasing climate-related legislation (e.g. possible fines). Time-horizon: short, medium, and long term	• Commitments to reduce GHG emissions (e.g. SBTi) • Internal policies and guidelines (e.g. responsible investment policies, underwriting principles, codes of conduct) • Effective governance structures and processes (e.g. risk management, screening, engagement) • Consideration of climate-related risks in the pricing of the products and services and in reinsurance • Internal training, competence development programmes, and awareness raising • Metrics and targets (e.g. SBTs related to own operations, investments, and suppliers)
Product and service offering	↑ Sampo Group has potential positive impact through the development of climate-friendly products and services (e.g. related to loss prevention and risk management). Non-life insurance and reinsurance are recognised by the EU Taxonomy as enabling economic activities that can make a substantial contribution to the environmental objective of climate change adaptation. Time-horizon: short, medium, and long term	↑ Development of sustainable products and services can provide business opportunities for Sampo Group (e.g. related to loss prevention, risk management, the EU Taxonomy). ↓ Sampo Group can face potential financial risks if it is not able to provide customers with sustainable products and services that meet their needs. Time-horizon: short, medium, and long term	• Development of sustainable products and services based on customers' needs and aligned with the EU Taxonomy • Climate resilience in product development and pricing • Loss prevention and risk management services

The table presents Sampo Group's material impacts, risks, and opportunities related to climate change identified in the double materiality assessment and their connection to Sampo Group's strategy and actions. The topics are linked to the ESRS sub-topics. The topic GHG emissions and climate-related risks is related to the ESRS sub-topics climate change mitigation and climate change adaptation. The topic Product and service offering is related to the ESRS sub-topic climate change adaptation.

Strategy

Material impacts, risks, and opportunities and their interaction with strategy and business model

Sampo Group's underwriting operations are exposed to both physical risks and transition risks. Physical risks are risk factors affecting the financial position and results of Sampo Group. Physical climate-related risks include storms, floods, heavy rains, landslides, erosion, hailstorms, and heat waves. The scale or frequency of these natural disasters can increase claims costs. Transition risks, on the other hand, relate to changes in the regulatory environment, the introduction of new technologies, changes in customer behaviour, and increased stakeholder concern for climate and environmental matters, for example. The European Insurance and Occupational Authority (EIOPA) has identified transition risks linked to policy, legal issues, technology, market sentiment, and reputation for non-life insurers.

Sampo Group's investments can also be exposed to both physical risks and transition risks, depending on the investment in question. Investments are particularly exposed to physical risks in the form of losses incurred from extreme weather events. The transition to a low-carbon society with potentially increasing environmental and climate regulation, more stringent emission requirements, and changes in market preferences could in turn cause transition risks for the Group's investments and possible revaluation of assets as operating models in carbon intense sectors change.

Sampo Group's capital planning, a forecast of own funds and capital requirements over a three-year planning period, and own risk and solvency assessment (ORSA) processes include scenario analyses, stress tests, sensitivity analyses, and reverse stress tests, including scenarios related to natural catastrophes.

Climate scenario analysis

Sampo Group has together with the external vendor ORTEC Finance analysed the Group's investment portfolio's exposure to systemic economic and financial climate change risks in four different climate scenarios over the next 40 years. The impact on the insurance results was also analysed based on the impact on macroeconomic variables as well as the potential effect on claims related to natural catastrophes, including the consequences for the pricing of insurance contracts.

The four scenarios analysed are the following:

- Net-Zero (NZ): This scenario describes an easy and smooth transition where political and social organisations act quickly and predictably to achieve net-zero CO_2 emissions by 2050.
- Net-Zero Financial Crisis (NZFC): In this scenario, the transition to a greener economy happens in a disorderly manner. Sudden divestments to align portfolios to the Paris Agreement goals in 2026 have disruptive effects on financial markets with sudden repricing followed by stranded assets and a sentiment shock.
- Limited Action (LA): In this scenario, policymakers implemented limited nationally determined contributions (NDCs) but fall short of meeting the Paris Agreement goals. The global warming reaches 2.8°C, and this causes high physical impact.
- High Warming (HW): In this scenario, the world fails to meet the Paris Agreement goals, and global warming reaches 4.2°C above pre-industrial levels by 2100. Physical climate impacts cause large reductions in economic productivity and increased impacts from extreme weather events. This scenario focuses on physical risk as the green transition does not happen.

The methodology used to assess systemic climate change risks and opportunities related to Sampo Group's investments combines climate science with econometric and financial modelling. The methodology relies on the following key assumptions:

- The scenarios used are climate science informed scenarios. Each scenario differs in terms of assumptions about policy and technology changes, physical risks, and pricing-in mechanisms. The scenarios are chosen to explore a range of plausible outcomes.
- The E3ME model by Cambridge Econometrics models the world's economic and energy systems and the environment. It is a quantitative framework for analysing the impacts of Energy-Environment-Economy (E3) policies over the short, medium and long term. It is widely used globally for policy assessment as well as for forecasting and research, and in this context, it is used to model the impact of transition risk on the evolution of macroeconomic variables. Currently, the E3ME model does not explicitly account for physical risk factors and is, therefore, complemented by methods to account for the impact of gradual physical risks and extreme weather events on the evolution of macroeconomic variables.
- Stochastic financial modelling that translates shocks to macroeconomic variables to risk-return metrics for different geographies, sectors, and asset classes is used in the last step to translate the climate-informed outputs from the previous steps, i.e. the impact of transition risks and physical risks on the evolution of macroeconomic variables in the different scenarios. In addition, assumptions about pricing-in and sentiment shocks in financial markets, and how they impact asset returns and risk for a large number of economic and financial market variables are made.

Impact on investment results

The climate scenario analysis was first conducted in 2023, and the results were reweighted based on the investment allocation as at 30 September 2024. The results of the scenario analysis form a set of data that can be analysed from various perspectives. The results are presented relative to a baseline that does not take into account any specific assumptions about climate change. Instead, the baseline relies on historical relationships and long-term views shaped by current market conditions.

According to the results of the climate scenario analysis, Sampo Group's current investment portfolio is relatively resilient to climate change risk in all four scenarios. This is due to the significant allocation to fixed income instruments, which tend to be less affected than equities, as well as the geographical allocation towards mainly the Nordics and other European countries where the effects of climate change are expected to be lower than in other parts of the world. According to the analysis, in the short run, the main risk is related to the pricing-in shock in the NZFC scenario. In the long run, there will be a negative impact on the returns in all scenarios, due to increased physical risks. In addition, returns from high GHG emitting sectors are particularly affected in both net-zero scenarios (NZ and NZFC).

Impact on insurance results

To assess the impact of the climate scenarios on the insurance results, the forecasts for macro variables (GDP and inflation) and their direct effect on insurance results in combination with assumptions for effects on natural catastrophe claims and repricing of insurance contracts under the different climate scenarios were used. The climate scenario analysis was performed for If's insurance portfolio (including Topdanmark), but the results are stated on a relative basis in terms of the insurance result and could be seen as broadly representative for the entire Sampo Group. Also, the business not included in the analysis, i.e. Hastings, has a very low share of home insurance business and, consequently, considered to have relatively low exposure to natural catastrophes.

The sensitivity to increased physical risk was assessed by including increased natural catastrophe claims in the HW scenario, and separately considering re-pricing due to increased claims cost.

According to the scenario analysis, the combined effect of changes in GDP and inflation in the HW scenario compared to the NZ scenario leads to a relatively limited impact on the insurance result. This is mainly due to offsetting effects stemming from how different economies are affected in the Nordic region. However, the assumed impact on natural catastrophe claims is more material, in particular in the scenario without repricing and the apparent offsetting effect of repricing actions. The scenario analysis hence indicates that although the direct impact from macroeconomic impacts is relatively limited, increased claims costs could materially influence the insurance results, and appropriate repricing of the insurance contracts will be particularly important in such a scenario. With P&C insurance contracts almost exclusively being renewed on a yearly basis within Sampo Group, the resilience towards trends in claims for whatever reason is typically high given the focus on financial control, clear financial targets, and general underwriting focus within the Group.

Transition plan for climate change mitigation

Sampo Group is developing its transition plan for climate change mitigation, which is based on its SBTs. To reach the targets, Sampo Group has identified relevant decarbonisation levers and actions to be taken in the coming years. Sampo Group is committed to further develop its transition plan according to applicable regulation and frameworks, and will report on the development annually as part of its sustainability reporting.

Once finalised, Sampo Group is planning to embed the transition plan in its overall strategy and financial planning, for example, by allocating sufficient resources to the development and implementation of the climate action plans in order to reach its SBTs. Currently, the implementation of Sampo Group's transition plan is not expected to require allocation of specific investments or funding beyond normal costs related to business development. However, this will be re-evaluated while developing the plan further.

Sampo Group has estimated that its key assets and products do not currently contain sources for significant locked-in emissions, as the Group does not operate in a GHG intensive sector. Sampo Group is not excluded from the EU Paris-aligned benchmarks.

Sampo Group's insurance and investment activities are covered by the EU Taxonomy. The Group's Taxonomy disclosures, including the description of future plans, are presented in the section EU Taxonomy (p. 71).

Science-based targets

Sampo Group has set SBTs in line with the SBTi's methodology to limit global warming to 1.5°C. Sampo Group's commitment to the SBTi has been approved by the company's management and the Board of Directors.

Sampo Group joined the SBTi in October 2023. Mandatory group level targets for own operations and investments were developed during 2024, and the targets were validated by the SBTi and published in November 2024. Sampo Group reports on progress against the targets annually as part of the company's sustainability reporting starting from financial year 2025. In addition to the group level targets related to own operations and investments, Sampo Group has set voluntary SBTs for suppliers on a subsidiary level.

Sampo Group works towards the SBTs to reduce GHG emissions related to its own operations, investments, and suppliers. The Group's actions regarding own operations include purchasing renewable electricity, switching to biogas and district heating, changing to LED lighting, optimising the use of office space, and transitioning its vehicle fleet to electric and hybrid cars. Measures related to investments include regular monitoring using screenings, engagement with investee companies (e.g. investor events, AGMs), development of the Group's coal phase-out plan, and normal portfolio turnover. In addition, Sampo Group engages with and encourages its suppliers to set SBTs. Sampo Group's climate targets are presented in detail in the table Science-based targets (p. 83).

Impact, risk and opportunity management

Policies related to climate change mitigation and adaptation

Sampo Group's policy regarding climate change mitigation and adaptation is the Sampo Group Code of Conduct, which is reviewed annually and approved by Sampo's Board of Directors. The Code of Conduct states that Sampo Group complies with climate-related legislation, is committed to combatting climate change, and supports the Paris Agreement. The policy is also supported by Sampo Group's commitment to the SBTi and involvement in various initiatives (e.g. UN Global Compact).

The Sampo Group Code of Conduct covers all Sampo Group's own operations. Sampo Group also expects its suppliers and other business partners to comply with the principles of the Code of Conduct throughout their own operations and supply chains. In addition to the Sampo Group Code of Conduct, each Group company has adopted supplementary and more detailed policies, guidelines, and processes for their own purposes, to guide the work related to climate change mitigation and adaptation. These include, for example, sustainability policies, supplier codes of conduct, and responsible investment policies.

The Sampo Group Code of Conduct together with the company-specific policies address climate change mitigation and adaptation, energy efficiency, and renewable energy deployment. Sampo Group takes ESG considerations, including climate change, into account in product and service development, insurance underwriting, investment operations, and supply chain management. The Group strives to reduce the consumption of resources (e.g. energy, water) and improve the efficient use of those resources.

Additionally, Sampo Group is committed to reducing emissions and waste generated from business operations, while incorporating the concepts of reduction, re-use, and recycling. Sampo Group also prioritises renewable energy sources, when possible. Sampo Group encourages its customers, investee companies, suppliers, and other business partners to uphold similar environmental and climate commitments, and consults and cooperates with its stakeholders on environmental and climate matters.

Actions and resources in relation to climate change policies

Sampo Group has assessed that it has a negative impact on climate change through the GHG emissions of its own operations and value chain. However, Sampo Group has emission reduction targets and a series of actions to mitigate the negative impact and to reduce the GHG emissions in line with the SBTi's framework.

Climate change mitigation

Through its SBTs, Sampo Group is committed to reducing its total Scope 1 and 2 emissions by 42 per cent by 2030 compared to the 2022 base year. This translates to an emission reduction of 2,514 tCO_2eq. Sampo Group has identified switching to renewable energy and reducing energy use in offices and electrifying the car fleet as the main decarbonisation levers. Sampo Group has assessed that the majority of the required emission reductions will be achieved by switching to renewable energy and reducing energy use in offices. In 2025, Sampo Group will further develop its reporting on decarbonisation levers and their quantitative contributions.

Sampo Group has also set SBTs for investments and voluntary SBTs (If and Topdanmark) for suppliers. The identified decarbonisation levers or actions related to these Scope 3 emissions are supplier engagement, sustainable claims handling, and responsible investment.

Own operations
In 2024, Sampo Group's climate change mitigation actions focused on the decarbonisation levers that are expected to reduce the company's Scope 1 and 2 emissions and contribute towards the Group's SBTs.

For the past years, Sampo Group has strived to transition to renewable energy sources for electricity and district heating across its locations. In 2024, Hastings' Bexhill and Leicester offices switched to 100 per cent renewable energy sources for both electricity and biogas, and If had solar panels installed on the office in Bergshamra. In addition, Sampo Group promoted energy efficiency in 2024, for example, by implementing environmental standards for energy efficiency in its offices.

Sampo Group also expects emission reductions from the shift to electric vehicles (EVs). In 2024, If started to pay for the installation cost of EV charging outlets at home for employees in Denmark who are entitled to a car benefit, and Hastings upgraded the company car parks in both Bexhill and Leicester with EV charging stations.

In addition to aiming for Scope 1 and 2 emission reductions from its own operations, Sampo Group strives to better understand the extent of its Scope 3 emissions. In 2024, Sampo Group conducted an inventory of its reported Scope 3 emissions and assessed which Scope 3 categories are material and need further development. As a result of the assessment, data quality in the categories Purchased goods and services, Capital goods, Upstream transportation and distribution, Business travelling, and Employee commuting was improved. In addition, Hastings conducted a spend-based assessment of its Purchased goods and services, leading to a large increase in reported emissions in this category.

During 2025, Sampo Group will continue its emission reduction actions and initiatives, and monitor progress against the Scope 1 and 2 targets. Collectively, these measures are expected to reduce the Group's GHG emissions. Regarding its Scope 3 emissions, Sampo Group plans to further develop GHG emission reporting, especially regarding the gaps identified in the 2024 assessment and align reporting across the Group. The company also recognises that emissions from insurance activities (i.e. insurance associated emissions) represent an important part of its Scope 3 emissions and, therefore, this category will be assessed in the coming years.

Investments
To achieve the Group's SBTs for investments, Sampo Group has devised a strategy that revolves around strategic asset allocation and proactive investee engagement. This means that investments in companies and assets that offer strong financial returns and align with the Group's climate objectives are prioritised. During 2024, Sampo Group developed its investment monitoring and reporting related to the SBTs, and practices to engage with its investee companies regarding emission reduction targets when needed. During 2025, the plan is to continue this work and prepare for reporting according to the SBTi's methodology.

In 2024, Sampo Group conducted an annual carbon footprint analysis of its investment portfolio for enhanced disclosure and transparency around climate-related risks. Sampo Group also continued to perform sector-based and norm-based screenings for its direct investment portfolio to identify and make decisions regarding companies that are involved in certain industries as well as companies' adherence to international norms concerning environmental protection. To support these practices and to ensure quality monitoring of investments from a sustainability point of view going forward, Sampo Group reviewed its ESG data service providers during the year.

Suppliers
Sampo Group works with its suppliers on topics related to climate change. Supplier engagement offers a way to influence decarbonisation efforts within the supply chain when granular emissions data is challenging to track or unavailable. Sampo Group's supplier engagement targets focus on engaging a defined set of suppliers in the near term to set their own SBTs for all applicable scopes and categories.

In 2024, If initiated a process to assess how many of its suppliers within motor and property claims have set SBTs or equivalent to be able to support and incentivise remaining suppliers to set targets going forward. Topdanmark will apply the same approach to all suppliers in its portfolio within purchased goods and services.

Sustainable claims handling
Sampo Group can contribute to climate change mitigation by emphasising energy and resource efficiency, and use of renewable energy in claims handling operations. For example, If has implemented a sustainable building module as part of its most comprehensive building insurance for commercial buildings in Norway in 2023 and Sweden in 2024. Through this module, which is based on BREEAM certification systems, If provides concrete advice, guidance, and financial support for sustainable measures, such as the use of solar panels and energy efficiency measures, in the reconstruction after major damage. In 2024, Topdanmark engaged with partners in the construction sector on the possibility of choosing reused materials instead of new materials in the context of building claims, while still taking cost and safety into consideration.

Climate change adaptation

During 2024, loss prevention remained an important theme for Sampo Group. If and Topdanmark continued to provide loss prevention services, such as on-site risk assessments and house assessments, for their customers. This is to identify specific and cost-effective preventative measures, which can reduce the customers' climate-related risks. Hastings also provided guidance to its customers on loss prevention, including winter car check reminders and recommendations on how to mitigate issues at home, such as freezing pipework. In addition, in 2024, Hastings created a Geo-Spatial Data Scientist team working to assess the value of climate-related data enrichment, producing address-level scores covering weather claims risk (e.g. flood, freeze) and supporting the Underwriting team with climate-related risk selection and accumulation management.

Sampo Group participates in various research projects together with universities, research institutes, and clients. The aim of this work is to better understand risks and to support the clients in their risk management, but also to contribute to a more sustainable society. For example, If has regularly published an extreme weather report in Norway – the previous one was published in 2023 and the next is planned for 2025. The report is prepared together with CICERO Center for Climate Research and IVL Swedish Environmental Research Institute. The report investigates how well Norwegian municipalities are prepared for extreme weather. Topdanmark, under the auspices of Insurance & Pension Denmark, provides data to help the Danish municipalities identify the largest risk areas in relation to extreme weather, such as heavy rainfall.

Metrics and targets

Targets related to climate change mitigation and adaptation

Sampo Group's climate targets are aligned with the SBTi's methodology, which supports the Paris Agreement. This approach is in line with the policy objectives stated in the Sampo Group Code of Conduct.

Sampo Group's target for own operations (Scope 1 and 2 emissions) follows the absolute contraction approach. Sampo Group's target boundary includes all Sampo Group companies. Only minor offices have been excluded from the boundary as emissions from these are deemed insignificant. The market-based approach was used to calculate the Scope 2 GHG emissions included in the target.

The targets for the listed equity, corporate bond, fund, ETF, and corporate loan investment portfolio have been set using the temperature rating approach and the target for the commercial real estate portfolio using the sectoral decarbonisation approach. Sampo Group's portfolio targets cover 57.9 per cent of its total investment and lending by total assets as of 2022. As of that year, required activities made up 57.9 per cent of Sampo Group's total investment and lending by total assets, while optional activities made up 5.6 per cent and out-of-scope activities made up 36.5 per cent.

Sampo Group has had dialogue with several stakeholders when committing to the SBTi and setting the targets. These have included, for example, investors, large corporate customers, and the company's management and boards of directors. Progress against Sampo Group's targets will be monitored regularly internally and reported externally in the sustainability statement.

There were no changes in the targets during the reporting year. The Scope 1 and 2 GHG emissions for the baseline year 2022 and comparative year 2023 were recalculated to reflect changes in the reporting boundary (e.g. Mandatum and Topdanmark Life were excluded from the boundary). In addition, errors related to data collection were corrected. Also, the GHG emissions of investments (Scope 3, category 15) were recalculated for the baseline year 2022 and comparative year 2023 to align with other regulatory frameworks (e.g. the EU Taxonomy).

Science-based targets

Sampo Group

Scope	Target	2024 results
Own operations (Scope 1 and 2)	• Sampo Group commits to reduce absolute scope 1 and 2 GHG emissions by 42 per cent by 2030 from a 2022 base year.	• Sampo Group's SBTs were approved in November 2024. The Group will start reporting on its progress against the targets from the year 2025 onwards.
Investments (Scope 3, category 15)	• Sampo Group commits to align its scope 1 + 2 portfolio temperature score by invested value of its listed equity, corporate bond, fund, ETF and corporate loan portfolio from 2.78°C in 2022 to 2.09°C by 2029. • Sampo Group commits to align its scope 1 + 2 + 3 portfolio temperature score by invested value of its listed equity, corporate bond, fund, ETF and corporate loan portfolio from 2.91°C in 2022 to 2.29°C by 2029. • Sampo Group commits to reduce its real estate direct investment and corporate loan portfolio GHG emissions by 57.7 per cent per square meter by 2029 from a 2022 base year.	• Sampo Group's SBTs were approved in November 2024. The Group will start reporting on its progress against the targets from the year 2025 onwards.
Suppliers* (Scope 3, category 1)	• If: 30 per cent of suppliers by spend, covering purchased goods and services, will have science-based targets by 2028. • Topdanmark: 20 per cent of suppliers by spend, covering purchased goods and services, will have science-based targets by 2028.	• If: 15.8 per cent • Topdanmark: 17.1 per cent

** Sampo Group has set SBTs in accordance with the SBTi's sector-specific guidelines for the financial sector, which require companies to set targets for own operations (Scopes 1 and 2) and investments (Scope 3, category 15). In addition, Sampo Group has voluntary climate targets for its supply chain on a subsidiary level.*

GHG emissions intensity (total GHG emissions per net revenue)

Sampo Group

GHG intensity per net revenue	2023 (Comparative)	2024	% 2024 / 2023
Total GHG emissions (location-based) per net revenue (tCO2eq/EUR)	0.000044	0.000035	-21.5%
Total GHG emissions (market-based) per net revenue (tCO2eq/EUR)	0.000045	0.000035	-21.6%

*The denominator used when calculating the GHG emissions intensity is the Total insurance revenue (Sampo Group's Financial Statements, **Statement of profit and other comprehensive income** and **Note 1 Insurance service result**).*

Biogenic emissions

Sampo Group

Metric	2024
Scope 1 (tCO2eq)	170
Scope 2, market-based (tCO2eq)	2,768
Scope 3 (tCO2eq)	97
Total biogenic emissions	3,035

Biogenic emissions arise from direct combustion of biomass or biodegradation. In Sampo Group's reporting these emissions are accounted for in Scopes 1, 2, and 3 in cases where the combusted fuel is assumed to have a portion of biomass. The biogenic emissions are not included in the GHG emissions reported on ***page 84****.*

Gross Scopes 1, 2, 3 and Total GHG emissions

Sampo Group

	Retrospective				Milestones and target years			
	2022 (Base year)	2023 (Comparative)	2024	% 2024 / 2023	2025	2030	(2050)	Annual % target / base year
Scope 1 GHG emissions								
Gross Scope 1 GHG emissions (tCO2eq)	1,197	1,115	883	-20.9%		-42%*		
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	-	-	-	-				
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions (tCO2eq)	2,482	1,738	1,886	8.5%				
Gross market-based Scope 2 GHG emissions (tCO2eq)	4,789	4,111	3,570	-13.2%		-42%*		
Significant Scope 3 GHG emissions								
Total gross indirect Scope 3 GHG emissions (tCO2eq)	353,054	370,412	326,376	-11.9%				
1 Purchased goods and services	2,017	1,652	14,493	777.3%				
[Optional sub-category: Cloud computing and data centre services]	-	-	-	-				
2 Capital goods	111	2,247	2,843	26.5%				
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	1,555	1,432	1,244	-13.1%				
4 Upstream transportation and distribution	-	52	456	773.3%				
5 Waste generated in operations	273	232	260	12.2%				
6 Business travelling	5,592	6,306	6,318	0.2%				
7 Employee commuting	5,141	6,712	6,860	2.2%				
8 Upstream leased assets	-	-	-	-				
9 Downstream transportation	-	-	-	-				
10 Processing of sold products	-	-	-	-				
11 Use of sold products	-	-	-	-				
12 End-of-life treatment of sold products	-	-	-	-				
13 Downstream leased assets	-	139	41	-70.2%				
14 Franchises	-	-	-	-				
15 Investments	338,364	351,641	293,860	-16.4%				
Total GHG emissions								
Total GHG emissions (location-based) (tCO2eq)	356,733	373,266	329,145	-11.8%				
Total GHG emissions (market-based) (tCO2eq)	359,039	375,638	330,828	-11.9%				

The figures for 2022 and 2023 were recalculated to reflect changes in the reporting boundary and correct errors in data collection. For investments, the calculation method was aligned with other regulatory frameworks (e.g. the EU Taxonomy) and the current Group structure. The increase in Sampo Group's Scope 3 GHG emissions in 2024 was mainly due to improved data quality and calculation methods, particularly at Hastings, and changes in emission factors.
Category 15 Investments concerns Sampo Group's financed emissions for Scopes 1 and 2. Investment categories included in the calculations are direct equity and fixed income investments and fund investments. The coverage was 74.2 per cent of Sampo Group's financial assets (including associated companies). Sampo Group's Scope 3 financed emissions were 4,020,003 tCO_2eq in 2024.
** Sampo Group has a combined near-term target for Scope 1 and Scope 2 (market-based) emissions. Sampo Group's emission reduction targets and results are disclosed in detail on* ***page 83***.

Emission factors and calculation details

Sampo Group

Activity	Calculation details	Emission factor reference
Stationary combustion	Stationary combustion includes combustion of natural gas (If, Topdanmark, and Hastings), biogas (Hastings), gas oil (Hastings), and fuel oil (If).	DESNZ 2024
Mobile combustion	Mobile combustion is calculated based on litres of fuel or kilometres driven, depending on the availability of data. If data is unavailable, the data is extrapolated based on the number and type of cars. The estimated fuel consumption per vehicle is based on national statistics.	DESNZ 2024; South Pole derived based on Drivmedel 2022 (diesel) and Värmeforsk 2023 (petrol)
Refrigerants	The calculation is based on the consumption of refrigerants (Hastings).	DESNZ 2024
Electricity	The calculation is based on purchased electricity (MWh). For smaller offices, the electricity consumption is extrapolated based on average consumption per FTE or office area (m^2). The residual mix emission factors used for the market-based method are higher than the emission factors for the location-based method, leading to market-based emissions being higher than location-based emissions.	AIB 2023; DESNZ 2024; Ecoinvent v3.10; EI 2023; IEA electricity emission factors 2023; IPCC, 2014
District heating	Purchased district heating (MWh) is reported by If, Topdanmark, and Sampo. For smaller offices, district heating is extrapolated based on average consumption per FTE or office area (m^2).	Euroheat & Power, 2023; Finnish Energy Statistics 2023; Swedenergy 2023; supplier-specific emission factors
District cooling	Purchased district cooling (MWh) is reported by If and Sampo. For smaller offices, district cooling is extrapolated based on average consumption per FTE or office area (m^2).	South Pole derived average based on suppliers, 2023; supplier-specific emission factors
Purchased goods and services	Purchased goods and services includes water (m^3), paper (tonnes), and cloud services (number of users) in all Group companies. Topdanmark reports on some office supplies (e.g. plastic items) and Sampo on food services. Hastings reports the financial records of its purchased goods and services. The calculations are based on supplier-specific, hybrid, average data, and spend-based methods.	AIB 2023; CEDA 4.01 Global; Cloud Carbon Footprint, 2021; DESNZ 2023; Ecoinvent v.3.3.8 2021; EI 2022, Ecoinvent v.3.9.1.; Google, 2012; Amazon, 2021; IPCC, 2014; Microsoft, 2021; SCA Ortviken 2012; Mondi, 2022
Capital goods	Capital goods includes purchased IT equipment (number and model of devices) and larger renovations (cost).	CEDA 4.01 Global; supplier-specific emission factors
Fuel and energy-related activities	Fuel and energy-related activities are calculated with the supplier-specific method, average method, and hybrid method.	Ecoinvent v3.10; national statistics
Upstream transportation and distribution	Upstream transportation includes letters sent to customers. The calculation is based on the number of letters and the destination.	DESNZ 2024 (road and air freight); CEDA 4.01 Global
Waste generated in operations	Waste data is only available for larger offices. For smaller offices, data is extrapolated based on average consumption per FTE or office area (m^2).	ADEME 2023 BC V8.9; DESNZ 2023 and 2024; Ecoinvent v3.9 and 3.10; World Bank waste statistics 2024
Business travelling	Business travelling includes travel by air, train, ferry, bus, staff cars, rental cars, and taxis, as well as hotel accommodation. The calculations are based on activity or spend data. Emissions from hotel stays are calculated with country or city-specific emission factors.	CEDA 4.01 Global; DESNZ 2024; Cornell Hotel Sustainability Benchmark Index 2023; RDC flight data 2024
Employee commuting	The category Employee commuting also includes remote working and is based on a survey, which was conducted in all Group companies. The survey was either sent out to all employees or targeted groups and the results were extrapolated to represent all employees.	Anthesis 2021, DESNZ 2024 (WFH assumptions); IEA electricity emission factors 2023; national statistics
Downstream leased assets	The category Downstream leased assets is reported by Topdanmark. The calculation is based on consumption data (electricity, natural gas) and the actual size of the leased location during the period January–June 2024.	AIB 2023; Ecoinvent v3.10; DESNZ 2023

Calculation principles and assumptions

Sampo Group's GHG emission calculations include If (Nordic and Baltic offices), Topdanmark (Danish offices), Hastings (UK and Gibraltar offices), and Sampo (Finnish office). An external data provider, South Pole, conducts the calculations based on data provided by Sampo Group. The data inventory, emission factors, and assumptions are based on the GHG Protocol, and include the main greenhouses gases CO_2, CH_4, N_2O, SF_6, HFCs, PFCs, and NF_3 converted to CO_2 equivalents. The selection of assumptions and emission factors follows a conservative approach. Where activity or spend data for the inventory is lacking, extrapolations and estimations are used.

The data behind Sampo Group's Scope 3 category 1–14 emissions consists of 49.0 per cent primary data and 51.0 per cent secondary data. Primary data includes data from directly reported activities (e.g. fuel consumption), supplier-specific data (e.g. IT equipment reported with supplier information), and the employee commuting survey. Secondary data includes spend-based (e.g. services) and extrapolated data (e.g. office waste). Regarding Scope 3 category 15 (investments), out of all investments covered by the data provider, 66.4 per cent is based on primary data, i.e. emissions reported by investees, and 33.6 per cent is based on secondary data, i.e. estimations.

Emissions from vehicle and property repairs in claims handling have been estimated using data from 2021. An external research institute commissioned by If calculated the emissions using the life cycle assessment methodology (LCA) and a mix of primary and secondary data from a representative number of vehicle and property claims cases. Spend data from claims was used to estimate the total emissions for vehicle and property repairs. If's estimated emissions for vehicle and property repairs amounted to 88,618 tCO_2eq. These emissions are not currently included in Sampo Group's Scope 3 inventory (category 11 Use of sold products) due to the level of uncertainty, but may be included in the future as reporting and data quality develop.

Scope 3 categories 8 Upstream leased assets, 9 Downstream transportation, 10 Processing of sold products and 12 End-of-life treatment of sold products are not considered relevant for Sampo Group as the energy use for leased assets (vehicles and IT equipment) is accounted for in Scopes 1 and 2, its operations do not include activities where non-paid transportation and distribution apply, and the Group does not sell tangible products. The relevance of category 14 Franchises will be further investigated in 2025.

The calculation methodology for Sampo Group investments' GHG emissions follows the GHG Protocol's investment-specific method. The emissions from investments are allocated to Sampo Group based on its proportional share of investments in investee companies. The proportional share is calculated by using Enterprise Value Including Cash (EVIC) to represent the total value of each investee company. The absolute GHG emissions of investee companies are collected using an external service provider, Bloomberg L.P., where the primary source used is company reported emissions followed by estimated emissions. The scope of investments' GHG emissions includes Sampo Group's financial assets and investments in associates. Due to the lack of reliable data, Sampo Group did not obtain GHG emissions data for its sovereign exposure and derivatives. Moreover, the data provider does not cover all investment assets (e.g. private companies). Due to these data gaps, the coverage was 74.2 per cent of Sampo Group's financial assets (including associated companies). Sampo Group has not used its own estimations for financed emissions yet as the data coverage by the external data provider has been relatively good and using estimates would affect the data quality. Hence, Sampo Group uses the transitional provision for not including information from the value chain. In order to fill the gaps, Sampo Group will evaluate the possibility to use extrapolation as a way of estimating the missing emissions data in the future.

The GHG emissions for the year 2024 are not validated by an external body other than the assurance provider of this Sustainability Statement.

Resource use and circular economy

Topic	Impacts	Risks and opportunities	Strategy and actions
Resource use and circular economy	↓ Sampo Group has a negative impact on the environment as it uses resources, for example, in its claims handling operations (e.g. construction material, car parts). By recycling and increasing the number of reused parts in claims handling, Sampo Group can limit the negative environmental impact. Time-horizon: short, medium and long term	↑ Increasing circular economy-based resource flow in claims handling can create cost savings for Sampo Group, for example, through purchasing of reused parts instead of new ones and reselling of used materials instead of disposing. ↓ There is a risk of reputational damage and added costs if Sampo Group fails to seize opportunities related to circular economy. This is, for example, due to difficulties in finding or using recycled or reused materials. Time-horizon: short, medium and long term	• Internal policies and guidelines (e.g. supplier codes of conduct) • Effective governance structures and processes (e.g. recycling, reuse and repair in claims handling, sustainable supply chain management) • Metrics and targets (e.g. reused parts, glass repairs)

The table presents Sampo Group's material impacts, risks, and opportunities related to resource use and circular economy identified in the double materiality assessment and their connection to Sampo Group's strategy and actions. The topics are linked to the ESRS sub-topics. The topic Resource use and circular economy is related to the ESRS sub-topic Resource inflows, including resource use.

Impact, risk, and opportunity management

Policies related to resource use and circular economy

The group level policy regarding resource use and circular economy is the Sampo Group Code of Conduct, which is reviewed annually and approved by Sampo's Board of Directors. The Code of Conduct states that Sampo Group should reduce the consumption of resources (e.g. energy, water) and improve the resource efficiency, as well as reduce pollution, emissions, and waste generated from business operations, while incorporating the concepts of reduction, reuse, and recycling. The Sampo Group Code of Conduct covers all of the Group's own operations. Additionally, Sampo Group expects its suppliers and other business partners to comply with the principles of the Code of Conduct throughout their own operations and supply chains.

In addition to the Sampo Group Code of Conduct, each Group company has adopted its own supplementary and more detailed policies, guidelines, and processes to guide the work related to resource use and circular economy in their own operations and value chain. The Group companies have, for example, sustainability policies to guide the work related to office space upgrades and supplier codes of conduct, which outline the expectations placed on suppliers with regards to environmental considerations. The Board of Directors or other governing body of each Sampo Group company approves the policies in the respective company, and the executive management is responsible for the implementation.

Sampo Group's supplier codes of conduct are publicly available and are based on the 10 principles of the UN Global Compact. The codes of conduct require suppliers to encourage the development and diffusion of low emission technologies that protect the environment, are less polluting, use resources in a more sustainable manner, recycle more of their waste and products, and handle residual waste in a more acceptable manner than the technologies for which they were substitutes. Suppliers are expected to continuously improve their climate and environmental efforts, reduce the consumption of resources and ensure the efficient use of these resources, and reduce pollution, emissions and waste from business activities. The supplier codes of conduct apply to suppliers with whom Sampo Group conducts business, including the suppliers' subsidiaries and sub-suppliers. The codes also apply to all of the suppliers' employees, whether permanent or temporary.

Actions and resources related to resource use and circular economy

The most significant impacts, risks, and opportunities regarding resource use and circular economy for Sampo Group are related to suppliers in the company's downstream value chain. Sampo Group does not produce, sell, or handle physical products requiring natural resources, but can instead affect the resource use in its value chain via insurance policies and claims handling processes. P&C insurance products and services affect the amount of resources used mainly through the policyholders' claims related to vehicles, buildings, furniture, electronics, and other property. Sampo Group's suppliers and business partners are central to the claims handling process, and Sampo Group is committed to taking environmental and climate considerations into account, for example, by encouraging and supporting circular efforts in these processes.

In 2024, Sampo Group cooperated with its suppliers in claims handling to increase material reuse, recycling, and repairs related to property and vehicle claims. Sampo Group also continued to focus on specific requirements it has set for its suppliers to promote circular economy. For instance, If's property and vehicle repair partners must comply with the sector-specific Additional Environmental Requirements (AER), which are incorporated into the purchasing agreements. These requirements include requirements to repair instead of using new parts, reuse spare parts and repair more, reduce material usage, demolish less, increase remote work using video and sensors, reduce transportation, use material with environmental certification (when available), and increase the use of electric and hybrid vehicles. During the year, Sampo Group also updated existing policies (e.g. supplier codes of conduct, sustainability policies) regarding resource use and circular economy. These activities will continue in 2025.

Metrics and targets

Targets related to resource use and circular economy

Sampo Group has not set measurable, time-bound and outcome-oriented targets for its resource use and circular economy actions on group level. The circular economy solutions in claims handling operations are developing, but continue to also be subject to several uncertainties. Therefore, Sampo Group has evaluated that setting group level targets at this stage is not justifiable from an environmental or financial viewpoint. However, Sampo Group reviews processes to manage impacts, risks, and opportunities related to resource use and circular economy regularly, and in case it is assessed that a group level externally disclosed target is a valuable addition, the decision will be revisited.

Metrics related to resource use and circular economy

Sampo Group measures the progress of its resource use and circular economy efforts, for instance, with the metrics presented in the table Circular economy in claims handling (car repairs). The share of reused parts and the share of glass repairs in car repair claims have been selected as key metrics, as they reflect Sampo Group's goals of promoting circular economy and reducing resource use. Sampo Group has chosen to initially focus on car repairs, as the maturity of reused parts market in this segment is higher compared to house repairs, for instance. Sampo Group measures the proportion of reused parts and glass repairs based on monetary amount spent and the number of claims.

Sampo Group's group level progress against these metrics has been measured starting 2024. The measurement is not validated by an external body other than the assurance provider of this Sustainability Statement.

Circular economy in claims handling (car repairs)

Sampo Group

Metric	2024
Share of reused parts	4.5%
Share of glass repairs	35.3%

Social information

Own workforce

Topic	Impacts	Risks and opportunities	Strategy and actions
Human rights and labour practices	↓ Sampo Group can have a negative impact on human rights and labour rights of its own workforce, as a result of unethical labour practices or breaching of Sampo Group's Code of Conduct, for example. Time-horizon: short term	↓ Sampo Group can face a financial risk due to increasing and tightening legislation related to human rights and labour rights (e.g. possible fines, reputational damage). Time-horizon: short term	• Internal policies and guidelines (e.g. codes of conduct, HR policies) • Effective governance structures and processes (e.g. reporting channels, forums for dialogue, employee engagement surveys, collective bargaining and freedom of association) • Internal training and competence development programmes • Metrics and targets
Employee health, wellbeing, and competence	↑ Through Sampo Group's wellbeing initiatives and competence development programmes, the mental and physical health of employees can be improved. This in turn can have a potential positive impact on the employees' motivation and facilitate their professional growth and skills advancement. Focusing on employee wellbeing and competence development can result in motivated and engaged employees. Time-horizon: short term	↓ A lack of competent employees can pose a financial risk for Sampo Group. If employees are not engaged and do not feel that there are opportunities to develop competencies, talented and unhappy employees might leave the company, taking their skill set with them. ↓ Increased sick leaves and employee turnover, for instance due to inadequate work-life balance, can pose a financial risk for Sampo Group. ↑ Engaged and competent employees can create opportunities for Sampo Group, as dedicated employees create results by delivering first-class customer experiences daily. For this reason, investing in personnel practices and an empowering work environment makes good business sense. Time-horizon: short term	• Internal policies and guidelines (e.g. codes of conduct, HR policies) • Effective governance structures and processes (e.g. activities to support physical and mental health, workplace initiatives, quality offices, attractive remuneration packages) • Internal training and competence development programmes • Metrics and targets (e.g. employee engagement eNPS or similar)
Diversity, equity, and inclusion (DEI)	↑ Sampo Group can have a positive impact on DEI in its own workforce as a result of the actions taken by the Group. Emphasising DEI can cultivate a sense of belonging amongst employees. Time-horizon: short term	↓ If Sampo Group's own workforce is not diverse, the Group may not be able to serve its diverse customer base, which can create a financial risk through lower productivity or innovation, for example. ↑ DEI can create financial opportunities for Sampo Group, as companies performing well in this area can be more innovative and profitable, and attract talent. Time-horizon: short term	• Internal policies and guidelines (e.g. codes of conduct) • Effective governance structures and processes (e.g. diversity models/programmes, employee initiatives, reporting channels) • Internal training and competence development programmes • Metrics and targets (e.g. related to gender diversity)

The table presents Sampo Group's material impacts, risks, and opportunities related to own workforce identified in the double materiality assessment and their connection to Sampo Group's strategy and actions. The topics are linked to the ESRS sub-topics. The topic Human rights and labour practices is related to the ESRS sub-topics Working conditions and Other work-related rights. The topic Employee health, wellbeing, and competence is related to the ESRS sub-topics Working conditions, Equal treatment and opportunities for all, and Other work-related rights. The topic Diversity, equity, and inclusion is related to the ESRS sub-topics Equal treatment and opportunities for all and Other work-related rights.

Strategy

Material impacts, risks, and opportunities and their interaction with strategy and business model

Engaged employees are an instrumental part of Sampo Group's strategy and business model. Sampo Group's business activities depend on the company's ability to create an empowering work environment and on the employees' motivation to contribute to the company's goals. The dedication and expertise of the workforce drive customer satisfaction and are the foundation of competitive advantage. The interests, views, and rights of Sampo Group's employees inform strategic decisions and shape the corporate culture.

When assessing material impacts on its own workforce, Sampo Group considers all types of employees who may face significant impacts from the company's own operations or value chain. This encompasses permanent, temporary, full-time, and part-time employees, and non-employees. For example, the double materiality assessment, human rights impact assessment, and employee engagement surveys inform the Group which types of employees or employee groups in its own workforce may be at greater risk of negative impacts. These can include underrepresented groups (e.g. based on ethnic background, gender, sexual orientation, disabilities) and employees working in high pressure environments (e.g. contact centres). Within Sampo Group, potential negative impacts related to its own employees may be tied to individual incidents rather than systemic human rights issues.

Sampo Group has identified potential risks stemming from a lack of diversity (e.g. lack of representation of minority groups), discrimination within the workforce as well as higher illness statistics and employee turnover in certain parts of the Group (e.g. contact centres). These factors may limit the ability to serve a diverse customer base in the best possible way and thus impact the Group's financial performance.

Impact, risk and opportunity management

Policies related to own workforce

Sampo Group's policy related to its own workforce is the Sampo Group Code of Conduct, which is reviewed annually and approved by Sampo's Board of Directors. The Code of Conduct covers topics such as human rights and labour practices, employee health, wellbeing, and competence development, as well as DEI. The Code of Conduct prohibits forced and compulsory labour, child labour, and human trafficking and requires the Group companies to take measures to identify, avoid and/or tackle such human rights violations in their own operations and value chain. When developing the Code of Conduct, Sampo Group consults both internal (e.g. employees, management) and external stakeholders (e.g. investors, rating agencies, authorities, external consultants), depending on need.

The Code of Conduct applies to all Sampo Group companies and in all countries of operation. The operative management in each Sampo Group company is responsible for the implementation of the Code of Conduct and it is the personal responsibility of every Sampo Group employee to comply with the Code. Sampo Group offers regular training (e.g. e-learning, workshops) on the topics covered by the Code of Conduct. The Code of Conduct is available to all stakeholders on Sampo Group's website. In addition to the Code of Conduct, each Group company has adopted supplementary policies and guidelines for their own purposes.

Sampo Group complies with all applicable human rights, labour rights, and employment legislation. In addition to national laws and regulations, Sampo Group is committed to respecting human rights as set out in the International Bill of Human Rights including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and those stated in the core conventions of the International Labour Organization (ILO). Sampo Group is a participant in the UN Global Compact, and respects the principles related to human rights and labour rights.

Sampo Group's policies and related training are part of the commitment to maintain open channels of communication with its own workforce and to objectively address human rights impacts that could potentially arise within the operations, ensuring the provision of suitable remedial actions, when necessary. Remedy may be provided, for example, in the form of support from HR, employee representatives, and health and safety delegates, insurance cover, and rehabilitation depending on the type of adverse impact and local regulations.

Sampo Group engages with its own workforce regularly and has multiple channels for this purpose. More information is available under the headings Processes for engaging with own workers and workers' representatives about impacts (p. 92) and Interests and views of stakeholders (p. 64).

Employee health, wellbeing, and competence
Sampo Group has health and safety policies addressing workplace accident prevention, and the company provides occupational health care in accordance with the legislation in each operating country. Sampo Group investigates health and wellbeing risks regularly and takes preventive action to mitigate potential risks, when considered relevant. All Sampo Group companies perform risk assessments, and any incidents and risks detected are handled accordingly and reported in the relevant incident reporting tools. Along with employee surveys, the risk assessments and incident reports provide valuable indications to further develop the business processes and work environment.

Sampo Group has work environment committees (or similar) set up in accordance with local legislation. These committees' responsibilities include monitoring the work environment, developing health and safety procedures, and ensuring a high quality of physical and psychosocial wellbeing. The duties of the work environment committees can vary between the Group companies.

Sampo Group has a comprehensive learning offering available to all employees, starting from onboarding processes. Sampo Group offers mandatory training (e.g. the training requirements of the Insurance Distribution Directive), voluntary training (e.g. digital skills, language studies), and training in collaboration with external suppliers. The training options depend on which part of the organisation the employees work in. Some trainings are mandatory for all employees (e.g. Code of Conduct training, compliance training, information security and data privacy training), and others are part of annual training cycles.

Over the years, Sampo Group has seen a growth of community-driven competence development opportunities. Employees have engaged in specialist academies, where they create their own learning paths according to their interests and professional competence needs.

Diversity, equity, and inclusion
Sampo Group respects each individual's human rights and does not tolerate any kind of discrimination, bullying, harassment, or any other type of abusive behaviour. The Code of Conduct states that discrimination is strictly prohibited, for example, on the grounds of age, disability, national extraction or social origin, racial and ethnic origin, colour, family commitments, gender, gender identity, political opinion, employees' representative activities, religion, sensitive medical conditions, sexual orientation, or any other personal characteristics. In addition, discriminatory practices regarding recruitment, job assignment, training and development, promotion, remuneration and other benefits, or general conduct in the workplace are not tolerated. Reported cases related to discrimination and harassment are investigated and corrective action is taken.

At Sampo Group, it is important that all employees feel included and can be themselves at work. All Group companies have DEI policies and/or programmes and have taken action to raise awareness and address DEI and vulnerable groups within their own workforce. DEI topics are advanced, for example, through internal employee communities or diversity boards, setting company-specific diversity targets, and promoting DEI in recruitment and the leadership pipeline.

Processes for engaging with own workers and workers' representatives about impacts

Sampo Group engages regularly and directly with employees and their representatives to gain insight into the employees' perspectives, receive feedback, and identify development needs. All Sampo Group companies have decided on the highest level of responsibility for engagement based on their respective organisational structures. Forums for dialogue include, for example, leader-employee dialogues, work environment councils, meetings with union representatives, exit interviews, and employee engagement surveys. In addition, employees can raise concerns through whistleblowing channels and internal reporting channels.

The employee engagement surveys cover the physical and psychosocial work environment. The surveys address questions related to wellbeing and DEI, and the results are also examined according to demographic groups, including minority groups. Aggregated data from the surveys allow management teams to identify development areas, set targets, and measure the effectiveness of implemented actions. Leaders discuss the results with their teams, with the support of HR if needed, and take relevant action. In addition to the employee engagement surveys, Sampo Group aims to gain insight into the perspectives of vulnerable groups through different company and employee-driven initiatives around the topics of disabilities, women in the workforce, language, and inclusion of different cultures and religions, for example.

Processes to remediate negative impacts and channels for own workers to raise concerns

Sampo Group strives for a constructive and trustful dialogue with employees and their elected representatives, such as unions, with the purpose of developing the company and safeguarding the correct treatment of all employees. Sampo Group promotes a culture of open discussion in which grievances can be aired and addressed proactively. Employees are encouraged to report unethical practices or possible violations of laws, regulations, or internal policies directly, for example, to a leader, HR, union representative, compliance units, or through the reporting channels.

Sampo Group systematically monitors employee feedback received through, for example, employee surveys and reporting channels. Sampo Group ensures that actionable insights are addressed through formalised HR processes and leadership review. In addition to the internal reporting channels, Sampo Group has externally managed whistleblowing channels through which employees and other stakeholders can raise concerns anonymously.

Any incident breaching the Code of Conduct will be investigated and the need for corrective action assessed on a case-by-case basis. Information about the different channels is available on the company intranets and communicated to employees during onboarding and regularly through internal communications campaigns.

The effectiveness of the different channels and the employees' willingness to openly voice opinions and misconduct are assessed, for example, through the employee engagement surveys. Processes for handling whistleblowing cases are discussed in the section Business conduct (p. 116).

Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Through the policies and processes described earlier, such as the Sampo Group Code of Conduct, Sampo Group aims to ensure that its employees are not subject to material negative impacts. In case of a negative impact occurs, Sampo Group's remediation processes are followed. The Group investigates all suspected breaches on a case-by-case basis to determine the actions needed in response. Sampo Group engages with relevant internal stakeholders (e.g. HR, Legal, Compliance) in developing an action plan to address potential negative impacts, as well as assessing the root cause of the incident and preventative measures to be taken going forward.

In 2024, Sampo Group provided training on the topics covered by the Code of Conduct and other company-specific policies to all new and existing employees. The aim is to ensure that all Sampo Group employees are aware of and act in accordance with the Group's policies for human rights and labour practices.

During 2024, Sampo Group conducted a human rights impact assessment, which included an analysis of potential human rights risks on the Group's own employees. The assessment covered risks related to Sampo Group's own operations across the Nordics, the Baltics, and the UK, and also included non-employees, where relevant. Based on the assessment, Sampo Group mapped its due diligence measures in order to identify whether appropriate processes were in place for preventing the identified risks. The assessment is reviewed regularly and updated based on need.

Sampo Group wants to be an attractive and responsible employer, and invests in creating a corporate culture which nurtures health and wellbeing, work-life balance, and career development. Sampo Group offers, for example, flexible working hours and hybrid work, sports, volunteering, occupational health services, and training and career development. Sampo Group monitors the effectiveness of these measures, for example, through employee engagement, turnover, and other health and safety metrics. The main responsibility for managing material impacts lies with the respective HR functions who work with the business to ensure that employees are not negatively impacted and seek to maintain or strengthen positive impacts.

Employee health, wellbeing, and competence

In 2024, Sampo Group conducted regular employee engagement surveys, which provide opportunities for employees to share feedback on a range of subjects. The surveys enable Sampo Group to identify any issues and opportunities related to its employees. The feedback is analysed, and Sampo Group aims to make improvements to the most material matters. Sampo Group tracks the effectiveness of actions taken through analysis of future survey responses. Based on feedback received, If, for example, paid special attention to activities which build a strong feedback culture to strengthen organisational, team, and personal growth during 2024. Communication activities focused, among other things, on building awareness and sharing good feedback practices and tools. During the year, due to Sampo's acquisition of Topdanmark and the following integration with If, Topdanmark conducted two additional employee engagement surveys to closely follow the employees' mental wellbeing in times of organisational change. These surveys helped identify specific areas that needed attention and further communication (e.g. fear of job loss, fear of losing close colleagues).

Employee health and wellbeing remained a high priority for Sampo Group in 2024. At Sampo Group, the mental and physical wellbeing of employees is managed by implementing preventative measures (e.g. wellbeing campaigns and webinars, preventative occupational healthcare, good design of offices, financial advice), focusing on work–life balance (e.g. workplace flexibility, working time reduction, dependent care, special leave), offering employees meaningful work assignments, education, and organising team activities and sports programmes. The actions have been directed at all employees of the individual Group companies.

During 2024, Sampo Group continued to develop the hybrid working model and flexible working options to better incorporate the employees' needs and preferences. This was done, for instance, by investing in IT infrastructure and equipment, redesigning office spaces, and training leaders in remote leadership. During the year, Sampo Group tested Microsoft 365 Copilot to learn about the product and take advantage of the opportunities it can bring to the workforce. At Topdanmark, the re-design of office spaces focused on accommodating employees with neurodiverse challenges. This meant having the right lighting and designing workspaces to reduce visual and auditory noise. The adaption of the physical workspace to accommodate all employees was done to mitigate the risk of losing skilled employees due to a lack of sense of belonging, but also to secure the inclusion of all employees. This work will continue in 2025.

In 2024, Sampo Group's key activities for enabling a positive impact on employee competence included investments in digitalisation and development of tools to support employees in their work, reinforcing resources dedicated to competence development, organising learning events, and updating employee courses and competence development processes. For instance, If continued to develop the mandatory learning programme One Responsible If. The programme deals with key ethical and practical guidelines, such as those outlined in If's Ethics and Sustainability policies. In addition, it includes an e-course on incident reporting with the aim to ensure that all employees are aware of the channels and the types of incidents that should be reported. Also, Hastings' Early Careers programme continued, offering apprenticeships, graduates, and other scheme opportunities. A Leadership Excellence pilot programme was also implemented at Hastings, providing leaders and employees with skills and tools to support their existing roles, create a consistent standard of leadership, and develop their careers. Sampo Group's development programmes aim to provide positive impacts across its own workforce. In 2025, Sampo Group will continue its efforts to promote opportunities for employees to develop their knowledge and roles.

For example through the above mentioned actions, Sampo Group actively manages the financial risks deriving from potential failure to adequately foster the employees' health, wellbeing, and competence development. Having dedicated employees also allows for better customer interactions and is thus an opportunity for the Group. Going forward, the goal is to further support the employees' mental and physical wellbeing, and allow for new professional development opportunities.

Diversity, equity, and inclusion

In 2024, Sampo Group focused on DEI, for example, through equal pay and equitable working conditions for all employees. These were exhibited through different initiatives taken by the Group.

During the year, Sampo Group initiated several projects related to equal pay, which included, for example, reviews of job architecture and pay grades, improvement of existing systems, improvement of internal reporting processes to obtain timely salary data, and development of policies and recruitment practices. The projects continue in 2025 to ensure the Group's ability to comply with the new EU regulation on Equal Pay for Equal Work or Work of Equal Value Between Men and Women in 2026, for example.

In 2024, Sampo Group and its employees hosted DEI events and forums (e.g. Hastings' Inclusion Council and DEI awareness campaigns), organised training (e.g. If trained all leaders in competence-based interview techniques to reduce unconscious bias), and took part in initiatives (e.g. Hastings' 30% Club training programme). While aimed at creating positive impacts on Sampo Group's employees, these also contribute to the management of DEI-related risks and opportunities the Group has identified. The actions have been directed at all employees of individual Sampo Group companies.

Sampo Group's DEI work is also communicated in job advertisements, and recruitment processes are developed to include different types of assessments, including the use of personality tests, case presentations, structured interview guidelines, references, and a four-eye-principle to avoid decisions being influenced by unconscious bias and discrimination. For example, If developed its existing employer branding initiatives to incorporate more of the company's DEI work in 2024. In 2025, If continues to examine the employer brand, to appeal to a more diverse workforce, which is impacted by societal trends such as immigration and generational values.

Going forward, Sampo Group will continue its efforts in relation to DEI. The plan is to improve methods to develop inclusive leadership, which contributes to increased psychological safety. Sampo Group will also focus on neurodiversity and disability through various activities, which include forming communities of best practice that can be consulted to make decisions more inclusive. These actions aim at fostering a diverse and inclusive culture and collecting insights to further enhance equal treatment of employees. Furthermore, they support Sampo Group in ensuring compliance with its Code of Conduct and zero tolerance for discrimination.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Sampo Group has set time-bound and outcome-oriented targets for employee engagement surveys to address impacts, risks, and opportunities related to employee safety, wellbeing, competencies, and diversity, for example. These themes are aligned with the policy objectives stated in the Sampo Group Code of Conduct, which aim at providing encouraging and rewarding working conditions, as well as fair and equal treatment.

The employee engagement results are based on surveys that employees fill out to assess their experience of working at a Sampo Group company. Employee engagement surveys are conducted at subsidiary level instead of group level to ensure the suitability of the surveys for each Group company and its individual needs and characteristics. The engagement surveys are sent out to all employees who have an active employment contract with Sampo Group when the survey is conducted. The surveys are conducted at least annually, and the results are reported to the respective management teams.

Sampo Group has set the employee engagement targets using internal and external benchmarking and historical data, for example. To assess the level of results, Sampo Group monitors trends internally and, when possible, compares the results to industry averages within its operating countries. Meeting the set targets can be considered as an excellent performance.

In addition to the top management of the Sampo Group companies, representatives from different parts of the Group have been involved in drafting the employee engagement targets. The targets are also discussed with union representatives, and external stakeholders' feedback is considered, where relevant. The results of the employee engagement surveys and other data related to own workforce are used by the management teams of the Sampo Group companies as input into the organisational development processes.

Employee engagement

Sampo Group

			2024	
Survey	**Scale**	**Target**	**H1**	**H2**
If: HeartBeat	-100–100	2024: 50	52	54
Topdanmark: Ennova Enagagement Survey	-100–100	2025: 79	80	80
Hastings: Your Voice	0–100	2024: 72	77	78
Sampo plc: Work Life Survey	-100–100	-	-	42

The surveys are company-specific and not comparable to each other. Sampo's survey is conducted annually in autumn. For If, Topdanmark, and Sampo, the scale is from -100 to 100. In general, scores above zero can be considered good/positive, while those above 50 can be considered excellent. However, score levels can vary according to industry and organisational type, for example. For Hastings' survey, results above 70 can be considered as high.

Calculation principles

Metrics related to own workforce are reported according to the requirements of the ESRS standard. The calculations are based on either headcount or full-time equivalent (FTE) and the method used is disclosed in conjunction with each metric. Hourly paid employees, summer workers, non-employees, and trainees are excluded from the headcount and FTE calculations. For FTE, the work time is adjusted in case an employee is on a longer leave, such as parental leave. Year-end figures are used in reporting unless otherwise indicated. Sampo Group only collects information on binary gender due to legal restrictions and lack of system support and, therefore, reporting includes data on women and men only. More specific calculation principles are described alongside the metrics.

The metrics for own workforce have not been validated by an external body other than the assurance provider of this Sustainability Statement. There are no figures related to own workforce in the Sampo Group Financial Statements.

Characteristics of the undertaking's employees

As at 31 December 2024, the total number of employees at Sampo Group was 15,581. The number of employees increased slightly in all Group companies during the year. The increase was the highest at Hastings, in the UK, due to business growth.

In 2024, the majority of Sampo Group's employees worked in the UK, Denmark, Sweden, Finland, and Norway. The share of women was slightly higher compared to men, but overall the binary gender balance was relatively equal. Sampo Group's employees were mainly employed full-time on permanent contracts at the end of the year.

Headcount is used for calculating the total number of employees, non-guaranteed hours employees, full and part-time employees, and permanent and temporary employees. A small number of employees work in what is called 'Other countries' in Group reporting. These countries have been combined in reporting due to the size of operations in these countries. 'Other countries' includes Spain, Gibraltar, France, Germany, the Netherlands, and the United States.

In 2024, Sampo Group's turnover rate and the number of terminations remained at the same level as in previous years. The turnover rate is calculated by dividing the number of employees who have left Sampo Group during the reporting year by average headcount. The figure includes external voluntary and involuntary turnover.

Total number of employees by gender

Sampo Group, 31 December 2024

Gender	Number of employees
Female	8,134
Male	7,447
Other	-
Not reported	-
Total employees	**15,581**

Total number of employees by country

Sampo Group, 31 December 2024

Country	Number of employees
United Kingdom	4,314
Denmark	2,977
Sweden	2,770
Finland	2,130
Norway	1,827
Latvia	573
Estonia	514
Spain	230
Lithuania	190
Gibraltar	32
Germany	8
Netherlands	8
France	7
United States	1
Total employees	**15,581**

Number of terminations and turnover rate

Sampo Group, 2024

Country	Terminations	Turnover rate
United Kingdom	776	19.9%
Denmark	416	13.7%
Sweden	312	11.4%
Finland	130	6.1%
Norway	143	8.1%
Baltic countries	93	7.4%
Other countries	102	36.8%
Sampo Group, total	**1,972**	**13.1%**

Information on employees by gender

Sampo Group, 31 December 2024

	Female	Male	Other	Not disclosed	Total
Number of employees	8,134	7,447	-	-	**15,581**
Number of permanent employees	8,016	7,384	-	-	**15,400**
Number of temporary employees	118	63	-	-	**181**
Number of non-guaranteed hours employees	168	126	-	-	**294**
Number of full-time employees	7,125	7,170	-	-	**14,295**
Number of part-time employees	1,007	279	-	-	**1,286**

Information on employees by country

Sampo Group, 31 December 2024

	United Kingdom	Denmark	Sweden	Finland	Norway	Baltic countries	Other countries	Total
Number of employees	4,314	2,977	2,770	2,130	1,827	1,277	286	**15,581**
Number of permanent employees	4,268	2,940	2,754	2,111	1,791	1,250	286	**15,400**
Number of temporary employees	46	37	16	19	36	27	0	**181**
Number of non-guaranteed hours employees	0	142	93	0	59	0	0	**294**
Number of full-time employees	3,741	2,766	2,576	1,955	1,736	1,245	276	**14,295**
Number of part-time employees	573	211	194	175	91	32	10	**1,286**

Characteristics of non-employee workers in the undertaking's own workforce

As at 31 December 2024, the total number of non-employees at Sampo Group was 3,283. The number of non-employees is reported as headcount. Non-employees are employees in the company's workforce who are not employed by the company (e.g. self-employed individuals or employees provided by staffing agencies). At Sampo Group, non-employees work within IT and in customer service centres, for example.

Collective bargaining coverage and social dialogue

As at 31 December 2024, 60.9 per cent of Sampo Group's employees were covered by collective bargaining agreements. The figure only includes employees who are fully covered by collective bargaining agreements in locations where trade unions are formally recognised. Nevertheless, the agreements apply to most employees' (excluding top management) terms of employment even if they are not covered by the agreement. There are several collective bargaining agreements within Sampo Group's operations in the European Economic Area, depending on the geographic location and national practices. In Sampo Group's operations in the UK, trade unions are not formally recognised, but employment terms are compared to market practices at regular intervals.

Sampo Group has no Global Framework Agreements. If has established an agreement on an information and consultation procedure with the workers' representatives, based on the European Works Councils' stipulation. The highest level of engagement with workers' representatives takes place in the Communication Council, which is chaired by If's CEO. The Communication Council meets quarterly to address topics concerning more than one country or business area.

The collective bargaining coverage is calculated by dividing the number of employees covered by collective bargaining agreements by the total number of employees using headcount. Estimations were used to calculate workplace representation.

Collective bargaining coverage and social dialogue

Sampo Group, 31 December 2024

	Collective bargaining coverage		Social dialogue
Coverage rate	**Employees – EEA**	**Employees – Non-EEA**	**Workplace representation (EEA only)**
0–19%	-	United Kingdom	-
20–39%	-	-	-
40–59%	-	-	-
60–79%	-	-	Denmark, Sweden
80–100%	Denmark, Sweden, Finland, Norway	-	Finland, Norway

The table includes countries with more than 50 employees, representing over 10% of total employees.

Diversity metrics

The age distribution within Sampo Group has historically been stable, and remained so in 2024. Age distribution is calculated by headcount at year-end.

As at 31 December 2024, the binary gender distribution at the four highest management levels of Sampo Group shows that there is still room for diversity at the very top. However, at the levels immediately below top management, the balance between women and men is more equal. Sampo Group defines top management as the Sampo Group CEO (level 1), the subsidiaries' CEOs (level 2), executives reporting to any of the CEOs (level 3), and management level employees reporting to these executives (level 4).

Gender distribution at top management level

	Level 1 (the Group CEO)		Level 2 (the CEOs of Sampo plc's subsidiaries)		Level 3 (reporting to any of the CEOs)		Level 4 (reporting to level 3)	
Gender	**31 Dec. 2024**		**31 Dec. 2024**		**31 Dec. 2024**		**31 Dec. 2024**	
Female	0	0.0%	0	0.0%	9	25.7%	77	40.8%
Male	1	100.0%	3	100.0%	26	74.3%	112	59.2%
Sampo Group, total	**1**	**100.0%**	**3**	**100.0%**	**35**	**100.0%**	**189**	**100.0%**

Distribution of employees by age group

Age group	**31 Dec. 2024**	
Under 30 years old	3,264	20.9%
30–50 years old	8,730	56.0%
Over 50 years old	3,587	23.0%
Sampo Group, total	**15,581**	**100.0%**

Adequate wages

At Sampo Group, remuneration is based on objective criteria, such as work experience, competence, position, and responsibilities, and all employees are paid an adequate wage which is in line with applicable benchmarks. Pay and additional benefits are not based on or affected by gender or any other non-professional aspect. Sampo Group has, for example, job title and job position structures to ensure that employees in the same position are employed under the same conditions, and internal and external benchmarks are used in setting the salary ranges.

Social protection

All Sampo Group employees are covered by social protection against loss of income due to major life events such as sickness, unemployment, employment injury and acquired disability, parental leave, and retirement.

Persons with disabilities

Sampo Group does not collect data on personal characteristics, such as disabilities, due to legal restrictions.

Training and skills development metrics

At Sampo Group, all employees are eligible to participate in regular career development reviews. In 2024, Sampo Group implemented new reporting processes for career development reviews to meet the ESRS reporting requirements. Reporting on this topic will be further developed in 2025 to ensure data accuracy. The percentage of employees who participated in performance and career development reviews is calculated by dividing the number of employees who participated in these reviews by the year-end headcount, broken down by gender.

Percentage of employees who participated in regular performance and career development reviews by gender

Gender	2024
Female	66.2%
Male	64.0%
Sampo Group, total	**65.1%**

Health and safety metrics

All Sampo Group's employees were covered by a health and safety management system on 31 December 2024. The system refers to the occupational healthcare services that the employer offers to employees. The system can be either statutory or offered voluntarily. The percentage of employees in Sampo Group's own workforce covered by a health and safety management system is calculated using headcount.

During 2024, there were no fatalities as a result of work-related injuries at Sampo Group, and the number of work-related accidents remained stable. Sampo Group reports the rate of recordable work-related accidents for the first time in 2024. The rate is calculated by dividing the number of cases by the estimated total hours worked and multiplied by one million. The rate represents the number of cases per one million hours worked. The disclosed metrics concern employees in Sampo Group's own workforce.

Sampo Group does not collect data on work-related ill health, fatalities due to work-related ill health, or days lost due to work-related ill health due to legal restrictions.

Percentage of employees covered by health and safety management system

Sampo Group

Metric	31 Dec. 2024
Percentage of employees who are covered by health and safety management system	100.0%

Work-related injuries and fatalities

Sampo Group

Metric	2024
Number of fatalities as a result of work-related injuries	0
Number of recordable work-related accidents	80
Rate of recordable work-related accidents	3.4

Work-life balance metrics

At Sampo Group, all employees are entitled to family-related leave through social policy or collective bargaining agreements. The percentage of employees who took family-related leave is calculated by dividing the number of employees who were on family-related leave divided by year-end headcount, broken down by gender.

Percentage of employees who took family-related leave

Gender	2024
Female	10.2%
Male	6.3%
Sampo Group, total	**8.3%**

Remuneration metrics (pay gap and total remuneration)

The gender pay gap describes the difference in actual paid out compensation between men and women. The difference in pay can be explained by factors such as position in the company, job tasks, responsibilities, and leave of absence. The calculation principles of the gender pay gap have been modified in 2024 to reflect the requirements of the ESRS.

Sampo Group calculated the annual total remuneration ratio of the highest paid individual to the median annual remuneration for the first time in 2024. The median remuneration data is retrieved from local payroll systems and includes fixed net compensation, holiday pay, bonuses, and all incentive schemes. Overtime compensation and pensions are excluded. The median annual remuneration figure is based on the number of employees in an employment relationship with Sampo Group at 31 December 2024, regardless of them being employed a full year or not.

Pay gap related metrics are calculated using FTE average. Exchange rates may have an impact on the remuneration figures presented in this statement.

Gender pay gap

Sampo Group

Metric	2024
Fixed remuneration	19.8%
Fixed and variable remuneration	24.5%

Annual total remuneration ratio of the highest paid individual to the median annual remuneration

Sampo Group

Metric	2024
Pay ratio	89.6

Incidents, complaints, and severe human rights impacts

In 2024, no severe human rights incidents, defined as severe violations of human rights and labour rights legislation concerning Sampo Group's own workforce, were reported. Two incidents of discrimination and harassment were reported. These include incidents of discrimination as defined in the Sampo Group Code of Conduct and incidents of harassment that have led to formal consequences (e.g. warning or dismissal). The total number of complaints filed through Sampo Group's channels for people in the own workforce was 22. These are complaints reported by employees through grievance mechanisms and whistleblowing channels, concerning social, human rights, and labour rights matters. The figure includes all applicable complaints filed during 2024 regardless of their status at the end of the reporting year. None of the incidents or complaints reported during the year resulted in fines, penalties, or compensation for damages.

Number of incidents of discrimination and harassment

Sampo Group

Metric	2024
Number	2

Number of severe human rights incidents

Sampo Group

Metric	2024
Number	0

Workers in the value chain

Topic	Impacts	Risks and opportunities	Strategy and actions
Suppliers and business partners	↓ Sampo Group has not identified actual negative impacts related to its suppliers and business partners. Potential negative impacts related to human rights and labour practices can occur across Group's entire value chain. Potential negative impacts can be mitigated, but due to the large number of suppliers and business partners, it is not possible to completely remove the risk for negative impacts on workers in the value chain (e.g. related to working conditions and equal treatment). ↑ Sampo Group can have a potential positive impact on the sustainability of its suppliers and business partners through its own actions. This can also improve the working conditions of its suppliers' workforce (e.g. job stability and health). Time-horizon: short to medium term	↓ If Sampo Group's suppliers or business partners exploit their employees, this may lead to legal, reputational, and operational risks for the supplier or partner in question. This could become an operational risk for Sampo Group, having to find a new partner or experience delays and poor quality in deliveries. ↓ Sampo Group can face a financial risk due to increasing and tightening legislation related to human rights and labour rights (e.g. possible fines, reputational damage). ↑ Having stable business relationships with responsible suppliers and business partners can be a competitive advantage and create financial opportunities for Sampo Group. Time-horizon: short to medium term	• Policies and guidelines (e.g. supplier codes of conduct) • Effective governance structures and processes (e.g. supplier risk assessments, audits, questionnaires, engagement) • Internal training and competence development programmes • Metrics and targets (e.g. share of suppliers signing a code of conduct)
Underwriting and investment management	↑ Sampo Group can have a potential positive impact on the entire value chain, including workers in the value chain, by adopting responsible investment and underwriting practices. Time-horizon: medium to long term	↓ If Sampo Group were to invest in or insure industries whose operations are harmful for value chain workers, it could cause reputational damage and financial risks for the Group. ↑ For Sampo Group, financial opportunities of responsible investment are limited, as sustainability is seen as a baseline. In the long run, there may be more opportunities, as the availability of information increases, and sustainability can also provide reputational value. Time-horizon: medium to long term	• Commitments to responsible investment and underwriting (e.g. PRI, SBTi) • Internal policies and guidelines (e.g. responsible investment policies, underwriting principles) • Effective governance structures and processes (e.g. screening, engagement) • Metrics and targets (e.g. SBTs)

The table presents Sampo Group's material impacts, risks, and opportunities related to workers in the value chain identified in the double materiality assessment and their connection to Sampo Group's strategy and actions. The topics are linked to the ESRS sub-topics. The topics Suppliers and business partners and Underwriting and investment management are related to the ESRS sub-topics Working conditions and Other work-related rights.

Strategy

Material impacts, risks, and opportunities and their interaction with strategy and business model

Sampo Group has an impact on workers in the value chain through its suppliers and business partners, corporate customers, and investments. For example, based on the double materiality assessment and the human rights impact assessment, Sampo Group has identified that especially workers in its downstream value chain (e.g. suppliers in claims handling) could be negatively affected. These workers may face risks inherent to their roles and operating contexts, which are mitigated, amongst other things, by the suppliers' adherence to the required health and safety standards outlined in Sampo Group's supplier codes of conduct.

Ensuring that human and labour rights are respected by the suppliers is important for Sampo Group to mitigate financial risks and seize opportunities. Suppliers breaching human rights and labour rights may face legal, reputational, and operational consequences, which may, in turn, become an operational risk for Sampo Group. A stable business relationship with a responsible supplier is a competitive advantage and can, therefore, be seen as an opportunity, too.

Sampo Group develops its understanding of particularly vulnerable value chain workers for instance through self-assessment questionnaires completed by suppliers and engagement with investee companies, corporate customers, and suppliers. Examples of particularly vulnerable groups within Sampo Group's value chain include different minorities and migrant workers.

Sampo Group includes all value chain workers who may be materially impacted by its operations, products, services, and business relationships in its disclosures. However, the main focus is on direct suppliers (Tier 1) where Sampo Group is expected to have the largest impact. In addition, impacts Sampo Group may have through its investees and corporate customers are also considered.

Sampo Group's upstream value chain encompasses suppliers of office supplies and services (e.g. software and hardware companies) as well as providers of other business services (e.g. consultants, external data providers) that support the running of the business. The downstream value chain includes, for example, suppliers of vehicle and property repair contractors, as well as healthcare providers. The key activities related to Sampo Group's products and services that are carried out by suppliers include property, vehicle, and content repairs, health and hospital services, and travel services. Sampo Group acknowledges the varying levels of human and labour rights risks associated with different industries and regions related to its business, particularly in sectors such as construction and vehicle repair.

The majority of Sampo Group's suppliers in claims handling are based in the Nordics, where the risk for human rights violations in general is considered lower than in many other regions globally. However, the value chains can be long and complex, and especially certain sectors such as construction, mining, transportation, and electronics are associated with risks to human rights and labour rights. Workers may be exposed to unhealthy or unsafe working conditions including, for example, long hours and exposure to hazardous substances. Risks also include forced labour and child labour, discrimination, and violations of privacy. These risks can be considered systemic.

Sampo Group's downstream value chain also encompasses the workforce and supply chains of its investee companies and corporate customers, through which the Group can have an impact on workers that goes beyond its own operating countries. This could, for example, include a risk of forced labour, unhealthy working conditions, or discrimination and harassment, as these risks can exist in industries or regions where the investee companies or corporate customers operate. As these risks materialise further down the value chain, Sampo Group's possibilities to limit the impacts are limited.

Impact, risk and opportunity management

Policies related to value chain workers

Sampo Group's policy related to workers in the value chain is the Sampo Group Code of Conduct, which is reviewed annually and approved by Sampo's Board of Directors. The Code of Conduct is mandatory for all Sampo Group companies and must be personally upheld by every Group employee.

The Code of Conduct states that Sampo Group complies with all applicable human rights, labour rights, and employment legislation. In addition, Sampo Group is committed to respecting human rights as set out in the International Bill of Human Rights including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and those stated in the core conventions of the International Labour Organization (ILO). Sampo Group also adheres to the principles of the UN Global Compact and follows the internationally recognised standards on business and human rights, such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Hence, Sampo Group is committed to the obligations related to human rights and the continuous development of related practices (e.g. human rights due diligence processes including human rights impact assessments) covering both its own operations and its value chain.

Sampo Group has due diligence processes aligned with the OECD Guidelines for Multinational Enterprises. These processes allow Sampo Group to identify, avoid and address possible adverse impacts on human rights, labour rights, the environment and anti-corruption commitments associated with its suppliers as well as underwriting and investment operations.

As stated in the Code of Conduct, Sampo Group condemns all forms of forced and compulsory labour as well as child labour and modern slavery (e.g. human trafficking) in the Group's own operations and value chain. In addition to the Sampo Group Code of Conduct, each Group company has adopted supplementary and more detailed policies, guidelines, and processes for their own purposes.

Sampo Group has not been made aware of severe confirmed cases of non-adherence to global standards for value chain workers in its upstream and downstream value chain during the reporting year. This includes direct suppliers (Tier 1), direct investments, and corporate customers.

Suppliers and business partners

The Sampo Group Code of Conduct is the group level guidance document on supplier codes of conduct. The Group's company-specific supplier codes of conduct set the minimum requirements that suppliers are expected to meet on topics such as fair and equal treatment, privacy, employment terms, working hours, fair wages, health and safety, and freedom of association and collective bargaining. The codes of conduct are based on the UN Global Compact and its underlying conventions, and apply to suppliers and sub-suppliers. The supplier codes of conduct are approved by the boards of directors or other governing bodies of the respective Sampo Group company. The ultimate responsibility for implementation lies with the top management of each Group company. The policies are available on the Group companies' websites and they are communicated to suppliers.

Sampo Group engages with its suppliers, for example, through dialogue, self-assessment questionnaires, reviews and site visits. In case of a breach against a supplier code of conduct, Sampo Group engages with the supplier to bring about improvements in the supplier's business conduct. Sampo Group monitors the situation and actions depend on the corrective measures taken by the supplier. Sampo Group can terminate the supplier contract if the supplier does not take steps to remediate the situation within a reasonable timeframe.

Underwriting and investment management

Sampo Group provides insurance to corporate customers in accordance with its underwriting principles and manages its investments in accordance with its responsible investment policies. Sampo Group updates its policies related to insurance and investment operations annually and they are approved by the boards of directors of each Group company. The policies include, among other things, descriptions on how to take sustainability risks and sustainability criteria into account in insurance and investment activities.

Sampo Group conducts norm-based screening of direct investments and corporate customers against international norms and standards (e.g. the UN Global Compact principles, the OECD Guidelines for Multinational Enterprises, the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, the Guiding Principles on Business and Human Rights, and the Paris Climate Agreement) using external service providers. If Sampo Group detects a violation of norms or standards, depending on the severity, nature, and extent of the breach, measures taken may consist of direct dialogue or other type of engagement action. As a measure of last resort, the investment can be sold or insurance contract terminated if the investee company or corporate customer does not take corrective action.

In addition to norm-based screening, Sampo Group excludes certain sectors from direct investments unless pre-defined criteria are fulfilled. Examples of such sectors are tobacco, coal, and controversial weapons, due to potential human rights risks, labour rights risks, reputational risk, and/or regulatory risks.

Processes for engaging with value chain workers about impacts

Sampo Group does not engage directly with its value chain workers or their legitimate representatives or credible proxies. However, indirect engagement can occur through suppliers, investee companies, or corporate customers. The engagement can be part of formal due diligence processes or regular monitoring of business relationships (e.g. meetings, self-assessment questionnaires, business reviews). These processes allow Sampo Group to understand and manage impacts on the workers in its value chain.

The frequency and method of engagement depends on assessed risk, which links, for example, to the type and size of the business partner in question. The effectiveness of engagement is monitored, for example, through follow-up meetings with suppliers and corporate customers or through external partners during engagement with investee companies.

Sampo Group gains insight into the perspectives of its value chain workers mainly through human rights due diligence processes. These include, for example, conducting human rights impact assessments, evaluating suppliers' adherence to sustainability criteria, and screening investments and corporate customers.

Processes to remediate negative impacts and channels for value chain workers to raise concerns

The Sampo Group Code of Conduct, supplier codes of conduct, and responsible investment and underwriting practices set clear requirements related to value chain workers. If non-compliance with the requirements is detected, Sampo Group will engage with the supplier, investee company, or corporate customer in question to rectify the situation and align them with the Group's policies, with plans to review and follow up on these actions. If the error or contract breach is major, or the supplier, investee company, or corporate customer is unwilling to make improvements within a given timeframe, Sampo Group may terminate the contract or divest.

Most of Sampo Group's whistleblowing channels are available to all stakeholders, including value chain workers, for reporting suspicions of violations against legislation or unethical conduct. The whistleblowing channels are either internally or externally managed, depending on the Group company, and allow anonymous reporting. In addition, the majority of Sampo Group's supplier codes of conduct or related contracts state that suppliers must provide channels for reporting grievances. Suppliers are also required to report any breaches against the principles of the codes of conduct to Sampo Group. In addition to making relevant policies and channels available to value chain workers, Sampo Group does not specifically assess how well they are aware of the processes to raise concerns.

Incidents reported through Sampo Group's whistleblowing channels are investigated promptly in accordance with applicable legislation. Sampo Group ensures the effectiveness of its channels through internal and external communications and training. The Group is also committed to develop its approaches further. The whistleblowing channels are discussed in detail in the section Business conduct (p. 116).

Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

In 2024, Sampo Group conducted a group-wide human rights impact assessment, where risks related to human rights topics across the Group's operations and value chain, including those related to suppliers, investments, and corporate customers, were assessed. The assessment covered the identification of human rights risks in relation to Sampo Group's own operations in the Nordics, the Baltics, and the UK, as well as key upstream and downstream activities and their geographies. The work also included a plan for developing the Group's due diligence processes further in order to address identified risks. During 2024, to support the group level work, the Group companies developed, for example, their human rights-related process descriptions, policies, and practices (e.g. supplier codes of conduct, human rights policies, whistleblowing channels). This work also strengthened Sampo Group's compliance with the minimum safeguards of the EU Taxonomy (p. 71).

Based on the assessment, Sampo Group develops its processes to improve its abilities in detecting, preventing, and mitigating potential negative impacts on human rights and labour practices of the Group's value chain workers. Additionally, Sampo Group continues its regular and on-going work with all relevant suppliers and business partners, investees, and corporate customers to ensure compliance with the Group's policies.

Sampo Group uses its continuous processes to determine whether engagement or other additional actions with the given supplier, corporate customer, or investee company are needed to address any potential negative impacts on value chain workers. Similarly, Sampo Group's policies, screening, and engagement practices allow for mitigating risks and pursuing opportunities that have been identified related to workers within the Group's value chain.

Sampo Group has not identified actual material negative impacts on its value chain workers and no severe human rights issues or incidents have been reported to Sampo in the Group's upstream or downstream value chain in 2024. Potential negative impacts on value chain workers are monitored, for example, through supplier self-assessment questionnaires, site visits, reviews, and potential contract terminations, which can occur due to a supplier's or business partner's non-compliance with Sampo Group's sustainability requirements.

In case any material negative impacts on value chain workers were to occur, Sampo Group has processes in place for reporting and addressing grievances and to take corrective action. Responsibility for the management of any material impacts on value chain workers is allocated to each Group company's respective departments, such as Procurement, Investment management, Insurance operations (e.g. If's Business area Industrial), and Sustainability.

Suppliers and business partners
In 2024, Sampo Group strengthened the integration of its supplier codes of conduct into processes, developed due diligence practices, and monitored suppliers' alignment with sustainability criteria. As Hastings implemented a supplier code of conduct in 2024, all Sampo Group companies now have a code of conduct outlining the expectations towards suppliers, including human and labour rights. Other actions taken to enhance the cooperation with suppliers were reviewing ESG questionnaires, as well as allocating training budgets and providing digital platforms and external consultancy support to assist in conducting the due diligence. All of these actions are meant to support Sampo Group's work in preventing negative impacts to workers across the value chain.

Sampo Group also aims to promote positive impacts among its value chain workers. For example, Topdanmark cooperates with its suppliers in the building sector and engages in upskilling the key employees at the supplier through targeted education related to claims handling practices. In addition, Sampo Group engaged with its suppliers to ensure alignment with the Group's policies and guidelines regarding labour practices in 2024.

Underwriting and investment management
Sampo Group updated the Group's responsible investment policies during 2024. The changes were linked, for example, to the SBTs. The development of the Group's responsible investment practices continues during the coming years based on internal sustainability ambitions, external stakeholder feedback, and overall market development.

In 2024, Sampo Group screened its direct investments and corporate customers for breaches against the UN Global Compact principles. Based on the screenings, Sampo Group did not have any direct investments in companies with confirmed norm violations and no severe and confirmed inconsistencies were identified among the corporate customers either. During the year, Sampo Group also continued to screen its direct investments for sensitive sectors to manage any possible risks related to human and labour rights.

During the reporting year, Sampo Group's investments in funds were managed by asset managers who are UN PRI signatories. A significant portion of these funds is also managed by asset managers who have committed to respecting the UN Global Compact principles.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Sampo Group's long-term goal is that all suppliers have signed a supplier code of conduct. However, for the time being, Sampo Group has not set measurable, time-bound, and outcome-oriented group level targets for the metrics related to workers in the value chain. Sampo Group reviews processes to manage impacts, risks, and opportunities related to workers in the value chain regularly. In case it is assessed that an externally disclosed target on the group level is a valuable addition, the decision will be revisited.

Metrics related to Supplier Code of Conduct

In order to evaluate its effectiveness in mitigating the risk of potential negative impacts on value chain workers and their human and labour rights, Sampo Group measures the inclusion of supplier codes of conduct in its supplier agreements. Tracking the inclusion also supports Sampo Group in managing financial risks related to any negative impacts on value chain workers and the pursuit of opportunities from business relationships with responsible partners.

Sampo Group started to track the inclusion of supplier codes of conduct in supplier agreements at group level in 2024. Performance is regularly monitored as part of Sampo Group's annually published sustainability statement. Going forward, Sampo Group will monitor the need for additional group level metrics and implement them, if considered material.

The share of suppliers having signed a supplier code of conduct is measured by dividing the number of suppliers that have signed one of Sampo Group's supplier codes of conduct (including suppliers that have their own code of conduct which Sampo Group has approved) by the number of all suppliers. The metric applies to both suppliers in Sampo Group's upstream (e.g. suppliers of office equipment) and downstream value chain (e.g. suppliers in claims handling). Some suppliers, such as large IT companies and consultancies, are excluded from the metric. There are Group company-specific adjustments in the methodology due to differences in supply chain structures.

Results for the year 2024 are presented in the table Supplier Code of Conduct included in existing supplier agreements. The measurement of supplier codes of conduct is not validated by an external body other than the assurance provider of this Sustainability Statement.

Supplier Code of Conduct included in existing supplier agreements

Sampo Group

Metric	31 Dec. 2024
Share of suppliers	75.6%

Consumers and end-users

Topic	Impacts	Risks and opportunities	Strategy and actions
Customer health and safety	↑ Customer health and safety is at the core of the insurance business and, therefore, also at the core of Sampo Group's business. As Sampo Group's strategy focuses on disciplined underwriting and careful risk management, the company has an actual positive impact on consumers' and end-users' health by providing insurance products, thus helping its customers in risk management. Time-horizon: short to medium term	↑ Sampo Group can create financial opportunities by offering consumers and end-users products and services they need and want. Opportunities can also be gained, for example, by cutting costs through digital solutions and by developing new products and services. Time-horizon: short to medium term	• Internal policies and guidelines (e.g. codes of conduct, underwriting principles, risk management principles) • Effective governance structures and processes (e.g. feedback channels, loss prevention, risk management) • Training and competence development programmes • Metrics and targets (e.g. NPS, EPSI, Trustpilot)
Sales and marketing practices	↓ Sampo Group can have potential negative societal impact through irresponsible sales and marketing practices (e.g. inaccessibility, discrimination, misleading). Time-horizon: short to medium term	↓ Possible irresponsible sales and marketing practices can cause a financial risk for Sampo Group through legislative consequences (e.g. possible fines) and reputational damage. Time-horizon: short to medium term	• Internal policies and guidelines (e.g. codes of conduct) • Effective governance structures and processes (e.g. feedback channels, quality communications, responsible remuneration practices) • Training and competence development programmes
Data privacy, information security, and cybersecurity	↓ As an insurance company, Sampo Group handles and stores large amounts of customers and other stakeholders' personal data. Due to increasing digitalisation and the use of AI, there is a risk of, for example, information security breaches, cybersecurity attacks, and data privacy incidents, leading to potential negative impacts on consumers and end-users. Time-horizon: short to medium term	↓ Sampo Group is exposed to data privacy, information security, and cybersecurity risks due to the high quantity of sensitive data the company handles and processes. In the case of incidents related to privacy and data security, negative financial risks, such as fines and reputational damage, may be significant. Time-horizon: short to medium term	• Internal policies and guidelines (e.g. codes of conduct, data privacy statement, information security principles, risk management principles) • Effective governance structures and processes (e.g. frameworks and reporting structures, screenings, impact assessments, security measures, data processing agreements, risk analyses, continuity planning, quality systems and infrastructure) • Training and competence development programmes • Metrics and targets

The table presents Sampo Group's material impacts, risks, and opportunities related to consumers and end-users identified in the double materiality assessment and their connection to Sampo Group's strategy and actions. The topics are linked to the ESRS sub-topics. The topic Customer health and safety is related to the ESRS sub-topic Personal safety of consumers and/or end-users. The topic Sales and marketing practises is related to the ESRS sub-topics Social inclusion of consumers and/or end-users and Information-related impacts for consumers and/or end-users. The topic Data privacy, information security, and cybersecurity is related to the ESRS sub-topic Information-related impacts for consumers and/or end-users.

Strategy

Material impacts, risks, and opportunities and their interaction with strategy and business model

Sampo Group provides insurance products and services to three main customer groups: private customers, commercial customers (including SMEs), and industrial customers. In addition to these groups, Sampo Group can have an impact on potential customers and end-users of insurance policies, who themselves are not Sampo Group's customers (e.g. beneficiaries). When assessing material impacts on consumers and end-users, Sampo Group aims to consider all types of customers who may face material impacts from the company's own operations or value chain.

Sampo Group does not offer products or services that are inherently harmful to consumers' or end-users' health, safety, or freedom of expression. Instead, Sampo Group has an actual positive impact on consumers' and end-users' health and safety, for example by providing insurance products and services, thus helping customers in loss prevention, risk management, and in case of a claim.

Sampo Group's sales and marketing practices can have a potential negative impact on consumers and end-users, for example, through inaccessibility of products and services, or if the needs of underserved groups are not fulfilled in a satisfactory manner. As an insurance provider, there is also a potential for Sampo Group to be associated with discrimination due to risk assessments that can in certain cases (e.g. due to legal restrictions) exclude customers from accessing insurance protection. For example, certain insurances may not be available to customers with specific risk profiles, or are only available with higher premiums.

As an insurance company, Sampo Group is required to handle large amounts of customers' personal data, and Sampo Group can, therefore, have a negative impact on consumers and end-users also through data privacy, information security, and cybersecurity. The privacy of customers can be jeopardised if Sampo Group's data privacy and information security measures are breached (e.g. as a result of a cyber attack). Due to digitalisation and AI, for instance, the risk of information security and cybersecurity attacks can increase, leading to a higher amount of potential negative impacts.

When offering insurance to consumers who can be more vulnerable to health, privacy, or accessibility impacts (e.g. elderly people, people with disabilities, people lacking financial literacy) and to beneficiaries who themselves are not Sampo Group's customers (e.g. children), it is especially important that Sampo Group offers these consumers and end-users accurate and accessible information about their insurance policies and coverage. To increase understanding about which stakeholders, including consumers and end-users, are particularly at risk of being harmed by negative human rights impacts, Sampo Group has conducted a human rights impact assessment. In addition, Sampo Group's stakeholder dialogue and customer feedback channels serve as a way to engage with affected consumers and end-users and understand potential human rights risks.

Risks and risk management are inherent elements of insurance companies' business activities and operating environment. At Sampo Group, the balance between risks, capital, and earnings requires that risks affecting profitability, as well as other material risks, are identified, assessed, and analysed. This means that underwriting risks are priced reflecting their inherent risk levels based on each individual customer's specific risk profile, which may, for instance, increase the potential negative impact on consumers and end-users through sales and marketing practices.

Impact, risk and opportunity management

Policies related to consumers and end-users

Sampo Group has several policies to manage its material impacts, risks, and opportunities related to consumers and end-users. These are, for example, Sampo Group's Code of Conduct, Data Privacy Statement, and Information Security Principles. The policies are all reviewed annually, approved by Sampo's Board of Directors, and available on Sampo's website. In addition, each Group company has supplementary and more detailed policies (e.g. underwriting principles. distribution policies, data privacy statements), guidelines, and processes (e.g. due diligence) for their own purposes. The ultimate responsibility for the implementation of the group level principles and company-specific policies lies with the management of each individual Sampo Group company. To ensure compliance with laws, regulations, and internal policies, Sampo Group has training programmes which guide personal conduct and increase the competence of employees.

The Sampo Group Code of Conduct states that the Group complies with the International Bill of Human Rights, including the Universal Declaration of Human Rights and the two covenants, the Core Conventions of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises, and the UN Global Compact. The Code of Conduct also describes that Sampo Group is committed to the obligations related to human rights and the continuous development of related practices (e.g. human rights impact assessments, human rights due diligence processes). Sampo Group's due diligence processes cover both the Group's own operations and its value chain, including consumers and end-users.

The Code of Conduct applies to all companies belonging to Sampo Group and it is each employee's responsibility to comply with its contents. The Code of Conduct obligates employees to ensure that human rights are respected and upheld through all operations, including the downstream value chain.

Sampo Group communicates on the topics covered by the Code of Conduct to its consumers and end-users, for example, through company websites, sustainability reporting, and other customer communication materials. The engagement with stakeholders is described in more detail under the heading Interests and views of stakeholders (p. 64).

Sampo Group has not been made aware of any severe legal cases of non-adherence to global standards related to consumers and end-users in its downstream value chain during the reporting year.

Customer health and safety and Sales and marketing practices

The Sampo Group Code of Conduct sets the group level requirements for products and services (i.e. customer health and safety) at Sampo Group. The Code of Conduct states that Sampo Group strives to act in the best interest of its customers, offering products and services that customers need and want. The products and services should be fair, comprehensible, and designed to help meet the evolving needs of all customers. In addition, ESG considerations, including climate change, are to be taken into account in insurance underwriting.

The Code of Conduct specifies that Sampo Group's sales, marketing, and product information must be professional, comprehensive, accurate, balanced, and never misleading. Sampo Group takes appropriate care to ensure that customers are given transparent and easily accessible and understandable information about the costs, risks, and conditions relating to the product or service in question, as well as the reasons leading to a decision regarding an insurance application, where applicable. In addition, at Sampo Group all customers are to be treated fairly and no individual customer is given preferential treatment at the expense of other customers. Insurance premiums are only based on relevant data and not on discriminating factors.

Sampo Group has controls in place to ensure that the information provided to customers is accessible, relevant, and timely before a customer commits to any purchase, and that the company satisfies all regulatory and conduct obligations. Sampo Group aims to clearly inform customers of their complaint options, as well as to ensure a fair and transparent complaint process. Possible measures to provide remedy to consumers and end-users depend on the nature of the impact. Sampo Group takes action on a case-by-case basis and according to established internal processes. When evaluating the effectiveness of mitigation approaches, Sampo Group also uses information obtained through stakeholder dialogue.

Data privacy, information security, and cybersecurity

Sampo Group's policies on data privacy, information security, and cybersecurity lay out how Sampo Group is committed to processing personal data in a lawful, fair, and transparent manner, while respecting human rights in all aspects of data management. The policies highlight how Sampo Group protects information and upholds cybersecurity. These policies also state that high levels of data privacy, information security, and cybersecurity are top priorities for Sampo Group.

Processes for engaging with consumers and end-users about impacts

Sampo Group has customer experience programmes (or similar) which are spread across the organisations and the different customer touchpoints. The programmes enable the Group to both collect customer data and monitor the related results. Sampo Group engages with consumers and end-users at several stages during the customer journey, such as before, during, and after a customer transaction. Customers are, for example, offered the possibility to leave feedback on the customer journey or based on a certain transaction.

Customer feedback is collected daily, weekly, or monthly depending on the situation. Feedback is reviewed and any questions or comments are followed up with the customer where relevant. Customer feedback is collected, for example, by phone, email, SMS, or chat. The operational responsibility for engagement with consumers and end-users lies with the top management of the Sampo Group companies.

Sampo Group gains insight into the effectiveness of its engagement through multiple channels, such as customer satisfaction surveys (e.g. NPS, EPSI, Trustpilot) and customer contact points (e.g. email, phone, chat, meetings). Feedback can reduce the risk of the customer leaving, and it is also used to find areas of improvement, for example regarding service, products, processes, and systems. In addition, the Customer Ombudsman engages with customers who have a complaint, and may, based on the engagement, suggest changes to, for example, the customer handling processes, claims procedures, or product terms and conditions.

Sampo Group has collected the perspectives of affected consumers and end-users, for example, through the Group's human rights impact assessment. The assessment included an analysis of Sampo Group's existing data and the use of credible proxies as a part of the desktop research. Impacts on vulnerable groups were also considered in the assessment.

As stated in the Sampo Group Code of Conduct, insurance premiums are only based on relevant data and not on discriminating factors, such as sexual orientation, religious belief, or ethnic background. Sampo Group expects its suppliers to uphold the same standards in their own operations.

When a customer or insured is not able to manage their own interests due to, for example, age, sickness, injury, or disability, Sampo Group ensures in accordance with local regulatory requirements that there is a trustee or guardian that can take care of their interests. Sampo Group also has instructions and guidelines on how to engage with customers in vulnerable situations (e.g. managing serious incidents with a caring attitude, ensuring privacy when communicating with customers with hearing disabilities, handling indemnities to an insured under guardianship).

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Sampo Group offers multiple channels for customers to raise concerns or needs. Customers can be directly in contact with the company through, for example, customer service (e.g. phone, website, app, chat) and customer surveys. Indirect contact with the company is possible through the Customer Ombudsman, whistleblowing channels, and external complaints boards. The whistleblowing channels are either internally or externally managed, depending on the Group company. Sampo Group encourages its suppliers, for example, through supplier codes of conduct and contract discussions, to provide similar platforms for customers to raise concerns. Some of Sampo Group's reporting channels, such as whistleblowing channels, are also available for the consumers and end-users of suppliers and business partners.

Sampo Group monitors and measures customer satisfaction continuously. Both positive and negative feedback is carefully analysed and used to further develop products and services and improve the customer experience. Quality assurance based on customer feedback is also important. Sampo Group follows the customer journey to find the root causes of the feedback, and to restore the customer relationship, if needed. The insight gained is utilised in training and in improving processes and the overall customer journey.

By encouraging dialogue, Sampo Group can identify and address any dissatisfaction among consumers and end-users. To foster transparency and build trust, Sampo Group has a list of its most material and publicly available principles and policies on its website. Furthermore, Sampo Group upholds non-retaliation policies to safeguard individuals who come forward with concerns, ensuring they can do so without fear of reprisal. The mechanisms to ensure that users can trust the whistleblowing channels to raise concerns and are protected from retaliation are described in the section Business conduct (p. 116).

Sampo Group has several processes for providing remedy or contributing to remedy, depending on the situation in question. In case of a customer complaint related to the sales and marketing of products and services, the priority is to discuss with the customer to find a solution that is satisfactory to both parties. If a consensus cannot be reached, the customer is entitled to appeal to external complaints boards (or similar), in accordance with local practices in each Sampo Group country. In addition, as required by law, certain Sampo Group companies have internal customer representative functions that the customer can contact to submit a complaint. Regardless of the outcome of appeal cases, Sampo Group always analyses how it can improve its practices.

Sampo Group has procedures for investigating breaches and processes for corrective actions to protect the personal data of consumers and end users. Data privacy and information security incidents are analysed and handled according to fixed processes, and they are assessed and reported in a timely manner to the local authorities, when applicable. If the risk to consumers and end users is considered high, they are notified of the incident.

Sampo Group evaluates the effectiveness of the remedies it provides to ensure that any negative impacts on consumers and end-users are addressed when needed. This is achieved through systematic follow-up procedures that include monitoring customer satisfaction post-resolution, analysing patterns in complaints and resolutions, and conducting reviews of remediation processes to identify areas for improvement. Sampo Group also follows up on every data privacy or information security incident to assess how similar incidents can be avoided in the future to ensure the rights and freedoms of data subjects.

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

Sampo Group adheres to the Code of Conduct and supplementary policies to prevent irresponsible sales and marketing practices, ensuring that all customer communication is clear, relevant, and timely. Sampo Group regularly assesses the products for appropriateness and compliance with regulatory obligations, supported by continuous training programmes that enhance the conduct and competence of customer-facing teams. Sampo Group actively collects customer feedback, and has transparent complaint processes in place, with options for review through external complaints boards.

Sampo Group allocates resources across product and service development, IT, and risk management, among other things, to further improve its sales and marketing practices, as well as its customers' privacy, health, and safety. Sampo Group also collaborates with authorities and regulators and works with relevant networks (e.g. related to customer experience, cybersecurity, and data security), industry associations (e.g. Finance Finland, Insurance Sweden, Finance Norway, Insurance and Pension Denmark, Association of British Insurers), and forums for knowledge sharing. These collaborations provide Sampo Group a possibility to share knowledge and experiences regarding topics such as climate change adaptation, loss prevention, risk management, health, and safety.

Sampo Group ensures effective complaints handling and remediation processes for any material negative impacts on customers by closely monitoring customer feedback, results of the customer satisfaction surveys, and cases raised with external complaints boards. When a negative impact originates from the Group's actions, appropriate remedies are based on the nature of the breach. In instances where customers are negatively impacted, Sampo Group has established incident management processes to oversee and ensure that remediation activities are both appropriate to the situation and executed as effectively as possible. Governance frameworks, including product reviews and customer forums, facilitate proactive identification of systemic risks.

No severe human rights issues or incidents connected to Sampo Group's consumers or end-users were reported to the Group during the reporting year.

Customer health and safety and Sales and marketing practices

During 2024, Sampo Group continued to provide loss prevention services to consumers and end-users. The main purpose of loss prevention is to prevent damage from occurring, but it also increases safety and reduces risk and economic cost, as well as environmental impact, as reduced damage means less need for repairs and rebuilding. During the year, Sampo Group focused on communicating easy-to-understand advice on loss prevention to customers using press releases, content marketing activities, social media, and websites. In addition, If, together with its partners, offered house assessments to private customers and building checks for SMEs that own residential buildings in certain markets. The house assessments provide the customer with a report that helps them to both plan the maintenance of the property and minimise the risk of unpleasant surprises. The building checks and the hands-on advice to larger customers within the SME segment, whom If often meets face-to-face, help customers to identify where maintenance and fire safety measures are most needed. They also make customers aware of risks and provide suggestions for mitigating actions.

Continuously improving the quality of its services in both digital and analogue channels is important to Sampo Group. During 2024, the Group aimed to enhance the way customers communicate with the company through various initiatives. This included, among other things, further development of digital platforms and testing of new communication channels. Additionally, understanding customer experiences through different channels remained one of Sampo Group's focus areas, as it enables identification of opportunities for enhancements to customer journeys and customer satisfaction.

A part of Sampo Group's responsible sales and marketing practices is quality policies and processes, and therefore, the Group conducted annual policy reviews during the year. For example, Topdanmark implemented the guidelines on green marketing from the Danish Consumer Ombudsman. As a result, a key action was to update business processes and policies on communication on environmental initiatives, products, and services to ensure compliance with legislation. In addition, Sampo Group continued to proactively contact customers to ensure that they are correctly insured.

Data privacy, information security, and cybersecurity

During 2024, Sampo Group took a series of measures to bolster data protection and ensure compliance with industry standards and regulations. This included, for example, raising awareness within the organisation about the importance of data privacy, information security, and cybersecurity, and providing training to employees on the latest developments, new laws, and regulations (e.g. Digital Operational Resilience Act DORA).

Sampo Group regularly updates its policies, guidelines, and training materials to stay current with the evolving landscape of data privacy, information security, and cybersecurity. During 2024, this continued through annual policy reviews conducted across the Group. Sampo Group, for example, updated privacy notices and ethical guidelines (or similar) to ensure artificial intelligence (AI) is used responsibly, with a particular focus on data security in automated and machine learning processes. During the year, all employees of If were instructed on the use of AI tools, for instance.

In 2024, Sampo Group monitored the processing of personal data to ensure it is carried out transparently and with respect for individuals' privacy. The key actions were the performance of data protection impact assessments and records of processing activities before new processing activities were initiated, as well as when changes to existing processing activities were planned. To ensure compliance with the regulation, Sampo Group reviewed all new systems and applications from a privacy perspective.

In 2024, If conducted a larger internal monitoring activity to ensure that it accommodates all data subject access requests according to the requirements of the General Data Protection Regulation (GDPR). The company continued the implementation of technical measures to better ensure the security of personal data in the context of electronic communication with customers. In addition, If initiated several actions to enable better control for customers in relation to their personal data. In 2024, If also established a Data Governance Committee to promote clear responsibilities and improved guidelines for how data can be used.

Sampo Group has several actions planned for 2025 regarding data privacy, information security, and cybersecurity, some of them already underway. Due to the Topdanmark transaction, one key action is to integrate relevant activities with If in a way that ensures continued compliance with data privacy and information security regulations and mitigates the potential risks for consumers and end-users. There are also other actions planned for 2025 to improve and strengthen the protection of personal data. These actions address, for example, unstructured data, access logging, privacy by design and default, as well as data ownership structure and governance.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Customer health and safety and Sales and marketing practices

In accordance with the Sampo Group Code of Conduct, Sampo Group strives to act in the best interests of its customers. This means that the aim is to provide products and services that are fair, comprehensible, and designed to help meet the evolving needs of customers.

Sampo Group uses the Net Promoter Score (NPS) to measure customer satisfaction, which allows the Group to advance positive impacts on consumers and end-users. Using NPS also supports monitoring of potential negative impacts and risks and acting on them. The NPS is an index ranging from -100 to 100 that measures the willingness of customers to recommend a company's products or services to others. It is used as a proxy for measuring the customer's overall satisfaction with a company's product or service, and the customer's loyalty to the brand. Transactional Net Promoter Score (tNPS) is an overall metric that assesses the customer's opinion on a certain business transaction and captures a wide range of customer experiences related to, for example, price, product, billing, brand, and marketing. The tNPS score shows whether customers want to recommend the company to others after they have been in contact with the company. It is calculated as the net result of the share of promoters (who replied 9–10) minus the share of detractors (who replied 0–6) on the question of to what extent they would recommend the company to others.

Sampo Group has set time-bound and outcome-oriented targets for customer satisfaction. The targets are specific to each individual Sampo Group company, and their scope differs between the Group companies due to company-specific characteristics (e.g. size, structure, operating countries). External stakeholders have not been directly involved in target setting. However, consumers and end-users have been indirectly involved, as customer-facing organisational units have been included in the target setting. The targets are presented in the table Customer satisfaction (tNPS) (p. 114).

Sampo Group actively monitors and analyses the tNPS, and the results are regularly reported to the respective top managements and internal committees to assess overall performance. Sampo Group tracks the tNPS performance internally on a monthly basis and has set targets to ensure continuous improvement. Sampo Group also publishes the results and targets externally on a quarterly basis. Through systematic measurement of customer satisfaction, Sampo Group wants to both identify the factors that are valued by the company's customers and recognise the parts of the customer journey that should be improved. In addition to improving the customer experience in general, the results are used in training as well as in developing products, services, and customer-related processes.

Additionally, Sampo Group collects feedback through various channels, including customer complaints and customer satisfaction surveys. The feedback not only contributes to tNPS but also provides deeper insights into the customer experience, enabling Sampo Group to address concerns proactively. Sampo Group is committed to actively addressing customer feedback, and low tNPS scores prompt engagement with customers to resolve their issues and inform service enhancements. Examples of improvements made based on customer feedback include clarifying terms and conditions and enhancing customer communications. These processes ensure consistent elevation of service quality and customer satisfaction.

The NPS methodology can have its limitations, such as oversimplification of customer sentiment, and a lack of detailed feedback on specific areas for improvement. However, follow-up with individual customers can provide a deeper insight into areas of potential development. The measurement of customer satisfaction is not validated by an external body other than the assurance provider of this Sustainability Statement.

In 2024, If's customer satisfaction remained high, but the tNPS result for Business area Private was somewhat below the previous year. Topdanmark's customer satisfaction improved in digital channels in 2024. However, the results related to the phone channel decreased slightly. Hastings exceeded its tNPS target in 2024. The underlying claims journey tNPS stabilised and results related to retail journeys continued to improve.

Data privacy, information security, and cybersecurity

The goal of Sampo Group's data privacy operations is to protect the employees', customers', and other stakeholders' personal data. In addition, information security and cybersecurity measures ensure protection of all types and forms of information according to its sensitivity and importance to Sampo Group, and in compliance with applicable rules and regulations. The key metrics used are the number of complaints from data subjects and data protection authorities (DPAs), data privacy incidents reported to local data protection authorities, and information security and cybersecurity incidents reported to the authorities within the reporting year.

Complaints from data subjects are based on Sampo Group's internal systems that capture complaints. Generally, Sampo Group's Data Protection Officers (DPOs) receive complaints from both customers and DPAs. Complaints can be received via different channels (e.g. email, phone, post/letter) depending on the Group company and local legislation in question. If a data subject has contacted the local data protection authorities directly, the complaint is forwarded to Sampo Group.

Sampo Group's DPOs (or similar) assess whether internally reported data privacy incidents require external reporting to local DPAs. The types of incidents that are deemed reportable are based on legislation (e.g. the GDPR). According to the GDPR, a personal data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed. However, there are regional differences in which data privacy incidents are required to be reported to the local DPAs based on their individual guidance. In 2024, the majority of Sampo Group's incidents were reported in the UK.

Information security and cybersecurity incidents are monitored internally at Sampo Group on a subsidiary level. Reporting on severe cases to the authorities is based on local legislation and is the responsibility of legal or information security units (or similar).

The measurement of the number of complaints from data subjects and data protection authorities, data privacy incidents reported to local data protection authorities, and information security and cybersecurity incidents reported to the authorities are not validated by an external body other than the assurance provider of this Sustainability Statement.

Customer satisfaction (tNPS)

Sampo Group

Metric	Target	2024
If (business area Private)	2024: 60	57
Topdanmark	2025: 60 2027: 70	57
Hastings	2024: 50	56

Complaints from data subjects and data protection authorities

Sampo Group

Metric	2024
Complaints from data subjects	135
Complaints from data protection authorities	3

Data privacy incidents reported to local data protection authorities

Sampo Group

Metric	2024
Data privacy incidents reported to local data protection authorities	414

Information security and cybersecurity incidents reported to the authorities

Sampo Group

Metric	2024
Information security and cybersecurity incidents reported to the authorities	0

Governance information

Business conduct

Topic	Impacts	Risks and opportunities	Strategy and actions
Corruption and bribery	↓ Sampo Group can have potential negative impact on society, as financial institutions tend to be favoured channels for financial crime, corruption, and bribery, for example, through customer support functions, investments, suppliers, or business partners. Time-horizon: short to medium term	↓ Sampo Group can face reputational risks, legal risks, business risks, and potential costs if it fails to combat financial crime, corruption, or bribery in all their forms. Time-horizon: short to medium term	• Internal policies and guidelines (e.g. codes of conduct, responsible investment policies) • Effective governance structures and processes (e.g. general risk management measures, screening of direct investments and corporate customers against international norms and standards, encouraging sustainability in supply chains, reporting channels) • Training and competence development programmes • Metrics and targets (e.g. reported incidents)
Responsible business practices	↑ Actual positive impact can occur through quality risk management, which is at the core of Sampo Group's business operations. Risk management ensures that Sampo Group can provide safety and financial security to its customers, investors, and society in general. ↑ Emphasising sustainability and responsible business practices in strategy and business operations may result in positive impacts across Sampo Group's value chain. ↓ Sampo Group can have potential negative impact on suppliers and business partners if it fails to manage its supplier relationships according to agreed terms and conditions (e.g. delays in payments). Time-horizon: short to medium term	↓ For an insurance company like Sampo Group, responsible business practices and quality risk management (e.g. adequate management and control systems, internal standards and processes) are at the core of the business. However, due to the size of the company and its value chain, it is not possible to completely remove the risk for potential negative impacts (e.g. risk of non-compliance due to increasing regulation or human error). ↓ If sustainability is not an integrated part of governance and business management, it can cause a financial risk for Sampo Group due to possible legislative consequences (e.g. fines) and reputational damage, for example. ↑ There might be financial opportunities for Sampo Group in the medium term, as ESG integration helps in preparing for future regulation and the sustainable development of society (e.g. green transformation), for instance. Time-horizon: short to medium term	• Internal policies and guidelines (e.g. risk management principles, compliance principles, codes of conduct) • Effective governance structures and processes (e.g. Sampo Group steering framework, risk management governance framework, regulated risk management measures, sustainability reporting and governance structure) • Training and competence development programmes

The table presents Sampo Group's material impacts, risks, and opportunities related to business conduct identified in the double materiality assessment and their connection to Sampo Group's strategy and actions. The topics are linked to the ESRS sub-topics. The topic Corruption and bribery is related to the ESRS sub-topic with the same name. The topic Responsible business practices is related to the ESRS sub-topics Corporate culture, protection of whistle-blowers, and Management of relationships with suppliers including payment practices.

Impact, risk, and opportunity management

Business conduct policies and corporate culture

Sampo Group's policy regarding business conduct and corporate culture is the Sampo Group Code of Conduct, which is reviewed annually and approved by Sampo's Board of Directors. The Code states that Sampo Group complies with applicable legislation and the rules and regulations of competent authorities in all its activities. In addition to the Group's Code of Conduct, each Sampo Group company has its own supplementary policies, guidelines, and processes (e.g. HR policies, underwriting policies, responsible investment policies, supplier codes of conduct). Sampo Group is also a participant in the UN Global Compact supporting its principles on human rights, labour rights, the environment, and anti-corruption.

The Sampo Group Code of Conduct applies to all companies belonging to Sampo Group. The Group companies offer regular training (e.g. e-learning, workshops) to all employees on the topics covered by the Code and are committed to communicating the topics to their employees (e.g. policy updates on the intranet). The frequency of the training varies from annual to biennial depending on the Group company and the topic in question.

Whistleblowing channels

Sampo Group has whistleblowing channels through which employees and relevant interest groups can report anonymously if they have reasonable grounds to suspect that somebody employed by Sampo Group has breached the Sampo Group Code of Conduct, legislation, regulations, or other rules that are relevant to the insurance industry. Material whistleblowing notifications reported through the whistleblowing channels are reported to the parent company, Sampo, as a part of regular compliance and sustainability reporting to ensure group level monitoring of these matters.

In addition to the whistleblowing channels, Sampo Group encourages its employees to report grievances related to unethical practices, as well as possible violations of laws, regulations, or internal policies through other internal reporting channels. Grievances can also be reported directly to a leader, HR, or compliance units, for example.

Sampo Group has defined structures for processing whistleblowing notifications. The company ensures that the outcomes and remedies related to whistleblowing systems accord with internationally recognised human rights.

Information about the whistleblowing channels and other internal reporting channels is proactively communicated to employees through the intranet, for example. Sampo Group also offers training to its own employees, including information about the designation and training of those reviewing the reports. The employees designated with this task receive training when they are appointed to the position (e.g. onboarding, on-the-job training). Maintaining objectivity is essential for the employees handling the reports. Sampo Group ensures that those handling the reports are separate from those whom the report concerns, and the investigators or investigating committees are separate from the chain of management involved in the matter.

All whistleblowing reports are investigated promptly and in a confidential manner, while always protecting the identity of the whistleblower. Sampo Group prohibits any form of retaliation (e.g. physical, psychological, economic) against an employee who in good faith raises a concern about suspected or actual misconduct through any reporting channel, or who cooperates in an investigation of misconduct.

Management of relationships with suppliers

Sampo Group complies with applicable local legislation and regulations in its payment practices. In addition, Sampo Group has internal guidelines in place (e.g. accounting instructions, claims guidelines) to ensure timely payment. Automated systems and digital invoicing help in preventing late payments.

Sampo Group is a major procurer of goods and services, especially in claims handling and, therefore, has an impact on the economy, environment, and people. In addition, Sampo Group emphasises sustainability factors when working with suppliers, as sustainability issues can carry reputational and operational risks if not managed correctly.

The Sampo Group Code of Conduct provides the group level guiding principles for sustainable supply chain management. According to the Code of Conduct, Sampo Group expects its suppliers and other business partners to comply with the principles of the Code of Conduct throughout their own operations and supply chains.

Environmental and social considerations are integral to Sampo Group's supplier selection process. In addition to the Group's Code of Conduct, each Sampo Group company has its own supplementary policies (e.g. supplier codes of conduct), guidelines, and processes (e.g. risk assessments) that guide supplier selection. Topics covered in these policies include, for example, human rights, labor rights, environmental considerations, and anti-corruption.

Sampo Group is committed to encouraging and supporting the company's suppliers in their efforts to use more sustainable methods in their operations. By actively requesting innovative solutions, resource efficiency, transparency, and responsibility from suppliers, Sampo Group aims to minimise its negative impact and stimulate sustainable production and consumption. Set requirements, in combination with close cooperation with suppliers, enable Sampo Group to develop its business while also contributing to sustainable development.

Prevention and detection of corruption and bribery

Sampo Group can be exposed to corruption and bribery especially through its customer support functions (e.g. sales, claims handling), investments, as well as suppliers and business partners (e.g. procurement, claims handling, IT). Customer support functions are at risk of corruption, for example due to financial transactions and handling of personal data. Investment operations can be vulnerable, for example, due to exposure to industries and markets with varying levels of corruption risk. Suppliers and business partners may face risks associated with the dependency on third-party partnerships and intricate procurement operations.

Allegations or incidents of corruption and bribery are generally detected through reporting channels (e.g. whistleblowing channels), screening of customers and direct investments, and supplier selection and risk assessment processes. The risks are mitigated by internal control systems. This includes commitments to international initiatives (e.g. the UN Global Compact), policies and guidelines (e.g. codes of conduct, investment policies), employee training, and other manual and automatic control activities.

The Sampo Group Code of Conduct sets the overall guiding principles on working against corruption and bribery within Sampo Group. In addition, each Group company has adopted supplementary policies and guidelines for its own purposes. These annually updated guidance documents contain, for example, rules on gifts, participation in events, and hospitality, as well as information on expectations regarding employees, and roles and responsibilities.

The managing director of each company in Sampo Group has the ultimate responsibility to ensure that sufficient resources are allocated to the prevention of corruption and bribery. Each Group company organises duties and takes other necessary and appropriate measures to comply with the applicable local rules and various sanctions regimes, which may be imposed by the UN and/or the EU.

Reporting on anti-corruption and anti-bribery activities, as well as on potential incidents, is organised in a manner that ensures that the management and the boards of directors of relevant Group companies receive all material information without undue delay, and that Sampo's Risk Management organisation is informed of all relevant incidents.

The number of whistleblowing notifications reported through the whistleblowing channels is reported to the parent company, Sampo, as part of regular compliance reporting. Sampo's Risk Management organisation is responsible for overseeing the reporting of relevant incidents to Sampo's Audit Committee and the Board of Directors.

Sampo Group provides training (e.g. e-learning, during contract discussions) on business conduct matters to ensure that employees, suppliers, and other business partners have sufficient knowledge. Related and relevant policies are available for all Group employees via intranet and for other stakeholders on the Group companies' websites.

All Sampo Group employees and top management (e.g. CEOs) are offered training (e.g. e-learning) on anti-corruption and anti-bribery at least biennially. Hence, also all employees who work in the functions most at risk for negative impacts (e.g. customer support functions, investment management, and supply chain management) receive training on the topic. Anti-corruption and anti-bribery are part of training programmes covering business ethics and conduct. In addition, employees are informed, for example, on the intranet, when related policies have been revised.

In 2024, Sampo Group reviewed its policies and training material related to corruption and bribery. In addition to annual policy updates, Sampo Group initiated projects and raised awareness regarding the topic using several methods. For example, If initiated an internal company-wide project to work against organised crime, while Hastings supplemented its existing mandatory training on corruption and bribery by introducing a new video series on recognising fraudulent activity and hosted a Fraud Awareness Week for employees. In the future, Sampo Group will continue its various activities and training programmes, which include training on anti-money laundering, anti-bribery, anti-corruption, and anti-fraud.

Metrics and targets

Incidents of corruption or bribery

In 2024, Sampo Group was not convicted for incidents of corruption or bribery and, therefore, did not pay any related fines. For the same reason, Sampo Group did not need to take specific actions related to breaches in procedures and standards of anti-corruption and anti-bribery. In 2024, there were no public legal cases regarding corruption or bribery brought against Sampo Group either.

Incidents of corruption and bribery included in the reporting are confirmed incidents that the Group companies report to Sampo as part of regular sustainability and compliance and/or risk reporting. The Group companies receive this information through their established reporting channels, such as whistleblowing channels. The measurements related to corruption and bribery are not validated by an external body other than the assurance provider of this Sustainability Statement.

Incidents of corruption or bribery

Sampo Group

Metric	2024
Confirmed incidents of corruption or bribery	0
Confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0

Payment practices

Due to the complexity of Sampo Group's payment systems, the diversity of its supplier base, and confidentiality considerations, Sampo Group is currently unable to provide a specific average time for invoice payments and information on its standard payment terms on a group level. However, Sampo Group is committed to fair and responsible payment practices and is actively working to improve related reporting.

Sampo Group's payment terms are influenced by various factors, including the nature of the supplier relationship, the country or geographical region of operation, and market standards. Sampo Group recognises the importance of timely payments to its suppliers and aims to ensure that its payment practices are transparent and equitable across the company's supply chain. Insurance companies tend to have a good liquidity position as insurance payments provide cash flow. As at 31 December 2024, Sampo Group was not party to any legal proceedings due to late payments.

During 2024, Sampo Group started to investigate reporting related to payment practices. The plan is to develop reporting in accordance with the ESRS guidance in the coming years.

Annexes

Annex 1: ESRS content index

Annex 2: Data points deriving from other EU legislation

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Location
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		**p. 56**
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		**p. 56**
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				**p. 59**
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	**p. 79**
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		**p. 79**

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Location
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		**p. 82**
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator no. 5 Table #2 of Annex 1				Not material
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				Not material
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Not material
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		**p. 84**
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		**p. 83**
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Phased-in

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Location
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk			Phased-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral			Phased-in
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Phased-in
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1, Indicator number 2 Table #2 of Annex 1, Indicator number 1 Table #2 of Annex 1, Indicator number 3 Table #2 of Annex 1				Not material
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table # 2 of Annex 1				Not material
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material
ESRS E3-4 Total water consumption in m^3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material
ESRS 2 – IRO-1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Not material
ESRS 2 – IRO-1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Not material
ESRS 2 – IRO-1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Not material

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Location
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Not material
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Not material
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Not material
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Not material
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Not material
ESRS 2 – SBM-3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Not material
ESRS 2 – SBM-3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Not material
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				**p. 91**
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		**p. 91**
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				**p. 91**
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I				**p. 91**
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I				**p. 93**
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		**p. 100**
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Phased-in
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		**p. 101**
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				**p. 101**
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				**p. 101**
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator no. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		**p. 101**

Disclosure requirement and related datapoint	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference	Location
ESRS 2 – SBM-3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and 13 Table #3 of Annex I				p. 103
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator no. 11 Table #1 of Annex 1				p. 103
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and 4 Table #3 of Annex 1				p. 103
SRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		p. 103
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		p. 103
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				p. 105
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Not material
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				p. 108
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		p. 108
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				p. 111
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				p. 116
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				p. 116
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		p. 118
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				p. 118

Annex 3: Reporting requirements related to the Delegated Regulation (EU) 2022/1214

Template 1 Nuclear 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

Template 2 Taxonomy-aligned economic activities (denominator)

Based on turnover

EURm

		Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
Row	**Economic activities**	**Amount**	**%**	**Amount**	**%**	**Amount**	**%**
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	–%	–	–%	–	–%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	–	–%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0.0%	4	0.0%	–	–%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	–	–%	–	–%	–	–%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	–	–%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	–	–%
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	121	0.6%	121	0.6%	0	0.0%
8.	**Total applicable KPI**	125	0.6%	125	0.6%	0	0.0%

Template 2 Taxonomy-aligned economic activities (denominator)

Based on CapEX

EURm

		Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
Row	**Economic activities**	**Amount**	**%**	**Amount**	**%**	**Amount**	**%**
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0%	1	0.0%	—	—%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	196	1.0%	195	1.0%	1	0.0%
8.	**Total applicable KPI**	196	1.0%	195	1.0%	1	0.0%

Template 3 Taxonomy-aligned economic activities (numerator)

Based on turnover

EURm

		Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
Row	**Economic activities**	**Amount**	**%**	**Amount**	**%**	**Amount**	**%**
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	—	—%	—	—%	—	—%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.3%	0	0.3%	—	—%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	3.1%	4	3.1%	—	—%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	—	—%	—	—%	—	—%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	—	—%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	—	—%
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	121	92.2%	121	92.0%	0	0.3%
8.	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	125	95.6%	125	95.3%	0	0.3%

Template 3 Taxonomy-aligned economic activities (numerator)

Based on CapEX

EURm

		Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
Row	**Economic activities**	**Amount**	**%**	**Amount**	**%**	**Amount**	**%**
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	—	—%	—	—%	—	—%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	—	—%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1	0.3%	1	0.3%	—	—%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	—	—%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	—	—%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0.0%	0	0.0%	—	—%
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	196	97.2%	195	96.7%	1	0.5%
8.	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	196	97.6%	195	97.1%	1	0.5%

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities

Based on turnover

EURm

		Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
Row	**Economic activities**	**Amount**	**%**	**Amount**	**%**	**Amount**	**%**
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0%	1	0.0%	—	—%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0%	1	0.0%	—	—%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
7.	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	480	2.4%	470	2.4%	10	0.0%
8.	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	483	2.4%	473	2.4%	10	0.0%

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities

Based on CapEX

EURm

		Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
Row	**Economic activities**	**Amount**	**%**	**Amount**	**%**	**Amount**	**%**
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%	—	—%	—	—%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0%	1	0.0%	0	0.0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0.0%	1	0.0%	—	—%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%	0	0.0%	—	—%
7.	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	610	3.1%	577	2.9%	34	0.2%
8.	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	613	3.1%	579	2.9%	34	0.2%

Template 5 Taxonomy non-eligible economic activities

Based on turnover

EURm

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	7	0.0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
7.	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	19,151	96.2%
8.	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	19,158	96.3%

Template 5 Taxonomy non-eligible economic activities

Based on CapEX

EURm

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0.0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	—	—%
7.	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	18,987	95.4%
8.	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	18,987	95.4%

Key figures

Financial highlights		2024	2023	2022 (restated)	2022 (published)	2021	2020
Group							
Gross written premiums & brokerage income	EURm	9,931	8,870	8,375	—	—	—
Insurance revenue, net	EURm	8,249	7,412	7,168	—	—	—
Insurance service result, net	EURm	1,394	1,193	1,062	—	—	—
Underwriting result	EURm	1,316	1,164	1,031	1,314	1,282	967
Net financial result	EURm	636	560	1,056	—	—	—
Profit before taxes (P&C operations)	EURm	1,559	1,481	1,924	1,863	3,171	380
Net profit for the equity holders	EURm	1,154	1,323	2,107	1,427	2,567	37
Operating result	EURm	1,193	1,046	—	—	—	—
Combined ratio	%	84.3	84.6	85.8	82.1	81.4	83.4
Undiscounted underlying combined ratio, current year, %	%	85.5	87.1	—	—	—	—
Solvency ratio[1 3]	%	177	182	210	210	185	176
Financial leverage	%	26.9	25.3	24.4	25.6	23.8	28.6
Return on own funds	%	21.3	18.1	—	—	—	—
Return on equity own funds	%	29.5	24.7	—	—	—	—
Return on equity	%	16.1	15.6	4.2	-1.3	26.8	3.1
Average number of staff		14,280	13,935	13,550	13,550	13,274	13,227

If		2024	2023	2022 (restated)	2022 (published)	2021	2020
Gross written premiums	EURm	5,860	5,468	5,432	—	—	—
Insurance revenue, net	EURm	5,258	4,996	5,024	—	—	—
Insurance service result/underwriting result	EURm	890	842	673	985	891	801
Net financial result	EURm	464	539	888	—	—	—
Premiums written before reinsurers' share (IFRS 4)	EURm	—	—	—	5,432	5,134	4,823
Premiums earned (IFRS 4)	EURm	—	—	—	5,002	4,772	4,484
Profit before taxes	EURm	1,256	1,358	1,550	1,217	1,077	901
Combined ratio	%	83.1	83.1	86.6	80.3	81.3	82.1
Cost ratio	%	20.9	21.2	21.6	21.1	21.4	21.5
Risk ratio	%	62.1	61.9	65.0	59.2	59.9	60.7
Adjusted risk ratio, current year, %[5]	%	61.5	61.3	62.3	—	—	—
Undiscounted adjusted risk ratio, current year, %[6]	%	64.4	64.7	65.2	—	—	—
Loss ratio	%	67.6	67.6	70.7	64.9	65.5	66.4
Expense ratio	%	15.5	15.6	15.9	15.4	15.8	15.8
Average number of staff		8,070	7,858	7,496	7,496	7,223	7,182

Topdanmark		2024	2023	2022 (restated)	2022 (published)	2021	2020
Gross written premiums	EURm	1,553	1,339	1,308	—	—	—
Insurance revenue, net	EURm	1,470	1,288	1,255	—	—	—
Insurance service result/underwriting result	EURm	233	194	230	224	227	182
Net financial result	EURm	60	27	-28	—	—	—
Premiums written before reinsurers' share, P&C insurance (IFRS 4)	EURm	—	—	—	1,391	1,383	1,315
Premiums earned, P&C insurance (IFRS 4)	EURm	—	—	—	1,326	1,285	1,227
Profit before taxes	EURm	137	162	158	220	346	167
Combined ratio	%	84.2	85.0	81.7	83.1	82.3	85.2
Loss ratio	%	66.0	66.9	64.4	66.8	66.7	69.0
Expense ratio	%	18.1	18.1	17.2	16.3	15.6	16.2
Average number of staff		2,412	2,160	2,381	2,381	2,395	2,428

Hastings		2024	2023	2022 (restated)	2022 (published)	2021	2020
GWP & brokerage income	EURm	2,565	2,063	1,636	—	—	—
Insurance revenue, net	EURm	1,522	1,128	889	—	—	—
Insurance service result, net	EURm	268	157	159	—	—	—
Underwriting result	EURm	190	128	128	104	164	—
Net financial result	EURm	41	44	27	—	—	—
Premiums written before reinsurers' share (IFRS 4)	EURm	—	—	—	1,313	1,127	103
Net premiums written (IFRS 4)	EURm	—	—	—	727	495	137
Premiums earned (IFRS 4)	EURm	—	—	—	594	499	63
Profit before taxes	EURm	193	129	107	73	127	-16
Operating ratio	%	88.5	89.8	87.2	89.7	80.3	—
Loss ratio	%	61.6	63.3	57.2	83.7	62.2	—
Average number of staff		3,736	3,200	3,021	3,021	3,005	2,974

Holding		2024	2023	2022 (restated)	2022 (published)	2021	2020
Profit before taxes	EURm	-29	-160	146	146	1,331	-826
Average number of staff		61	54	50	50	63	67

Per share key figures		**2024**	**2023**	**2022 (restated)**	**2022 (published)**	**2021**	**2020**
Earnings per share	EUR	2.25	2.62	3.97	2.69	4.63	0.07
Earnings per share, continuing operations[2]	EUR	2.25	2.12	2.88	—	—	—
Earning per share, discontinuing operations	EUR	—	0.50	1.09	—	—	—
Operational result per share	EUR	2.33	2.07	—	—	—	—
Equity per share	EUR	13.11	14.47	18.70	17.44	23.39	20.56
Net asset value per share	EUR	13.11	15.30	20.01	18.74	25.48	19.82
Market capitalisation[4]	EURm	21,196	19,876	25,112	25,112	24,093	19,199
Dividend per share	EUR	1.70	1.80	2.60	2.60	4.10	1.70
Dividend payout ratio	%	75.5	68.8	65.4	96.7	88.6	78.7
Effective dividend yield	%	4.3	4.5	5.3	5.3	9.3	4.9
Price/earnings ratio		17.5	15.1	12.3	18.1	9.5	16.0
Number of shares at 31 Dec.	1,000	538,248	501,797	514,369	514,369	546,812	555,352
Average number of shares	1,000	512,114	505,939	530,296	530,296	554,317	555,352
Weighted average number of shares	1,000	512,114	505,939	530,296	530,296	554,317	555,352

A shares		**2024**	**2023**	**2022**	**2022**	**2021**	**2020**
Number of shares at 31 Dec.	1,000	538,048	501,597	514,169	514,169	545,612	554,152
Average number of shares	1,000	511,914	505,739	530,096	530,096	553,117	554,152
Weighted average number of shares	1,000	511,914	505,739	530,096	530,096	553,117	554,152
Weighted average share price	EUR	40.11	39.36	44.25	44.25	40.50	32.35
Adjusted share price, high[4]	EUR	42.37	45.21	49.97	49.97	47.33	42.46
Adjusted share price, low[4]	EUR	37.38	34.53	35.85	35.85	33.82	21.34
Adjusted closing price	EUR	39.38	39.61	48.82	48.82	44.06	34.57
Share trading volume during the financial year	1,000	178,910	178,801	257,879	257,879	243,763	376,964
Relative share trading volume	%	34.9	35.4	48.6	48.6	44.1	68.0

B shares		**2024**	**2023**	**2022**	**2022**	**2021**	**2020**
Number of shares at 31 Dec.	1,000	200	200	200	200	1,200	1,200
Average number of shares	1,000	200	200	200	200	1,200	1,200

[1] The Group solvency is calculated according to the consolidation method defined in the Solvency II Directive (2009/138/EC).

[2] Earnings per share on continuing operations for comparative period 2022 includes the divested operations i.e. Topdanmark Life operations.

[3] The solvency ratio for 2023 is pro forma figure excluding the effect of Saxo Bank on the Group SCR.

[4] Share prices have been adjusted to reflect the separation of Mandatum Group in the partial demerger.

[5] Adjusted risk ratio illustrates the underlying underwriting performance as it excludes certain volatile effects such as large and severe weather and prior year development on risk ratio.

[6]Undiscounted adjusted risk ratio excludes the effect from current year discounting on adjusted risk ratio and illustrates the underlying current year underwriting performance.

The number of shares used at the reporting date was 538,247,772 and the average number during the financial period 512,114,448.

In calculating the key figures the tax corresponding to the result for the accounting period has been taken into account.

In the net asset value per share, the Group valuation difference on the listed subsidiary Topdanmark has been taken into account in the comparison year. At the end of the financial year 2024, Topdanmark was no longer a listed company

Calculation of key figures

The key figures have been calculated in accordance with the decree issued by the Ministry of Finance and the specifying regulations and instructions of the Financial Supervisory Authority. The Group solvency is calculated according to the consolidation method defined in the Solvency II Directive (2009/138/EC) and Insurance Companies Act (521/2008).

Additional information on the Group's alternative performance measures is on the Group's website **www.sampo.com**.

Return on equity, %

+ total comprehensive income attributable to owners of the parent

--- x 100%

+ total equity attributable to owners of the parent
(average of values 1 Jan. and the end of reporting period)

Return on equity own funds, %

+ operating result (annualised)

--- x 100 %

+ Unrestricted Tier 1 Own funds
(average of values 1 Jan. and the end of reporting period)

Return on own funds, %

+ operating result (annualised)

--- x 100 %

+ SII own funds
(average of values 1 Jan. and the end of reporting period)

Equity/assets ratio, %

+ total equity attributable to owners of the parent

--- x 100%

+ balance sheet total

Financial leverage[1]

financial debt

--- x 100%

equity + financial debt

[1] *The Group's financial leverage includes only long-term funding.*

Insurance revenue, net

+ insurance revenue, gross
- reinsurers' share of insurance revenue
- quota share premium expense (Hastings)

---

insurance revenue, net

Underwriting result

+ insurance revenue, net
+ other income (Hastings)
- claims incurred
- operating expenses

---

underwriting result

Operating result

+ P&C operations' (incl. Sampo plc) profit after tax
- non-controlling interest in P&C operations
- unrealised gains/losses on investments (excl. derivatives) in P&C
- result effect from changes in discount rates in P&C operations
- non-operational amortisations in P&C operations
- non-recurring items
- adjustment on taxes

---

operating result

Combined ratio for P&C insurance, %

+ claims incurred
+ operating expenses

--- x 100%

+ insurance revenue, net
+ other revenue (Hastings)

Risk ratio for P&C insurance, %

$$\frac{+\ \text{claims incurred} - \text{claims settlement expenses}}{\text{insurance revenue, net}} \times 100\%$$

Cost ratio for P&C insurance, %

$$\frac{+\ \text{operating expenses} + \text{claims settlement expenses}}{\text{insurance revenue, net}} \times 100\%$$

Loss ratio for P&C insurance, %

$$\frac{+\ \text{claims incurred}}{\text{insurance revenue, net}} \times 100\%$$

Expense ratio for P&C insurance, %

$$\frac{+\ \text{operating expenses}}{\text{insurance revenue, net}} \times 100\%$$

Operating ratio for Hastings, %

$$\frac{+\ \text{claims incurred} + \text{acquisition costs} + \text{other operating expenses} + \text{operational depreciation and amortisation}}{+\ \text{insurance revenue, net} + \text{other revenue}} \times 100\%$$

Per share key figures

Earnings per share

$$\frac{\text{profit for the financial period attributable to owners of the parent}}{\text{adjusted average number of shares}}$$

Operating result per share

$$\frac{\text{operating result}}{\text{adjusted average number of shares}}$$

Equity per share

$$\frac{\text{equity attributable to owners of the parent}}{\text{adjusted number of shares at the balance sheet date}}$$

Net asset value per share

$$\frac{+\ \text{equity attributable to owners of the parent} \pm \text{valuation differences on listed Group companies}}{\text{adjusted number of shares at balance sheet date}}$$

Market capitalisation

number of shares at the balance sheet date x closing share price at the balance sheet date

Dividend payout ratio

$$\frac{\text{Dividend per share}}{\text{Earnings per share}} \times 100\%$$

Effective dividend yield

$$\frac{\text{Dividend per share}}{\text{Adjusted closing price}} \times 100\%$$

Price/earnings ratio

$$\frac{\text{Adjusted closing price}}{\text{Earnings per share}}$$

Relative share trading volume

$$\frac{\text{Share trading volume during the financial year}}{\text{Average number of A shares}} \times 100\%$$

Exchange rates used in reporting

	1–12/2024	1–9/2024	1–6/2024	1–3/2024	1–12/2023
EURSEK					
Income statement (average)	11.4345	11.4143	11.3945	11.2814	11.4745
Balance sheet (at end of period)	11.4590	11.3000	11.3595	11.5250	11.0960
DKKSEK					
Income statement (average)	1.5327	1.5300	1.5274	1.5127	1.5406
Balance sheet (at end of period)	1.5365	1.5156	1.5232	1.5453	1.4888
NOKSEK					
Income statement (average)	0.9831	0.9850	0.9912	0.9880	1.0048
Balance sheet (at end of period)	0.9715	0.9605	0.9968	0.9851	0.9871
EURDKK					
Income statement (average)	7.4589	7.4589	7.4579	7.4562	7.4510
Balance sheet (at end of period)	7.4578	7.4560	7.4575	7.4580	7.4529
EURGBP					
Income statement (average)	0.8467	0.8514	0.8547	0.8563	0.8697
Balance sheet (at end of period)	0.8292	0.8354	0.8464	0.8551	0.8691

Group's IFRS Financial Statements

Statement of profit and other comprehensive income

EURm	Note	1-12/2024	1-12/2023
Insurance revenue		9,450	8,417
Insurance service expenses		-7,684	-7,076
Reinsurance result		-372	-148
Insurance service result	1	**1,394**	**1,193**
Net investment income	2	888	1,006
Net finance income or expense from insurance contracts	3	-252	-446
Insurance finance income or expense, gross		-309	-529
Insurance finance income or expense, reinsurance		57	83
Net financial result		**636**	**560**
Other income	4	312	277
Other expenses	5	-685	-457
Finance expenses	7	-103	-93
Share of associates' profit or loss		6	1
Profit before taxes		**1,559**	**1,481**
Income taxes	15,16	-330	-339
Profit from the continuing operations		**1,229**	**1,142**
Discontinued operations, net of tax	30	—	251
Divested operations, net of tax		-26	—
Net profit		**1,203**	**1,393**

EURm	Note	1-12/2024	1-12/2023
Other comprehensive income	8		
Items reclassifiable to profit or loss			
Exchange differences		-4	-1
Cash flow hedges		1	-1
Total items reclassifiable to profit or loss, net of tax		**-3**	**-3**
Items not reclassifiable to profit or loss			
Actuarial gains and losses from defined pension plans		0	-6
Taxes		0	1
Total items not reclassifiable to profit or loss, net of tax		**0**	**-5**
Other comprehensive income total, net of tax		**-3**	**-8**
Total comprehensive income		**1,200**	**1,386**
Profit attributable to			
Owners of the parent		1,154	1,323
Non-controlling interests		50	70
Total comprehensive income attributable to			
Owners of the parent		1,151	1,316
Non-controlling interests		50	70
Earnings per share (EPS), EUR		2.25	2.62
Earnings per share, continuing operations, EUR		2.25	2.12

In the comparative year, Mandatum segment is presented in a single line as discontinued operations. For further information, please see ***note 30****.*

Consolidated balance sheet

EURm	Note	12/2024	12/2023
Assets			
Property, plant and equipment	10	284	318
Intangible assets	11	3,637	3,637
Investments in associates		4	12
Financial assets	12,13,14	16,090	15,757
Deferred income tax	15	2	3
Reinsurance contract assets	19	2,618	2,282
Other assets	17	880	800
Cash and cash equivalents		962	1,415
Total assets		**24,478**	**24,225**
Liabilities			
Insurance contract liabilities	18,19,20,21	12,286	11,716
Subordinated debts	22	1,642	1,645
Other financial liabilities	22	1,395	1,269
Deferred income tax	15	535	567
Other liabilities	23	1,562	1,342
Total liabilities		**17,419**	**16,538**
Equity	25		
Share capital		98	98
Reserves		3,531	1,530
Retained earnings		4,176	6,378
Other components of equity		-746	-743
Equity attributable to owners of the parent		**7,059**	**7,263**
Non-controlling interests		—	424
Total equity		**7,059**	**7,687**
Total equity and liabilities		**24,478**	**24,225**

Statement of changes in equity

EURm	Share capital	Legal reserve	Invested unres-tricted equity	Retained earnings[1]	Transla-tion of foreign opera-tions	Available-for-sale financial assets	Cash flow hedges	Total	Non-control-ling interest	Total
Equity at 31 December 2022 (IFRS 17)	**98**	**4**	**1,527**	**8,482**	**-741**	**248**	**0**	**9,618**	**560**	**10,178**
Impact of IFRS 9 transition 1 January 2023	—	—	—	248	—	-248	—	**—**	—	**—**
Equity at 1 January 2023	**98**	**4**	**1,527**	**8,730**	**-741**	**—**	**0**	**9,618**	**560**	**10,178**
Changes in equity										
Acquired non-controlling interests	—	—	—	-11	—	—	—	**-11**	-3	**-14**
Dividends [3]	—	—	—	-1,321	—	—	—	**-1,321**	-187	**-1,508**
Transferred assets at fair value in the demerger	—	—	—	-1,835	—	—	—	**-1,835**	—	**-1,835**
Acquisition of own shares	—	—	—	-555	—	—	—	**-555**	—	**-555**
Other changes in equity	—	—	—	51	—	—	—	**51**	-15	**36**
Profit for the reporting period	**—**	**—**	**—**	**1,323**	**—**	**—**	**—**	**1,323**	**70**	**1,393**
Other comprehensive income for the period	—	—	—	-5	-1	—	-1	**-8**	—	**-8**
Total comprehensive income	**—**	**—**	**—**	**1,318**	**-1**	**—**	**-1**	**1,316**	**70**	**1,386**
Equity at 31 December 2023	**98**	**4**	**1,527**	**6,378**	**-742**	**—**	**-1**	**7,263**	**424**	**7,687**
Changes in equity										
Directed share issue [2]	—	—	2,000	—	—	—	—	**2,000**	—	**2,000**
Acquired non-controlling interests [2]	—	—	—	-1,666	—	—	—	**-1,666**	-334	**-2,000**
Compulsory acquisition of non-controlling interests [2]	—	—	—	-265	—	—	—	**-265**	-59	**-325**
Transaction costs related to the acquisition of non-controlling interests	—	—	—	-31	—	—	—	**-31**	—	**-31**
Dividends [3]	—	—	—	-903	—	—	—	**-903**	-69	**-972**
Acquisition of own shares	—	—	—	-475	—	—	—	**-475**	—	**-475**
Other changes in equity	—	—	—	-14	—	—	—	**-14**	-11	**-25**
Profit for the reporting period	**—**	**—**	**—**	**1,154**	**—**	**—**	**—**	**1,154**	**50**	**1,203**
Other comprehensive income for the period	—	—	—	—	-4	—	1	**-3**	—	**-3**
Total comprehensive income	**—**	**—**	**—**	**1,153**	**-4**	**—**	**1**	**1,151**	**50**	**1,200**
Equity at 31 December 2024	**98**	**4**	**3,527**	**4,176**	**-746**	**—**	**—**	**7,059**	**—**	**7,059**

[1] IAS 19 Pension benefits had a net effect of EUR -0 million (-5) on retained earnings.

[2] The share issue was directed at Topdanmark's non-controlling interests. For further information related to the acquired non-controlling interests and liability to non-controlling interests recognised in the reporting period, see note 28.

[3] Dividend per share EUR 1.70 (2.60)

On 12 December 2024, Sampo plc cancelled 11,747,690 own shares acquired during the financial year 2024.

Statement of cash flows

EURm	1–12/2024	1–12/2023
Operating activities		
Profit before tax	1,533	1,765
Adjustments		
Depreciation and amortisation	180	158
Unrealised gains and losses arising from valuation	-227	-559
Realised gains and losses on investments	-58	-280
Change in liabilities for insurance and investment contracts	383	1,146
Other adjustments	132	-537
Adjustments total	**410**	**-72**
Change (+/-) in assets of operating activities		
Investments [1]	-223	-86
Other assets	-98	-208
Total	**-321**	**-294**
Change (+/-) in liabilities of operating activities		
Financial liabilities	122	176
Other liabilities	5	-196
Paid taxes	-331	-277
Paid interest	-91	-132
Total	**-296**	**-429**
Net cash from (or used in) operating activities	**1,327**	**970**
Investing activities		
Investments in subsidiary shares	—	-247
Divestments in subsidiary shares	—	20
Investments in tangible and intangible assets	-142	0
Divestments in equipment and intangible assets	17	5
Net cash from (or used in) investing activities	**-125**	**-223**

EURm	1–12/2024	1–12/2023
Financing activities		
Dividends paid	-903	-1,321
Dividends paid to non-controlling interests	-69	-187
Acquisition of non-controlling interests	-325	-14
Transaction costs related to acquisition of non-controlling interests	-31	—
Acquisition of own shares	-475	-555
Issue of debt securities [2]	194	142
Repayments of debt securities in issue [2]	-50	-473
Net cash used in (or from) financing activities	**-1,660**	**-2,407**
Total cash flows	**-458**	**-1,660**
Cash and cash equivalents at the beginning of reporting period	1,415	3,073
Effects of exchange rate changes	5	3
Cash and cash equivalents at the end of reporting period	962	1,415
Net change in cash and cash equivalents	**-458**	**-1,660**

Additional information to the cash flow statement	**1–12/2024**	**1–12/2023**
Interest income received	512	751
Dividend income received (excl. profit sharing from funds)	42	92
Total out-going cashflows from leases	-39	-37

[1] Investments include investment property and financial assets.

[2] Changes in short-term issues and repayments of debt securities are presented as net amounts.

Both in the financial year and the comparative year, the statement of cash flows includes both continuing and discontinued/divested operations. Profit before tax is therefore the total of Group's profit and the discontinued/divested operations' profit before taxes. In the financial year, subsequently, operating activities include EUR -26 million from divested activities. In the comparative year, the operating activities include EUR 173 million from the discontinued operations, investing activities EUR 20 million and financing activities EUR -280 million. Cash flows from financing activities include an internal dividend of EUR -150 million and a group contribution of EUR -29 million to Sampo plc. In addition, Mandatum repaid the subordinated loan to Sampo plc EUR 100 million in September 2023.

The items of the statement of cash flows cannot be directly concluded from the balance sheets due to e.g. exchange rate differences, and acquisitions and disposals of subsidiaries during the period.

Cash and cash equivalents include cash at bank and in hand EUR 682 million (1,081) and short-term deposits (max 3 months) EUR 280 million (334).

Group's notes to the financial statements

Group's notes to the financial statements

Summary of material accounting principles

Sampo plc (business ID 0142213-3) is a Finnish public company listed in Helsinki Nasdaq. Sampo has a dual listing in Nasdaq Stockholm and in Nasdaq Copenhagen. It is domiciled in Helsinki and the headquarters are at Fabianinkatu 27, 00100 Helsinki, Finland. The consolidated financial statements of Sampo Group include Sampo plc together with its subsidiaries and associates as of 31 December 2024. The group subsidiaries have insurance and financing activities in Finland, Sweden, Norway, Denmark, the Baltic countries, and the United Kingdom.

A copy of the Group's financial statements is available at the internet address **www.sampo.com**.

Basis of preparation

Sampo Group has prepared the consolidated financial statements for 2024 in compliance with the International Financial Reporting Standards (IFRSs). In preparing the financial statements, Sampo has applied all the standards and interpretations relating to its business, adopted by the commission of the EU and effective on 31 December 2024.

The annual improvements or other amendments to the standards, adopted at the beginning of 2024, had no material impact on the Group's financial statements reporting.

In preparing the notes to the consolidated financial statements, attention has also been paid to the Finnish accounting and company legislation and applicable regulatory requirements.

The going concern accounting assumption has been assessed by the Board and used in the preparation of the financial statements.

The consolidated financial statements are presented in euro (EUR), rounded to the nearest million, unless otherwise stated.

The Board of Directors of Sampo plc accepted the financial statements for issue on 12 March 2025. In accordance with Limited Liability Companies Act, the Annual General Meeting has the right to approve or reject the consolidated financial statements or change the statements after they have been issued.

Consolidation

Subsidiaries

The consolidated financial statements combine the financial statements of Sampo plc and all its subsidiaries. Companies in which the Group has control are consolidated as subsidiaries. Control exists when the Group has more than half of the voting power or it has power over the entity together with exposure to variable returns from its involvement there, and the ability to use its power to affect the amount of these returns. Subsidiaries are consolidated from the date on which control is transferred to the Group and cease to be consolidated from the date that control ceases.

The acquisition method of accounting is used for the purchase of subsidiaries. The cost of an acquisition is allocated to the identifiable assets, liabilities and contingent liabilities, which are measured at the fair value of the date of the acquisition. Acquisition-related costs are recognised through profit or loss. Possible non-controlling interest of the acquired entity is measured either at fair value or at proportionate interest in the acquiree's net assets. The acquisition-specific choice affects both the amount of recognised goodwill and non-controlling interest. The excess of the aggregate of consideration transferred, non-controlling interest and possibly previously held equity interest in the acquiree, over the Group's share of the fair value of the identifiable net assets acquired, is recognised as goodwill.

The accounting policies used throughout the Group for the purposes of consolidation are consistent with respect to similar business activities and other events taking place in similar conditions. All intra-group transactions and balances are eliminated upon consolidation.

Non-controlling interests

The technical division of profit for the financial year and the total comprehensive income to the owners of the parent and non-controlling interests is presented after the statement of comprehensive income. The share of profits is attributed to non-controlling interests even if it should be negative.

Non-controlling interests are presented in the balance sheet separately as part of equity.

Non-controlling interests in an acquiree are measured either at fair value or as a proportionate share of net assets of the acquiree. The choice is made for each acquisition separately.

At the end of the financial year, due to the acquisition of non-controlling interests in Topdanmark, the total equity of consolidated financial statements did not include the non-controlling interest share.

At the end of financial year, as the proportion of equity held by non-controlling interests changed, the carrying amounts of both the equity owners of the parent and the non-controlling interests were adjusted to reflect the changes. The difference between the book value of the NCI and the consideration paid was recognised directly in equity (retained earnings), and attributed to the owners of the parent company.

Going forward, Sampo will allocate all of Topdanmark's profits, after the completion of the acquisition, to the owners of the parent company. During the financial year, the NCI's share of the profit was calculated as weighted average on their remaining share of ownership.

Foreign currency translation

The consolidated financial statements are presented in euro, which is the functional and reporting currency of the Group and the parent company. Items included in the financial statements of each of the Group entities are measured using their functional currency, being the currency of the primary economic environment in which the Group operates. Foreign currency transactions are translated into the appropriate functional currency using the exchange rates prevailing at the dates of transactions or the average rate for a month. The balance sheet items denominated in foreign currencies are translated into the functional currency, at the rate prevailing at the balance sheet date.

Exchange differences arising from the translation of transactions and monetary balance sheet items denominated in foreign currencies into functional currency are recognised as translation gains and losses in profit or loss.

The income statements of Group entities whose functional currency is other than euro are translated into euro at the average rate for the period, and the balance sheets at the rates prevailing at the balance sheet date. The resulting exchange differences are included in equity and their change in other comprehensive income. When a subsidiary is divested entirely or partially, the cumulative exchange differences are included in the income statement under sales gains or losses.

Goodwill and fair value adjustments arising from an acquisition of a foreign entity are treated as if they were assets and liabilities of the foreign entity. Exchange differences resulting from the translation of these items at the exchange rate of the balance sheet date are included in equity, and their change in other comprehensive income.

Exchange rate differences arising from a monetary item, accounted for as Sampo's net investment in a foreign operation (subsidiary), are recognised in other comprehensive income.

A monetary item included in the net investment in a foreign operation may be denominated in the functional currency of Sampo (reporting entity), in the functional currency of the foreign operation or in a currency other than the functional currency of either the reporting entity or the foreign operation. When a foreign subsidiary is divested entirely or partially, the cumulative exchange differences are reclassified from equity to profit or loss.

The following exchange rates were applied in the consolidated financial statements:

1 euro (EUR) =	Balance sheet date	Average exchange rate
Swedish krona (SEK)	11.4590	11.4345
Danish krona (DKK)	7.4578	7.4589
Pound sterling (GBP)	0.8292	0.8467

Segment reporting

The Group's segmentation is based on business areas whose risks and performance bases as well as regulatory environment differ from each other. The control and management of business and management reporting are organised in accordance with the business segments. The Group's business segments are If, Topdanmark, Hastings, and Holding.

Geographical information has been given on income from external customers and non-current assets. The reported areas are Finland, Sweden, Norway, Denmark, United Kingdom, and the Baltic countries.

In the inter-segment and inter-company pricing, for both domestic and cross border transactions, market-based prices are applied. The pricing is based on the Code of Conduct on Transfer Pricing Documentation in the EU and OECD guidelines.

Inter-segment transactions, assets and liabilities are eliminated in the consolidated financial statements.

Non-current assets held for sale and discontinued operations

Non-current assets and the assets and liabilities related to discontinued operations are classified as held for sale, if their carrying amount will be recovered principally through sales transactions rather than from continuing use. For this to be the case, the sale must be highly probable, and the asset or disposal group must be available for immediate sale in its present condition, subject only to terms that are usual and customary for sales of such assets. In addition, the management must be committed to a plan to sell, and the sale should be expected to qualify for recognition as a completed sale within one year from the date of classification. The classification, presentation, and measurement requirements of non-current assets or disposal groups held for sale also apply to those that are held for distribution to owners acting in their capacity as owners.

Assets that meet the criteria to be classified as held for sale are measured at the lower of carrying amount and fair value less costs to sell. Immediately before the initial classification of the asset as held for sale, the carrying amount of the asset shall be measured in accordance with applicable IFRSs. If the fair value less costs to sell is the lower, the Group recognises an impairment loss at initial reclassification. Gains for subsequent increases in fair value are recognised through profit or loss. Once reclassified, any depreciation or recognition of associates' share of profit or loss on such assets ceases.

Income and expense recognition principles related to insurance contracts

The introduction of IFRS 17 changed the structure of the statement of profit or loss to reflect the key sources of profit. The insurance service result, comprising of insurance revenue, insurance service expenses, and reinsurance result, reflects the result relating to underwriting and servicing insurance policies. The net financial result reflects the impacts arising from financial components of insurance contracts.

Insurance revenue

Insurance revenue reflects the compensation that Sampo receives from the policyholder in return for the transfer of risk (insurance contract services) on an earned basis. The insurance revenue recognised in the reporting period is based on premium receipts and expected premium receipts, allocated linearly over the underlying terms of the insurance contracts, i.e. based on the passage of time. The liability for remaining coverage is reduced with a corresponding amount as the insurance revenue.

Insurance service expenses

The insurance service expenses comprise of both claims incurred and operating expenses.

Claims incurred for the reporting period include claims payments during the period and changes in the liability for incurred claims. The change in liability for the incurred claims includes the changes in undiscounted best estimate, discounted risk adjustment, and the changes in discounting effect due to changes in underlying best estimate or changes in payment patterns. The claims incurred also include claims handling expenses and changes in the loss component.

Operating expenses reported in the insurance service result relate to administrative expenses arising from the handling of insurance contracts. Additionally, the operating expenses include the acquisition cash flows recognised in profit or loss, where the liability for remaining coverage changes with a corresponding amount.

Reinsurance result

Reinsurance result comprises both reinsurance premium expenses and reinsurer's share of claims incurred. Reinsurance premium expenses related to reinsurance contracts held are recognised similarly to insurance revenue and reflect the premium payments attributable to the reporting period for the reinsurance contract services received. Any commissions received reduce the reinsurance premium expenses. The reinsurers' share of claims incurred is reported consistently with direct insurance expenses, including changes in the risk of non-performance.

Insurance finance income or expense

The insurance finance income or expenses included in the net financial result reflect the impacts arising from financial components. These include changes in the liability for incurred claims related to changes in discount rates and time value of money (unwinding). Therefore, the effect from changes in interest rates, as well as interest expense, is presented in its entirety as insurance finance income or expenses. The effect of changes in indexation of annuities is also presented within insurance finance income or expenses. Amounts related to reinsurance contracts are presented separately. The option to present changes in discounting effect in other comprehensive income is not applied.

In 2024, Sampo updated the accounting policy for the presentation of the change in discounting effect relating to risk adjustment. The change in discounting effect is now allocated between the insurance service expenses and insurance finance income and expense.

Net investment income

Interest and dividends

Interest income and expenses are recognised in the income statement using the effective interest rate method. This method recognises income and expenses on the instrument evenly in proportion to the amount outstanding over the period to maturity. Dividends on equity securities are recognised as revenue when the right to receive payment is established.

Fees and commissions

The fees and transaction costs of financial instruments measured at fair value through profit or loss are recognised in profit or loss when the instrument is initially recognised.

Revenue from contracts with customers

Other income consists of income from insurance-related services provided, that do not involve a transfer of significant insurance risk, and are therefore accounted for under IFRS 15 *Revenue from contracts with customers*. Such income is primarily attributable to sales commission and services for administration, claims settlement, etc. in insurance contracts on behalf of other parties.

Furthermore, If Group's subsidiary Viking Assistance Group AS provides roadside assistance. Income from these services is recognised when roadside assistance has been provided.

The subsidiary Hastings has revenue from broker activities in accordance with IFRS 15 *Revenue from Contracts with Customers*. The revenue consists principally of fees and commissions relating to the arrangement of third party underwritten insurance contracts and ancillary products.

Revenue from insurance brokerage activities is recognised at the point of sale to the customer, and revenue from other retail services is recognised when the service has been completed. Revenue arising from insurance broking activities is measured on an agency basis, net of cost, at the fair value of the income receivable after adjusting for any allowance for expected future cancellation refunds. Hastings may also provide contracts for the provision of other ad hoc, point-in-time services to customers. Such income is recognised when the performance obligation has been satisfied at the expected value of consideration.

In the consolidated financial statements, the fees and commissions from external broker activities are included in Other income or Other expenses.

Financial assets and liabilities

Initial recognition and derecognition

Financial assets and liabilities are measured at the initial recognition at fair value. If the acquired financial assets and liabilities are not measured at fair value, transaction costs directly attributable to acquisition or issue are added or deducted respectively.

Purchases and sales of financial assets at fair value through profit or loss are recognised and derecognised on the trade date, which is the date on which the Group commits to purchase or sell the asset. Loans and other receivables are recognised when cash is advanced.

Financial assets and liabilities are offset, and the net amount is presented in the balance sheet only when the Group has a legally enforceable right to set off the recognised amounts, and it intends to settle on a net basis, or to realise the asset and settle the liability simultaneously.

Financial assets are derecognised when the contractual rights to receive cash flows have expired or the Group has substantially transferred all the risks and rewards of ownership. Financial liabilities are derecognised when the obligation specified in the contract is discharged, cancelled or expired.

Classification and measurement principles of financial assets

Financial assets are classified as being subsequently measured either at amortised cost, at fair value through other comprehensive income (FVOCI), or at fair value through profit or loss (FVPL). The majority of Sampo Group's financial assets are classified at fair value through profit or loss, and only a limited amount of financial assets is measured at amortised cost. No financial assets are classified as FVOCI.

The classification of financial assets into these measurement categories is based on Sampo Group's business model for managing the financial assets and the contractual cash flow characteristics of the financial assets. The Group's business model reflects how the portfolios of financial assets are managed to achieve business objectives and to generate cash flows. The factors considered in determining the portfolio's business model include how the financial assets' performance is evaluated and reported to management, how risks are assessed and managed, past experience of how the cash flows have been collected, and how compensation is linked to performance.

Financial assets at fair value through profit or loss

Financial assets classified as at fair value through profit or loss include mainly investments in equity instruments and funds, debt instruments, and other loans.

Equity instruments are classified and measured at fair value through profit or loss.

Debt instruments, such as bonds and other interest-bearing securities, are classified as measured at fair value through profit or loss when the business model reflects the assets being managed and evaluated on a fair value basis. The instruments are initially recognised and subsequently measured at fair value. Transaction costs that are directly attributable to the issue or acquisition of the assets are expensed in profit or loss.

Gains and losses arising from changes in fair value, or realised on disposal, together with related interest income and dividend, are recognised in the income statement under net investment income.

Derivative instruments that are not designated as hedges and do not meet the requirements for hedge accounting are classified as financial assets at fair value through profit or loss. Derivatives are initially recognised at fair value. Derivative instruments are carried as assets when the fair value is positive and as liabilities when the fair value is negative. Derivative instruments are recognised at fair value, and gains and losses arising from changes in fair value, together with realised gains and losses, are recognised in the income statement under net investment income.

Financial assets measured at amortised cost

A financial asset is measured at amortised cost only if the objective of the business model is to hold a financial asset in order to collect contractual cash flows, and the contractual cash flows of the financial asset meet the SPPI criteria (solely payments of principal and interest -criteria, SPPI), i.e. it is consistent with the basic lending arrangement. SPPI criteria is met when the financial instrument's contractual cash flows are solely payments of principal and interest on the principal amount outstanding. Financial assets measured at amortised cost comprise mainly debt instruments, loans, and receivables.

Financial assets measured at amortised costs are initially recognised at their fair value, including transaction costs directly attributable to the acquisition of the asset. Loans and other receivables are subsequently measured at amortised cost using the effective interest rate method.

Interest revenue is calculated using the effective interest rate method. Under IFRS 9, financial assets subsequently measured at amortised cost are subject to loss allowance, that is, expected credit losses (ECL) requirements.

Financial liabilities

Financial liabilities, including subordinated debt securities, debt securities in issue, and other financial liabilities, are subsequently measured at amortised cost using the effective interest rate method. Interest expenses and gains or losses on derecognition are recognised in the income statement.

Derivative financial liabilities are measured at fair value through profit or loss.

If debt securities issued are redeemed before maturity, they are derecognised and the difference between the carrying amount and the consideration paid at redemption is recognised in profit or loss.

Fair value

The fair value of financial instruments is determined primarily by using quoted prices in active markets. Instruments are measured either at a bid price or at the last trade price, if there is an auction policy in the stock market of the price source. An exception are the syndicated loans, which are measured at a mid-price because of the lower liquidity. The financial derivatives are also measured at the last trade price. If the financial instrument has a counter-item that will offset its market risk, the same price source is used in assets and liabilities to that extent. If a published price quotation does not exist for a financial instrument in its entirety, but active markets exist for its component parts, the fair value is determined based on the relevant market prices of the component parts.

Fair values of financial assets are based on either published price quotations or valuation techniques based on market observable inputs, where available. If these are not available, the fair value is established by using generally accepted valuation techniques, including recent arm's length market transactions between knowledgeable, willing parties, reference to the current fair value of another instrument that is substantially the same, discounted cash flow analysis, and option pricing models. For a limited amount of assets, the value needs to be determined using these other techniques.

The carrying amount of cash and cash equivalents, as well as settlement receivables included in other assets is used as an approximation of fair value.

The financial instruments measured at fair value have been classified into three hierarchy levels in the notes, depending on, e.g. if the market for the instrument is active, or if the inputs used in the valuation technique are observable.

On level 1, the measurement of the instrument is based on quoted prices in active markets for identical assets or liabilities.

On level 2, inputs for the measurement of the instrument include also other than quoted prices observable for the asset or liability, either directly or indirectly by using valuation techniques.

On level 3, the measurement is based on other inputs rather than observable market data.

In level 3 equity investment is valued by using the excess return model, in which the value of a company is the sum of capital currently invested in the company and the present value of excess returns that the company expects to make in the future.

For private equity funds the valuation of the underlying investments is conducted by the fund manager who has all the relevant information required in the valuation process. The valuation is usually updated quarterly based on the value of the underlying assets and the amount of debt in the fund. There are several valuation methods, which can be based on, for example, the acquisition value of the investments, the value of publicly traded peer companies, the multiple based valuation or the cash flows of the underlying investments.

Impairment of financial assets

Sampo assesses, at the end of each reporting period, whether there is any objective evidence that a financial asset, other than those at fair value through profit or loss, may be impaired. A financial asset is impaired, and impairment losses are recognised based on the estimated future cash flows of the financial asset if there is objective evidence of impairment as a result of one or more loss events that occurred after the initial recognition of the asset, and if that event has an impact that can be reliably estimated.

There is objective evidence of impairment, if, for example, an issuer or debtor encounters significant financial difficulties that will lead to insolvency, and to estimation that the customer will probably not be able to meet the obligations to the Group. When there is objective evidence of impairment of a financial asset carried at amortised cost, the amount of the loss is measured as the difference between the receivable's carrying amount and the present value of estimated future cash flows discounted at the receivable's original effective interest rate. The difference is recognised as an impairment loss in profit or loss. In Sampo Group the impairment is assessed individually for each asset.

Financial assets measured at amortised cost

In accordance with IFRS 9, Sampo applies a forward-looking ECL model, which in Sampo Group is mainly applicable to financial assets measured at amortised cost. Impairment requirements do not apply to equity instruments or other financial instruments measured at FVPL. Expected credit losses reflect past events, i.e. historical loss experience, current conditions, and forecasts of future economic conditions.

Sampo applies a general approach for impairment in which a loss allowance is calculated either for 12-month expected credit losses or a lifetime expected credit losses. A three-staged model is used to determine the ECL at each reporting date. In stage 1, the credit risk has not increased significantly. Loss allowance is measured at an amount equal to 12-month expected credit losses. In stages 2 and 3, the credit risk has increased significantly since initial recognition and the loss allowance is measured at an amount equal to the lifetime expected credit losses. In stage 3, the financial asset is assessed to be credit-impaired (at default), and the interest is calculated on the credit-impaired amount instead of gross carrying amount.

In Sampo Group, the general approach is based on three components, namely probability of default (PD), loss given default (LGD), and exposure at default (EAD).

Derivative financial instruments and hedge accounting

Derivative financial instruments are classified as those held for trading and those held for hedging, including interest rate derivatives, credit risk derivatives, foreign exchange derivatives, equity derivatives and commodity derivatives. Derivative instruments are measured initially at fair value. All derivatives are carried as assets when fair value is positive, and as liabilities when fair value is negative.

Derivatives held for trading

Derivative instruments that are not designated as hedges are treated as held for trading. They are measured at fair value and the change in fair value, together with both realised gains and losses and interest income and expenses, is recognised in profit or loss.

Hedge accounting

Sampo Group may hedge its operations against interest rate risks, currency risks, and price risks through fair value hedging and cash flow hedging. Cash flow hedging is used as a protection against the variability of the future cash flows. During the financial year, cash flow hedging has been applied in Hastings.

Hedge accounting applies to hedges that are effective in relation to the hedged risk and meet the hedge accounting requirements of IFRS 9. The hedging relationship between the hedging instrument and the hedged item, as well as the risk management objective and strategy for undertaking the hedge, are documented at the inception of the hedge.

Cash flow hedging

Cash flow hedging is used to hedge the interest cash flows of individual floating rate debt securities or other floating rate assets or liabilities. The hedging instruments used include currency forward contracts. Derivative instruments which are designated as hedges and are effective as such, are measured at fair value. The effective part of the change in fair value is recognised in other comprehensive income.

The cumulative change in fair value is transferred from equity and recognised in profit or loss in the same period that the hedged cash flows affect profit or loss.

When a hedging instrument expires, is sold, terminated, or the hedge no longer meets the criteria for hedge accounting, the cumulative change in fair value remains in equity until the hedged cash flows affect profit or loss.

Leases

Group as lessee

All lease contracts are primarily recognised in the balance sheet in accordance with IFRS 16 *Leases*. The only optional exemptions include certain short-term contracts with a duration under 12 months or low-value contracts, for which the lease payments can be recognised as an expense on a straight-line basis over the lease term.

Right-of-use assets related to lease contracts (right to use an underlying asset) are recognised in the asset side as part of Property, plant and equipment and the corresponding lease liabilities in the liability side, as part of Other liabilities. A right-of-use asset is recognised at the commencement date of the lease and measured at cost that includes the amount of the initial measurement of the liability and potential prepaid rents to the lessor. Right-of-use assets are amortised on a straight-line basis over the lease period. Lease liability is also recognised at the commencement date and measured at the present value of the lease payments.

Depreciations on right-of-use assets and interests on lease liabilities are recognised in the income statement.

Intangible assets

Goodwill

Goodwill represents the excess of the cost of an acquisition (made after 1 January 2004) over the fair value of the Group's share of net identifiable assets, liabilities, and contingent liabilities of the acquired entity at the date of acquisition. Goodwill on acquisitions before 1 January 2004 is accounted for in accordance with the previous accounting standards, and the carrying amount is used as the deemed cost in accordance with the IFRS.

Goodwill is measured at historical cost less accumulated impairment losses. Goodwill is not amortised. Instead, it is tested at least annually for impairment.

Other intangible assets

IT software and other intangible assets, whether procured externally or internally generated, are recognised in the balance sheet as intangible assets with finite useful lives if it is probable that the expected future economic benefits that are attributable to the assets will flow to the Group and the cost of the assets can be measured reliably. The cost of internally generated intangible assets is determined as the sum of all costs directly attributable to the assets. Research costs are recognised as expenses in profit or loss as they are incurred. Costs arising from the development of new IT software or from significant improvement of existing software are recognised only to the extent they meet the above-mentioned requirements for being recognised as assets in the balance sheet.

Intangible assets with finite useful lives are measured at historical cost less accumulated amortisation and impairment losses. Intangible assets are amortised on a straight-line basis over the estimated useful life of the asset. The estimated useful lives by asset class are as follows:

- IT software 3-10 years
- Other intangible assets 3-10 years

Intangible assets with an indefinite useful life, such as brands and trademarks acquired in business combinations, are not amortised. Instead, they are tested at least annually for impairment.

Amortisations and impairment losses are recognised in the statement of profit or loss in other expenses.

Property, plant and equipment

Property, plant and equipment comprise properties occupied for Sampo's own activities, office equipment, fixtures and fittings, and furniture.

Property, plant and equipment are measured at historical cost less accumulated depreciation and impairment losses.

Improvement costs are added to the carrying amount of a property when it is probable that the future economic benefits that are attributable to the asset will flow to the Group. Costs for repairs and maintenance are recognised as expenses in the period in which they were incurred.

Items of property, plant and equipment are depreciated on a straight-line basis over their estimated useful life. In most cases, the residual value is estimated at zero. Land is not depreciated. Estimates of useful life are reviewed at financial year-ends and the useful life is adjusted if the estimates change significantly. The estimated useful lives by asset class are as follows:

- Buildings 20-50 years
- Components of buildings 15-20 years
- Property and leasehold improvements 4-10 years
- IT equipment and motor vehicles 2-5 years
- Other equipment 3-15 years

Depreciations and impairment losses are recognised in the statement of profit or loss in other expenses.

Depreciation of property, plant or equipment will be discontinued if the asset in question is classified as held for sale in accordance with IFRS 5 *Non-current Assets Held for Sale and Discontinued Operations*.

Impairment of intangible assets and property, plant and equipment

At each reporting date, the Group assesses whether there is any indication that an intangible asset or an item of property, plant or equipment may be impaired. If any such indication exists, the Group will estimate the recoverable amount of the asset. In addition, goodwill, intangible assets not yet available for use, and intangible assets with an indefinite useful life will be tested for impairment annually, independent of any indication of impairment. For impairment testing the goodwill is allocated to the cash-generating units of the Group from the date of acquisition. In the test, the carrying amount of the cash-generating unit, including the goodwill, is compared with its recoverable amount.

The recoverable amount is the higher of an asset's fair value less costs to sell and its value in use. The value in use is calculated by estimating future net cash flows expected to be derived from an asset or a cash-generating unit, and by discounting them to their present value using a pre-tax discount rate. If the carrying amount of an asset is higher than its recoverable amount, an impairment loss is recognised in profit or loss. In conjunction with this, the impaired asset's useful life will be re-determined.

The impairment loss is reversed if there has been a change in circumstances and the recoverable amount has changed after the recognition of the impairment loss, but no more than to the carrying amount that it would have been without recognition of the impairment loss. Impairment losses recognised for goodwill are not reversed.

Insurance contracts

Sampo Group has applied IFRS 17 *Insurance Contracts* from 1 January 2023. Sampo Group's operations are focused on the P&C business and Sampo primarily uses the premium allocation approach (PAA) under IFRS 17.

The risks involved in insurance contracts are widely elaborated in the Group's **note 34**.

P&C operations

Scope

In the Group's P&C insurance contracts, insurance risk is considered significant. Insurance contracts issued by third party underwriters (panel underwriters), which do not transfer any insurance risk to the Group companies, are not in the scope of IFRS 17 but instead accounted for under IFRS 15 *Revenue from Contracts with Customers*.

Insurance contracts containing one or more components within the scope of different accounting standards are accounted for separately. Sampo evaluates the insurance contracts to identify components from the contracts. For example, an insurance contract may include an investment component or a component for services other than insurance contract services (or both).

Level of aggregation

Insurance contracts are aggregated into portfolios of insurance contracts. The portfolios comprise contracts with similar risks that are managed together. These portfolios are further divided into annual cohorts, i.e. contracts not issued more than one year apart.

In Sampo Group's P&C operations, portfolios are determined based on a segmentation of business, or a combination of line of business (as defined by the management), business area and country. Portfolios are determined separately for each legal entity or based on product lines.

Sampo Group has identified some onerous contracts, but, all in all, their amount is insignificant.

The carrying amount of the portfolios of insurance and reinsurance contracts determines their presentation as assets or liabilities in the balance sheet.

Contract boundary

The initial measurement of a group of insurance contracts includes all future cash flows arising within the contract boundary. In determining which cash flows fall within the contract boundary, substantive rights and obligations arising from the terms of the contract, together with applicable laws and regulations, are considered.

In Sampo Group's P&C operations, the majority of contracts have a one-year contract boundary, typically until the next renewal date, i.e. the contract has one-year coverage period during which there are substantive rights and obligations.

Measurement

In accordance with IFRS 17, a general measurement model (GMM) is applicable to all insurance contracts to measure insurance contract liabilities. Under the general measurement model, insurance contracts are measured based on future cash flows, adjusted to reflect the time value of money, including a risk adjustment, and a contractual service margin (CSM).

When certain eligibility criteria are met, insurers may apply a simplified approach, the premium allocation approach (PAA), for the measurement of insurance contracts. PAA is eligible for insurance contracts with a coverage period of one year or less. This approach is also available for contracts where the PAA would not materially differ from the results of the GMM. In Sampo Group's P&C operations, PAA is applied to all insurance contracts, because the coverage period for most of the insurance contracts is one year or less, and for longer insurance contracts the qualifying eligibility criteria are fulfilled.

The measurement of insurance liabilities consists of the liability for remaining coverage (LRC) and acquisition cash flow asset, and liability for incurred claims (LIC), the latter including both reported but not settled claims, as well as incurred but not reported claims (IBNR).

On the initial recognition of P&C operations' groups of insurance contracts, the carrying amount of LRC is measured as the premiums initially received less insurance acquisition cash flows. In case of onerous contracts, a loss component is recognised.

The acquisition cash flows reducing the carrying amount of LRC mainly include staff costs related to sales personnel and commissions, as well as certain costs related to selling policies through price comparison websites. Any overhead costs are expensed immediately. Sampo Group's P&C operations in the private business area have elected to recognise acquisition cash flows as an expense at the date when they are incurred. For other business areas, the acquisition costs are deferred over the coverage period of the contracts, generally one year, or longer in case of expected renewals.

Any acquisition cash flows paid relating to a group of insurance contracts not yet recognised, are presented as a separate acquisition cash flow asset and included in the related portfolio's total carrying amount.

The liability for remaining coverage relates to the obligation to investigate and pay valid claims that have not yet occurred. At subsequent reporting periods, the carrying amount of LRC is increased by premiums received during the period and decreased by the amount recognised as insurance revenue for services provided in the period, which for most products is based on the passage of time (straight line basis). Consequently, any premium receipts pertaining to insurance services to be provided after the closing date remain in this liability. The carrying amount is also increased for any premiums received in subsequent periods, less additional insurance acquisition cash flows paid. The carrying amount of LRC is not discounted or adjusted with the effect of financial risk, as the time between providing services and the related premium due date generally is no more than a year.

For groups of onerous contracts, a loss component is part of the liability for remaining coverage. The loss component is calculated as the difference between the liability measured with the general measurement model and with the premium allocation approach.

The liability for incurred claims (LIC) is intended to cover the future payments of all claims incurred, including claims not yet reported to the company and all claims handling expenses. Sampo Group measures the liability for incurred claims (LIC) for the group of insurance contracts at the amount of estimated fulfilment cash flows relating to incurred claims. Fulfilment cash flows consist of three components, namely expected cash flows, discounting and risk adjustment. The estimated future cash flows (best estimate) are calculated with the aid of statistical methods or through individual assessments of individual claims.

Both the best estimate and risk adjustment are discounted to present value using standard actuarial methods and applying market-based yield curves. The curves are constructed based on a risk-free rate and an illiquidity premium for each of the main currencies.

Discounting

Sampo Group's P&C operations have determined the discount rates based on a bottom-up approach. The interest rate curve includes a risk-free rate (excluding credit risk adjustment) and an illiquidity premium for each currency. The illiquidity premium is mainly derived based on a portfolio of high-rated bonds for the liquid part of the interest rate curve. Beyond this, the curve converges to the ultimate forward rate, consistent with the EIOPA curves. Discount rates are constructed separately for the main currencies applied in Sampo Group's subsidiaries.

The discounting effect of current-year liabilities for incurred claims and changes in the cash flows is recognised in the insurance service result. Unwinding of interest rates, effect of changes in interest rates, and other financial assumptions are presented as insurance finance income or expense in profit or loss. Sampo Group has elected not to apply the OCI option allowed under IFRS 17.

Risk adjustment

In accordance with IFRS 17, an explicit risk adjustment is included in the measurement of insurance liabilities. The risk adjustment reflects the cost of uncertainty associated with the amount and timing of cash flows arising from non-financial risk and the degree of risk aversion. The risks typically considered in P&C operations, when assessing risk adjustment, are reserve risk, longevity risk, inflation risk, and premium risk.

In Sampo Group, the risk adjustment is derived through a confidence level technique whereby management determines the appropriate quantile. The risk adjustment is calculated at the subsidiary level and aggregated into the consolidated Sampo Group level risk adjustment, without any diversification effects assumed. Under the premium allocation approach, the risk adjustment is only included in LIC, unless a group of insurance contracts is onerous.

Reinsurance contracts

The PAA model is applied to reinsurance contracts held. The corresponding accounting policies as for measuring the insurance contracts issued are applied when measuring the reinsurance contracts held. Thus, correspondingly to insurance liabilities for issued insurance contracts, the reinsurance assets for reinsurance contracts held consist of asset for remaining coverage and asset for incurred claims. The asset for incurred claims also takes into consideration the effect of the risk of non-performance by the issuer of the reinsurance contract.

Investment components are included in the reinsurance contracts held for cash flows repaid to a policyholder in all circumstances, i.e. regardless of whether an insured event occurs or not. Identified amounts of investment components are excluded from recognised amounts for reinsurance result in the statement of profit and other comprehensive income.

Life operations

Sampo Group's life operations were reclassified as discontinued operations during the first quarter of comparative period 2023.

Employee benefits

Post-employment benefits

Post-employment benefits include pensions and life insurance.

Sampo has defined benefit plans in Sweden and Norway, and defined contribution plans in other countries. The most significant defined contribution plan is that arranged through the Employees' Pensions Act (TyEL) in Finland.

In the defined contribution plans, the Group pays fixed contributions to a pension insurance company and has no legal or constructive obligation to pay further contributions. The obligations arising from a defined contribution plan are recognised as an expense in the period to which the obligation relates.

In the defined benefit plans, the company still has obligations after paying the contributions for the financial period and bears their actuarial and/or investment risk. The obligation is calculated separately for each plan using the projected unit credit method. In calculating the amount of the obligation, actuarial assumptions are used. The pension costs are recognised as an expense for the service period of employees.

Defined benefit plans are both funded and unfunded. The amounts reported as pension costs during a financial year consist of the actuarially calculated earnings of old-age pensions during the year, calculated straight-line, based on pensionable income at the time of retirement. The calculated effects in the form of interest expense for crediting/appreciating the preceding years' established pension obligations are then added. The calculation of pension costs during the financial year starts at the beginning of the year and is based on assumptions about such factors as salary growth and price inflation throughout the duration of the obligation and on the current market interest rate adjusted to take into account the duration of the pension obligations.

The current year pension cost and the net interest of the net liability is recognised through profit or loss in pension costs. The actuarial gains and losses and the return of the plan assets (excluding net interest) are recognised as a separate item in other comprehensive income.

The fair value of the plan assets covered by the plan is deducted from the present value of future pension obligations and the remaining net liability or net asset is recognised separately in the balance sheet.

The Group has also certain voluntary defined benefit plans, which have no material significance.

Termination benefits

An obligation based on the termination of employment is recognised as a liability when the Group is verifiably committed to terminating the employment of one or more persons before the normal retirement date, or to granting benefits payable upon termination as a result of an offer to promote voluntary redundancy. As no economic benefit is expected to flow to the employer from these benefits in the future, they are recognised immediately as expenses. Obligations maturing more than 12 months later than the balance sheet date are discounted. The benefits payable upon termination at Sampo are the monetary and pension packages related to redundancy.

Share-based payments

During the financial year, Sampo had four valid share-based incentive schemes settled in cash (the long-term incentive schemes 2020 I, 2020 II, 2020 III, and 2024 for the management and key employees).

Topdanmark had a share-based incentive scheme that was converted to a phantom equity plan in the last quarter of the financial year. Hastings had a share-based incentive scheme settled in cash during the financial year. More information on the different incentive schemes of the Group companies can be found in note 26 Incentive schemes.

The schemes have been measured at fair value at the grant date and at every reporting date thereafter.

In the schemes settled in cash, the valuation is recognised as a liability and changes are recognised through profit or loss. In the schemes settled in shares, the strike amounts received on the exercise of the options are recognised in the shareholder's equity.

The fair value of the schemes has to a large extent been determined using the Black-Scholes-pricing model. The fair value of the market-based part of the incentive takes into consideration the model's forecast concerning the number of incentive units to be paid as a reward. The effects of non-market-based terms are not included in the fair value of the incentive; instead, they are considered in the number of those incentive units that are expected to be exercised during the vesting period. In this respect, the Group will update the assumption on the estimated final number of incentive units at every interim or annual balance sheet date.

Provisions

A provision is recognised when the Group has a present legal or constructive obligation as a result of a past event, and when it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and the Group can reliably estimate the amount of the obligation.

If it is expected that some or all of the expenditure required to settle the provision will be reimbursed by another party, the reimbursement will be treated as a separate asset only when it is virtually certain that the Group will receive it.

Income taxes

Item Tax expenses in the income statement comprise current and deferred tax. Tax expenses are recognised through profit or loss, except for items recognised directly in equity or other comprehensive income, in which case the tax effect will also be recognised for those items. Current tax is calculated based on the valid tax rate of each country. Tax is adjusted for any tax related to previous periods.

Deferred tax is calculated on all temporary differences between the carrying amount of an asset or liability in the balance sheet and its tax base. Deferred tax is not recognised on non-deductible goodwill impairment, nor is it recognised on undistributed profits of subsidiaries to the extent that it is probable that the temporary difference will not reverse in the foreseeable future. Deferred tax liabilities and assets are offset in individual companies if, and only if, they relate to income taxes levied by the same taxation authority and the company has a legally enforceable right of offset them.

Deferred tax is calculated using the enacted tax rates prior to the balance sheet date. A deferred tax asset is recognised to the extent that it is probable that future taxable income will be available against which a temporary difference can be utilised.

Share capital

The incremental costs directly attributable to the issue of new shares or options or to the acquisition of a business are included in equity as a deduction, net of tax, from the proceeds.

Dividends are recognised in equity in the period when they are approved by the Annual General Meeting. When the parent company or other Group companies purchase the parent company's equity shares, the consideration paid is deducted from equity as treasury shares until they are cancelled. If such shares are subsequently sold or reissued, any consideration received is included in equity.

Treasury shares

The purchase price paid for the buy-back of treasury shares (own shares) is directly deducted from equity. No gains or losses are recognised from purchase, sale, or cancellation of own shares. If own shares are re-issued, the difference between purchase price and consideration received is recognised in the premium reserve.

Cash and cash equivalents

Cash and cash equivalents comprise cash and short-term deposits (3 months).

Sampo presents cash flows from operating activities using the indirect method, in which the profit (loss) before taxation is adjusted for the effects of transactions of a non-cash nature, deferrals and accruals, and income and expense associated with investing or financing cash flows.

In the cash flow statement, interest received and paid is presented in cash flows from operating activities. In addition, the dividends received from other than associated companies are included in cash flows from operating activities. Dividends received from associates are presented in cash flows from investments. Dividends paid are presented in cash flows from financing.

Accounting policies requiring management judgement and key sources of estimation uncertainties

Preparation of the accounts in accordance with the IFRS requires management estimates and assumptions that have affected the revenue, expenses, assets, liabilities and contingent liabilities presented in the financial statements. Judgement is also required in the application of accounting policies. The estimates made are based on the best information available at the balance sheet date. The estimation is based on historical experience and the most probable assumptions concerning the future at the balance sheet date. The actual outcome may deviate from results based on estimates and assumptions. Any changes in the estimates will be recognised in the financial year during which the estimate is reviewed in all subsequent periods.

Insurance contracts

Sampo Group management applies judgement regarding the determination of discount rates and risk adjustment.

The interest rate curve includes a risk-free rate and an illiquidity premium determined by Management, which in Sampo Group is mainly based on a portfolio of high-rated bonds.

Risk adjustment is determined separately for all Sampo Group's companies and aggregated at the Group level. Management considers this to reflect the compensation that different entities would require for bearing non-financial risk and their degree to risk aversion. The confidence level approach is applied in the Group companies. The confidence level applied in calculating the risk adjustment is varying between group companies from 75 per cent to 85 per cent. If Group applies a confidence level of 85 per cent, and Hastings 75 per cent, respectively.

Actuarial assumptions

Evaluation of insurance liabilities always involves uncertainty, as technical provisions are based on estimates and assumptions concerning future claims costs. The estimates are based on statistics on historical claims available to the Group on the balance sheet date. The uncertainty related to the estimates is generally greater when estimating new insurance portfolios, or portfolios where the clarification of a loss takes a long time because complete claims statistics are not yet available. In addition to historical data, estimates of insurance liabilities take into consideration other matters such as claims development, the amount of unpaid claims, legislative changes, court rulings and the general economic situation.

A substantial part of the Group's P&C insurance liabilities concerns statutory accident and traffic insurance. The most significant uncertainties related to the evaluation of these liabilities are assumptions about inflation, mortality, discount rates and the effects of legislative revisions and legal practices.

Defined benefit plans as intended in IAS 19, are also estimated in accordance with actuarial principles. As the calculation of a pension plan reserve is based on expected future pensions, assumptions must be made not only about discount rates, but also about matters such as mortality, employee turnover, price inflation and future salaries.

Determination of fair value

The fair value of any non-quoted financial assets is determined using valuation methods that are generally accepted in the market.

Impairment tests

Goodwill, and intangible assets with an indefinite useful life are tested for impairment at least annually. The recoverable amounts from cash-generating units have mainly been determined by using calculations based on the value in use. These require management estimates on matters such as future cash flows, the discount rate, and, general economic growth and inflation.

Acquisition of Topdanmark's non-controlling interest

On 17 June 2024, Sampo announced that Sampo and Topdanmark had entered into a combination agreement, based on which Sampo made a recommended best and final public exchange offer to acquire all of the outstanding shares in Topdanmark not already owned by Sampo. The transaction was completed by the compulsory acquisition of the remaining Topdanmark minority shares on 25 October 2024. Following the acquisition of NCI, Sampo plc sold all the issued shares in Topdanmark A/S to If P&C Insurance Holding Ltd. For more detailed description of the acquisition, please see **note 28**.

In accordance with IFRS 10 *Consolidated Financial Statements*, after the control of a subsidiary has been gained, any subsequent change in the ownership, not resulting in a loss of control, is treated as an equity transaction between the non-controlling interests and the owners of the parent company (IFRS 10.23). The acquisition of non-controlling interest of Topdanmark was accounted for as an equity transaction between the

NCI and the owners of the parent. Transaction costs, which were incremental and directly related to equity transaction, were deducted directly from equity. The original purchase price allocation calculation (PPA), prepared at the time of the original acquisition in 2017, and including goodwill, remained unchanged.

Measurement of acquired Topdanmark shares

Sampo has determined that the measurement of acquired Topdanmark A/S shares was based on the compensation given as an exchange of those shares. The issue price was determined based on the closing price of the Sampo class A shares on Nasdaq Helsinki Ltd on the last full trading day prior to the Sampo Board resolving upon the directed issuance of shares. For shares acquired via compulsory acquisition, the value of acquired shares was determined based on the compensation paid in cash.

Sale of Topdanmark A/S shares to If P&C Insurance Holding Ltd

As the sale transaction of Topdanmark's shares was an intra-group transaction, all impacts, including the sales gain of the shares, were eliminated on the Sampo Group level. The sales gain was due to the previously owned shares being on balance sheet at historical value. The transaction was completed at arm's length basis. The intra-group sale of shares met the definition of a common control transaction as both If P&C Insurance Holding Ltd and Topdanmark A/S are under control of Sampo plc before and after the acquisition.

As part of the intra-group sales transaction, Sampo granted If P&C Insurance Holding loans denominated partly in currencies other than functional currencies either in Sampo or in If Group. IAS 21 *The Effects of Changes in Foreign Exchange Rates* enables to recognise exchange rate differences arising from a loan (monetary item) in other comprehensive income when that loan is included as part of the net investment in a foreign operation. Sampo has assessed that in its consolidated accounts, the long-term loan receivable forms a part of Sampo's net investment in foreign operation i.e. investment in subsidiary shares in If P&C Insurance Holding Ltd.

Segment presentation

At the end of the financial year, Sampo Group's business segments were If, Topdanmark, Hastings and Holding. Topdanmark continued to be presented as a business segment regardless of the intra-group sale of Topdanmark A/S shares. As Sampo presents reporting segments unchanged for the financial year 2024 reporting, no changes have been done to the allocation of goodwill to Topdanmark segment.

Restructuring reserve

Following the acquisition of non-controlling interests in Topdanmark, Sampo plc sold the shares of Topdanmark A/S to If P&C Insurance Holding Ltd for further integration into If Group's structure. In connection with the acquisition and the integration of Topdanmark into If Group, the one-off restructuring costs incurred amounted to approximately EUR 150 million. If and Topdanmark have estimated that requirements set in the IAS 37 *Provisions, Contingent Liabilities and Contingent Assets* for a recognition of a provision were met at the end of the reporting period. The restructuring provision is recognised as it is probable that the restructuring costs will incur while carrying out the integration. The costs relate mainly to redundancies, decommissioning and sunsetting of systems as well as rebranding.

On Sampo Group level, the restructuring provision amounted to approximately EUR 150 million, of which EUR 77 million was recognised in If's segment and EUR 73 million in Topdanmark's segment. In Sampo Group's balance sheet, the restructuring provision is presented under other liabilities.

Pillar II

Sampo Group is within the scope of Pillar II regulations (EU Minimum Tax Directive and OECD Safe Harbour rules). Sampo Group companies have applied a temporary mandatory relief from deferred tax accounting for any potential impacts of the top-up tax and account for it as a current tax should it occur. Sampo Group will, as of fiscal year 2024, be subject to the global minimum top-up tax rules either at the ultimate parent entity level, by Sampo plc in Finland, or domestic top-up tax in the countries where Sampo Group companies operate and where such rules are enacted. At the reporting date, Sampo Group has identified that Hastings' operations in Gibraltar are subject to the global minimum top-up tax rules.

Discontinued operations in 2023

In order to segregate the Mandatum subgroup in the demerger of Sampo plc, Mandatum's assets and liabilities were reclassified as a disposal group held for distribution to owners and related liabilities on 31 March 2023. In the statement of profit and other comprehensive income, the result of Mandatum is reported as a single line item as profit from the discontinued operations.

The partial demerger was completed on 1 October 2023, and the first trading day for Mandatum on Nasdaq Helsinki was 2 October 2023. In the demerger, all the shares in Mandatum Holding Ltd (a wholly owned direct subsidiary of Sampo plc) and the related assets and liabilities were transferred without a liquidation procedure to Mandatum plc, a company incorporated in the demerger on the effective date.

In addition, EUR 102 million of Sampo's general liabilities, not allocated to any specific business operations, were allocated to Mandatum plc. These liabilities cannot be legally transferred due to their nature, and therefore Sampo and Mandatum agreed on forming an equivalent debt relationship between them on 2 October 2023.

Application of new or revised IFRSs and interpretations

The Group will apply new or amended standards and interpretations related to the Group's business in the financial years when they become effective, or if the effective date is other than the beginning of the financial year, during the financial year following the effective date. The new IFRSs coming into effect in the financial year 2025 will not have any significant influence on the Group's financial reporting.

Segment information

At the end of the reporting period, Sampo Group's business segments are If, Topdanmark, Hastings and Holding. Topdanmark continued to be presented as a business segment regardless of the intra-group sale of Topdanmark A/S shares to If P&C Holding Ltd.

Segment information has been produced in accordance with the accounting policies adopted for preparing and presenting the consolidated financial statements. The segment revenue, expense, assets and liabilities, either directly attributable or reasonably allocable, have been allocated to the segments. Inter-segment pricing is based on market prices. The transactions, assets and liabilities between the segments are eliminated in the consolidated financial statements on a line-by-line basis. There was no significant income between segments during the financial periods.

Result by segment for twelve months ended 31 December 2024

EURm	If	Topdan-mark	Hastings	Holding	Elim.	Sampo Group
GWP & brokerage income	5,860	1,553	2,565	—	-47	9,931
Insurance revenue, net (incl. brokerage)	5,258	1,470	1,659	—	—	8,386
Claims incurred, net	-3,554	-970	-938	—	4	-5,459
Operating expenses	-814	-267	-532	—	—	-1,612
Underwriting result	**890**	**233**	**190**	**—**	**3**	**1,316**
Net investment income	652	93	72	78	-8	888
Insurance finance income or expense, net	-188	-33	-31	—	—	-252
Net financial result	**464**	**60**	**41**	**78**	**-8**	**636**
Other items	-98	-155	-39	-107	8	-392
Profit before taxes	**1,256**	**137**	**193**	**-29**	**3**	**1,559**
Income taxes	-252	-48	-30	0	—	-330
Profit after taxes	**1,003**	**90**	**163**	**-30**	**3**	**1,229**
Divested operations, net of tax	—	-26	—	—	—	-26
Net profit						**1,203**
Other comprehensive income						
Items reclassifiable to profit or loss						
Exchange differences	-104	-1	101	—	—	-4
Cash flow hedges	—	—	1	—	—	1
Total items reclassifiable to profit or loss, net of tax	**-104**	**-1**	**102**	**—**	**—**	**-3**

EURm	If	Topdan-mark	Hastings	Holding	Elim.	Sampo Group
Items not reclassifiable to profit or loss						
Actuarial gains and losses from defined pension plans	0	—	—	—	—	0
Taxes	0	—	—	—	—	0
Total items not reclassifiable to profit or loss, net of tax	**0**	**—**	**—**	**—**	**—**	**0**
Total other comprehensive income, net of tax	**-105**	**-1**	**102**	**—**	**—**	**-3**
Total comprehensive income	**899**	**63**	**265**	**-30**	**3**	**1,200**
Profit attributable to						
Owners of the parent						1,154
Non-controlling interests						50
Total comprehensive income attributable to						
Owners of the parent						1,151
Non-controlling interests						50

All intra-group transactions related to the sale of Topdanmark A/S shares to If P&C Insurance Holding Ltd have been eliminated already from the segment figures. For more information on the transaction, please see ***note 28****.*

Result by segment for twelve months ended 31 December 2023

EURm	If	Topdan-mark	Hastings	Holding	Elim.	Sampo Group
GWP & brokerage income	5,468	1,339	2,063	—	—	8,870
Insurance revenue, net (incl. brokerage)	4,996	1,288	1,251	—	—	7,535
Claims incurred, net	-3,377	-862	-714	—	—	-4,953
Operating expenses	-777	-233	-409	—	—	-1,419
Underwriting result	**842**	**194**	**128**	**—**	**—**	**1,164**
Net investment income	871	107	79	-37	-13	1,006
Insurance finance income or expense, net	-331	-79	-35	—	—	-446
Net financial result	**539**	**27**	**44**	**-37**	**-13**	**560**
Other items	-24	-59	-42	-122	4	-243
Profit before taxes	**1,358**	**162**	**129**	**-160**	**-9**	**1,481**
Income taxes	-285	-43	-11	0	—	-339
Profit from the continuing operations	**1,073**	**119**	**118**	**-160**	**-9**	**1,142**
Discontinued operations, net of tax [1]	—	—	—	—	9	251
Net profit						**1,393**
Other comprehensive income						
Items reclassifiable to profit or loss						
Exchange differences	-23	-3	24	—	—	-1
Cash flow hedges	—	—	-1	—	—	-1
Total items reclassifiable to profit or loss, net of tax	**-23**	**-3**	**23**	**—**	**—**	**-3**

EURm	If	Topdan-mark	Hastings	Holding	Elim.	Sampo Group
Items not reclassifiable to profit or loss						
Actuarial gains and losses from defined pension plans	-6	—	—	—	—	-6
Taxes	1	—	—	—	—	1
Total items not reclassifiable to profit or loss, net of tax	**-5**	**—**	**—**	**—**	**—**	**-5**
Total other comprehensive income for the continuing operations, net of tax	**-28**	**-3**	**23**	**—**	**—**	**-8**
Total comprehensive income	**1,045**	**117**	**141**	**-160**	**-9**	**1,386**
Profit attributable to						
Owners of the parent						1,323
Non-controlling interests						70
Total comprehensive income attributable to						
Owners of the parent						1,316
Non-controlling interests						70

Mandatum Group has been presented in the comparative year in a single line as discontinued operations, and therefore the Group total by lines do not reconcile to the segment totals.

[1] The elimination totalling EUR 9 million is related to intra-segment operations between the reportable segments and discontinued operation.

Balance sheet by segment at 31 December 2024

EURm	If	Topdanmark	Hastings	Holding	Elim.	Sampo Group
Assets						
Property, plant and equipment	151	114	15	3	—	284
Intangible assets	560	1,521	1,554	1	—	3,637
Investments in associates	4	—	—	—	—	4
Financial assets	10,454	2,418	2,287	7,645	-6,713	16,090
Deferred income tax	4	1	—	0	-4	2
Reinsurance contract assets	679	73	1,896	—	-30	2,618
Other assets	593	91	167	31	-1	880
Cash and cash equivalents	273	108	333	248	—	962
Total assets	**12,720**	**4,327**	**6,252**	**7,927**	**-6,748**	**24,478**
Liabilities						
Insurance contract liabilities	7,049	1,875	3,396	—	-33	12,286
Subordinated debts	131	147	—	1,491	-127	1,642
Other financial liabilities	19	43	353	979	—	1,395
Deferred income tax	358	113	64	—	—	535
Other liabilities	1,113	290	110	51	-1	1,562
Total liabilities	**8,670**	**2,469**	**3,923**	**2,520**	**-162**	**17,419**
Equity						
Share capital						98
Reserves						3,531
Retained earnings						4,176
Other components of equity						-746
Equity attributable to owners of the parent						**7,059**
Non-controlling interests						—
Total equity						**7,059**
Total equity and liabilities						**24,478**

*All intra-group transactions related to the sale of Topdanmark A/S shares to If P&C Insurance Holding Ltd have been eliminated already from the segment figures. For more information on the transaction, please see **note 28**..*

Balance sheet by segment at 31 December 2023

EURm	If	Topdanmark	Hastings	Holding	Elim.	Sampo Group
Assets						
Property, plant and equipment	177	117	19	4	—	318
Intangible assets	579	1,545	1,512	1	—	3,637
Investments in associates	4	8	—	—	—	12
Financial assets	10,838	2,060	1,407	7,564	-6,112	15,757
Deferred income tax	4	4	—	—	-4	3
Reinsurance contract assets	563	79	1,640	—	—	2,282
Other assets	553	89	136	23	—	800
Cash and cash equivalents	197	24	448	747	—	1,415
Total assets	**12,915**	**3,926**	**5,162**	**8,339**	**-6,117**	**24,225**
Liabilities						
Insurance contract liabilities	7,134	1,855	2,726	—	—	11,716
Subordinated debts	135	148	—	1,490	-127	1,645
Other financial liabilities	58	46	186	979	—	1,269
Deferred income tax	352	139	76	—	—	567
Other liabilities	1,011	162	112	58	—	1,342
Total liabilities	**8,689**	**2,350**	**3,100**	**2,527**	**-128**	**16,538**
Equity						
Share capital						98
Reserves						1,530
Retained earnings						6,378
Other components of equity						-743
Equity attributable to owners of the parent						**7,263**
Non-controlling interests						424
Equity						**7,687**
Total equity and liabilities						**24,225**

Geographical information

EURm 2024	Finland	Sweden	Norway	Denmark	UK	Baltic	Total
Revenue from external customers	1,269	1,954	1,749	2,126	2,234	245	**9,577**
Non-current assets	99	433	179	1,639	1,570	6	**3,925**

EURm 2023	Finland	Sweden	Norway	Denmark	UK	Baltic	Total
Revenue from external customers	1,343	1,801	1,654	1,897	1,977	223	**8,894**
Non-current assets	111	454	189	1,675	1,531	7	**3,968**

Geographical information has been disclosed on income from external customers and non-current assets. The reported areas are Finland, Sweden, Norway, Denmark, UK and the Baltic countries.

The revenue includes insurance revenue according to the underwriting country. Holding includes net investment income and other operating income. For Hastings, income from broker activities has been included as well. Revenue from external customers during the reporting period 2023 includes Mandatum's revenue until the date of demerger i.e. 1 October 2023.

Non-current assets comprise of intangible assets, investments in associates, property, plant and equipment, and investment property. Mandatum's assets were no longer included at the end of the comparative period 2023.

Other notes

1 Insurance service result

EURm	1-12/2024	1-12/2023
Insurance revenue		
Insurance contracts measured under PAA		
Gross written premiums	9,527	8,513
Change in liability for remaining coverage	-343	-329
Brokerage revenue	266	233
Total insurance revenue from contracts measured under PAA	**9,450**	**8,417**
Total insurance revenue	**9,450**	**8,417**
Insurance service expenses		
Expenses related to claims incurred		
Claims paid and benefits	-5,827	-5,292
Claims handling expenses	-518	-468
Change in liability for incurred claims	118	-29
Change in risk adjustment	-80	-9
Change in loss component	21	-12
Insurance service expenses related to claims incurred	**-6,287**	**-5,810**
Operating expenses	**-1,396**	**-1,266**
Total insurance service expenses	**-7,684**	**-7,076**
Reinsurance result		
Premiums	-909	-1,005
Claims recovered	537	857
Total reinsurance result	**-372**	**-148**
Total insurance service result	**1,394**	**1,193**

2 Net investment income

The net investment income consists of investment income and expenses from financial assets and liabilities held by the group companies.

EURm	1-12/2024	1-12/2023
Derivative financial instruments		
Interest income	4	6
Interest expense	0	-23
Net gains or losses	13	5
Derivative financial instruments, total	**17**	**-12**
Financial assets at fair value through profit or loss		
Debt securities		
Interest income	493	447
Net gains or losses	147	364
Equity securities		
Dividend income	37	59
Net gains or losses	81	64
Funds		
Distributions	6	5
Interest income	10	11
Net gains or losses	70	60
Financial assets at fair value through profit or loss, total	**844**	**1,010**
Financial assets at amortised cost	**32**	**23**
Total income or expenses from financial assets	**892**	**1,021**
Other		
Expenses from asset management	-21	-19
Other income	57	34
Other expenses	-38	-26
Fee expenses	0	-1
Expenses from investment property	-3	-4
Total other	**-4**	**-15**
Total net investment income	**888**	**1,006**

Net gains or losses for debt securities include exchange differences of EUR 2 million (-3).

The amount of expected credit losses on financial assets measured at amortised cost is presented in the **note 12**.

3 Net finance income or expense from insurance contracts

EURm	1-12/2024	1-12/2023
Insurance contracts		
Unwinding of discount rate	-324	-322
Effect of changes in interest rates and other financial assumptions	15	-207
Total finance income or expenses from insurance contracts	**-309**	**-529**
Reinsurance contracts		
Unwinding of discount rate	86	74
Reinsurers' share of effect of changes in interest rates and other financial assumptions	-29	9
Total finance income or expenses from reinsurance contracts	**57**	**83**
Net finance result insurance and reinsurance contracts	**-252**	**-446**

4 Other income

EURm	1-12/2024	1-12/2023
Other income	300	265
Income related to broker activities	12	12
Total other income	**312**	**277**

If's other operating income includes approximately EUR 144 million (144) income from insurance operations without a transfer of insurance risk. Such income is primarily attributable, e.g. to sales commission and services for administration and claims settlement in insurance contracts on behalf of other parties. This operating income is accounted for under IFRS 15 *Revenue from Contracts with Customers*. In addition, other operating income includes income from roadside assistance services provided by If's subsidiary Viking Assistance Group AS, recognised when roadside assistance has been provided.

Hastings' operating income includes total of EUR 134 million (115) revenue recognised under IFRS 15 and consisting of fees and commission on panel providers, ancillary product income, and other retail income. Income related to broker activities is also accounted for under IFRS 15 if there is no insurance risk transferred to Hastings.

5 Other expenses

EURm	1-12/2024	1-12/2023
Other expenses	-465	-300
Depreciation and amortisation	-119	-99
Salaries and other staff costs	-100	-57
Total other expenses	**-685**	**-457**

Expenses by nature

As Sampo presents expenses by function in the statement of profit or loss, the following table provides additional information on the nature of the expenses, including the total of depreciation, amortisation, and employee benefit expense.

EURm	1-12/2024	1-12/2023
Staff costs		
Salaries and wages	-967	-893
Cash-settled share-based payments	-22	-4
Share-settled share-based payments	-7	-2
Pension costs		
Pension expenses - defined contribution plans	-101	-99
Pension expenses - defined benefit plans	-9	-15
Other social security costs	-188	-168
Depreciations		
Depreciation on plant and equipment	-17	-15
Depreciation IFRS 16	-34	-33
Amortisations		
Amortisation on customer relations	-72	-64
Amortisation on other intangibles	-57	-46
Rental expenses	-35	-34
IT costs	-243	-244
Marketing expenses	-75	-62
Other	-824	-654
Total expenses split by nature	**-2,653**	**-2,335**

The comparative year includes Mandatum Group's figures.

The main items in line Other include commissions of EUR 146 million (138), other technical expenses of EUR 228 million (132), acquisition costs of EUR 125 million (92), and levies EUR 47 million (48).

6 Auditor's fees

EUR thousand	1-12/2024	1-12/2023
Auditing fees	**-4,322**	**-4,666**
Deloitte	-4,322	-4,032
KPMG	—	-634
Other fees	**-712**	**-612**
Deloitte	-712	-460
KPMG	—	-152
Total	**-5,034**	**-5,278**

7 Finance expenses

EURm	1-12/2024	1-12/2023
Interest expense on financial liabilities	-21	-24
Interest expense on subordinated loans	-52	-48
Other items	-30	-22
Total finance expenses	**-103**	**-93**

8 Components of other comprehensive income

EURm	1-12/2024	1-12/2023
Other comprehensive income		
Items reclassifiable to profit or loss		
Exchange differences	-25	-1
Exchange differences arising from net investment in foreign operation	21	—
Cashflow hedges	1	-1
Total items reclassifiable to profit or loss, net of tax	**-3**	**-3**
Items not reclassifiable to profit or loss		
Actuarial gains and losses from defined pension plans	0	-6
Taxes	0	1
Total items not reclassifiable to profit or loss, net of tax	**0**	**-5**
Other comprehensive income total, net of tax	**-3**	**-8**

On 1 November 2024, Sampo plc sold all the issued shares in Topdanmark A/S to If P&C Insurance Holding Ltd. As part of the arrangement, Sampo plc granted a loan to If P&C Insurance Holding Ltd, amounting to EUR 1,724 million divided in principle amounts of DKK 6,432 million and EUR 862 million. The loan is considered to form a part of Sampo's net investment in a foreign operation (subsidiary) and therefore any exchange rate gains or losses are recognised in other comprehensive income. The net exchange rate differences are accumulated in the equity in the translation of foreign operations reserve.

For more information on the transaction, please see **note 28** Acquisition of Topdanmark's non-controlling interest and **note 29** Related party disclosures.

9 Earnings per share

EURm	1-12/2024	1-12/2023
Profit or loss attributable to the equity holders of the parent company	1,154	1,323
Weighted average number of shares outstanding during the financial year*	512	506
Earnings per share (EUR per share)	2.25	2.62
Earnings per share, continuing operations	2.25	2.12
Earning per share, discontinuing operations	—	0.50

** The weighted average number of treasury shares during the financial year has been taken into account in the number of shares. There were no other share-related transactions during the financial year.*

10 Property, plant and equipment

2024

EURm	Right-of-use assets[1]	Land and buildings	Plant and equipment[2]	Total
At 1 January				
Cost	286	114	182	582
Accumulated depreciation	-126	-9	-130	-264
Net carrying amount at 1 January	**160**	**106**	**52**	**318**
Carrying amount at 1 January				
Additions	14	2	17	33
Disposals	-4	-7	-1	-12
Depreciation	-34	0	-17	-51
Exchange differences	-4	0	0	-4
Other changes	1	-1	—	—
Carrying amount at 31 December	**134**	**100**	**51**	**284**
At 31 December				
Cost	294	108	197	599
Accumulated depreciation	-160	-9	-147	-315
Net carrying amount at 31 December	**134**	**100**	**51**	**284**

2023

EURm	Right-of-use assets[1]	Land and buildings	Plant and equipment[2]	Total
At 1 January				
Cost	289	119	162	570
Accumulated depreciation	-92	-8	-115	-216
Net carrying amount at 1 January	**197**	**111**	**47**	**355**
Carrying amount at 1 January				
Business acquisitions	—	1	0	1
Additions	19	1	25	45
Disposals	-20	-4	-5	-29
Depreciation	-32	0	-14	-46
Exchange differences	-4	0	-1	-4
Other changes	—	-3	—	-3
Carrying amount at 31 December	**160**	**106**	**52**	**318**
At 31 December				
Cost	286	114	182	582
Accumulated depreciation	-126	-9	-130	-264
Net carrying amount at 31 December	**160**	**106**	**52**	**318**

[1] The Group acts as a lessee in various leases of office premises, vehicles, and office equipment. Right-of-use assets relate to lease contracts for large office premises. The Group leases premises mainly for its own use. The expected lease term varies from 2 to 12 years. Most contracts include an option to extend the contract at the term end. Some lease contracts have an option to terminate the contract before the term end. Variable lease payments are generally linked to consumer price indexes.

*More information on leases is in **note 23** Other liabilities.*

[2] Equipment in different segments comprise IT equipment and furniture.

The disposals in the comparative year include the PP&E of Mandatum Group, separated from Sampo on 1 October 2023.

11 Intangible assets

2024

EURm	Goodwill	Customer relations	Trademark	Work in progress	Other intangible assets	Total
At 1 January						
Cost	2,469	726	233	91	722	4,241
Accumulated amortisation	—	-282	0	-1	-321	-604
Net carrying amount at 1 January	**2,469**	**443**	**233**	**90**	**401**	**3,637**
Net carrying amount at 1 January						
Additions	—	—	—	96	5	101
Disposals	-5	-13	-6	—	-1	-25
Amortisation	—	-72	—	—	-57	-129
Impairment losses	—	—	—	-2	—	-2
Transfers from WIP	—	—	—	-36	36	—
Exchange differences	26	7	6	0	14	54
Net carrying amount at 31 December	**2,490**	**365**	**233**	**149**	**399**	**3,637**
At 31 December						
Cost	2,490	719	234	151	777	4,371
Accumulated amortisation	—	-354	—	-1	-378	-733
Accumulated impairment losses	—	—	—	-2	—	-2
Net carrying amount at 31 December	**2,490**	**365**	**233**	**149**	**399**	**3,637**

2023

EURm	Goodwill	Customer relations	Trademark	Work in progress	Other intangible assets	Total
At 1 January						
Cost	2,385	679	224	72	625	3,985
Accumulated amortisation	—	-216	—	—	-275	-492
Net carrying amount at 1 January	**2,385**	**463**	**224**	**72**	**350**	**3,494**
Net carrying amount at 1 January						
Business acquisitions	238	72	7	—	8	325
Additions	—	—	—	102	4	106
Disposals	-163	-31	—	-2	-4	-200
Amortisation	—	-65	0	-1	-44	-109
Transfers from WIP	—	—	—	-81	81	—
Exchange differences	10	3	3	0	5	21
Net carrying amount at 31 December	**2,469**	**443**	**233**	**90**	**401**	**3,637**
At 31 December						
Cost	2,469	726	233	91	722	4,241
Accumulated amortisation	—	-282	0	-1	-321	-604
Net carrying amount at 31 December	**2,469**	**443**	**233**	**90**	**401**	**3,637**

The disposals in the comparative year include the intangibles of Mandatum Group, separated from Sampo on 1 October 2023.

Goodwill is split between the segments as follows:	2024	2023
If	537	556
Topdanmark	1,036	1,038
Hastings	918	876
Total	**2,490**	**2,469**

The useful life for customer relations in the Group is 3–10 years. They are amortised using the straight-line method. The useful life of trademark is deemed indefinite and it will not be amortised.

Other intangible assets in all segments comprise mainly IT software. Amortisations and impairment losses are included in the income statement item Other expenses.

Testing goodwill for impairment

Goodwill is annually tested for impairment in accordance with IAS 36 *Impairment of assets*. No impairment losses have been recognised based on these tests.

For the purpose of testing goodwill for impairment, Sampo determines the recoverable amount of its cash-generating units, to which goodwill has been allocated, on the basis of value in use. Sampo has defined these cash-generating units as If Group, Topdanmark Group, and Hastings Group.

The recoverable amounts for If and Hastings have been determined by using a discounted cash flow model. The model is based on the best estimates of companies' management of both historical evidence and financial conditions such as premiums, claims, reinsurance, margins, interest rates, capital structure, and income and cost development. The derived cash flows were discounted at the pre-tax rate of the cost of equity which for If was 9.2 per cent and for Hastings 11.1 per cent. The cost of capital is defined based on the CAPM model from external sources to reflect the risk of each company relative to the market.

Financial plans for If and Hastings, approved by the management and the boards, cover the years 2025–2027. The cash flows beyond that have been extrapolated using a 2 per cent growth rate.

For Hastings, the recoverable amount exceeds its carrying amount by some EUR 600 million. With the calculation method used, e.g. an increase of about 2 percentage points in the cost of equity could lead to a situation where the recoverable amount of the entity would equal its carrying amount.

As for If Group, management believes that any reasonably possible change in any of the key assumptions would not cause the aggregate carrying amount to exceed the aggregate recoverable amount.

Sampo acquired the non-controlling interests of Topdanmark at a market price during H2/2024. Management has not identified any indicators of impairment as per 31 December 2024.

Sensitivity analysis

Impact on the present value from the following changes (EURbn)	2024
If	
Long-term Combined ratio +2.5 p.p.	-1.4
Long-term Combined ratio -2.5 p.p.	2.0
Long-term growth rate -1 p.p.	-1.9
Long-term growth rate +1 p.p.	2.7
Cost of equity +1 p.p.	-2.3
Cost of equity -1 p.p.	3.2
Hastings	
Long-term growth rate -1 p.p.	-0.2
Long-term growth rate +1 p.p.	0.3
Cost of Equity +1 p.p.	-0.4
Cost of Equity -1 p.p.	0.5

12 Financial assets

EURm	12/2024	12/2023
Financial assets		
Derivative financial instruments	**26**	**38**
Financial assets at fair value through profit or loss		
Debt securities	13,325	12,925
Equity securities	1,288	1,640
Funds	823	662
Deposits and other	—	40
Total financial assets at fair value through profit or loss	**15,436**	**15,267**
Financial assets measured at amortised cost		
Loans	272	276
Loans and advances to customers	356	175
Deposits	1	1
Total financial assets measured at amortised cost	**629**	**452**
Total financial assets	**16,090**	**15,757**

Loans and advances to customers consist of Hastings' loans to customers.

Loans measured at amortised cost also include a loan receivable from Mandatum plc amounting to 101 million (101 million). The loan receivable was recognised in the allocation of general liabilities, as part of the partial demerger of 1 October 2023.

During 2024, Sampo completed the sale of its 19.8 per cent stake in Saxo Bank to Mandatum, as agreed in connection with the partial demerger completed in 2023. The transaction price was EUR 302 million, representing the price agreed in the demerger, adjusted for dividends received.

Financial assets measured at amortised cost by stages

The financial assets measured at amortised cost are in the scope of impairment. The impairment model is based on a forward-looking expected credit loss model (ECL). The expected credit loss model has a three-stage approach based on changes in credit risk. A 12-month ECL (Stage 1) applies to all items, unless there is a significant increase in credit risk since initial recognition. For items where there is a significant increase in credit risk (Stage 2), or in default (Stage 3), lifetime ECL applies.

The determination of expected credit losses is described in detail in the section Accounting principles.

The next table presents the gross amounts of financial assets measured at amortised cost and loss allowance by stages.

2024

EURm	Stage 1 - 12-month ECL	Stage 2 - Lifetime ECL - not credit-impaired	Stage 3 - Lifetime ECL - credit-impaired	Total
Financial assets at amortised cost				
Loans	273	—	—	273
Loans and advances to customers	347	16	14	377
Deposits	1	—	—	1
Loss allowance	-8	-3	-11	-23
Total	**613**	**13**	**3**	**629**

2023

EURm	Stage 1 - 12-month ECL	Stage 2 - Lifetime ECL - not credit-impaired	Stage 3 - Lifetime ECL - credit-impaired	Total
Financial assets at amortised cost				
Loans	278	—	2	280
Loans and advances to customers	173	8	5	186
Deposits	1	—	—	1
Loss allowance	-9	-1	-5	-16
Total	**442**	**6**	**2**	**451**

The gross carrying amounts of the financial assets measured at amortised cost was EUR 651 million (EUR 468 million) and loss allowance was EUR -23 million (EUR -16 million).

During the reporting period, the expected credit losses recognised in the income statement was EUR -7 million and in the comparative period EUR -10 million.

Derivative financial instruments

	2024	Fair value		2023	Fair value	
EURm	**Contract/ Notional Amount**	**Assets**	**Liabilities**	**Contract/ Notional Amount**	**Assets**	**Liabilities**
Derivatives held for trading						
Interest rate derivatives						
OTC derivatives						
Interest rate swaps	456	2	49	340	3	44
Inflation cover	211	13	18	211	16	12
Total interest rate derivatives	**667**	**15**	**68**	**551**	**18**	**56**
Foreign exchange derivatives						
OTC derivatives						
Currency forwards	2,760	10	19	3,032	18	57
Currency options, bought and sold	24	1	0	53	1	1
Total foreign exchange derivatives	**2,784**	**11**	**20**	**3,085**	**20**	**58**
Total derivatives held for trading	**3,451**	**26**	**87**	**3,636**	**38**	**114**

	2024	Fair value		2023	Fair value	
EURm	**Contract/ Notional Amount**	**Assets**	**Liabilities**	**Contract/ Notional Amount**	**Assets**	**Liabilities**
Derivatives held for hedging						
Cash flow hedges						
Currency forwards	5	0	—	—	—	—
Interest rate swaps	576	—	1	228	—	2
Total cash flow hedges	**581**	**0**	**1**	**228**	**—**	**2**
Total derivatives held for hedging	**581**	**0**	**1**	**228**	**—**	**2**
Group financial derivatives, total	**4,032**	**26**	**88**	**3,864**	**38**	**116**

13 Determination and hierarchy of fair values

A majority of Sampo Group's financial assets are valued at fair value. The valuation is based on either published price quotations or valuation techniques based on market observable inputs, where available. For a limited amount of assets, the value needs to be determined using other techniques. The financial instruments measured at fair value have been classified into three hierarchy levels in the notes, depending on, for example, whether the market for the instrument is active, or if the inputs used in the valuation technique are observable. The classification of financial assets into hierarchy levels is assessed quarterly.

The fair value of the derivative instruments is assessed using quoted market prices in active markets, discounting method, or option pricing models.

The fair value of loans and other financial instruments, which have no quoted price in active markets is based on discounted cash flows, using quoted market rates. The market's yield curve is adjusted by other components of the instrument, e.g. by credit risk.

Fair values are "clean" fair values, i.e. less interest accruals.

On level 1, the measurement of the instrument is based on quoted prices in active markets for identical assets or liabilities. Quoted prices in active markets are considered to represent the best estimate of fair value for related financial assets. On an active market quoted prices are easily and regularly available and represent actual and regularly occurring transactions at arm's length distance.

On level 2, inputs for the measurement of the instrument also include other than quoted prices observable for the asset or liability, either directly or indirectly by using valuation techniques.

On level 3, the measurement is based on other inputs rather than observable market data. Sampo Group's level 3 assets consist mainly of a few larger equity investments and investments in private equity and alternative funds.

In level 3 equity investment is valued by using excess return model, in which value of a company is sum of capital invested currently in the company and the present value of excess returns that the company expects to make in the future.

For private equity funds, the valuation of the underlying investments is conducted by the fund manager who has all the relevant information required in the valuation process. The valuation is usually updated quarterly based on the value of the underlying assets and the amount of debt in the fund. There are several valuation methods, which can be based on, for example, the acquisition value of the investments, the value of publicly traded peer companies, the multiple-based valuation or the cash flows of the underlying investments.

The carrying amounts and fair values of financial assets and financial liabilities, including their fair value hierarchy levels, are presented in the following table. Fair value information on financial assets and financial liabilities not measured at fair value is not presented in the table, if the carrying amount is a reasonable estimate of the fair value.

EURm 31 December 2024	Carrying amount	Level 1	Level 2	Level 3	Total
Financial assets at fair value					
Derivative financial instruments					
Interest rate swaps	2	—	2	—	2
Foreign exchange derivatives	11	—	11	—	11
Inflation cover derivatives	13	—	13	—	13
Total	**26**	**—**	**26**	**—**	**26**
Financial assets at fair value through profit or loss					
Debt securities	13,325	8,469	4,839	17	13,325
Equity securities	1,288	837	19	432	1,288
Funds	823	491	176	157	823
Total	**15,436**	**9,796**	**5,033**	**606**	**15,436**
Total financial assets measured at fair value	**15,462**	**9,796**	**5,059**	**606**	**15,462**
Financial assets measured at amortised cost					
Loans	272	—	101	171	272
Loans and advances to customers	356	—	—	356	356
Other	1	—	—	1	1
Total	**629**	**—**	**101**	**528**	**629**
Total financial assets	**16,090**	**9,796**	**5,160**	**1,134**	**16,090**

EURm 31 December 2024	Carrying amount	Level 1	Level 2	Level 3	Total
Financial liabilities at fair value					
Derivative financial instruments					
Interest derivatives	50	—	50	—	50
Foreign exchange derivatives	20	—	20	—	20
Inflation cover derivatives	18	—	18	—	18
Total financial liabilities at fair value	**88**	**—**	**88**	**—**	**88**
Financial liabilities measured at amortised cost					
Subordinated debt securities					
Subordinated loans	1,642	1,535	20	—	1,555
Debt securities in issue					
Bonds	954	847	80	—	927
Amounts owed to credit institutions	353	—	—	353	353
Financial liabilities measured at amortised cost total	**2,948**	**2,382**	**100**	**353**	**2,835**
Group financial liabilities, total	**3,036**	**2,382**	**188**	**353**	**2,923**

EURm 31 December 2023	Carrying amount	Level 1	Level 2	Level 3	Total
Financial assets at fair value					
Derivative financial instruments					
Interest rate swaps	3	—	3	—	3
Foreign exchange derivatives	20	—	20	—	20
Inflation cover derivatives	16	—	16	—	16
Total	**38**	**—**	**38**	**—**	**38**
Financial assets at fair value through profit or loss					
Debt securities	12,925	8,476	4,430	19	12,925
Equity securities	1,640	886	24	730	1,640
Funds	662	480	31	151	662
Deposits and other	40	—	40	—	40
Total	**15,267**	**9,842**	**4,525**	**900**	**15,267**
Total financial assets measured at fair value	**15,305**	**9,842**	**4,563**	**900**	**15,305**
Financial assets measured at amortised cost					
Loans	276	—	97	179	276
Loans and advances to customers	175	—	—	175	175
Other	1	—	—	1	1
Total	**452**	**—**	**97**	**354**	**452**
Total financial assets	**15,757**	**9,842**	**4,660**	**1,254**	**15,756**

EURm 31 December 2023	Carrying amount	Level 1	Level 2	Level 3	Total
Financial liabilities at fair value					
Derivative financial instruments					
Interest derivatives	46	2	44	—	46
Foreign exchange derivatives	58	—	58	—	58
Inflation cover derivatives	12	—	12	—	12
Total financial liabilities at fair value	**116**	**2**	**114**	**—**	**116**
Financial liabilities measured at amortised cost					
Subordinated debt securities					
Subordinated loans	1,645	1,448	148	—	1,596
Debt securities in issue					
Bonds	959	936	—	—	936
Amounts owed to credit institutions	194	—	9	184	194
Financial liabilities measured at amortised cost total	**2,798**	**2,385**	**157**	**184**	**2,726**
Group financial liabilities, total	**2,914**	**2,387**	**271**	**184**	**2,842**

Transfers between levels 1 and 2

EURm	1-12/2024		1-12/2023	
Transfers between levels 1 and 2	**Transfers from level 2 to level 1**	**Transfers from level 1 to level 2**	**Transfers from level 2 to level 1**	**Transfers from level 1 to level 2**
Financial assets at fair value through profit or loss				
Debt securities	192	181	378	334
Total	**192**	**181**	**378**	**334**

Transfers are based mainly on the changes of trading volume information provided by an external service provider.

Sensitivity analysis of fair values

The sensitivity of financial assets and liabilities to changes in exchange rates is assessed on business area level due to different base currencies.

EURm	12/2024 Recognised in profit or loss	12/2023 Recognised in profit or loss
If		
10 percentage point depreciation of all other currencies against SEK	17	4
Topdanmark		
10 percentage point depreciation of all other currencies against DKK	-1	-1
Hastings		
10 percentage point depreciation of all other currencies against GBP	8	—
Holding		
10 percentage point depreciation of all other currencies against EUR	-68	-73

The sensitivity analysis of the Group's fair values of financial assets and liabilities in different market risk scenarios is presented in the following table. The effects represent the instantaneous effects of a one-off change in the underlying market variable on the fair values on 31 December 2024. The sensitivity analysis includes the effects of derivative positions. All sensitivities are calculated before taxes.

	Interest rate	Interest rate	Equity	Other financial assets
EURm	**1% parallel shift down**	**1% parallel shift up**	**20% fall in prices**	**20% fall in prices**
Effect in profit/loss	354	-332	-270	-141
Total effect	**354**	**-332**	**-270**	**-141**

14 Movements in level 3 financial instruments measured at fair value

EURm

Financial assets	At 1 Jan	Total gains/ losses in income statement	Purchases and re-classifi-cations	Sales	Settle-ments	At 31 Dec 2024
Financial assets at fair value through profit or loss						
Debt securities	19	0	—	—	-2	17
Equity securities	730	-1	5	-302	—	432
Funds	151	6	—	—	—	157
Total	**900**	**6**	**5**	**-302**	**-2**	**606**

On 13 May 2024, Sampo completed the sale of its 19.8 per cent stake in Saxo Bank to Mandatum, as agreed in connection with the partial demerger completed in 2023. The transaction price was EUR 302 million, representing the price agreed in the demerger adjusted for dividends received.

EURm

Financial assets	At 1 Jan	Total gains/ losses in income statement	Purchases and re-classifi-cations	Sales	At 31 Dec 2023
Financial assets at fair value through profit or loss					
Debt securities	134	1	11	-126	19
Equity securities	763	-14	9	-28	730
Funds	212	-61	—	0	151
Total	**1,109**	**-74**	**20**	**-155**	**900**

Mandatum Group's financial instruments on level 3 are not included in the opening balance 1 January 2023. Additional information on classification of Mandatum Group into discontinued operations in **note 30**.

Sensitivity analysis of level 3 financial instruments measured at fair value

	12/2024		12/2023	
EURm	**Carrying amount**	**Effect of reasonably possible alternative assumptions (+/-)**	**Carrying amount**	**Effect of reasonably possible alternative assumptions (+/-)**
Financial assets at fair value through profit or loss				
Debt securities	17	-1	19	0
Equity securities	432	-86	730	-146
Funds	157	-31	151	-30
Total	**606**	**-118**	**900**	**-176**

The value of financial assets regarding the debt security instruments has been tested by assuming a rise of 1 per cent in interest rate level in all maturities. For other financial assets, the prices were assumed to go down by 20 per cent.

During the reporting period, on the basis of these alternative assumptions, a possible change in interest levels would cause a reduction of EUR -1 (-0) million for the debt instruments, and EUR -118 (-176) million valuation loss for other instruments in the Group's statement of profit or loss. The reasonably possible effect, proportionate to the Group's equity, would thus be 1.7 (2.4) per cent.

15 Deferred tax assets and liabilities

Changes in deferred tax during the financial year 2024

EURm	1 Jan	Business acquisitions/ disposals	Recognised in statement of profit and other comprehensive income	Recognised in equity	Exchange differences	31 Dec
Deferred tax assets						
Tax losses carried forward	1	—	—	—	0	1
Changes in fair values	0	—	—	—	0	0
Other deductible temporary differences	116	—	38	1	0	156
Total	**117**	**—**	**38**	**1**	**0**	**157**
Netting of deferred taxes						-155
Deferred tax assets in the balance sheet, total	**117**	**—**	**38**	**1**	**0**	**2**
Deferred tax liabilities						
Depreciation differences and untaxed reserves	224	—	1	—	-5	219
Changes in fair values	194	—	32	—	2	228
Pension assets	7	—	1	0	—	8
Other taxable temporary differences	255	—	-18	0	-3	235
Total	**680**	**—**	**15**	**1**	**-6**	**690**
Netting of deferred taxes						-155
Deferred tax liabilities in the balance sheet, total	**680**	**—**	**15**	**1**	**-6**	**535**

Changes in deferred tax during the financial year 2023

EURm	1 Jan	Business acquisitions/ disposals	Recognised in statement of profit and other comprehensive income	Recognised in equity	Exchange differences	31 Dec
Deferred tax assets						
Tax losses carried forward	2	0	-1	—	0	1
Changes in fair values	5	—	-5	—	0	0
Other deductible temporary differences	128	-3	-11	0	2	116
Total	**135**	**-3**	**-17**	**0**	**2**	**117**
Netting of deferred taxes						-114
Deferred tax assets in the balance sheet, total	**135**	**-3**	**-17**	**0**	**2**	**3**
Deferred tax liabilities						
Depreciation differences and untaxed reserves	209	-2	21	—	-4	224
Changes in fair values	194	-70	67	0	2	194
Pension assets	7	—	-1	—	—	7
Other taxable temporary differences	379	-93	-32	0	1	255
Total	**790**	**-164**	**56**	**0**	**-1**	**680**
Netting of deferred taxes						-114
Deferred tax liabilities in the balance sheet, total	**790**	**-164**	**56**	**0**	**-1**	**567**

The disposals include the deferred tax assets and liabilities of Mandatum Group, separated from Sampo on 1 October 2023.

Pillar II - tax losses

Sampo Group companies have applied a temporary mandatory relief from deferred tax accounting for any impacts of the top-up tax and accounts for it as a current tax should it occur.

EURm

Tax losses carried forward 2024	Country	Tax losses carried forward in local currency	Tax losses carried forward	Of which no deferred tax asset has been recognised	Of which deferred tax asset has been recognised	Recognised deferred tax asset	Applicable tax rate	Potential deferred tax asset not recognised
Sampo Plc	Finland	EURm 413	413	413	—	—	20,0 %	83
If P&C Insurance Holding Ltd (publ)	Norway	NOKm 83	7	7	—	—	22,0 %	-*
If P&C Insurance Ltd (publ)	Germany	—	—	—	—	—	27,4 %	-*
If P&C Insurance Ltd (publ)	France	EURm 15	15	15	—	—	25,8 %	-*
If P&C Insurance Ltd (publ)	UK	GBPm 9	11	11	—	—	25,0 %	-*
If P&C Insurance AS	Latvia	—	—	—	—	—	20,0 %	—
Insrt AB	Sweden	SEKm 6	1	—	0	0	20,6 %	—
Viking Sverige AB	Sweden	SEKm 61	5	2	4	1	20,6 %	0
Viking Assistance A/S	Denmark	DKKm 27	4	4	0	0	22,0 %	1
Viking Membership AB	Sweden	SEKm 3	0	0	—	—	20,6 %	0
Viking Guard AS	Norway	NOKm 6	1	—	1	0	22,0 %	—
Viking Assistance A/S	Estonia	EURm 0	0	0	—	—	20,0 %	0
Hastings Group Finance plc	UK	GBPm 9	9	9	—	—	25.0 %	2
Hastings Holdings Limited	UK	GBPm 0	0	0	—	—	25.0 %	0
Hastings (US) Limited	UK	GBPm 0	0	0	—	—	25.0 %	0
Total								**86**

** Loss has occurred in a foreign branch and has been deducted in the head office. Utilisation of the loss locally in the foreign branch would not affect the tax expense for the company as a whole. Therefore, no deferred tax asset can be recognised relating to the foreign branch.*

MEUR

Tax losses carried forward 2023	Country	Tax losses carried forward in local currency	Tax losses carried forward	Of which no deferred tax asset has been recognised	Of which deferred tax asset has been recognised	Recognised deferred tax asset	Applicable tax rate	Potential deferred tax asset not recognised
Sampo Plc	Finland	EURm 365	365	365	—	—	20.00 %	73
If P&C Insurance Holding Ltd (publ)	Norway	NOKm 83	7	7	—	—	22.00 %	-*
If P&C Insurance Ltd (publ)	Germany	EURm 2	2	2	—	—	27.38 %	-*
If P&C Insurance Ltd (publ)	France	EURm 16	16	16	—	—	25.83 %	-*
If P&C Insurance Ltd (publ)	UK	GBPm 20	23	23	—	—	25.00 %	-*
If P&C Insurance AS	Latvia	—	—	—	—	—	20.00 %	-
Insrt AB	Sweden	SEKm 6	1	1	—	—	20.60 %	—
Viking Sverige AB	Sweden	SEKm 42	4	—	4	1	20.60 %	—
Viking Assistance A/S	Denmark	DKKm 33	4	4	—	—	22.00 %	1
Viking Nordic Assistance S.L	Spain	—	—	—	—	—	25.00 %	—
Hastings Group Finance plc	UK	GBPm 7	8	8	—	—	25.00 %	2
Total						**1**		**76**

** Loss has occurred in a foreign branch and has been deducted in the head office. Utilisation of the loss locally in the foreign branch would not affect the tax expense for the company as a whole. Therefore, no deferred tax asset can be recognised relating to the foreign branch.*

16 Taxes

EURm	2024	2023
Profit before tax	1,559	1,481
Tax calculated at parent company's tax rate	-312	-296
Different tax rates in foreign jurisdictions	-3	-40
Income from associates not subject to tax	2	0
Income not subject to tax	9	46
Non-deductible expenses	-17	-40
Tax losses for which no deferred tax asset has been recognised	-10	-36
Changes in tax rates	0	-8
Tax from previous years	1	2
Total	**-330**	**-372**

The comparative year taxes include taxes EUR -33 million as part of the result from the discontinued operations.

Sampo Group has identified that Hastings' operations in Gibraltar are subject to the global minimum top-up tax rules under Pillar II regulations. A top-up tax amounting to EUR -4 million has been recognised during the reporting period.

17 Other assets

EURm	12/2024	12/2023
Receivables arising from direct insurance operations	233	245
Receivables arising from reinsurance operations	174	92
Settlement receivables	8	5
Accrued interest	155	130
Net pension asset	36	32
Other	274	296
Total other asset	**880**	**800**

Item Other includes, e.g. assets related to patient insurance pool EUR 56 million (63), other receivables, prepaid expenses and damaged goods.

Other assets include non-current assets EUR 53 million (61).

18 Insurance contract liabilities

Insurance liabilities reflect the liability the Group has for its insurance undertakings, meaning the insurance contracts underwritten. The liability consists of two parts, the liability for remaining coverage and acquisition cash flow assets, as well as the liability for incurred claims.

The liability for remaining coverage relates to the obligation to investigate and pay valid claims that have not yet occurred. The liability consists of the premium payments received for insurance services to be provided after the closing date, i.e. relating to the unexpired portion of the insurance coverage, and adjusted for acquisition cash flows. The liability for incurred claims relates to the obligation to investigate and pay valid claims that have occurred. The liability is designed to cover anticipated future payments for all claims incurred, including claims not yet reported.

For further information on accounting principles related to insurance contract liabilities, please see the section *Accounting principles*.

EURm	12/2024	12/2023
Insurance contract liability - contracts measured under PAA		
Liability for remaining coverage	1,877	1,709
Liability for incurred claims	10,409	10,007
Total insurance contract liabilities	**12,286**	**11,716**
Reinsurance contract assets		
Assets for remaining coverage	276	258
Assets for incurred claims	2,342	2,024
Reinsurance contract assets, total	**2,618**	**2,282**
Total insurance contracts, net of reinsurance	**9,668**	**9,434**

The table below presents the yield curves by currency as a percentage that have been used to discount the cash flows of the insurance contract liabilities.

	2024					2023				
Currency, %	**1 year**	**5 years**	**10 years**	**20 years**	**30 years**	**1 year**	**5 years**	**10 years**	**20 years**	**30 years**
DKK	2.23	2.13	2.26	2.25	2.38	3.35	2.31	2.38	2.40	2.53
EUR	2.44	2.34	2.47	2.46	2.55	3.61	2.57	2.64	2.66	2.74
GBP	4.70	4.58	4.92	5.41	5.69	4.83	3.83	4.02	4.51	4.58
NOK	4.82	4.52	4.45	4.23	4.01	4.56	3.87	3.78	3.75	3.70
SEK	2.91	3.07	3.29	3.35	3.33	3.71	2.94	2.93	3.16	3.26

19 Reconciliation of insurance contract liabilities

Insurance contracts

The first table presents the reconciliation of the carrying amounts of the liability for remaining coverage, and the liability for incurred claims for issued insurance contracts during the reporting period, as a result of amounts recognized in the statement of total comprehensive income and cash flows.

Reinsurance contracts

The following table presents the reconciliation of the carrying amounts of the asset for remaining coverage, and the asset for incurred claims for reinsurance contracts during the reporting period, as a result of amounts recognized in the statement of profit and other comprehensive income and cash flows.

The information is presented on the Sampo Group level and on the reporting segment level. Information regarding insurance contract liability is presented on contracts measured under PAA model.

If and Hastings entered into an internal reinsurance arrangement at the beginning of 2024. Reconciliation calculations of the insurance contract liabilities for the reported segments are presented, including the internal amounts. On the Sampo Group level these amounts have been eliminated.

Mandatum Group's figures are not included in the reconciliation tables for the comparative year 2023, as Mandatum is reported as a disposal group held for distribution to owners.

Sampo Group - Insurance contract liabilities, gross at 31 December 2024 and 31 December 2023

	2024					2023				
	Liabilities for remaining coverage		Liabilities for incurred claims			Liabilities for remaining coverage		Liabilities for incurred claims		
EURm	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening balance	**1,701**	**27**	**9,547**	**459**	**11,734**	**1,499**	**14**	**8,931**	**444**	**10,889**
Acquisition cash flow asset					-18					—
					11,716					**10,889**
Changes in the statement of comprehensive income										
Insurance revenue	-9,450	—	—	—	-9,450	-8,417	—	—	—	-8,417
Insurance service expenses										
Incurred claims and other insurance service expenses	—	—	6,847	186	7,032	—	—	6,503	154	6,657
Amortisation of insurance acquisition cash flows	262	—	—	—	262	223	—	—	—	223
Changes that relate to past service (LIC)	—	—	-174	-100	-274	—	—	-395	-145	-540
Changes that relate to future service (LRC)	—	-21	—	—	-21	—	12	—	—	12
Total insurance service expenses	262	-21	6,673	85	7,000	223	12	6,108	9	6,351
Insurance service result	**-9,188**	**-21**	**6,673**	**85**	**-2,450**	**-8,195**	**12**	**6,108**	**9**	**-2,066**
Insurance finance income or expense	—	—	307	—	307	—	—	529	—	529
Other items (including FX effects)	-62	0	24	11	-27	-185	0	91	4	-89
Total changes in the statement of comprehensive income	**-9,250**	**-21**	**7,004**	**97**	**-2,170**	**-8,379**	**12**	**6,728**	**13**	**-1,626**
Cash flows during the period										
Premiums received	9,718	—	—	—	9,718	8,785	—	—	—	8,785
Claims and other insurance service expenses paid	—	—	-6,703	—	-6,703	—	—	-6,111	—	-6,111
Insurance acquisition cash flows paid	-283	—	—	—	-283	-221	—	—	—	-221
Total cash flows during the period	**9,435**	**—**	**-6,703**	**—**	**2,732**	**8,564**	**—**	**-6,111**	**—**	**2,453**
Transfer to other items in the balance sheet	—	—	—	—	—	17	—	—	1	18
Other	5	—	4	0	9	—	—	—	—	—
Closing balance - liabilities relating to insurance contracts	**1,891**	**6**	**9,853**	**557**	**12,305**	**1,701**	**27**	**9,547**	**459**	**11,734**
Acquisition cash flow asset					-20					-18
Closing balance					**12,286**					**11,716**

Sampo Group - Reinsurance contracts at 31 December 2024 and 31 December 2023

	2024				2023			
	Assets for remaining coverage	Assets for incurred claims			Assets for remaining coverage	Assets for incurred claims		
EURm		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening assets	**258**	**1,803**	**220**	**2,282**	**221**	**1,384**	**215**	**1,820**
Changes in the statement of comprehensive income								
Allocation of reinsurance premiums paid	-909	—	—	-909	-1,005	—	—	-1,005
Amounts recoverable from reinsurers								
Recoveries of incurred claims and other insurance service expenses	—	521	79	600	—	935	72	1,007
Adjustments to assets for incurred claims	0	21	-52	-31	0	-80	-70	-150
Effect of changes in non-performance risk of reinsurers	—	0	—	0	—	0	—	0
Net expenses from reinsurance contracts	**-909**	**542**	**28**	**-340**	**-1,005**	**855**	**2**	**-148**
Insurance finance income or expenses from reinsurance contracts	—	57	—	57	—	83	—	83
Effect of movements in exchange rates	-33	29	4	-1	-8	31	4	26
Reinsurance investment component	—	—	—	—				
Total changes in the statement of comprehensive income	**-943**	**628**	**31**	**-284**	**-1,014**	**969**	**6**	**-39**
Investment component excluded from the net expenses from reinsurance contracts	-216	216	—	—				
Cash flows								
Premiums paid	1,176	—	—	1,176	1,051	—	—	1,051
Amounts received	—	-556	—	-556	—	-550	—	-550
Total cash flows	**1,176**	**-556**	**—**	**620**	**1,051**	**-550**	**—**	**501**
Closing assets	**276**	**2,090**	**252**	**2,618**	**258**	**1,803**	**220**	**2,282**

If - Insurance contract liabilities, gross at 31 December 2024 and 31 December 2023

	2024					2023				
	Liabilities for remaining coverage		Liabilities for incurred claims			Liabilities for remaining coverage		Liabilities for incurred claims		
EURm	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening balance - liabilities relating to insurance contracts	**911**	**17**	**6,038**	**175**	**7,141**	**868**	**7**	**5,655**	**162**	**6,693**
Acquisition cash flow asset					-7					—
					7,134					**6,693**
Changes in the statement of comprehensive income										
Insurance revenue	-5,680	—	—	—	-5,680	-5,330	—	—	—	-5,330
Insurance service expenses										
Incurred claims and other insurance service expenses	—	—	4,060	65	4,125	—	—	3,924	58	3,981
Amortisation of insurance acquisition cash flows	107	—	—	—	107	100	—	—	—	100
Changes that relate to past service (LIC)	—	—	-191	-50	-241	—	—	-184	-43	-228
Changes that relate to future service (LRC)	—	-11	—	—	-11	—	10	—	—	10
Total insurance service expenses	107	-11	3,869	15	3,980	100	10	3,739	14	3,863
Insurance service result	**-5,573**	**-11**	**3,869**	**15**	**-1,700**	**-5,230**	**10**	**3,739**	**14**	**-1,467**
Insurance finance income or expense	—	—	208	—	208	—	—	340	—	340
Other items (including FX effects)	-5	-1	-104	-3	-112	-191	0	57	-2	-135
Total changes in the statement of comprehensive income	**-5,579**	**-11**	**3,973**	**12**	**-1,605**	**-5,420**	**10**	**4,136**	**13**	**-1,261**
Cash flows during the period										
Premiums received	5,694	—	—	—	5,694	5,572	—	—	—	5,572
Claims and other insurance service expenses paid	—	—	-4,052	—	-4,052	—	—	-3,754	—	-3,754
Insurance acquisition cash flows paid	-125	—	—	—	-125	-108	—	—	—	-108
Total cash flows during the period	**5,569**	**—**	**-4,052**	**—**	**1,517**	**5,463**	**—**	**-3,754**	**—**	**1,710**
Transfer to other items in the balance sheet	—	—	—	—	**—**	—	—	—	—	—
Other	5	—	4	—	**9**	—	—	—	—	—
Closing balance - liabilities relating to insurance contracts	**906**	**6**	**5,962**	**188**	**7,062**	**911**	**17**	**6,038**	**175**	**7,141**
Acquisition cash flow asset					-14					-7
Closing balance - Insurance contract liabilities					**7,049**					**7,134**

As a consequence of Sampo plc's partial demerger of Mandatum Holding Ltd in 2023, If Livförsäkring AB concluded an agreement on the transfer of parts of Mandatum's life portfolio to If Livförsäkring AB. The transfer was completed on 1 October 2024.

If - Reinsurance contracts at 31 December 2024 and 31 December 2023

	2024				2023			
	Assets for remaining coverage	Assets for incurred claims			Assets for remaining coverage	Assets for incurred claims		
EURm		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening assets	**36**	**510**	**17**	**563**	**28**	**226**	**10**	**264**
Changes in the statement of comprehensive income								
Allocation of reinsurance premiums paid	-423	—	—	-423	-334	—	—	-334
Amounts recoverable from reinsurers								
Recoveries of incurred claims and other insurance service expenses	—	282	11	293	—	339	10	348
Adjustments to assets for incurred claims	—	30	-4	26	—	41	-3	38
Effect of changes in non-performance risk of reinsurers	—	0	—	0	—	0	—	0
Net expenses from reinsurance contracts	**-423**	**312**	**6**	**-104**	**-334**	**380**	**7**	**52**
Insurance finance income or expenses from reinsurance contracts	—	20	—	20	—	8	—	8
Effect of movements in exchange rates	1	-7	—	-6	-12	8	0	-4
Reinsurance investment component	—	—	—	—				
Total changes in the statement of comprehensive income	**-421**	**325**	**6**	**-90**	**-346**	**396**	**7**	**57**
Investment component excluded from the net expenses from reinsurance contracts	-25	25	—	—				
Cash flows								
Premiums paid	429	—	—	429	354	—	—	354
Amounts received	—	-223	—	-223	—	-112	—	-112
Total cash flows	**429**	**-223**	**—**	**206**	**354**	**-112**	**—**	**242**
Closing assets	**20**	**636**	**23**	**679**	**36**	**510**	**17**	**563**

Topdanmark - Insurance contract liabilities, gross at 31 December 2024 and 31 December 2023

	2024					2023				
	Liabilities for remaining coverage		Liabilities for incurred claims			Liabilities for remaining coverage		Liabilities for incurred claims		
EURm	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening balance - liabilities relating to insurance contracts	**282**	**2**	**1,546**	**37**	**1,867**	**285**	**2**	**1,441**	**35**	**1,763**
Acquisition cash flow asset					-12					—
					1,855					**1,763**
Changes in the statement of comprehensive income										
Insurance revenue	-1,560	—	—	—	-1,560	-1,369	—	—	—	-1,369
Insurance service expenses										
Incurred claims and other insurance service expenses	—	—	1,287	39	1,326	—	—	1,093	15	1,108
Amortisation of insurance acquisition cash flows	29	—	—	—	29	31	—	—	—	31
Changes that relate to past service (LIC)	—	—	-31	-16	-47	—	—	-27	-16	-43
Changes that relate to future service (LRC)	—	-2	—	—	-2	—	1	—	—	1
Total insurance service expenses	29	-2	1,256	23	1,306	31	1	1,066	-1	1,097
Insurance service result	**-1,530**	**-2**	**1,256**	**23**	**-253**	**-1,337**	**1**	**1,066**	**-1**	**-272**
Insurance finance income or expense	—	—	32	—	32	—	—	81	—	81
Other items (including FX effects)	1	0	-1	1	1	0	0	-5	1	-4
Total changes in the statement of comprehensive income	**-1,530**	**-2**	**1,287**	**25**	**-220**	**-1,337**	**1**	**1,142**	**0**	**-194**
Cash flows during the period										
Premiums received	1,561	—	—	—	1,561	1,336	—	—	—	1,336
Claims and other insurance service expenses paid	—	—	-1,298	—	-1,298	—	—	-1,038	—	-1,038
Insurance acquisition cash flows paid	-29	—	—	—	-29	-18	—	—	—	-18
Total cash flows during the period	**1,531**	**—**	**-1,298**	**—**	**234**	**1,318**	**—**	**-1,038**	**—**	**280**
Transfer to other items in the balance sheet	—	—	—	—	—	17	—	—	1	18
Other	—	—	—	—	—	—	—	—	—	—
Closing balance - liabilities relating to insurance contracts	**284**	**0**	**1,535**	**61**	**1,881**	**282**	**2**	**1,546**	**37**	**1,867**
Acquisition cash flow asset					-6					-12
Closing balance - liabilities relating to insurance contracts					**1,875**					**1,855**

Topdanmark - Reinsurance contracts at 31 December 2024 and 31 December 2023

	2024				2023			
	Assets for remaining coverage	Assets for incurred claims			Assets for remaining coverage	Assets for incurred claims		
EURm		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening assets	**-1**	**78**	**1**	**79**	**-2**	**80**	**1**	**79**
Changes in the statement of comprehensive income								
Allocation of reinsurance premiums paid	-90	—	—	-90	-80	—	—	-80
Amounts recoverable from reinsurers								
Recoveries of incurred claims and other insurance service expenses	—	44	2	46	—	49	—	49
Adjustments to assets for incurred claims	—	2	-1	1	—	1	0	1
Effect of changes in non-performance risk of reinsurers	—	—	—	—	—	—	—	—
Net expenses from reinsurance contracts	-90	46	1	-43	-80	49	0	-31
Insurance finance income or expenses from reinsurance contracts	—	1	—	1	—	2	—	2
Effect of movements in exchange rates	—	—	—	0	0	0	0	0
Reinsurance investment component	—	—	—	—				
Total changes in the statement of comprehensive income	**-90**	**47**	**1**	**-42**	**-80**	**51**	**0**	**-29**
Investment component excluded from the net expenses from reinsurance contracts	—	—	—	—				
Cash flows								
Premiums paid	90	—	—	90	82	—	—	82
Amounts received	—	-54	—	-54	—	-54	—	-54
Total cash flows	**90**	**-54**	**—**	**36**	**82**	**-54**	**—**	**28**
Closing assets	**-1**	**72**	**2**	**73**	**-1**	**78**	**1**	**79**

Hastings - Insurance contract liabilities, gross at 31 December 2024 and 31 December 2023

	2024					2023				
	Liabilities for remaining coverage		Liabilities for incurred claims			Liabilities for remaining coverage		Liabilities for incurred claims		
EURm	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total	Excluding loss component	Loss component	Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening balance - liabilities relating to insurance contracts	**508**	**7**	**1,964**	**247**	**2,726**	**347**	**5**	**1,835**	**247**	**2,434**
Acquisition cash flow asset					—					—
					2,726					**2,434**
Changes in the statement of profit or loss										
Insurance revenue	-2,234	—	—	—	-2,234	-1,719	—	—	—	-1,719
Insurance service expenses										
Incurred claims and other insurance service expenses	—	—	1,517	84	1,601	—	—	1,486	81	1,568
Amortisation of insurance acquisition cash flows	125	—	—	—	125	92	—	—	—	92
Changes that relate to past service (LIC)	—	—	48	-34	14	—	—	-184	-86	-269
Changes that relate to future service (LRC)	—	-8	—	—	-8	—	2	—	—	2
Total insurance service expenses	125	-8	1,566	50	1,733	92	2	1,303	-4	1,391
Insurance service result	**-2,109**	**-8**	**1,566**	**50**	**-501**	**-1,628**	**2**	**1,303**	**-4**	**-328**
Insurance finance income or expense	—	—	67	—	67	—	—	108	—	108
Other items (including FX effects)	-20	0	129	13	122	6	0	39	5	50
Total changes in the statement of profit or loss	**-2,129**	**-7**	**1,762**	**63**	**-312**	**-1,622**	**2**	**1,449**	**1**	**-170**
Cash flows during the period										
Premiums received	2,463	—	—	—	2,463	1,877	—	—	—	1,877
Claims and other insurance service expenses paid	—	—	-1,353	—	-1,353	—	—	-1,320	—	-1,320
Insurance acquisition cash flows paid	-129	—	—	—	-129	-95	—	—	—	-95
Total cash flows during the period	**2,334**	**—**	**-1,353**	**—**	**981**	**1,782**	**—**	**-1,320**	**—**	**462**
Transfer to other items in the balance sheet	—	—	—	—	—	—	—	—	—	—
Other	—	—	—	—	—	—	—	—	—	—
Closing balance - liabilities relating to insurance contracts	**713**	**0**	**2,373**	**310**	**3,396**	**508**	**7**	**1,964**	**247**	**2,726**
Closing balance - liabilities relating to insurance contracts					**3,396**					**2,726**

Hastings - Reinsurance contracts at 31 December 2024 and 31 December 2023

	2024				2023			
	Assets for remaining coverage	Assets for incurred claims			Assets for remaining coverage	Assets for incurred claims		
EURm		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total		Estimates of present value of future cash flows	Risk adjustment for non-financial risk	Total
Opening assets	**223**	**1,215**	**202**	**1,640**	**195**	**1,078**	**203**	**1,477**
Changes in the statement of comprehensive income								
Allocation of reinsurance premiums paid	-420	—	—	-420	-591	—	—	-591
Amounts recoverable from reinsurers								
Recoveries of incurred claims and other insurance service expenses	—	181	63	245	—	548	62	610
Adjustments to assets for incurred claims	0	-11	-46	-57	0	-121	-67	-188
Effect of changes in non-performance risk of reinsurers	—	—	—	—	—	—	—	—
Net expenses from reinsurance contracts	-420	170	17	-232	-591	426	-5	-170
Insurance finance income or expenses from reinsurance contracts	—	36	—	36	—	73	—	73
Effect of movements in exchange rates	2	63	10	75	4	22	4	30
Total changes in the statement of comprehensive income	**-418**	**269**	**27**	**-122**	**-588**	**521**	**-1**	**-68**
Investment component excluded from the net expenses from reinsurance contracts	-191	191	—	—				
Cash flows								
Premiums paid	657	—	—	657	615	—	—	615
Amounts received	—	-279	—	-279	—	-384	—	-384
Total cash flows	**657**	**-279**	**—**	**378**	**615**	**-384**	**—**	**231**
Closing assets	**270**	**1,396**	**229**	**1,896**	**223**	**1,215**	**202**	**1,640**

20 Assets for insurance acquisition cash flows

The table presents the reconciliation from opening to closing balances of the carrying amount of the acquisition cash flow asset during the reporting periods.

EURm	2024	2023
Reconciliation of acquisition cash flow asset		
At 1 January	18	10
Cash flows recognised as an asset	32	36
Amounts transferred to liability for remaining coverage	-30	-28
At 31 December	**20**	**18**

The following table presents the expected timing of when the acquisition cash flow asset will be derecognised and instead be included in the liability for remaining coverage of the group of insurance contracts to which they are allocated.

Time bands: Assets for insurance acquisition cash flows

2024	Expected timing of derecognition				
EURm	2025	2026-2027	2028-2029	2030-	Total
Acquisition cash flow asset	7	6	1	5	**20**

2023	Expected timing of derecognition			
EURm	2024	2025-2026	2027-2028	Total
Acquisition cash flow asset	12	4	2	**18**

21 Non-life claims development

Prior-year estimates of the claims expense for individual claims years also represent a measure of Sampo Group's and its reporting segment's ability to foresee final claims expenses. The following tables present the expense trend for the claims for individual claims for the past ten years, before and after reinsurance. For earlier years, the information is aggregated into one row. The information is presented at the Sampo Group level and at the reporting segment level.

The upper part of the table shows how an estimate of the total claims expense per accident year evolves annually in relation to the undiscounted fulfilment cash flows (i.e. consisting of both best estimate and risk adjustment). The lower section shows how large a share of this is presented in the balance sheet. More information on insurance liabilities can be found in the risk management **note 34**.

Since Sampo Group's group companies have operations in various countries, their portfolios are exposed to a number of currencies. To adjust for currency effects, the local reporting currency has been translated to EUR at the closing rate on 31 December 2024. Consequently, the table is not directly comparable with the corresponding tables reported in previous years, since all accident years include translated information and amounts are always translated with the closing balance sheet rates of the financial year. The table is not directly comparable with the income statement either where average rates throughout the year are applied, and since the effect is partially presented in claims incurred and partially within insurance finance income or expense when relating to changes in indexation of annuities.

Sampo Group - Claims development before reinsurance

EURm Claims expense, gross Accident year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Estimated claims expense											
at the close of the claims year	3,917	4,034	4,129	4,344	4,529	4,531	4,760	5,321	6,342	6,491	
one year later	3,937	4,049	4,136	4,429	4,591	4,574	4,916	5,427	6,403		
two years later	3,914	4,015	4,120	4,495	4,642	4,650	4,986	5,426			
three years later	3,896	3,985	4,164	4,556	4,747	4,658	4,975				
four years later	3,843	3,924	4,118	4,560	4,710	4,696					
five years later	3,832	4,012	4,137	4,530	4,719						
six years later	3,812	3,988	4,106	4,543							
seven years later	3,835	3,986	4,142								
eight years later	3,803	3,943									
nine years later	3,744										
ten years later											
Current estimate of total claims expense	3,777	3,930	4,100	4,486	4,606	4,515	4,844	5,372	6,430	6,491	
Total disbursed	2,469	2,308	2,301	2,526	2,581	2,787	2,700	2,672	2,833	1,963	
Liability (gross) reported in the balance sheet	**184**	**252**	**289**	**351**	**417**	**504**	**781**	**1,109**	**1,933**	**3,245**	**9,066**
Liability (gross) relating to prior years											**2,859**
Discounting effect, gross											-2,120
Liability for claims handling expenses and other items											624
Elimination											-20
Total liability for incurred claims											**10,409**

Sampo Group - Claims development after reinsurance

EURm Claims expense, net of reinsurance Accident year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Estimated claims expense											
at the close of the claims year	3,779	3,807	3,929	4,191	4,327	4,244	4,374	4,925	5,529	5,868	
one year later	3,797	3,822	3,969	4,258	4,362	4,239	4,465	4,982	5,567		
two years later	3,766	3,803	3,949	4,302	4,388	4,270	4,456	4,959			
three years later	3,748	3,758	3,968	4,341	4,453	4,295	4,472				
four years later	3,692	3,713	3,915	4,334	4,435	4,338					
five years later	3,672	3,714	3,930	4,302	4,459						
six years later	3,655	3,705	3,902	4,308							
seven years later	3,667	3,672	3,916								
eight years later	3,634	3,658									
nine years later	3,608										
ten years later											
Current estimate of total claims expense	3,644	3,570	3,698	4,009	4,080	4,030	4,135	4,463	4,929	5,193	
Total disbursed	2,435	2,250	2,282	2,419	2,497	2,515	2,475	2,494	2,558	1,861	
Liability (net) reported in the balance sheet	**170**	**171**	**209**	**302**	**306**	**355**	**515**	**761**	**1,202**	**2,513**	**6,504**
Liability (net) relating to prior years											**2,678**
Discounting effect, gross											-1,594
Liability for claims handling expenses											482
Risk of non-performance by reinsurer											1
Elimination											-4
Total liability for incurred claims											**8,067**

If - Claims development before reinsurance

EURm Claims expense, gross Accident year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Estimated claims expense											
at the close of the claims year	2,515	2,474	2,546	2,678	2,797	2,927	2,917	3,157	3,775	3,921	
one year later	2,529	2,505	2,582	2,768	2,839	2,962	3,066	3,273	3,870		
two years later	2,513	2,499	2,569	2,796	2,851	3,006	3,049	3,223			
three years later	2,487	2,456	2,572	2,812	2,896	2,978	2,997				
four years later	2,456	2,443	2,543	2,830	2,887	2,938					
five years later	2,450	2,452	2,552	2,799	2,846						
six years later	2,435	2,457	2,527	2,790							
seven years later	2,445	2,427	2,504								
eight years later	2,425	2,411									
nine years later	2,413										
ten years later											
Current estimate of total claims expense	2,413	2,411	2,504	2,790	2,846	2,938	2,997	3,223	3,870	3,921	
Total disbursed	2,279	2,270	2,361	2,577	2,646	2,694	2,654	2,759	2,943	2,005	
Liability (gross) reported in the balance sheet	**134**	**141**	**143**	**212**	**200**	**244**	**343**	**464**	**927**	**1,916**	**4,725**
Liability (gross) relating to prior years											**2,332**
Discounting effect, gross											-1,374
Liability for claims handling expenses											467
Total liability for incurred claims											**6,150**

If - Claims development after reinsurance

EURm Claims expense, net of reinsurance Accident year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Estimated claims expense											
at the close of the claims year	2,479	2,423	2,491	2,628	2,739	2,757	2,797	3,074	3,424	3,627	
one year later	2,490	2,433	2,532	2,702	2,771	2,774	2,914	3,163	3,486		
two years later	2,471	2,426	2,515	2,729	2,780	2,818	2,879	3,116			
three years later	2,454	2,390	2,518	2,747	2,826	2,791	2,824				
four years later	2,421	2,378	2,490	2,761	2,820	2,750					
five years later	2,414	2,382	2,509	2,731	2,777						
six years later	2,400	2,388	2,484	2,721							
seven years later	2,410	2,358	2,460								
eight years later	2,391	2,343									
nine years later	2,379										
ten years later											
Current estimate of total claims expense	2,379	2,343	2,460	2,721	2,777	2,750	2,824	3,116	3,486	3,627	
Total disbursed	2,248	2,216	2,323	2,514	2,586	2,514	2,511	2,675	2,786	2,027	
Liability (net) reported in the balance sheet	**131**	**127**	**138**	**207**	**191**	**236**	**313**	**442**	**700**	**1,600**	**4,083**
Liability (net) relating to prior years											**2,317**
Discounting effect, gross											-1,345
Liability for claims handling expenses											434
Risk of non-performance by reinsurer											1
Total liability for incurred claims											**5,491**

Topdanmark - Claims development before reinsurance

EURm **Claims expense, gross** **Accident year**	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**Total**
Estimated claims expense											
at the close of the claims year	826	800	727	786	789	819	842	882	975	1,087	
one year later	836	799	743	798	809	801	834	875	968		
two years later	821	785	735	806	815	779	843	868			
three years later	818	774	743	814	816	793	847				
four years later	812	756	737	812	815	791					
five years later	793	759	734	816	817						
six years later	787	755	741	817							
seven years later	795	756	740								
eight years later	789	759									
nine years later	788										
ten years later											
Current estimate of total claims expense	788	759	740	817	817	791	847	868	968	1,087	
Total disbursed	752	723	695	753	739	705	727	709	722	600	
Liability (gross) reported in the balance sheet	**36**	**36**	**45**	**64**	**78**	**86**	**120**	**159**	**246**	**487**	**1,357**
Liability (gross) relating to prior years											**352**
Discounting effect, gross											-157
Other items											45
Total liability for incurred claims											**1,596**

Topdanmark - Claims development after reinsurance

EURm Claims expense, net of reinsurance Accident year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Estimated claims expense											
at the close of the claims year	776	742	703	735	756	782	785	837	925	1,042	
one year later	783	745	716	746	773	764	777	830	919		
two years later	770	731	707	754	780	743	784	823			
three years later	767	719	716	761	781	757	787				
four years later	756	701	710	759	778	756					
five years later	746	700	707	763	779						
six years later	742	698	714	763							
seven years later	750	700	713								
eight years later	744	702									
nine years later	741										
ten years later											
Current estimate of total claims expense	741	702	713	763	779	756	787	823	919	1,042	
Total disbursed	707	667	668	701	703	671	671	669	685	581	
Liability (net) reported in the balance sheet	**34**	**35**	**45**	**63**	**76**	**85**	**116**	**154**	**234**	**461**	**1,303**
Liability (net) relating to prior years											**351**
Discounting effect, gross											-155
Liability for claims handling expenses											24
Total liability for incurred claims											**1,523**

Hastings - Claims development before reinsurance

EURm **Claims expense, gross** **Accident year**	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**Total**
Estimated claims expense											
at the close of the claims year	576	760	856	880	943	786	1,000	1,282	1,591	1,483	
one year later	573	744	811	863	943	811	1,016	1,279	1,564		
two years later	581	730	817	893	976	865	1,094	1,336			
three years later	591	755	849	930	1,035	888	1,131				
four years later	574	724	838	918	1,008	967					
five years later	590	800	851	915	1,056						
six years later	590	776	838	936							
seven years later	595	802	898								
eight years later	589	774									
nine years later	543										
ten years later											
Current estimate of total claims expense	576	760	856	880	943	786	1,000	1,282	1,591	1,483	
Total disbursed	-562	-685	-754	-805	-804	-612	-681	-795	-832	-641	
Liability (gross) reported in the balance sheet	**14**	**75**	**101**	**75**	**139**	**174**	**318**	**486**	**759**	**842**	**2,985**
Liability (gross) relating to prior years											**176**
Discounting effect, gross											-589
Liability for claims handling expenses											112
Total liability for incurred claims											**2,683**

Hastings - Claims development after reinsurance

EURm Claims expense, net of reinsurance Accident year	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Estimated claims expense											
at the close of the claims year	524	642	735	828	832	706	792	1,014	1,180	1,199	
one year later	523	643	721	810	818	701	774	989	1,162		
two years later	525	646	728	819	828	709	792	1,020			
three years later	527	648	734	833	846	746	861				
four years later	516	634	716	814	837	832					
five years later	512	631	714	808	904						
six years later	513	620	704	824							
seven years later	506	614	742								
eight years later	499	613									
nine years later	488										
ten years later											
Current estimate of total claims expense	524	524	524	524	524	524	524	524	524	524	
Total disbursed	-520	-633	-709	-796	-792	-671	-706	-849	-912	-747	
Liability (net) reported in the balance sheet	**5**	**9**	**26**	**32**	**40**	**35**	**86**	**165**	**268**	**453**	**1,118**
Liability (net) relating to prior years											**10**
Discounting effect, gross											-93
Liability for claims handling expenses											24
Total liability for incurred claims											**1,058**

22 Financial liabilities

Group

EURm	12/2024	12/2023
Subordinated debt liabilities		
Subordinated loans	1,642	1,645
Total subordinated debt liabilities	**1,642**	**1,645**
Other financial liabilities		
Derivative financial instruments	88	116
Financial liabilities measured at amortised cost		
Debt securities in issue	954	959
Amounts owed to credit institutions	353	194
Total financial liabilities measured at amortised cost	**1,307**	**1,153**
Total other financial liabilities	**1,395**	**1,269**
Total financial liabilities	**3,036**	**2,914**

The segment financial liabilities include subordinated debts, derivatives, debt securities in issue, and other financial liabilities.

If

EURm			12/2024	12/2023
Subordinated debt securities				
Subordinated loans	**Maturity**	**Interest**		
Subordinated loan, 2021 (nominal value SEKm 1,500)	30 years	3 month Stibor + 1.30%	131	135
Total subordinated debt securities			**131**	**135**
Other financial liabilities				
Derivative financial instruments			19	58
Total financial liabilities			**150**	**193**

The loan of 2021 was issued with floating interest rate terms. The loan includes terms stating the right of redemption after five years, at any date for a three-month period after the first five years and thereafter at any interest payment date. The loan is listed on the Luxembourg Stock Exchange (BdL Market).

Topdanmark

EURm	Maturity	Interest	12/2024	12/2023
Subordinated debt securities				
Subordinated loans	**Maturity**	**Interest**		
Subordinated loan tier 1, 2022 (nominal value DKKm 400)	perpetual	3 month Cibor + 4.75 %	54	54
Subordinated loan, 2021 (nominal value DKKm 700)	12/2031	3 month Cibor + 1.25 %	94	94
Total subordinated debt securities			**147**	**148**
Other financial liabilities				
Derivative financial instruments			43	36
Amounts owed to credit institutions			—	9
Total financial liabilities			**191**	**193**

Subordinated loans are wholly included in Topdanmark's own funds. Approximately EUR 127 million (127) (DKK 950 million) of the subordinated loans are subscribed by If.

Hastings

EURm	12/2024	12/2023
Other financial liabilities		
Derivative financial instruments	1	2
Amounts owed to credit institutions	353	184
Total financial liabilities	**353**	**186**

Hastings has a revolving credit facility with a financial institution, totalling EUR 103 million (98), of which EUR 39 million (56) was undrawn at the end of the reporting period. The revolving credit facility matures on 20 December 2026, after which the contract has an extension option of two more years.

Related to the RCF above, the applicable covenants for Hastings are leverage ratio and interest cover, and the related carrying amount of the liability would be EUR 63 million. There are no facts or circumstances that would indicate that Hastings may have difficulty with complying with the covenants, or that Hastings would not have complied with the covenants if they were assessed for compliance based on Hastings circumstances at 31 December 2024.

Hastings also has a securitisation facility arrangement with a financial institution to refinance the acquisition of loans totalling EUR 332 million (201), of which EUR 42 million (58) was undrawn at the end of reporting period. The arrangement ends in November 2027.

Hastings has an undrawn credit facility also with Sampo plc, totalling EUR 90 million with a maturity date of 29 October 2026.

Holding

EURm	Maturity	Interest	12/2024	12/2023
Subordinated debt securities				
Subordinated loans	**Maturity**	**Interest**		
Subordinated loan, 2020 (nominal value EURm 1,000)	32 years	2.50 %	994	993
Subordinated loan, 2019 (nominal value EURm 500)	30 years	3.38 %	497	496
Total subordinated debt securities			**1,491**	**1,490**
Other financial liabilities				
Derivative financial instruments			25	20
Debt securities in issue	**Maturity**	**Interest**		
Bond 2017, (nominal value EURm 500)	8 years	1.25 %	162	162
Bond 2018, (nominal value EURm 500)	10 years	1.625 %	312	311
Bond 2018, (nominal value EURm 500)	12 years	2.25 %	395	395
Bond 2018, (nominal value NOKm 1,000)	10 years	3.10 %	85	89
Other				2
Total bonds			**954**	**959**
Total financial liabilities			**2,470**	**2,469**

The subordinated loan of 2019 has a fixed interest rate for the first ten years, and the 2020 loan for the first 12 years. After that, the loans become subject to a variable interest rate, but they also include terms stating the right of redemption at this point in time or at any interest payment date thereafter. The loans are listed on the London Stock Exchange.

The determination and hierarchy of fair values of financial assets and liabilities measured at acquisition cost is disclosed in **note 13**. According to this determination, the subordinated debt securities and bonds are categorised either on level 1 or 2.

Eliminations between segments

EURm	12/2024	12/2023
Eliminations between segments	-127	-127
Group financial liabilities total	**3,036**	**2,914**

Change in liabilities from financing activities

EURm	1 January 2024	Incoming cash flows	Outgoing cash flows	Exchange differences	Other	31 December 2024
Subordinated debt	1,645	—	—	-3	—	1,642
Bonds	959	—	-2	-3	—	954
Other loans	194	194	-48	13	—	353
Total	**2,798**	**194**	**-50**	**7**	**—**	**2,948**

EURm	1 January 2023	Incoming cash flows	Outgoing cash flows	Exchange differences	Other	31 December 2023
Subordinated debt	1,983	—	-87	-3	-248	1,645
Bonds	1,306	—	-340	-7	—	959
Other loans	96	143	-46	2	—	194
Total	**3,384**	**143**	**-473**	**-8**	**-248**	**2,798**

Item Other for the reporting period 2023 is mainly related to the separation of Mandatum.

23 Other liabilities

EURm	12/2024	12/2023
Liabilities arising out of direct insurance operations	176	227
Liabilities arising out of reinsurance operations	126	69
Settlement liabilities	90	5
Provisions	174	6
Interests	29	29
Tax liabilities	14	2
Lease liabilities	134	160
Employee benefit liability	21	21
Prepayments and accrued income	265	241
Other	535	581
Total other liabilities	**1,562**	**1,342**

Item Other includes, e.g. premium taxes of EUR 148 million (164), liabilities related with patient insurance pool of EUR 54 million (64), and other tax liabilities and employee withholding taxes.

The non-current share of other liabilities is EUR 96 million (82).

Leases

The total effect of leases on the statement of cash flows was EUR -36 million (-33). Non-cash flow additions from IFRS 16 leases to the balance sheet items were EUR 12 million (15).

EURm	1-12/2024	1-12/2023
Items recognised in the p/l from lease liabilities		
Interest expenses	-2	-2
Expenses from short-term and low-value lease liabilities	-4	-4

Provisions

EURm	2024
At 1 January	**6**
Reclassification of Topdanmark's provision	27
Provisions utilized during the financial year	-9
Provisions added during the fiscal year	151
Translation difference	-1
At 31 December	**174**

In connection with the acquisition and the integration of Topdanmark into If Group, a restructuring reserve amounting to EUR 149 million was recognised. The costs relate mainly to redundancies, decommissioning, and sunsetting of systems, as well as rebranding.

Other restructuring provisions consist of funds amounting to EUR 13 million reserved for future expenses attributable to previously implemented or planned future organisational changes including expenses related to the separation of Topdanmark Liv Holding Group (now Nordea Pension Holding Danmark A/S) to Nordea.

In addition, provisions for employer contributions reserved for commitments attributable to endowment policies and other uncertain liabilities are also included in the total amount of the provisions.

The non-current share of provisions is EUR 73 million.

24 Employee benefits

Employee benefit obligations

Sampo Group's subsidiary, If, had defined benefit plans in Sweden and Norway during the financial year 2024.

If applies IAS 19 *Employee Benefits* and recognizes defined-benefit pension plans in Sweden and Norway. Other pension plans existing in the Group have either been classified as defined-contribution plans or have been classified as defined-benefit plans, but recognized as defined-contribution plans. This occurs because If lacks the information necessary to recognize them as defined-benefit plans, or they have been deemed as insignificant.

For the defined-contribution pension plans, If pays fixed contributions and has no further payment obligations once the contributions have been paid. The pension expense for the defined-contribution plans is equal to the premiums paid by If for the financial year.

Employee benefit obligations of If

EURm	2024	2023
Defined benefit pension obligations, including social costs	217	209
Fair value of plan assets	232	220
Net liability (asset) recognised in the balance sheet	**-15**	**-11**
of which recognised as Net pension assets in Other assets	36	32
of which recognised as Net pension liabilities in Other liabilities	21	21

The Swedish defined-benefit pension plan, FTP2, is a multiemployer plan and is closed to new employees born in 1972 or later. In Norway, there are a few smaller pension plans, mainly unfunded pension plans, for which If is responsible for ongoing payments. These include a small number of pension obligations on salary above 12G (G= National Insurance basic amount) or individual pension agreements.

A common feature of the defined-benefit plans is that the employees and survivors encompassed by the plans are entitled to a guaranteed pension that depends on the employees' service period and pensionable salary at the time of retirement. The dominating benefit is the old-age pension, referring to a life-long pension after the anticipated retirement age.

The anticipated retirement age for Sweden, in connection with life-long pension, is 65 years. Life-long old-age pension following a complete service period is payable at a rate of 10% of the pensionable salary between 0 and 7.5 income base amounts, 65% of salary between 7.5 and 20 income base amounts and 32.5% between 20 and 30 income base amounts. Paid-up policies and pension payments from the Swedish plans are normally indexed annually, with an amount corresponding to the change in the consumer price index. However, there is no agreement guaranteeing the value and future supplements, in addition to the contractual pension benefit, which could either rise or fall.

The pensions in Sweden are primarily funded through insurance, whereby the insurer establishes the premiums and disburse the benefits. If's obligation is primarily fulfilled through payment of the premiums. Should the assets that are attributable to the pension benefits not be sufficient to enable the insurer to cover the guaranteed pension benefits, If could be forced to pay supplementary insurance premiums or secure the pension obligations in some other way. However, given the insurer's high consolidation ratio, the risk that If will be forced to take any such action is low.

To cover the insured pension benefits in Sweden, as well as for a small plan in Norway, the related capital is managed as part of the insurers' management portfolios. New and existing asset categories are evaluated on an ongoing basis in order to diversify the asset portfolios, with a view to optimize the anticipated risk-adjusted return. Any surplus that arises from management of the assets normally accrues to If and/or the insured, and there is no form of transfer of the asset value to other members of the insurance collective.

The insurers and If are jointly responsible for monitoring the pension plans, including investment decisions and contributions. The pension plans are essentially exposed to similar material risks regarding the final amount of the benefits, longevity, the investment risk associated with the plan assets, and the fact that the choice of the discount interest rate affects the valuation in the financial statements.

When applying IAS 19, the pension obligation and the pension cost attributed to the fiscal period are calculated annually, using the Projected Unit Credit method. The calculation of the defined benefit obligation is based on future expected pension payments and includes yearly updated actuarial assumptions, such as salary growth, inflation, mortality and employee turnover. The expected pension payments are then discounted to a present value, using a discount rate set with reference to AAA and AA corporate bonds issued in local currency, including mortgage-backed bonds, as of mid- December. The discount rates chosen in Sweden and Norway take into account the duration of the company's pension obligations in each respective country. After a deduction for the plan assets, a net asset or a net liability is recognized in the balance sheet.

The following tables contain a number of material assumptions, specifications of pension costs, assets and liabilities, and a sensitivity analysis showing the potential effect on the obligations of reasonable changes in those assumptions, as of the end of the fiscal year.

The carrying amounts have been stated, including special payroll tax in Sweden (24.26%) and a corresponding fee in Norway (14.1%-19.1%).

Specification of employee benefit obligations by country

	2024			2023		
EURm	**Sweden**	**Norway**	**Total**	**Sweden**	**Norway**	**Total**
Recognised in income statement and other comprehensive income						
Current service cost	2	0	3	3	0	3
Total defined benefit pensions costs in insurance service result	**2**	**0**	**3**	**3**	**0**	3
Interest expense on net pension liability	-1	1	-1	-1	1	-1
Remeasurement of the net pension liability	-1	1	0	6	0	6
Total net cost (income) in comprehensive income statement	**0**	**2**	**2**	**8**	**1**	**8**
Recognised in balance sheet						
Defined benefit pension obligations, including social costs	194	22	217	186	23	209
Fair value of plan assets	230	1	232	218	2	220
Net liability (net assets) recognised in balance sheet	**-36**	**21**	**-15**	**-32**	**21**	**-11**
Distribution by asset class						
Bonds	41 %	—		42 %	—	
Equities	22 %	—		20 %	—	
Properties	9 %	—		10 %	—	
Other	28 %	—		28 %	—	

The following actuarial assumptions have been used for the calculation of defined benefit pension plans in Norway and Sweden:

	Sweden 31 Dec 2024	Sweden 31 Dec 2023	Norway 31 Dec 2024	Norway 31 Dec 2023
Discount rate	3.25 %	3.50 %	4.00 %	3.75 %
Future salary increases	3.00 %	3.00 %	3.25 %	3.25 %
Price inflation	2.00 %	2.00 %	2.25 %	2.25 %
Mortality table	DUS23	DUS23	K2013	K2013
Average duration of pension liabilities	17 years	17 years	11 years	11 years
Expected contributions to the defined benefit plans during 2025 and 2024	5	6	-	-

	2024			2023		
Sensitivity analysis of effect of reasonably possible changes	**Sweden**	**Norway**	**Total**	**Sweden**	**Norway**	**Total**
Discount rate, +0.50%	-15	-1	**-16**	-15	-1	**-15**
Discount rate, -0.50%	17	1	**18**	16	1	**17**
Future salary increases, +0.25%	3	0	**4**	4	0	**4**
Future salary increases, -0.25%	-3	0	**-3**	-3	0	**-3**
Expected longevity, +1 year	7	1	**7**	6	1	**6**

	2024			2023		
EURm	**Funded plans**	**Unfunded plans**	**Total**	**Funded plans**	**Unfunded plans**	**Total**
Distribution of obligations on funded and unfunded plans						
Defined benefit pension obligations, including social costs	196	20	**217**	188	20	**209**
Fair value of plan assets	232	—	**232**	220	—	**220**
Net pension liability (net assets) recognised in the balance sheet	**-36**	**20**	**-15**	**-31**	**20**	**-11**

Analysis of the change in net liability recognised in the balance sheet

EURm	2024	2023
Pension liabilities		
At the beginning of the year	**202**	**204**
Current cost	2	3
Interest cost	7	7
Actuarial gains (-) / losses (+) on financial assumptions	7	—
Actuarial gains (-) / losses (+), experience adjustments	4	-3
Exchange differences on foreign plans	-7	-1
Benefits paid	-6	-7
Defined benefit pension obligations on Dec 31, excl. social security costs	**210**	**203**
Social security costs	7	6
Defined benefit plans on Dec 31, incl. social security costs	**217**	**209**
Reconciliation of plan assets		
At the beginning of the year	**220**	**220**
Interest income	7	7
Difference between actual return and calculated interest income	11	-9
Contributions paid	5	5
Exchange differences on foreign plans	-7	0
Benefits paid	-5	-4
Plan assets at 31 December	**232**	**220**

Other short-term employee benefits

There are other short-term employee incentive programmes in the Group, the terms of which vary according to country, business area, or company. Benefits are recognised in the profit or loss for the year they arise. An estimated amount of these short-term incentives, social security costs included, for 2024 is EUR 81 million.

25 Equity and reserves

Equity (1,000 shares)

	12/2024	12/2023
Equity (1,000 shares)	538,248	501,797

The shares are divided into A and B classes, with the number of A shares being 179,000,000 at minimum and 711,200,000 at maximum, and the number of B shares being 0 at minimum and 4,800,000 at maximum. Each A share entitles its holder to one vote and each B share entitles its holder to five votes at a General Meeting of Shareholders. The shares have no nominal value.

At the end of the financial year 2024, the number of A shares amounted to 538,047,772 and B shares to 200,000 shares.

Treasury shares (1,000 shares)

	12/2024	12/2023
Own shares held by Sampo plc (1,000 shares)	–	–

Reserves and retained earnings

Legal reserve

The legal reserve comprises the amounts to be transferred from the distributable equity, according to the Articles of Association or on the basis of the decision of the AGM.

Reserve for invested unrestricted equity

The reserve includes other investments of equity nature, as well as the issue price of shares, to the extent it is not recorded in the share capital by an express decision.

During the financial year 2024, the directed share issue of EUR 2,000 million to acquire the non-controlling interests of Topdanmark was recognised in the reserve.

Other components of equity

Other components of equity include changes in exchange differences, derivatives used for cash flow hedges, revaluation reserve and hedges of a net investment.

Changes in the reserves and retained earnings are presented in the Group's statement of changes in equity.

26 Incentive schemes

Sampo's long-term incentive scheme 2020 I

The Board of Directors of Sampo plc has decided on the long-term incentive schemes 2020:1 for the key employees of Sampo Group. The Board of Directors of Sampo plc has authorised the Group CEO to decide on the allocation of incentive units that are used to determine the incentive reward. The Board decides on the number of incentive units allocated to the Group CEO and the Group Executive Committee members. Some 90 persons in Sampo plc and If were included in the long-term incentive schemes at the end of 2024.

The amount of the incentive reward is based on the share price development of the Sampo A share and Sampo Group's return on capital at risk (RoCaR). In addition, in accordance with the terms updated in September 2023, the amount of the incentive paid in 2024 was partly based on the share price development of Mandatum plc. The value of one calculated incentive unit is the trade-weighted average price of the Sampo A share (and for rewards paid in 2024, Mandatum share price) at the time period specified in the terms of the incentive scheme, reduced by the dividend-adjusted starting price. The starting price of the incentive schemes varies between EUR 32.94–44.74. The maximum value of one incentive unit varies between EUR 52.64–64.44. The calculation of the incentive reward furthermore takes into account the RoCaR. If the RoCaR is at least risk-free return + 5 per cent, the reward is paid out in full. If the RoCaR is at least risk-free return + 3 per cent but less than risk-free return + 5 per cent, the payout is 50 per cent. If the RoCaR is below risk-free return + 3 per cent, no incentive reward will be paid.

Each plan has three performance periods and incentive rewards are paid in cash in three instalments. Identified staff shall buy Sampo A shares with 50 per cent of the amount of the instalment after deducting income tax and other comparable charges. The shares are subject to disposal restrictions for three years from the date when the instalment was paid. A premature payment of the incentive reward may occur in the event of changes in the Group structure. The fair value of the incentive schemes is estimated by using the Black-Scholes pricing model.

		2020:I	2020:I/2	2020:I/3
Terms approved*		5 Aug 2020	5 Aug 2020	5 Aug 2020
Granted (1,000) 31 Dec 2021		3,815	220	—
Granted (1,000) 31 Dec 2022		3,805	220	208
Granted (1,000) 31 Dec 2023**		2,124	170	158
Granted (1,000) 31 Dec 2024**		1,052	119	158
End of performance period I 30%		Q2-2023	Q2-2024	Q2-2025
End of performance period II 35%		Q2-2024	Q2-2025	Q2-2026
End of performance period III 35%		Q2-2025	Q2-2026	Q2-2027
Payment I 30%		09/2023	09/2024	09/2025
Payment II 35%		09/2024	09/2025	09/2026
Payment III 35%		09/2025	09/2026	09/2027
Price of Sampo A at terms approval date EUR*		30.30	30.30	30.30
Starting price EUR***		32.94	43.49	44.74
Starting price adjusted with dividend and Mandatum EUR at 31 December 2024		18.11	30.36	35.71
Sampo A closing price EUR at 31 December 2024	39.38			
Total intrinsic value, EURm		19	1	1
Total debt	21			
Total cost for the financial period, EURm (incl. social cost)	14			

** Grant dates vary*

*** Without Mandatum*

**** The trade-weighted average price of the Sampo A share during twenty-five trading days commencing the day after Sampo plc's publication of its Half-Year Financial Report in 2020.*

Sampo's long-term incentive scheme 2024

On 6 March 2024, the Board of Directors of Sampo plc decided to adopt a performance-based long-term incentive scheme for the Group Executive Committee (including the Group CEO) and other senior leaders and key employees of Sampo Group.

The participants in LTI 2024 were granted 355,699 performance incentive units (out of a maximum of 370,000). The performance incentive units have a three-year performance period covering financial years 2024-2026, with subsequent deferral periods according to the rules and regulations applicable to Sampo Group.

The reward is a cash-based compensation. According to the terms and conditions of the scheme, identified staff must buy Sampo A shares with 50% of the net reward after taxes and other comparable charges. The shares are subject to a formal disposal restriction of three years from the date of payment, and the Board of Directors of Sampo plc will perform a risk and compliance assessment before any shares are released to participants.

To achieve a maximum reward from the LTI 2024, excellent financial and operational performance is required. The performance assessment will be based on the following performance criteria:

Relative total shareholder return: 25% of the reward is subject to the performance of the Sampo A share's relative TSR over the performance period against a peer group of companies.

Adjusted absolute total shareholder return: 25% of the reward is subject to the performance of the Sampo A share's growth and combined dividends over the performance period.

Underwriting profit growth: 40% of the reward is subject to the performance of Sampo Group's underwriting profit growth over the performance period.

Sustainability charter: 10% of the reward is subject to the performance of Sampo Group's work related to sustainability.

In addition, the performance incentive units are subject to Sampo A share price movements over the performance period. The share price growth is capped at a maximum increase to avoid excessive pay-outs and minimize risk.

The fair value of the scheme has been estimated using the Monte Carlo pricing model.

At the end of the period 76 persons were included in the scheme. The total cost for the financial period and the liability of the scheme amounted to EUR 1 million.

Topdanmark's incentive schemes

Long-term incentive programme

Topdanmark's LTI programme for the Executive Board and other grade A and B+ managers is a revolving option- and/or phantom share units based long-term incentive programme which entail that a fixed proportion, equivalent to 10 per cent of the salary, is paid in the form of share options according to a revolving option programme and/or as phantom share units based on the development in the share price of Sampo plc's A shares.

Upon completion of Sampo's compulsory acquisition of the remaining Topdanmark shares in October 2024, the outstanding rights to Topdanmark shares under the LTI programme have been converted. Instead of options with the right to receive Topdanmark shares upon exercising of options, the LTI participants have received phantom share units tied to the development in the share price of Sampo's listed A share which will be settled in cash when the phantom share units are exercised. When converting LTI options under the LTI programme to phantom share units, the market value of the LTI option was determined per the completion in accordance with the Black-Scholes formula. Based on the calculated market value, the LTI participant has been granted a number of phantom share units in Sampo per the Compulsory Acquisition Date. The LTI participants are compensated for any negative tax effect in consequence of the convertion into phantom share units.

The options and/or phantom share units are issued at the beginning of a financial year and may not be exercised any earlier than subsequent to the publication of the first interim results announced by Sampo three years after the options and/or phantom share units were acquired. For phantom share units resulting from the conversion of options under the LTI programme, the calculation is made from the original time of granting of options.

At the end of the financial period, the liability of the scheme amounted to EUR 15 million.

Short-term incentive programme

Topdanmark's STI programme is a cash and share and/or phantom share-based short-term incentive programme which is tied up to the completion of a number of predefined targets for each member of the programme. For the financial year 2024, individual STI participant agreements have been entered with every member of the Executive Board, other grade A managers as well as a group of other Material Risk Takers.

STI bonus cannot exceed 40% of the employee's fixed basic salary including pension.

As per the Compulsory Acquisition Date, the STI participant's outstanding rights to Topdanmark shares under the STI programme have been replaced by rights to phantom shares tied to the development in the share price of Sampo's listed A share which will be settled in cash when the deferral and retention period expires.

The market value of the right to Topdanmark shares under the STI programme is determined in accordance with the exchange ratio in connection with the share exchange offer, thus the right to receive a Topdanmark share is replaced by the right to receive 1.25 phantom shares based on the development in share price of Sampo shares. The STI participants are compensated for any negative tax effect in consequence of the convertion into phantom shares.

Payment of STI bonus is 50% cash payment at the time of allocation and 50% shares and/or phantom shares based on the development in share price of Sampo's A share.

For larger amounts (generally, more than DKK 750,000), 40% is paid as a cash amount at the time of allocation, and 60% as shares and/or phantom shares. The number of shares and/or phantom shares is calculated based on the average trade price of Sampo's listed A share four banking days after the announcement of Sampo's annual results.

Long-term incentive schemes of Hastings

The total charge for the share-based payments recognised in profit or loss during 2024 was EUR 29 million (7) with a share-based payment liability of EUR 36 million (8) held at 31 December 2024.

Long-term incentive plan

Certain management personnel of Hastings Group participate in the Group's Long-Term Incentive Plan ('LTIP'), which is a cash settled scheme. Vesting is subject to a three-year service period and the achievement of certain performance conditions. The performance conditions for the LTIP are profit before tax and live customer policies.

Cash awards totalling EUR 15 million (13) were granted in 2024, and EUR 9 million (6) of cash awards were forfeited. The expected life is the contractual life of the award adjusted to reflect management's best estimate of holder behaviour. There were cash awards with a value of EUR 40 million (32) outstanding on 31 December 2024.

Restricted stock awards

Restricted Stock Awards are whereby certain individuals are granted cash awards conditional upon their continued employment with the Group. The expected life is the contractual life of the award adjusted to reflect management's best estimate of holder behaviour. During 2024, certain key management personnel were granted cash awards with a value of EUR 0.6 million (0.7) conditional upon continued employment within the Group. There were cash awards with a value of EUR 1.0 million (0.9) outstanding at 31 December 2024.

Capital appreciation plan

At the year end, 31 December 2021, certain key management personnel were invited to participate in the Hastings Group's Capital Appreciation Plan ('CAP'), under which they may be awarded up to five free B Ordinary Shares in HGCL, for every B Ordinary Share they purchase, subject to performance thresholds, based upon total shareholder return ('TSR'). The total number of B Ordinary Shares purchased and allotted under the scheme in 2024 was zero (-). Potential matching awards of B Ordinary Shares have the potential to vest in two tranches, with 50% being conditional upon a TSR measured over a four-year period, and 50% being conditional upon TSR measured over a five-year period, with the number of awards dependent upon the level of return between a minimum and maximum target. At the end of each performance period, one-half of shares will vest immediately, and one half will be deferred for 12 months before becoming exercisable. The vesting is dependent on continuing service by the participant over the period of any deferment, ranging from three to six years.

The TSR measure for these awards is calculated using the Monte Carlo valuation model. The fair value of the matching shares was EUR 4 million, or approximately EUR 4 per matching share.

27 Investments in subsidiaries

Name	Group holding %	Carrying amount
If P&C Insurance Holding Ltd	100	4,820
If P&C Insurance Ltd	100	1,441
If P&C Insurance AS	100	39
Vertikal Helseassistanse AS	100	9
Viking Assistance Group AS	100	80
Topdanmark A/S	100	39
Topdanmark Forsikring A/S	100	4,614
Topdanmark EDB A/S	100	41
Topdanmark BidCo A/S*	100	261
Hastings Group (Consolidated) Ltd	100	2,611
Hastings Group Holdings Limited	100	2,535
Advantage Global Holdings Limited	100	1,518
Advantage Insurance Company Limited	100	283
Hastings Insurance Services Limited	100	537

** Topdanmark BidCo A/S relates to the acquisition and holding of Oona Health A/S.*

The table excludes dormant companies in Great Britain as well as property and housing companies accounted for in the consolidated accounts, and other companies that are insignificant to the consolidated financial statements.

Changes in subsidiary shares in 2024

Sampo acquired all the outstanding NCI shares in Topdanmark A/S through a public exchange offer, followed by a compulsory acquisition during H2 in 2024. The shares were then sold to If P&C Holding Ltd in November 2024. At the same time, a shareholders' contribution of EUR 2,934 million was made to If P&C Insurance Holding Ltd by Sampo plc.

The carrying amounts of Hastings' companies have changed mainly due to internal restructuring in Hastings' subgroup.

28 Acquisition of Topdanmark's non-controlling interest

Background

On 17 June 2024, Sampo announced that Sampo and Topdanmark had entered into a combination agreement, based on which Sampo made a recommended best and final public exchange offer to acquire all of the outstanding shares in Topdanmark not already owned by Sampo. The offer period began on 9 August 2024 and expired on 9 September 2024. The transaction was completed by the compulsory acquisition of the remaining Topdanmark minority shares on 25 October 2024. Topdanmark shares were removed from trading on Nasdaq Copenhagen on 18 October 2024. For more detailed description of the acquisition, please see sections **Other developments**.

Compensation to non-controlling interests

During the tender offer process, Sampo received acceptances representing approximately 92.6 per cent of the entire share capital and total number of voting rights in Topdanmark, excluding Topdanmark's treasury shares. The Board resolved to issue 48,198,710 new Sampo A shares to the Topdanmark non-controlling shareholders and the subscription price for the new class A shares was EUR 41.50 per share. The price was determined based on the closing price of the Sampo class A shares on Nasdaq Helsinki Ltd at the last full trading day prior to the Sampo Board resolving upon the directed issuance of shares. The share issue amounting to EUR 2,000 million was recognised in the invested unrestricted equity.

Following the completion of the tender process, Sampo commenced a compulsory acquisition of the 6,613,865 Topdanmark shares held by the remaining non-controlling shareholders of Topdanmark. The total acquisition cost of the remaining minority shares amounted to EUR 325 million. Compensation was paid in cash.

Equity transaction

As the transaction with the non-controlling interest is accounted for as an equity transaction in Sampo Group, the compensation paid to the NCI for their shares in Topdanmark A/S was recognised as a decrease in the retained earnings, amounting to EUR 2,325 million. The portion of the NCI's share in equity, amounting to EUR 394 million, was allocated to the owners of the parent company, and recognised as an increase in retained earnings. The total decrease of retained earnings amounted to EUR 1,931 million. As a result of the acquisition, there were no accumulated balances at the year end 2024. In the statement of profit or loss, the NCI's share of EUR 49 million was calculated as the weighted average during the financial year.

The acquisition costs related to the equity transaction, amounting to EUR 31 million, were accounted for as a deduction from the equity. Therefore, the transaction decreased Sampo Group's total equity by EUR 356 million consisting of compensation paid in compulsory acquisition of EUR 325 million and transaction costs of EUR 31 million.

Valuation of Topdanmark A/S shares

The measurement of acquired Topdanmark A/S shares was based on the compensation given as an exchange of those shares. For Topdanmark's shares acquired via tender offer, the value of the acquired shares was determined based on the value of Sampo's shares issued totalling EUR 2,000 million. For shares acquired via the compulsory acquisition, the value of acquired shares was determined based on the compensation paid in cash totalling EUR 325 million.

Sale of Topdanmark A/S shares to If P&C Insurance Holding Ltd

On 1 November 2024, Sampo plc sold all the issued shares in Topdanmark A/S to If P&C Insurance Holding Ltd. The transaction was completed at arm's length basis. The sale price, based on the recent market value of EUR 4,659 million, equivalent to approximately DKK 34.7 billion, was paid in full by way of a loan agreement and a shareholder's contribution between Sampo plc and If P&C Insurance Holding Ltd. On 1 November, the loan agreement, amounting to EUR 1,724 million, consisted of EUR nominated facility of EUR 862 million and DKK nominated facility of DKK 6,432 million (approx. EUR 862 million). The remaining part of the purchase price was paid by setting-off against shareholder's contribution amounting to SEK 34 029 million (approx. EUR 2,934 million) granted by Sampo plc to If Holding. The shareholder's contribution was recognised as an increase in the carrying amount of If Holding's shares in Sampo plc's balance sheet.

As the sale transaction of Topdanmark's shares is an intra-group transaction, all impacts, including the sales gain of the shares, are eliminated at the Sampo Group level. The intra-group sale of shares meets the definition of a common control transaction as both If P&C Insurance Holding Ltd and Topdanmark A/S are under control of Sampo plc before and after the acquisition.

29 Related party disclosures

The related parties of Sampo Group include subsidiaries, associates and joint ventures. In addition, related parties include, as mentioned below, key management personnel and their related parties. The Group's subsidiaries are included in **note** 27. At the end of the financial year, there were no significant associates in the Group.

All intra-group transactions and balances are eliminated upon consolidation. The related party transactions disclosed in the note include transactions with related parties that are not eliminated in the preparation of consolidated financial statements.

During the financial year, Sampo plc sold Topdanmark A/S shares to If Holding A/B. Related to the sale, substantial internal transactions and financing arrangements were formed between group entities. For further information, please see **note** 28.

Transactions with related parties are on an arm's length basis.

Key management personnel and their related parties

The key management personnel in Sampo Group consists of the members of the Board of Directors of Sampo plc, the Chief Executive Officer (CEO) and Sampo Group's Executive Committee. Their related parties include close family members and the entities over which the members of the key management personnel or their close family members have control or significant influence.

Key management compensation

EURm	2024	2023
Short-term employee benefits	-8	-8
Post employment benefits	-4	-3
Other long-term benefits	-8	-6
Total	**-20**	**-17**

Short-term employee benefits comprise salaries and other short-term benefits, including profit-sharing bonuses accounted for the year, and social security costs.

Post-employment benefits include pension benefits under the Employees' Pensions Act (TyEL) in Finland and voluntary supplementary pension benefits.

Other long-term benefits consist of the benefits under long-term incentive schemes accounted for the year (see **note** 26).

Related party transactions of the key management

The key management does not have any loans from the Group companies.

30 Discontinued operations

Mandatum Group's business

Mandatum was a wholly owned direct subsidiary of Sampo plc until 1 October 2023 when it was separated from the Group in the partial demerger of Sampo plc. In the comparative year, Mandatum Group was presented as a discontinued operation, in accordance with IFRS 5 N*on-current assets held for sale and discontinued operations,* until the demerger.

Result of discontinued operations

EURm	1-9/2023
Insurance revenue	255
Insurance service expenses	-213
Reinsurance result	-1
Insurance service result	**41**
Net investment result	658
Net finance income or expense from insurance contracts	-161
Net result from investment contracts	-369
Net financial result	**127**
Other income	22
Other expenses	-12
Finance expenses	-4
Profit before taxes	**173**
Income taxes	-33
Discontinued operations, net of tax	**140**

The profit from the discontinued operations is attributed entirely to the owners of the parent company. Other comprehensive income did not include any items from the discontinued operations.

The profit from discontinued operations in the consolidated income statement, amounting to 251 million, included also the difference of 9 million from the derecognition of the dividend liability, and 102 million from the recognition of a loan.

31 Business combinations

On 1 December 2023, Topdanmark acquired 100% of the shares of Oona Health A/S, owner of Dansk Sundhedssikring A/S (DSS), PrimaCare A/S and DSS Hälsa AB. DSS is an insurance company that offers health insurance to companies and private individuals.

The purchase price included goodwill of EUR 237 million (DKK 1,770 million), related to the unique business model and operational setup of DSS. Goodwill is not deductible for income tax purposes. The following table summarises the consideration paid for Oona Health, and the assets acquired and liabilities assumed at the acquisition date.

EURm	1 Dec 2023
Cash	257
Contingent consideration	12
Total purchase price	**269**
Acquisition related costs	5
Identified assets acquired and liabilities assumed	
Financial assets	39
Cash and cash equivalents	8
Intangible asset	87
Other assets	11
Total assets	**146**
Insurance contract liabilities	18
Other liabilities	96
Total liabilities	**114**
Total identifiable net assets	31
Goodwill	237
Purchase price	**269**

In accordance with the purchase agreement Topdanmark A/S took over 97% of the shares of Oona Health A/S at closing and will acquire the remaining 3% at a purchase price which is variable and dependent on profit after tax in 2026.

On 1 November 2024, shares of Topdanmark A/S were sold to If Holding A/B. The shares of Oona Health A/S were therefore transferred to If Group. For further information, please see **note** 27 and **note** 28.

32 Contingent liabilities, commitments and legal proceedings

EURm	12/2024	12/2023
Off-balance sheet items		
Guarantees	9	9
Investment commitments	40	15
IT acquisitions	—	1
Other	2	2
Total	**51**	**27**

Assets pledged as collateral for liabilities or contingent liabilities

	12/2024		12/2023	
EURm	Assets pledged	Liabilities/ commitments	Assets pledged	Liabilities/ commitments
Assets pledged as collateral				
Investment securities	403	294	408	293
Subsidiary shares	91	25	91	27
Cash and cash equivalents	66	43	63	36
Total	**559**	**362**	**561**	**356**
Assets pledged as security for derivative contracts				
Investment securities	—		9	
Cash and cash equivalents	66		62	
Assets pledged as security for insurance undertakings				
Investment securities	403		399	
Assets pledged as security for loans				
Shares in subsidiaries	91		91	

The pledged assets are included in the balance sheet item Financial assets, Other assets or Cash.

Policyholder's beneficiary rights

EURm	12/2024	12/2023
Assets covered by policyholders' beneficiary rights	9,748	10,034
Technical provisions, net	-6,021	-6,171
Surplus of registered securities	**3,727**	**3,863**

The assets are registered as assets covering technical provisions (Solvency II). In the event of an insolvency situation, policyholders have a beneficiary right to assets registered for coverage of technical provisions.

Other financial commitments

If

The subsidiary If P&C Insurance Ltd provides insurance with mutual undertakings within several pools, such as the Nordic Nuclear Insurance Pool, Norwegian Natural Perils' Pool and the Dutch Terror Pool.

In connection with the transfer of property and casualty insurance business from the Skandia Group to the If Group as of March 1, 1999, If P&C Holding Ltd and If P&C Insurance Ltd issued a guarantee for the benefit of Försäkringsaktiebolaget Skandia (publ.), whereby the aforementioned companies in the If Group mutually guarantee that companies in the Skandia group will be indemnified against any claims or actions due to guarantees or similar commitments made by companies in the Skandia Group, within the property and casualty insurance business transferred to the If Group.

If P&C Insurance Holding Ltd and If P&C Insurance Ltd have separately entered into agreements with Försäkringsaktiebolaget Skandia (publ.) and Tryg-Baltica Forsikrings AS, whereby Skandia and Tryg-Baltica will be indemnified against any claims attributable to guarantees issued by Försäkrings-aktiebolaget Skandia (publ.) and Vesta Forsikring AS, on behalf of Skandia Marine Insurance Company (U.K.) Ltd. (renamed Marlon Insurance Company Ltd., company dissolved in July 2017) in favour of the Institute of London Underwriters. Marlon was sold during 2007, and the purchaser issued a guarantee in favour of the aforementioned companies in the If Group for the full amount that they may be required to pay under these guarantees.

If P&C Insurance Company Ltd has outstanding commitments to private equity funds totalling EUR 40 million, which is the maximum amount that the company has committed to invest in the funds. Capital will be called to these funds over several years as the funds make investments.

With respect to certain IT systems that If and Sampo use jointly, If P&C Insurance Holding Ltd has undertaken to indemnify Sampo for any costs caused by If that Sampo may incur in relation to the owners of the systems.

Topdanmark
Sampo Group's Danish companies and Topdanmark Group's companies are jointly taxed, with Topdanmark A/S being the management company. Pursuant to the specific rules on corporation taxes etc. in the Danish Companies Act, the companies are liable for the jointly taxed companies and for any obligations to withhold tax from interest, royalties and dividend for companies concerned.

In connection with the implementation of a new customer and core system, Topdanmark Forsikring A/S has undertaken to provide support towards specific suppliers to fulfil Topdanmark EDB IV ApS' obligations in accordance with the contracts.

Contingent liability

Hastings
Entities within Hastings Group are subject to review by tax authorities in the UK and Gibraltar. The Hastings Group commenced discussion with HMRC in December 2016 regarding aspects of its business model and the allocation of certain elements of its profit between the Group's operating subsidiaries, Hastings Insurance Services Limited ('HISL') in the UK and Advantage Insurance Company Limited ('AICL') in Gibraltar. During the year, management has engaged in correspondence and meetings with HMRC. Management has reviewed current and previous tax filings and considered the nature of the ongoing enquiries, and does not consider it appropriate to provide for any additional tax due. Hastings Group provides for potential tax liabilities that may arise on the basis of the amount expected to be paid to the tax authorities, having taken into consideration any ongoing enquiries or reviews and based on guidance from professional firms. The final amounts paid may differ from the amounts provided depending on the ultimate resolution of such matters and any changes to the estimates or amounts payable in respect of prior periods are reported through adjustments relating to prior periods. In the event that the tax authorities do not ultimately accept the filed tax position, it is possible that the Hastings Group will have an additional tax liability. However the ongoing nature of the enquiry means that it is inherently difficult to predict a range of potential outcomes with certainty. Based on the information received from HMRC to date, management does not believe that it is probable that any additional amounts will ultimately become payable. Further information in respect of the enquiries has, therefore, not been provided in accordance with IAS 37, on the grounds it is not practicable to do so.

Topdanmark
In December 2022, Sampo plc´s subsidiary Topdanmark Forsikring A/S sold Topdanmark Liv Holding A/S and all its subsidiaries to Nordea Life Holding AB. On 1 May 2024, Topdanmark announced that Topdanmark Forsikring A/S had entered into an agreement with Nordea regarding the process for completion of the IT separation of Topdanmark Liv Holding A/S (today Nordea Pension Holding Danmark A/S).

As announced by Topdanmark in the first quarter of 2024, Nordea Group has reserved the right to raise claims against Topdanmark Forsikring A/S for certain potential losses. At present, it is not possible for Topdanmark A/S to determine the size or existence of the potential losses, and thus it is not possible to assess whether they would constitute losses for which Topdanmark Forsikring A/S may be held liable under the signed Share Purchase Agreement (SPA). Currently, there is no new information on the potential claims, and thus the contingent liability remains.

Rental commitments
During the reporting period 2024, Sampo plc signed a rental agreement on new office premises commencing in June 2025.

Legal proceedings
There are a number of legal proceedings against the Group companies outstanding as of 31 December 2024, arising in the ordinary course of business. The companies estimate it unlikely that any significant loss will arise from these proceedings.

33 Subsequent events after the balance sheet date

Dividend proposal to the AGM

In the meeting on 6 February 2025, the Board of Directors decided to propose, at the Annual General Meeting on 23 April 2025, a divided distribution of EUR 1.70 per share (totalling approx. EUR 915 million based on the number the number of outstanding shares at the balance sheet date). The dividends to be paid will be accounted for in equity in 2025 as a deduction of retained earnings.

Share split

On 5 February 2025, the Board of Directors of Sampo plc resolved on a share split by way of a share issue without consideration in proportion to shares owned by shareholders. In the share split, Sampo issued four (4) new A shares for each existing A share and four (4) new B shares for each existing B share to shareholders in proportion to their existing holdings on the record day of the share issuance on 12 February 2025. In total, 2,152,191,088 new Sampo A shares and 800,000 new Sampo B shares were issued. Following the registration of the new shares, Sampo's total share count amounts to 2,691,238,860 shares.

The resolution was based on the authorisation granted by Annual General Meeting held on 25 April 2024. The share split does not require any action from shareholders nor holders of Swedish depository receipts. Further information is available at **www.sampo.com/sharesplit**.

34 Risk Management disclosure

Sampo Group business and risk strategy

Sampo's strategy is to create long-term value from its non-life insurance operations. The Group's focus within non-life insurance is on the private and SME business in the Nordic countries, and the digital distribution market in the United Kingdom. Sampo Group is first and foremost exposed to the general performance of the Nordic economies. However, the Nordic economies typically are at different stages of their economic cycles at any given time, for reasons such as different economic structures and separate currencies. Also, geographically the Nordics as a large area is more a source of underwriting diversification than concentration. Hence, the Nordic area is inherently a good basis for a diversified business. Geographic diversification is also extended outside of the Nordics into the United Kingdom and to a smaller extent the Baltics.

To further maintain diversification of businesses, Sampo Group proactively prevents concentrations, to the extent possible, by segregating the duties of separate business areas. Despite proactive strategic decisions on segregation of duties, concentrations in underwriting and investments may appear, and hence liabilities and assets are monitored at the Group level to identify potential concentrations at a single company or risk factor level.

Underwriting and market risk concentrations, and their management are described in the later sections, as well as the parent company's role as a risk manager of group-wide risks and as a source of liquidity.

Sampo's risk management strategy is to:

- Ensure that risks affecting the profit and loss account and the balance sheet are identified, assessed, managed, monitored, and reported in all business activities and at the Group level;
- Ensure cost-efficient customer business that is soundly priced in terms of risks and adding value to our clients;
- Ensure the overall efficiency and resilience of operations;
- Ensure that risk buffers – in the form of capital and foreseeable profitability – are adequate in relation to the current risks inherent in business activities and the existing market environment;
- Limit M&A transactions to bolt-ons in non-life insurance within current markets;
- Dispose of non-strategic or otherwise unnecessary balance sheet items and distribute the released capital and reserves to the parent company as appropriate; and
- Arrange its activities in ways that safeguard the Group's reputation, since in addition to the ability to provide value-adding services for its clients and sound capitalisation, the confidence of the clients and other stakeholders is among the most significant assets of Sampo Group.

Sampo Group risk management system

The purpose of risk management is the creation and protection of value. The risk management system is part of the larger internal control system, and it integrates risk management into the governance of the Group and its significant activities and functions, including decision making. The risk management system comprises the overall organisational structure, documented rules, processes, and procedures, as well as resources to identify, measure, or assess, contain, monitor, and report on risk exposure and overall risk management. It is supported by Sampo's corporate governance system and risk culture. It is built on the risk management principles and the corresponding policies.

Effective management of risks

Effective risk management is carried out by way of the risk management process, which involves the systematic application of policies, procedures and practices to the identifying, assessing, treating, monitoring, measuring, and reporting risk:

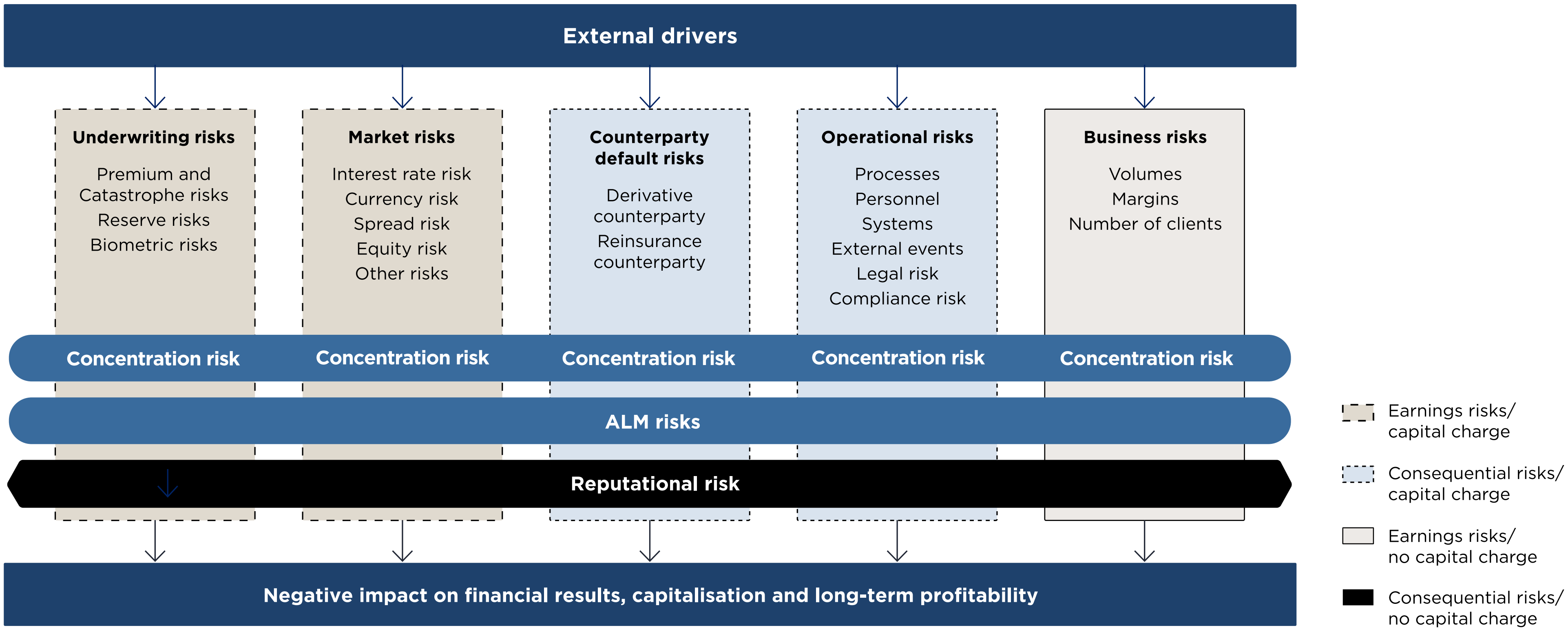
- Identification of risks: The risks involved in business operations and business environment, are monitored continuously together with earnings potential. In particular, when new services are launched or business environment is changing, earnings potential and risks including reputational risks shall be thoroughly analysed.
- Assessment of capital need: The capital need to cover measured risks, risk-based capital, is assessed and analysed regularly by risk types and over risks and business areas. In addition, management considers the size of the buffers over risk-based capital to get actual amount of capital.
- Pricing of risks: Sound pricing of customer transactions and careful risk/return consideration of investments is the prerequisite for achieving the targeted financial performance and profitability over time. In general, the starting points of insurance policy pricing and investment decisions are (i) adequate expected return on allocated capital and (ii) operating costs.
- Managing risk exposures, capital positions, and operational processes: The risks of insurance liabilities, investment portfolios and operative processes and capital positions are adjusted to maintain a sound risk-to-return ratio and return on capital.

- Measuring and reporting of risks: Results, risks, profitability, and needed capitalisation are measured, analysed, and reported by Finance and Risk Management functions, which are independent from business activities

Classification of risks

Risks in Sampo Group are classified under three broad categories, namely business risks, reputational risk, and risks inherent in business operations, as shown in the picture Classification of risks in Sampo Group.

Classification of risks in Sampo Group



Risks inherent in business operations

In its underwriting and investment operations, Sampo Group is consciously taking certain risks to generate earnings. These earnings risks are carefully selected and actively managed. Underwriting risks are priced to reflect their inherent risk levels and the expected return of investments is compared to the related risks. Furthermore, earnings related risk exposures are adjusted continuously and their impact on the capital need is assessed regularly.

Successful management of underwriting risks and investment portfolio market risks is the main source of earnings for Sampo Group. Day-to-day management of these risks, i.e., maintaining them within given limits and authorisations is the responsibility of the business areas and the investment units.

Some risks, such as counterparty default risks and operational risks presented in the graph Classification of Risks in Sampo Group are indirect repercussions of Sampo's normal business activities. They are one-sided risks, which in principle have no related earnings potential. Accordingly, the risk management objective is to mitigate these risks efficiently rather than actively manage them. Mitigation of consequential risks is the responsibility of the business areas and the investment units. The capital need for these risks is measured by independent risk management functions. It must be noted that the categorisation of risks between earnings and consequential risks varies, depending on the industry. For Sampo Group's clients, for instance, the events that are subject to insurance policies are consequential risks and for Sampo Group these same risks are earnings risks.

Some risks such as interest rate, currency, and liquidity risks are by their nature simultaneously linked to various activities. To manage these risks efficiently, Sampo Group must have a detailed understanding of expected cash flows and their variance within its business operations. In addition, a thorough understanding of how the market values of assets and liabilities may fluctuate at the total balance sheet level under different scenarios is needed. These balance sheet level risks are commonly defined as Asset and Liability Management ("ALM") risks. In addition to interest rate, currency, and liquidity risk, inflation risk and risks relating to GDP growth rates are central ALM risks in Sampo Group. The ALM risks are one of the focus areas of senior management because of their relevance to risks and earnings in the long run.

In general, concentration risk arises when the company's risk exposures are not diversified enough. When this is the case, an extremely unfavourable claim or financial market event, for instance, could threaten the solvency of the company.

Concentrations can evolve within separate activities – such as large single name or industry specific insurance or investment exposures – or across activities when a single name or an industry is contributing widely to the profitability and risks of the company through both insurance and investment activities.

Concentration risk may also materialise indirectly when profitability and the capital position react similarly to general economic developments or to structural changes in the institutional environment in different areas of business.

Emerging risks

Emerging risk refers to newly developing or changing risks that are difficult to quantify and which may have a major impact on Sampo Group. Being aware of the risk, gathering information about it, and reviewing contractual terms in light of development are means of managing and mitigating the risk.

Sustainability approach

Sampo Group has a sustainability programme, which drives group level sustainability work. The programme consists of three strategic sustainability themes: Business management and practices, People and communities, and Climate and environment. Under each theme, the most material sustainability topics have been identified. They link to Sampo Group's strategy, business, and risk management and are seen as important by the Group's various stakeholders.

When drafting the programme, views of both internal and external stakeholders have been considered. This includes, for example, regulatory requirements regarding current and future sustainability reporting (e.g., CSRD, CSDDD), feedback from investors and employees, industry best practices, relevant reporting frameworks (e.g., GRI Standards, TCFD), and the views of various ESG rating agencies.

The business management and practices theme focuses on topics that are fundamental to Sampo Group's operations. This includes especially good corporate governance, sustainable insurance operations and supply chain management, and responsible investment.

Good governance in Sampo Group means effective policies, management practices, and training that provide assurance that the Group complies with laws, regulations, and generally accepted principles, for example, regarding anti-corruption and bribery and anti-money laundering, and counter-terrorist financing. Furthermore, they include comprehensive information security and cybersecurity governance systems, and data privacy activities, as well as effective whistleblowing and grievance procedures.

Sustainable insurance operations are important in meeting the evolving needs of all customers and in mitigating potential adverse impacts on the Group's reputation. Therefore, Sampo Group aims to take ESG considerations into account in product and service development, and insurance underwriting. By integrating ESG considerations into insurance operations, Sampo Group aims to prevent association with business activities that do not comply with the company's sustainability policies, and offer products and services aligned with customers' need and preferences. This means, for example, that Sampo Group integrates ESG considerations into insurance underwriting (e.g. expectations for corporate clients to respect international norms and standards as defined by the UN Global Compact, integration of sustainability considerations into underwriting principles and/or other relevant policies), provides loss prevention services, handles claims in a sustainable way, and develops products and services in accordance with relevant legal requirements (e.g. the EU Taxonomy).

Sampo Group emphasises sustainability factors when working with suppliers. Sampo Group is a major procurer of goods and services, especially in claims handling, and therefore has an impact on the economy, the environment, and people. Supply chains are also a crucial part of the sustainability of Sampo Group's products and services. Sustainability issues can carry significant reputational and operational risks if not managed correctly. Therefore, Sampo Group takes ESG considerations into account in supply chain management, for example, by using supplier codes of conduct, setting additional contractual requirements for specific suppliers (e.g. based on ESG risks, sector, size, geography, business relevance), setting targets related to supply chain management, and conducting supplier risk assessments (e.g. audits, questionnaires). Sampo Group is also committed to encouraging and supporting the company's suppliers and partners in their efforts to use more sustainable methods in their operations.

Responsible investment management and operations are important in managing investment-related risks, and in mitigating potential adverse impacts on the Group's reputation. Therefore, Sampo Group takes ESG considerations into account when assessing the security, quality, liquidity, and profitability of investments. Investment opportunities are carefully analysed before any investments are made, and ESG considerations are analysed in parallel with other factors that might affect the risk-return ratio of individual investments. Depending on the asset class, Sampo Group uses different ESG strategies to ensure the effective consideration and management of investment risks arising from ESG considerations. The strategies used include, for example, ESG integration, sector-based screening, norms-based screening, and engagement with investee companies.

The people and communities theme includes topics relating to human rights and labour practices; diversity, equity, and inclusion; health, safety, and wellbeing; competence development; customer needs and preferences; and sustainable sales and marketing practices.

Sampo Group wants to provide customers with the best service in all situations. Here, skilled and motivated employees are an essential success factor. Losing talent or being perceived as an unattractive employer would pose large risks for the businesses. Therefore, Sampo Group strives to ensure a sound work environment, not only because it is stipulated by law but also because it lays the foundation for sustainable business performance. Diversity and inclusion are key focus areas for Sampo Group, as it is committed to providing a non-discriminatory, open, and agreeable work environment where everyone is treated fairly and equally. Risks related to these themes are managed, for example, by having strong internal policies and governance structures, conducting organisational development programmes, and offering employees training, interesting career opportunities, and attractive remuneration packages.

Additionally, a sustainable product and service offering requires being attentive to the risks relating to inappropriate customer advice and product sales, errors in claims handling and complaint processes, and a lack of clarity on conditions, prices, and fees. The focus in sales and marketing practices is on meeting the demands and needs of the customer and providing the customer with the information necessary for them to make well-informed decisions on their insurance coverage. Sampo Group manages risks related to these themes, for example, by having effective internal policies and governance structures, and offering employees training.

The climate and environment theme includes topics, such as, climate change, resource use and circular economy as well as biodiversity.

Climate change and environmental issues are factors that are expected to have a mid- and long-term effect on Sampo Group's businesses. Climate-related risks can be categorised into physical risks and transition risks.

The financial position and results of Sampo Group's insurance operations are affected especially by physical risks. The increasing likelihood of extreme weather conditions and natural disasters is included in internal risk models. Climate-related risks are also managed effectively with reinsurance programmes and price assessments. Since climate change can increase the frequency and/or severity of physical risks, Sampo Group conducts sensitivity analyses using scenarios in which the severity of natural catastrophes is assumed to increase. Sampo Group also helps its corporate and private customers to manage climate-related risks. Extreme weather events can, for example, damage properties and lead to crop failure and business interruption. Loss prevention is an essential part of insurance services, as it helps customers to reduce economic losses and mitigates the impacts of climate change.

Sampo Group's investments can be exposed to both physical risks and transition risks, depending on the investment in question. Investments are particularly exposed to physical risks in the form of losses incurred from extreme weather events. The transition to a low-carbon society, with potentially increasing environmental and climate regulation, more stringent emission requirements, and changes in market preferences, could in turn cause transition risks for the Group's investments, and a possible revaluation of assets as operating models in carbon-intense sectors change. To manage physical risks and transition risks, investment opportunities are carefully analysed before any investments are made, and climate-related risks are considered along with other factors affecting the risk-return ratio of individual investments. The methods used by Sampo Group include annual analysis of the carbon footprint and climate impact of investments, sector-based screening and ESG integration, monitoring the geographical distribution of investments, and engagement with investee companies.

In terms of climate change scenario analysis, Sampo Group, together with the external vendor ORTEC Finance, has analysed the Group investment portfolio's exposure to systemic economic and financial climate change risks in four different climate scenarios over the next 40 years. Based on the impact on macroeconomic variables as well as the potential effect on claims related to natural catastrophes, including consequences on pricing of insurance contracts, the impact on the insurance results has also been analysed.

For more information on the scenario analysis, see the section Climate change in the Sustainability Statement.

Core risk management activities

To create value for all stakeholders in the long run, Sampo Group must have the following forms of capital in place:

- Financial flexibility in the form of adequate capital and liquidity.
- Good technological infrastructure.
- Intellectual capital in the form of comprehensive proprietary actuarial data and analytical tools to convert this data into information.
- Human capital in the form of skilful and motivated employees.
- Social and relationship capital in the form of good relationships with society and clients to understand the changing needs of different stakeholders.

These resources are being continuously developed in Sampo Group. They are in use when the following core activities related to risk pricing, risk taking, and active management of risk portfolios are conducted.

Appropriate selection and pricing of underwriting risks

- Underwriting risks are carefully selected and are priced to reflect their inherent risk levels.
- Insurance products are developed proactively to meet clients' changing needs and preferences.

Effective management of underwriting exposures

- Diversification is actively sought.
- Reinsurance is used effectively to reduce largest exposures.

Careful selection and execution of investment transactions

- Risk return ratios and sustainability issues of separate investments opportunities are carefully analysed.
- Transactions are executed effectively.

Effective mitigation of consequential risks

- Counterparty default risks are mitigated by carefully selecting counterparties, applying collateral agreements, and assuring adequate diversification.
- High quality and cost-efficient business processes are maintained.
- Continuity and recovery plans are continuously developed to secure business continuity.

Effective management of investment portfolios and the balance sheet

- Balance between expected returns and risks in investment portfolios and the balance sheet is optimised, considering the features of insurance liabilities, internally assessed capital needs, regulatory solvency rules and rating requirements.
- Liquidity risks are managed by having an adequate portion of investments in liquid instruments. The portion is mainly dependent on the features of the liabilities.

At the Group level, the risk management focus is on capitalisation, leverage, and liquidity. It is also essential to identify potential risk concentrations, and to have a thorough understanding of how solvency and reported profits of Group companies would develop under different scenarios. These concentrations and correlations may influence Group level capitalisation, leverage, and liquidity, as well as on Group level management actions.

When the above-mentioned core activities are successfully implemented, a balance between profits, risks and capitalisation can be achieved and shareholder value can be created.

Underwriting risks at Sampo Group

With respect to the underwriting businesses carried out in the subsidiary companies, it has been established that If and Topdanmark operate within the Nordic countries, but mostly in different geographical areas, and in different lines of business; hence their underwriting risks differ by nature. However, there are no material underwriting risk concentrations in the normal course of business. Hastings operates solely in the United Kingdom and hence, its underwriting risks are geographically distinct from the Nordics. Consequently, business lines as such are contributing diversification benefits rather than a concentration of risks.

Sampo Group's insurance service result increased in 2024 by 14 per cent to EUR 1,394 million (1,193). The table Underwriting performance, 31 December 2024 and 31 December 2023 presents the development of insurance revenue, claims expenses, operating expenses, and insurance service result for the last two years.

Underwriting performance

Sampo Group, 31 December 2024 and 31 December 2023

	Insurance revenue		Reinsurance premiums expenses		Insurance service expenses, Claims incurred		Insurance service expenses, Operating expenses		Reinsurers' share of claims incurred		Insurance service result	
EURm	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**	**2024**	**2023**
Motor	4,520	3,973	-392	-590	-2,989	-2,688	-680	-621	173	424	632	499
Workers' compensation	314	309	-6	-6	-164	-106	-43	-42	5	1	106	155
Liability	460	446	-71	-68	-213	-222	-68	-65	36	22	143	114
Accident	1,162	910	-8	-6	-746	-542	-180	-148	6	4	234	217
Property	2,796	2,532	-406	-307	-2,054	-2,097	-388	-347	297	393	244	173
Marine, aviation, transport	136	142	-24	-27	-75	-79	-21	-22	16	13	31	28
Other	62	105	-2	-2	-46	-76	-16	-22	4	1	3	7
Total	**9,450**	**8,418**	**-909**	**-1,006**	**-6,287**	**-5,810**	**-1,396**	**-1,266**	**537**	**858**	**1,394**	**1,193**

Key sensitivities

Effects from instant change on profit or loss in year 2024

EURm	Shock	2024
Combined ratio (quarterly effect)	Discount rate +100 bps	-0.60 %
Combined ratio (quarterly effect)	Discount rate -100 bps	0.60 %
Insurance finance income and expense, net	Discount rate +100 bps	330
Insurance finance income and expense, net	Discount rate -100 bps	-380
Net investment income	Interest rates +100 bps	-320
Net investment income	Interest rates -100 bps	350
Net investment income	Spreads +100 bps	-330
Net investment income	Equities -10%	-220

The main non-life underwriting risks that may influence future claims are the risk of single large claims and the risk of catastrophe events. However, Sampo Group has comprehensive reinsurance programmes in place, contributing to the low level of underwriting risk. The negative economic impacts of natural catastrophes and single large claims are also mitigated by the Group's well-diversified portfolio. Claims costs may also be affected by uncertainty in claims outstanding caused by higher-than-expected claims inflation, lower discount rates, or an increased retirement age with the consequence that both annuities and lump sum payments would increase. However, higher long-term inflation would be expected to coincide with higher nominal discount rates, whereby the effects would in part cancel each other out.

Net liabilities for incurred claims have been presented in the following table.

Net liabilities for incurred claims

Sampo Group, 31 December 2024

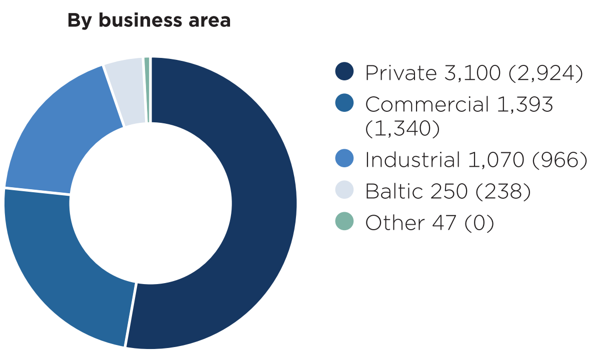
	Sweden		Norway		Finland		Denmark		Baltics		UK		Total	
	EURm	Duration	EURm	Duration	EURm	Duration	EURm	Duration	EURm	Duration	EURm	Duration	EURm	Duration
Motor other and MTPL	779	8.9	163	1.3	655	11.0	273	2.2	111	4.0	1,030	2.2	3,011	5.9
- whereof MTPL	679	10.2	91	2.0	633	11.4	238	2.3	98	4.5	—	—	1,739	8.8
Workers' compensation	—	—	97	2.8	773	10.3	1,137	7.3	—	—	—	—	2,008	8.3
Liability	229	3.8	100	1.5	113	2.7	193	2.5	23	2.0	—	—	658	2.8
Accident	253	6.0	338	5.9	190	7.1	269	2.3	3	0.3	—	—	1,053	5.2
Property	349	0.9	334	0.9	160	0.8	325	1.1	34	0.4	44	1.0	1,245	0.9
Marine, aviation, transport	17	0.7	18	0.7	9	1.0	13	0.7	2	0.6	—	—	59	0.8
Other	—	—	0	—	—	—	34	1.1	—	0.0	—	—	34	1.1
Total	1,628	6.0	1,050	2.8	1,900	8.9	2,243	4.6	172	3.0	1,074	2.1	8,067	5.3

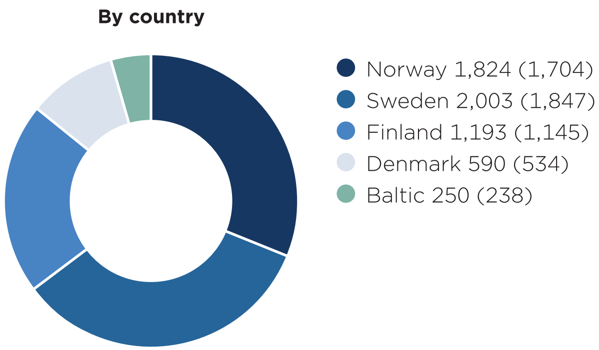
Underwriting risks at If Group

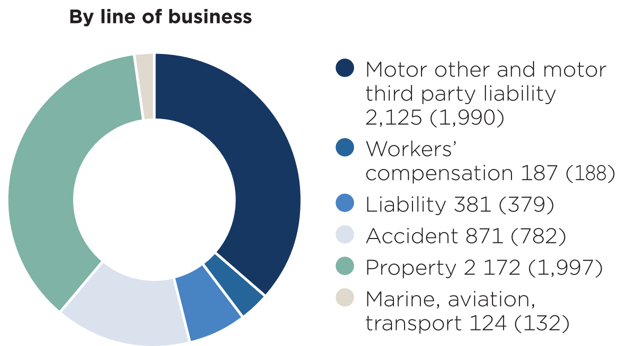
As shown in the graph Breakdown of gross written premiums by business area, country, and line of business, If, 31 December 2024, the If insurance portfolio is well diversified across business areas, countries, and lines of business. The six lines of business are segmented in accordance with the insurance class segmentation used in IFRS.

Breakdown of gross written premiums by business area, country, and line of business

If, 31 December 2024, total EUR 5,860 million (5,468)







There are minor differences between the figures reported by Sampo Group and If due to different foreign exchange rates used in the consolidation.

Premium and catastrophe risk and their management and control

The main factors affecting If's premium risk are claims volatility, claims inflation, and pricing methodology.

Given the inherent uncertainty of P&C insurance operations, there is a risk of losses due to unexpectedly high claim expenses. Examples of what could lead to high claim expenses include large fires, natural catastrophes, or an unforeseen increase in the frequency or the average size of small and medium-sized claims. Another example is claims inflation, which is taken into account in the pricing process and can affect competitiveness when claim costs increases.

The principal methods for mitigating premium risk are reinsurance and risk sharing, portfolio diversification, prudent underwriting, and detailed and frequent follow-ups linked to the strategy and financial planning process.

An analysis of how changes in the combined ratio, insurance revenue, and claims incurred affect the result before tax is presented in the table Sensitivity analysis, premium risk, If, 31 December 2024 and 31 December 2023.

Sensitivity analysis, premium risk

If, 31 December 2024 and 31 December 2023

	Level 2024		Change in current level	Effect on result before tax (Gross)		Effect on result before tax (Net)	
Key Figures	**(Gross)**	**(Net)**		**2024**	**2023**	**2024**	**2023**
Combined ratio, business area Private	81.9 %	82.2 %	+/- 1 percentage point	+/-- 30.1	+/-- 28.7	+/-- 29.7	+/-- 28.4
Combined ratio, business area Commercial	89.4 %	83.6 %	+/- 1 percentage point	+/-- 13.7	+/-- 13.2	+/-- 13.6	+/-- 13.1
Combined ratio, business area Industrial	76.9 %	88.7 %	+/- 1 percentage point	+/-- 10.3	+/-- 9.2	+/-- 6.6	+/-- 6.3
Combined ratio, business area Baltics	85.6 %	86.0 %	+/- 1 percentage point	+/-- 2.4	+/-- 2.3	+/-- 2.4	+/-- 2.2
Insurance revenue (net of reinsurance premium expenses EURm)	5,680	5,258	+/- 1 per cent	+/-- 56.8	+/-- 53.3	+/-- 52.6	+/-- 49.9
Claims incurred (EURm)	3,873	3,554	+/- 1 per cent	+/-- 38.7	+/-- 37.6	+/-- 35.5	+/-- 33.7

The overall risk appetite and risk tolerance limit for underwriting risk is set out in the Risk Management Policy, which is complemented by sub-limits for risks within the underwriting operations. The Underwriting Policy sets general principles, restrictions, and directions for the underwriting activities, and is supplemented by guidelines outlining in greater detail how to conduct underwriting within each business area.

The Reinsurance Policy stipulates guidelines for the purchase of reinsurance. The optimal choice of reinsurance program is evaluated by comparing the expected cost with the benefit of the reinsurance, as well as the impact on result volatility and capital requirements. The main tool for this evaluation is the Sampo Group internal model in which small claims, large claims, and natural catastrophes are modelled. The Reinsurance Policy includes limitations on permitted reinsurers as well as limits relating to concentration risk and reinsurance risk.

In 2024, retention levels were between SEK 100 million (approximately EUR 11.0 million) and SEK 300 million (approximately EUR 34.0 million) per risk and SEK 300 million (approximately EUR 34.0 million) per event.

Reserve risk and its management and control

If's main reserve risks are claims inflation and increased retirement age.

Reserves, especially in long tailed business, are sensitive to assumptions of future claims inflation, as they affect the future claim amount. An increased retirement age, through for instance a political decision, will increase the duration and present value of annuities as they decrease, or expire, at retirement. An increase in life expectancy will likewise increase the duration and present value of annuities.

The valuation of the liability for incurred claims always includes a degree of uncertainty, since it is based on estimates of the size and the frequency of future claim payments. The uncertainty in the valuation is normally greater for new portfolios for which complete run-off statistics are not yet available, and for portfolios including claims that take a long time to settle. Workers' compensation, motor third party liability (MTPL), personal accident, and liability insurance are products with the latter characteristics.

The value of the net liability for incurred claims is, in addition to risk factors relating to reserve risk, also impacted by changes in discount rates and exchange rates. These market risks are described in sections for interest rate risk and currency risk. Reserve risk differs from interest rate risk since it relates to the size of future cash flows, while the interest rate risk only impacts the present value of future cash flows.

The duration of the provisions, and thus the sensitivity to changes in discount rates, varies with each product portfolio. The weighted average duration for 2024 across the product portfolios was 6.1 years (6.2).

A large part of the exposure relates to lines of business MTPL and workers' compensation, where a part of the liability for these lines includes annuities. In 2024 the proportion of liability for incurred claims related to MTPL and workers' compensation was 51 per cent (52).

In the table Net liability for incurred claims by line of business and major geographical area, If, 31 December 2024 and 31 December 2023, the size and duration of If's IFRS net liability for incurred claims are presented by line of business and major geographical area.

Net liabilities for incurred claims by line of business and major geographical area

If, 31 December 2024

	Sweden		Norway		Finland		Denmark		Baltics		Total	
	EURm	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**
Motor other and MTPL	800	8.8	163	1.3	655	11.0	102	2.3	111	4.0	1,831	8.3
- whereof MTPL	699	10.0	91	2.0	633	11.4	97	2.4	98	4.5	1,618	9.3
Workers' compensation	—	—	97	2.8	773	10.3	319	8.1	—	—	1,190	9.1
Liability	229	3.8	100	1.5	113	2.7	84	2.8	23	2.0	548	2.9
Accident	253	6.0	338	5.9	190	7.1	79	1.9	3	0.3	863	5.8
Property	349	0.9	334	0.9	160	0.8	125	0.3	34	0.4	1,001	0.8
Marine, aviation, transport	17	0.7	18	0.7	9	1.0	12	0.7	2	0.6	58	0.7
Total	**1,648**	**5.9**	**1,050**	**2.8**	**1,900**	**8.9**	**721**	**4.5**	**172**	**3.0**	**5,491**	**6.1**

Includes internal items with Hastings.

Net liabilities for incurred claims by line of business and major geographical area

If, 31 December 2023

	Sweden		Norway		Finland		Denmark		Baltics		Total	
	EURm	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**	**EURm**	**Duration**
Motor other and MTPL	868	9.2	226	1.7	669	10.8	103	3.0	107	4.0	1,972	8.2
- whereof MTPL	774	10.2	159	2.3	647	11.1	89	3.1	93	4.5	1,762	9.2
Workers' compensation	—	—	116	2.9	805	10.4	300	8.2	—	—	1,220	9.1
Liability	249	4.0	120	1.5	117	3.3	74	2.9	20	2.0	580	3.1
Accident	283	6.4	319	6.1	163	7.0	80	1.7	3	0.3	847	5.9
Property	330	1.0	364	0.8	175	0.7	101	0.4	26	0.6	996	0.8
Marine, aviation, transport	17	0.7	16	0.7	9	1.1	26	0.6	3	0.7	70	0.7
Total	**1,747**	**6.3**	**1,162**	**2.7**	**1,938**	**8.9**	**681**	**4.7**	**158**	**3.1**	**5,686**	**6.2**

A sensitivity analysis of the reserve risk is presented in the table below, as well as the interest rate risk relating to insurance contracts. The effects represent the immediate impact on the liability values as a result of changes in the different risk factors as per December 31 each year. The sensitivity analysis is calculated before tax. Changes in the liability for incurred claims, net will result in a corresponding change in result before income taxes. The effect in the income statement is presented in either the insurance service result or the net financial result.

Sensitivity analysis, reserve risk

If, 31 December 2024 and 31 December 2023

Insurance liabilities item	Risk factor	Change in risk parameter	Country	Effect EURm 2024 Gross	Effect EURm 2024 Net	Effect EURm 2023 Gross	Effect EURm 2023 Net
Discounted estimated future cash flows	Inflation increase	Increase by 1 percentage point	Sweden	110.4	106.5	124.5	120.1
			Denmark	35.7	33.8	33.6	33.0
			Finland	29.0	27.9	25.5	25.2
			Norway	17.3	16.2	21.5	20.2
Annuities and reated INBR	Decrease in mortality	Life expectancy increase by 1 year	Sweden	14.7	14.7	15.1	15.1
			Denmark	1.1	1.1	1.0	1.0
			Finland	49.1	49.1	49.2	49.2
			Norway	0.2	0.2	0.2	0.2
Discounted liability for incurred claims	Decrease in discount rate	Decrease by 1 percentage point to liquid part of yield curve	Sweden	79.0	75.2	87.0	82.6
			Denmark	35.3	33.4	33.5	32.9
			Finland	169.5	168.4	171.6	171.3
			Norway	28.6	27.5	31.4	30.1

The output from the sensitivity analysis is illustrated both before and after reinsurance in the claims cost trend tables. These are disclosed in **note 21**.

The Boards of Directors decide on the guidelines governing the calculation of insurance liabilities. The Chief Actuary is responsible for developing and presenting guidelines on how the insurance liabilities are to be calculated, and for assessing whether the level of total liability is sufficient.

The actuarial estimates are based on historical claims data and exposures that are available at the closing date. Considered factors include loss development trends, level of unpaid claims, changes in legislation, case law and economic conditions. When estimating the liability, established actuarial methods are generally used, combined with projections of the number of claims and average claim costs.

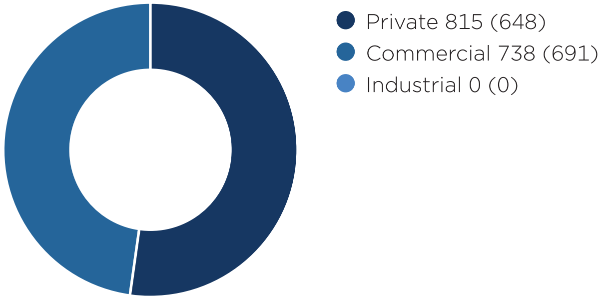
Underwriting risks in Topdanmark

As shown in the graph Breakdown of gross written premiums by business area, country and line of business, Topdanmark, 31 December 2024, Topdanmark's insurance portfolio is well diversified across Business areas and lines of business.

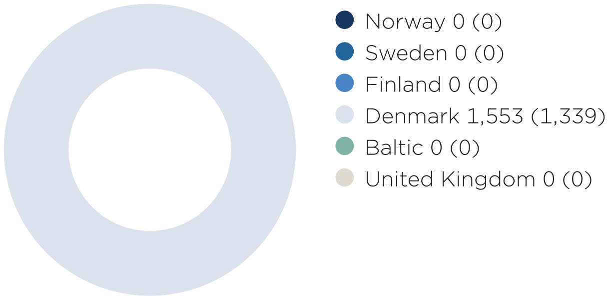
Breakdown of gross written premiums by business area, country and line of business

Topdanmark, 31 December 2024, Total EUR 1,553 million (1,339)

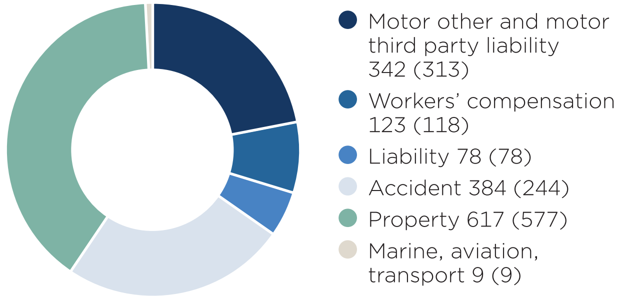
By business area



By country



By line of business



Premium and catastrophe risk and their management and control

The main underwriting risk that influences the performance is the risk of catastrophe events. However, the insurance risk of Topdanmark Forsikring is mitigated by a comprehensive reinsurance program. The reinsurance program focuses on catastrophe risks such as storm, cloudburst, fire, and other cumulative risks, where several policyholders are affected by the same event. The biggest retentions are on storm with DKK 150 million plus reinstatement for each event, while the biggest retention on fire is DKK 30 million with a maximum capacity of DKK 1,245 billion. In workers' compensation risks are covered up to DKK 1 billion with a retention of DKK 50 million.

Nearly all insurance risks in Topdanmark Forsikring are measured by a partial internal model instead of the Solvency II standard model. The partial internal model has been approved by the Danish Supervisory Authorities for solvency calculations. The efficiency of the reinsurance programme is assessed by the partial internal model.

With certain restrictions, acts of terrorism are covered by the reinsurance contracts. The NBCR (nuclear, biological, chemical, radiological) acts of terrorism are covered by a public organisation. This is based on an Act on NBCR acts of terrorism. Under this scheme the costs from a NBCR attack in Denmark will initially be borne by the State, but those costs will subsequently be recovered from policyholders.

Premium risk reduction measures taken at different levels of operations are as follows:

- Collection of data on risk and claims history
- Use of collected and processed data in profitability reporting, risk analyses, and in the internal model
- Ongoing follow-up on risk developments, as well as quarterly forecasts for future risk development
- Correct pricing using a statistical model tool, including customer scoring tools
- Reinsurance cover that reduces the risk, especially for catastrophe events
- Ongoing follow-up on the risk overview and reinsurance coverage in Topdanmark's Risk Committee.

To maintain product and customer profitability, Topdanmark monitors changes in its customer portfolios. Provisions are recalculated, and the profitability reports are updated in the same context on a monthly basis. Based on this reporting, trends in claim levels are carefully assessed, and price levels may be adjusted if considered necessary.

In the private market segment, customer scoring is used, and customers are divided into groups, according to their expected profitability levels. The customer scoring has two roles. First, it helps to maintain the balance between the individual customer's price and risk. Secondly, it facilitates the fairness between individual customers by ensuring that no customers are paying too large premiums to cover losses from customers who pay too small premiums.

The historical profitability of major SME customers with individual insurance schemes is monitored using customer assessment systems. These assessment systems enable Topdanmark to achieve accurate information about income, claims expenses, combined ratio etc., for each customer.

In addition to the analysis described above, Topdanmark continuously improves its administration systems to achieve more detailed data, which, in turn enables the company to continuously improve pricing and gain even better insight into how the different types of claims are composed.

The insurance risk scenarios are presented in the table Sensitivity analysis, premium risk, Topdanmark, 31 December 2024 and 31 December 2023.

Sensitivity analysis, premium risk

Topdanmark, 31 December 2024 and 31 December 2023

Key figures	Current level 2024 (Gross)	Current level 2024 (Net)	Change in current level	Effect on result before tax (Gross) 2024	Effect on result before tax (Gross) 2023	Effect on result before tax (Net) 2024	Effect on result before tax (Net) 2023
Combined ratio, business area Private	85.6 %	85.4 %	+/- 1 percentage point	+/- 8.2	+/- 7.6	+/- 8.1	+/- 7.5
Combined ratio, business area Commercial	85.0 %	83.2 %	+/- 1 percentage point	+/- 7.4	+/- 7.0	+/- 6.6	+/- 6.4
Insurance revenue (net of insurance premium expense, EURm)	—	1,468	+/- 1 per cent	—	—	+/- 14.7	+/- 13.8
Claims incurred (EURm)	1,017	971	+/- 1 per cent	+/- 10.2	+/- 9.5	+/- 9.7	+/- 9.1

Reserve risk and its management and control

The insurance lines of business are divided into short-tail i.e., those lines where the period from notification until settlement is short, and long-tail i.e., those lines where the period from notification until settlement is long. The main short-tail lines in Topdanmark Forsikring are buildings, other property, and motor. Other short tail lines are health products registered via Oona A/S. For the short-tail lines, the claims are mainly settled within the first year. Long-tail lines relate to personal injury and liability, and consist of the lines Workers' compensation, Accident, Motor third party insurance, and Commercial liability. Composition of non-life provisions for outstanding claims is presented in the following table.

Net liability for incurred claims by line of business

Topdanmark, 31 December 2024 and 31 December 2023

	2024 EURm	2024 Duration	2023 EURm	2023 Duration
Motor other and MTPL	170	2.1	159	2.1
- whereof MTPL	141	2.3	133	2.3
Workers' compensation	818	7.1	813	7.2
Liability	110	2.3	105	2.3
Accident	190	2.5	179	2.5
Property	199	1.5	209	1.4
Marine, aviation, transport	1	1.2	1	1.0
Other	35	1.1	37	1.0
Total	**1,523**	**4.7**	**1,503**	**4.8**

Due to the longer period of claims settlement, the risk profile of the long-tail lines of business are generally more uncertain than that of the short-tail lines. It is not unusual that claims in long-tail lines are settled three to five years after notification and in rare cases up to ten to fifteen years.

The reserve risk is calculated using Topdanmark's partial internal model for insurance risk. Workers' compensation claims provision has by far the biggest risk, followed by the other long-tail lines' claims provisions.

During such a long period of settlement, the levels of compensation could be significantly affected by changes in legislation, case-law or practice in the compensation of claim incidents adopted by the Danish Labour Market Insurance, which decides on compensation for injury and loss of earnings potential in all cases of serious industrial injuries. The practice adopted by the Danish Labour Market Insurance also has some impact on the levels of compensation for accident and personal injury within motor liability and commercial liability insurance. Supreme court decisions can also influence the provisions for former years, especially for Workers' compensation.

The reserve risk represents mostly the ordinary uncertainty of calculation and claims inflation, i.e., an increase in the level of compensation due to the annual increase in compensation per policy being higher than the general development in prices, or due to a change in judicial practice or legislation. The sufficiency of the provisions is tested in key lines by calculating the provisions using alternative models as well, and then comparing the compensation with information from external sources, primarily statistical material from the Danish Labour Market Insurance and the Danish Road Sector/Road Directorate.

The sensitivity analysis of the reserve risk is presented in the following table.

Sensitivity analysis, reserve risk

Topdanmark, 31 December 2024 and 31 December 2023

Insurance liabilities item	Risk factor	Change in risk parameter	Country	Effect EURm 2024	Effect EURm 2024 Net	Effect EURm 2023	Effect EURm 2023 Net
Discounted estimated future cash flows	Inflation increase	Increase by 1 percentage point	Denmark	49.9	49.9	50.7	50.7
Annuities and reated INBR	Decrease in mortality	Life expectancy increase by 1 year	Denmark	0.9	0.9	0.9	0.9
Discounted insurance liabilities, net	Decrease in discount rate	Decrease by 1 percentage point	Denmark	59.1	58.7	62.4	61.7

Underwriting risks in Hastings Group

Hastings provides motor, home insurance products, and is a provider of regulated consumer credit in the current form of personal loans. In the United Kingdom (UK) market, the motor and home insurance products are provided through its Gibraltar-based general insurance underwriting company Advantage.

For Solvency II reporting purposes the lines of business are:

- Motor vehicle liability insurance (Motor liability)
- Other motor insurance (Motor other)
- Fire and other damage to property insurance

Net liability for incurred claims by line of business

Hastings, 31 December 2024 and 31 December 2023

	31 Dec 2024		31 Dec 2023	
	EURm	Duration	EURm	Duration
Motor	1,014	2.2	755	2.2
Property	44	1.0	40	1.8
Total	**1,058**	**2.1**	**794**	**2.2**

Sensitivity analysis, premium risk

Hastings, 31 December 2024 and 31 December 2023

				Effect on pre-tax profit (Gross), EURm		Effect on pre-tax profit (Net), EURm	
Key figure	Level, 2024 (Gross)	Level, 2024 (Net)	Change	2024	2023	2024	2023
Operating ratio	— %	89 %	+/- 1 percentage point	—	—	+/- 16.7	+/- 12.5
Insurance revenue (net of reinsurance premium expense)	2234	1814	+/- 1 per cent	+/- 22.3	+/- 17.2	+/- 18.2	+/- 11.3
Claims incurred	1417	1230	+/- 1 per cent	+/- 14.2	+/- 11.4	+/- 12.3	+/- 7.1

Pricing risk

Advantage's risk appetite requires management to maintain rates that are projected to achieve loss ratios within the target loss ratio range. As a response to market conditions, rates were regularly adjusted, after review by management, to remain competitive and provide customer-focused benefits to policyholders. The rate changes were regularly reviewed and amended, in keeping with an agile approach to pricing and appropriately factoring in ongoing claims cost inflation risk. Robust technical product pricing with strong governance controls for both Motor and Household products is the principal way Advantage manages insurance risk exposures, in order to mitigate the risk of pricing ineffectively.

Changes to technical rates are constructed based upon the analysis of current and future predicted frequency and severity patterns, new business acquisition, and existing case models to ensure an appropriate risk spread and balance. Competitor monitoring also feeds into the development of pricing and product segmentation.

Weekly governance arrangements approve changes to rate plan and review account performance. The Rating Analysis Committee approves decisions for segment level rate changes and book level rate changes. The goal is to ensure that the business being written will be profitable.

Audits are conducted on a regular basis to ensure that all underwriting and rating rules are being applied correctly.

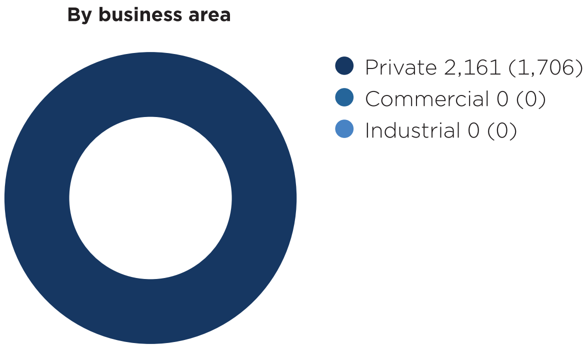
Reserve risk

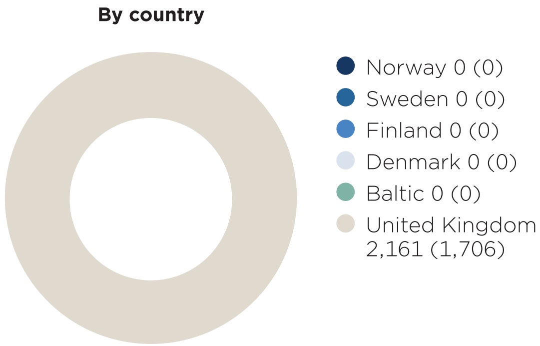
Advantage does not take significant reserve risk and holds an internal risk margin at a 75 per cent confidence level versus the internal best estimate. Since reserving is subject to expert judgment, the Group Chief Actuary calculates the best estimate, the Hastings Group Senior Actuary verifies the data, appropriateness of techniques utilised, and assumptions used to create the best estimate, and an additional best estimate is created by a fully independent third party. Advantage has a series of monthly, quarterly, and semi-annual controls to ensure reserve adequacy.

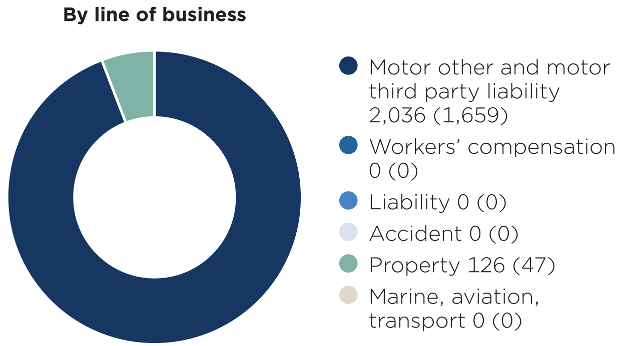
Hastings' Gross Written Premiums (GWP) for 2024 amounted to EUR 2,161 million.

Breakdown of gross written premiums by business area, country and line of business

Hastings, 31 December 2024, Total EUR 2,161 million (1,706)







Advantage maintained a disciplined approach to pricing despite continued market competition. Live customer policies grew year-on-year in 2024. This disciplined but agile underwriting and pricing approach led to many selective rate adjustments during 2024.

Claims cost inflation remained a large influence on the risk profile for 2024. Effective pricing, claims management, and frequency experience has resulted in profits and capital with the solvency ratio within or above of Advantage's target range during the year.

Sensitivity analysis, reserve risk

Hastings, 31 December 2024 and 31 December 2023

Insurance liabilities item	Risk factor	Change in risk parameter	Effect Gross EURm 2024	Effect Net EURm 2024	Effect Gross EURm 2023	Effect Net EURm 2023
Discounted estimated future cash flows	Inflation increase	Increase by 1 percentage point	66.1	12.6	63.0	10.1
Periodic Payment Orders (PPOs)	Decrease in mortality	Life expectancy increase by 1 year	3.4	0.1	3.1	0.1
Discounted insurance liabilities, net	Decrease in discount rate	Decrease by 1 percentage point	58.8	17.3	37.4	10.2

Market risks at Sampo Group

For all insurance entities, their insurance liabilities and the company specific risk appetite are the starting points for their investment activities. The insurance liabilities, including loss-absorbing buffers, as well as the risk appetite of the insurance entities in If, Topdanmark, and Hastings differ, and as a result, the structures and risks of the investment portfolios and the balance sheets of the companies differ respectively. Sampo Group's investment assets presented in the tables and graphs in this section do not include investments in the shares of subsidiaries.

The total amount of Sampo Group's investment assets as at 31 December 2024 was EUR 16,727 million (17,160) as presented in the following table, Investment Allocation, Sampo Group, 31 December 2024 and 31 December 2023.

Investment allocation

Sampo Group, 31 December 2024 and 31 December 2023

	2024			2023		
Asset class	**Market value, EURm**	**Weight, %**	**Average maturity, years**	**Market value, EURm**	**Weight, %**	**Average maturity, years**
Fixed income total	**14,780**	**88 %**	**3.7**	**14,903**	**87 %**	**3.4**
Money market securities and cash	1,262	8 %	0.1	2,026	12 %	0.1
Government bonds	1,597	10 %	4.1	1,299	8 %	3.4
Credit bonds, funds and loans	11,922	71 %	3.9	11,579	67 %	3.9
Covered bonds	4,175	25 %	4.9	4,022	23 %	4.8
Investment grade bonds and loans	6,518	39 %	3.4	6,013	35 %	3.6
High-yield bonds and loans	1,228	7 %	3.3	1,544	9 %	3.1
Listed equity total	**1,520**	**9 %**	**-**	**1,474**	**9 %**	**-**
Nordic Countries	693	4 %	-	735	4 %	-
Western Europe	447	3 %	-	416	2 %	-
North America	204	1 %	-	155	1 %	-
Asia	176	1 %	-	147	1 %	-
Others	0	0 %	-	20	– %	-
Alternative investments total	**465**	**3 %**	**-**	**800**	**5 %**	**-**
Real estate	0	0 %	-	1	0 %	-
Private equity	464	3 %	-	765	4 %	-
Other alternative	0	0 %	-	34	0 %	-
Derivatives	**-38**	**0 %**	**-**	**-17**	**0 %**	**-**
Asset classes total	**16,727**	**100 %**	**-**	**17,160**	**100%**	**-**

The financial assets, as presented in the note 12, differ from the investment allocation because the latter does not include the Hastings lending business and the associated expected credit loss (ECL) provision. Additionally, investment allocation includes cash and cash equivalents, accrued interest and derivatives with negative market value. It also includes settlement receivables and liabilities.

Investment activities and market risk taking are arranged pro-actively in order to diversify single name risks, except with regards to Nordic banks, where most Sampo Group companies have placed their extra funds in short-term money market assets and cash. From the diversification of the assets on the balance sheet perspective, Topdanmark is a positive factor because the role of Danish assets is dominant in its portfolios, and especially the role of Danish covered bonds is central. In Sampo Group's other insurance companies' portfolios, the weight of Danish investments has been immaterial. Also Hastings' investment portfolio has a positive impact on the diversification of Sampo Group's investments. Most Hastings' assets are British investments, denominated in pound sterling, which is a market that Sampo Group otherwise has very limited exposure to. Moreover, Hastings' investment portfolio consists mainly of investment grade fixed income investments.

In the next paragraphs concentrations by homogenous risk groups and by single names are presented first, and after that balance sheet level risks are discussed.

Holdings by sector, geographical area and asset class

Regarding fixed income and equity exposures, financial institutions and covered bonds have a material weight in the group-wide portfolios, whereas the role of public sector investments is quite limited. Most of these assets are issued by Nordic corporates and institutions, although Hastings brings some diversification in this respect. Most corporate issuers, although being based in the Nordic countries, are operating at global markets and hence their performance is not as dependent on the Nordic markets. Exposures by sector, asset class, and rating are presented in the following table. Sampo considers that the balance sheet values to be descriptive of the maximum exposure amount exposed to credit risk.

Exposures by sector, asset class and rating

Sampo Group, 31 December 2024

EURm	AAA	AA+ - AA-	A+ - A-	BBB+ - BBB-	BB+ - C	D	Non-rated	Fixed income total	Listed equities	Other	Counter-party risk	Total	Change from 31 Dec 2023
Basic industry	–	–	36	171	28	–	31	266	32	–	–	**297**	-49
Capital goods	–	15	100	228	26	–	31	399	518	–	–	**917**	-84
Consumer products	–	57	272	323	22	–	122	796	173	1	–	**969**	-12
Energy	–	21	44	–	–	–	44	108	13	–	–	**122**	2
Financial institutions	34	962	2,122	800	27	–	81	4,026	–	404	3	**4,432**	-1,049
Governments	487	209	–	–	–	–	15	711	–	–	–	**711**	240
Government guaranteed	55	25	–	–	–	–	–	80	–	–	–	**80**	6
Health care	–	–	17	141	23	–	47	228	2	–	–	**230**	32
Insurance	17	20	44	230	8	–	4	324	–	–	–	**324**	-210
Media	–	–	–	5	5	–	47	57	–	–	–	**57**	42
Packaging	–	–	–	6	12	–	9	27	–	–	–	**27**	2
Public sector, other	478	18	–	–	–	–	–	496	–	–	–	**496**	-27
Real estate	–	35	149	137	27	3	154	506	–	–	–	**507**	-133
Services	–	–	42	193	135	–	59	428	–	–	–	**428**	68
Supranationals	310	–	–	–	–	–	–	310	–	–	–	**310**	107
Technology and electronics	–	12	28	68	–	–	86	193	–	1	–	**194**	38
Telecommunications	–	–	35	263	–	–	–	298	43	–	–	**341**	51
Transportation	–	49	85	48	5	–	62	249	–	–	–	**249**	29
Utilities	–	–	130	238	60	–	94	522	–	–	–	**522**	114
Others	–	–	31	20	–	–	42	93	4	25	–	**122**	32
Covered bonds	3,764	–	109	–	–	–	302	4,175	–	–	–	**4,175**	137
Funds	157	79	120	18	24	–	81	480	735	13	–	**1,228**	-22
Clearing house	–	–	–	–	–	–	–	–	–	–	9	**9**	7
Total	**5,302**	**1,502**	**3,363**	**2,887**	**402**	**3**	**1,311**	**14,771**	**1,520**	**445**	**12**	**16,748**	**-677**
Change from 31 Dec 2023	-111	-235	-118	206	10	3	18	-228	43	-436	-57	**-677**	

Total assets differ from the table Investment allocation due to derivatives.

Most of the financial institutions and covered bonds are in the Nordic countries, which can be seen in the table Fixed income investments in the financial sector, Sampo Group, 31 December 2024 and 31 December 2023.

Fixed income investments in the financial sector

Sampo Group, 31 December 2024

EURm	Covered bonds	Cash and money market securities	Long-term senior debt	Long-term subordinated debt	Total	%
Denmark	2,214	7	332	168	**2,721**	32,3 %
Sweden	1,506	40	474	175	**2,195**	26,0 %
Norway	303	–	361	311	**974**	11,6 %
Finland	39	310	269	161	**778**	9,2 %
France	–	153	233	15	**401**	4,8 %
United States	–	–	331	–	**331**	3,9 %
United Kingdom	–	134	144	–	**278**	3,3 %
Canada	64	–	131	–	**195**	2,3 %
Netherlands	–	–	159	32	**192**	2,3 %
Australia	45	–	37	–	**82**	1,0 %
Switzerland	5	–	70	–	**75**	0,9 %
Iceland	–	–	61	–	**61**	0,7 %
Germany	–	–	50	–	**50**	0,6 %
Spain	–	–	37	–	**37**	0,4 %
Belgium	–	–	33	–	**33**	0,4 %
Austria	–	–	21	–	**21**	0,2 %
Bermuda	–	–	3	8	**11**	0,1 %
Total	**4,175**	**644**	**2,745**	**871**	**8,435**	**100,0 %**

Fixed income investments in the financial sector

Sampo Group, 31 December 2023

EURm	Covered bonds	Cash and money market securities	Long-term senior debt	Long-term subordinated debt	Total	%
Sweden	1,776	191	566	169	**2,702**	32,1 %
Denmark	1,863	79	315	162	**2,419**	28,7 %
Finland	52	750	275	125	**1,202**	14,3 %
Norway	338	–	384	319	**1,041**	12,4 %
France	–	249	133	5	**388**	4,6 %
United States	–	2	179	–	**181**	2,2 %
Netherlands	–	–	92	21	**113**	1,3 %
Iceland	–	–	60	2	**62**	0,7 %
Switzerland	–	–	52	–	**52**	0,6 %
Canada	–	–	51	–	**51**	0,6 %
Ireland	–	–	47	–	**47**	0,6 %
United Kingdom	–	–	41	–	**41**	0,5 %
Australia	–	–	36	–	**36**	0,4 %
Austria	–	–	20	–	**20**	0,2 %
Germany	–	–	18	–	**18**	0,2 %
Spain	–	–	15	–	**15**	0,2 %
Belgium	–	–	15	–	**15**	0,2 %
New Zealand	–	–	11	–	**11**	0,1 %
Bermuda	–	–	–	7	**7**	0,1 %
Total	**4,028**	**1,271**	**2,310**	**811**	**8,420**	**100,0 %**

The public-sector exposure includes government bonds, government guaranteed bonds, and other public-sector investments including supranationals, as shown in the tables Fixed income investments in the public sector, Sampo Group 31 December 2024 and 31 December 2023. The public sector has had a relatively minor role in Sampo Group's portfolios and these exposures have been mainly in the Nordic countries.

Fixed income investments in the public sector

Sampo Group, 31 December 2024

EURm	Governments	Government guaranteed	Public sector, other	Total
Sweden	415	–	96	511
Norway	72	–	397	470
Supranationals	–	–	313	313
United States	122	–	–	122
United Kingdom	87	–	–	87
Germany	–	56	–	56
Finland	14	25	–	39
Total	**711**	**80**	**806**	**1,597**

Sampo Group, 31 December 2023

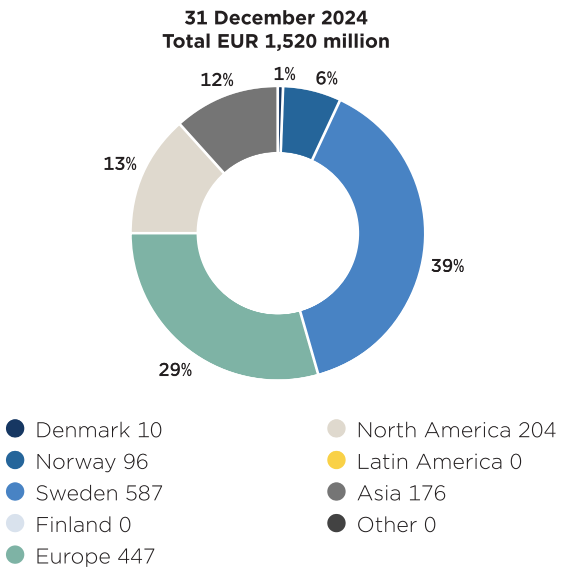
EURm	Governments	Governments guaranteed	Public sector, other	Total
Sweden	421	–	131	552
Norway	–	–	391	391
Supranationals	–	6	191	197
United States	46	–	–	46
Germany	–	46	–	46
Finland	–	25	–	25
Denmark	7	–	–	7
Total	**473**	**77**	**713**	**1,264**

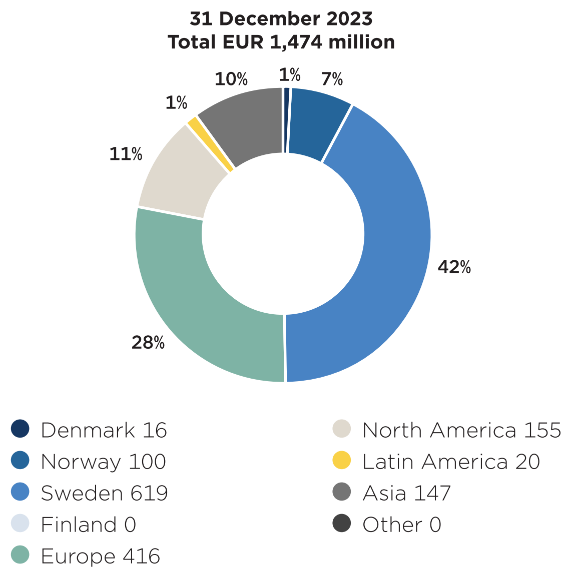
The listed equity investments of Sampo Group totalled EUR 1,520 million at the end of year 2024 (1,474).

The geographical core of Sampo Group's equity investments is in Nordic companies. The proportion of Nordic equities corresponds to 46 per cent of the total equity portfolio. A breakdown of the listed equity exposures of Sampo Group is shown in the graph Breakdown of listed equity investments by geographical regions, Sampo Group, 31 December 2024 and 31 December 2023.

Breakdown of listed equity investments by geographical regions

Sampo Group, 31 December 2024 and 31 December 2023





Equity funds and ETFs are reported using a fund look-through approach for both the 2024 and 2023 reporting periods.

Largest holdings by single name

The largest exposures by individual issuers and counterparties are presented in the tables Largest exposures by issuer and asset class, Sampo Group 31 December 2024 and 31 December 2023.

Largest exposures by issuer and asset class

Sampo Group, 31 December 2024

Issuer	Total, EURm	% of total investment assets	Cash & short-term fixed income	Long-term fixed income: Covered bonds	Long-term fixed income: Other bonds	Equities	Uncolla-teralised part of derivatives
Nordea Bank	1,174	7 %	204	788	181	—	1
Nykredit Association	897	5 %	—	815	82	—	—
Swedbank	658	4 %	—	546	112	—	—
Svenska Handelsbanken	582	3 %	40	451	91	—	—
Realkredit Danmark	558	3 %	—	558	—	—	—
Sweden	511	3 %	—	—	511	—	—
Norway	472	3 %	—	—	472	—	—
NOBA	433	3 %	—	—	9	424	—
Jyske Bank	299	2 %	—	226	73	—	—
Danske Bank	223	1 %	34	15	174	—	1
Total top 10 exposures	**5,808**	**35 %**	**278**	**3,399**	**1,704**	**424**	**2**
Other	10,919	65 %					
Total investment assets	**16,727**	**100 %**					

Largest exposures by issuer and asset class

Sampo Group, 31 December 2023

Issuer	Total, EURm	% of total investment assets	Cash & short-term fixed income	Long-term fixed income: Covered bonds	Long-term fixed income: Other bonds	Equities	Uncolla-teralised part of derivatives
Nordea Bank	959	6 %	284	489	183	—	2
Svenska Handelsbanken	814	5 %	108	622	83	—	—
Swedbank	713	4 %	—	589	124	—	—
Nykredit Realkredit A/S	598	3 %	—	598	—	—	—
Realcredit Danmark	592	3 %	—	592	—	—	—
Sweden	552	3 %	—	—	552	—	—
NOBA	471	3 %	—	—	46	425	—
Skandinaviska Enskilda Banken	439	3 %	252	22	164	—	2
Danske Bank	429	2 %	251	24	152	—	1
Norway	391	2 %	—	—	391	—	—
Total top 10 exposures	**5,958**	**35 %**	**896**	**2,936**	**1,696**	**425**	**5**
Other	11,202	65 %					
Total investment assets	**17,160**	**100 %**					

The largest high-yield and non-rated fixed income investment single-name exposures are presented in the tables Ten largest direct high yield and non-rated fixed income investments, Sampo Group, 31 December 2024 and 31 December 2023. Furthermore, the largest direct listed equity exposures are presented in the tables Ten largest direct listed equity investments, Sampo Group, 31 December 2024 and 31 December 2023.

Ten largest high yield and non-rated fixed income investments and listed equity investments

Sampo Group, 31 December 2024

Ten largest high yield and non-rated fixed income investments	Rating	Total, EURm	% of total fixed income investments
Vattenfall AB	BB+	60	0.4 %
Pohjolan Voima Oy	NR	32	0.2 %
Campus Byen A/S	NR	29	0.2 %
Swedavia AB	NR	29	0.2 %
Visma AS	NR	28	0.2 %
Hexagon AB	NR	24	0.2 %
Sanoma Oyj	NR	22	0.2 %
Altera Shuttle	NR	21	0.1 %
Granite Debtco 9 Ltd	NR	20	0.1 %
Ica Gruppen AB	NR	20	0.1 %
Total top 10 exposures		**286**	**1.9 %**
Other fixed income investments		14,494	98.1 %
Total fixed income investments		**14,780**	**100.0 %**

Ten largest listed equity investments	Total, EURm	% of total equity investments
NOBA *	424	21,8 %
Nexi S.p.A. **	156	8,0 %
Volvo	148	7,6 %
ABB	88	4,5 %
Nederman Holding	66	3,4 %
Veidekke	61	3,1 %
Autoliv Inc	57	2,9 %
Telia Company	43	2,2 %
Husqvarna	40	2,1 %
Beijer AB	32	1,7 %
Total top 10 exposures	**1,116**	**57,4 %**
Other equity investments	828	42,6 %
Total equity investments	**1,944**	**100,0 %**

** Although NOBA is not listed company, it is major equity investment in Sampo plc's portfolio and therefore included in the table.*

*** Investment in Nexi S.p.A is managed by HF Evergood partners.*

Ten largest high yield and non-rated fixed income investments and listed equity investments

Sampo Group, 31 December 2023

Ten largest high yield and non-rated fixed income investments	Rating	Total, EURm	% of total fixed income investments
Saab	NR	56	0.4 %
NOBA	NR	46	0.3 %
ALM Equity	NR	38	0.3 %
Ellevio Holding 1 AB	NR	35	0.2 %
Visma Group Holding	NR	35	0.2 %
Altera Infrastructure Holdings LLC	NR	30	0.2 %
Swedavia	NR	30	0.2 %
Campus Byen A/S	NR	29	0.2 %
Resource Group TRG	NR	27	0.2 %
Huhtamaki	BB+	25	0.2 %
Total top 10 exposures		**351**	**2.4 %**
Other fixed income investments		14,031	97.6 %
Total fixed income investments		**14,382**	**100.0 %**

Ten largest direct listed equity investments	Total, EURm	% of total direct equity investments
NOBA*	425	19.3 %
Saxo Bank*	302	13.7 %
Volvo	180	8.2 %
Nexi S.p.A.**	149	6.8 %
ABB	86	3.9 %
Autoliv Inc	64	2.9 %
Husqvarna	59	2.7 %
Nederman Holding	56	2.6 %
Veidekke	46	2.1 %
Volvo Cars	38	1.7 %
Total top 10 exposures	**1,405**	**63.8 %**
Other equity investments	797	36.2 %
Total equity investments	**2,202**	**100.0 %**

** Although NOBA and Saxo Bank are not listed companies, they are major equity investments in Sampo plc's portfolio and are therefore included in the table.*

*** Investment in Nexi S.p.A is managed by HF Evergood partners.*

The exposures in fixed income instruments issued by non-investment grade issuers are significant, because a relatively small number of Nordic companies are rated. Furthermore, many of the Nordic rated companies have a high yield rating.

Balance sheet concentrations

In general, Sampo Group is structurally dependent on the performance of the Nordic economies, as described earlier. Sampo Group is also economically exposed to a fall in interest rates. This follows from the duration of insurance liabilities being longer than the fixed income asset duration in If. In Topdanmark and Hastings, interest rate risk of the balance sheet is limited, and hence, Topdanmark or Hastings are not increasing interest rate risk materially at the Group level.

Sampo Group benefits when interest rates rise, as the economic value of insurance liabilities decreases more than the value of assets backing them.

Market risks at If Group

The total market value of If's investment portfolio at 31 December 2024 was EUR 10,704 million (11,156). A large part of the fixed income portfolio was concentrated to corporate bonds issued by financial institutions, and bank account balances amounted to 29.6 per cent of the fixed income portfolio. When including covered bonds, the concentration to financial institutions was 49.4 per cent. Consumer products represent the second largest concentration of 4.7 per cent.

The overall risk appetite and risk tolerance limit for market risk is set out in the Risk Management Policy, which is complemented by sub-limits for risks within investment operations in the Investment Policy and Currency Risk Policy. The Investment Policy is the principal document for managing market risk. It sets the guiding principles, for instance, the prudent person principle, specific risk restrictions, and decision-making structure for asset management. If also has a Responsible Investment Policy, expanding the scope of the responsible investment processes and increasing alignment across the Sampo Group. Investment performance and market risk are actively monitored and controlled by the Investment Control Committee.

If's investment management strategy is conservative, with a low equity share and low fixed-income duration.

Market risks of balance sheet

Asset and liability management risk

If's exposure to ALM risk arises mainly from interest rate risk, inflation risk, and currency risk. ALM risk is considered through the risk appetite framework and is governed by the Investment Policy. To maintain the ALM risk within the overall risk appetite, the insurance liabilities may be matched by investing in appropriate fixed income instruments, and by using currency and interest rate derivatives.

Interest rate risk

The exposure to interest rate risk from issued insurance contracts and held reinsurance contracts arises from the net liability for incurred claims, where future claim payments are discounted to present value and, therefore, impacted by changes in discount rates.

The duration sensitivity to changes in interest rates in the net liability for incurred claims is analysed in the Reserve risk section. For more information see the tables Sensitivity analysis, reserve risk, If, 2024 and 2023 in the section **Underwriting risks**.

If's exposure to interest rate risk from financial instruments arises primarily from fixed income investments.

On a net basis, If is negatively affected when interest rates are decreasing, as the duration of insurance liabilities is longer than the duration of investment assets. The duration of fixed income investments at year-end 2024 was 2.5 years (2.4). The respective duration of insurance liabilities was 6.1 years (6.2).

Interest rate risk relating to insurance liabilities is, in accordance with the Investment Policy, considered in the composition of investment assets. The interest rate risk is managed by sensitivity limits for instruments sensitive to interest rate changes.

Currency risk

If writes insurance policies that are mostly denominated in the Scandinavian currencies and in euro. If is mainly exposed to transaction currency risk due to its insurance operations in foreign currencies. In addition, If's investment decisions create currency exposure. The currency risk has decreased compared to 31 December 2023.

Transaction currency risk is reduced by matching insurance liabilities with investment assets in corresponding currencies or by using currency derivatives. The currency exposure in insurance operations is hedged to the functional currency at branch level on a regular basis. The currency exposure in investment assets is monitored weekly and is hedged when the exposure reaches a specified level, which is set with respect to cost efficiency and minimum transaction size. The transaction risk positions to the Swedish krona are shown in the tables Transaction risk position, If, 31 December 2024 and 31 December 2023. The tables show the net transaction risk exposures and the changes in the value of positions, given a 10 per cent decrease in the value of the functional currency.

Transaction risk position

If, 31 December 2024

Base currency SEK (in EURm)	EUR	USD	JPY	GBP	SEK	NOK	DKK	Other	Total, net
Insurance operations	-3,225	-156	0	-93	13	-2,332	-1,163	-32	-6,989
Investments	3,261	480	0	68	97	1,930	53	1	5,889
Derivatives	-117	-323	12	20	-109	354	976	7	820
Transaction risk, net position	-82	1	12	-5	1	-49	-134	-25	-280
Sensitivity: SEK -10%	**-8**	**0**	**1**	**0**	**0**	**-5**	**-13**	**-2**	**-28**

Transaction risk position

If, 31 December 2023

Base currency SEK (in EURm)	EUR	USD	JPY	GBP	SEK	NOK	DKK	Other	Total, net
Insurance operations	-3,255	-180	0	-49	37	-2,233	-1,114	-29	-6,823
Investments	3,091	319	0	24	113	1,869	187	0	5,604
Derivatives	117	-123	5	22	-168	350	916	22	1,141
Transaction risk, net position	-47	15	5	-4	-18	-13	-11	-7	-79
Sensitivity: SEK -10%	**-5**	**2**	**0**	**0**	**-2**	**-1**	**-1**	**-1**	**-8**

The transaction risk position in SEK represents exposure in foreign subsidiaries/branches within If with a functional currency other than SEK.

In addition to transaction risk, If is also exposed to translation risk at Group level, stemming from foreign operations, predominantly through If P&C insurance Ltd branches, with other functional currencies than SEK.

Liquidity risk

Liquidity risk is not deemed material since premiums are collected in advance, and large claim payments are usually known well in advance. The risk is managed in accordance with the principles set out in the Investment Policy. In general, the liquidity position for If is strong, from both availability and maturity point of view. Liquidity risk is reduced by investing in assets that are readily marketable in liquid markets. The available liquidity of financial assets, meaning the part of the assets that can be converted into cash at a specific point in time, is continuously analysed and reported to the Risk Committee.

The maturities of cash flows from financial instruments, insurance liabilities, and reinsurance contracts are presented in the tables Cash flows, according to contractual maturity, If, 31 December 2024 and 31 December 2023, where financial assets and liabilities are divided into contracts with a contractual maturity profile, and other contracts. The tables also show expected future cash flows for insurance liabilities and reinsurance assets, which by nature are inherently associated with a degree of uncertainty. The average maturity of fixed income investments was 3.4 years (3.2).

Cash flows according to contractual maturity

If, 31 December 2024

EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	Cash flows 2025	2026	2027	2028	2029	2030-2039	2040-
Financial assets	**10,848**	**1,353**	**9,495**	**1,434**	**1,850**	**2,524**	**1,577**	**1,129**	**1,945**	**3**
Financial assets (non-derivatives)	10,838	1,353	9,484	1,423	1,850	2,524	1,577	1,129	1,945	3
FX derivatives	11	—	11	11	—	—	—	—	—	—
Asset for incurred claims	**659**	**—**	**659**	**424**	**131**	**52**	**23**	**11**	**18**	**1**
Financial liabilities	**-482**	**-1**	**-481**	**-323**	**-134**	**-27**	**—**	**—**	**—**	**—**
Financial liabilities (non-derivatives)	-462	-1	-461	-305	-134	-27	—	—	—	—
FX derivatives	-19	—	-19	-18	—	—	—	—	—	—
Lease liabilities	**-125**	**—**	**-125**	**-27**	**-24**	**-20**	**-17**	**-16**	**-44**	**—**
Liability for incurred claims and other insurance related payables	**-6,445**	**—**	**-6,445**	**-2,606**	**-789**	**-475**	**-339**	**-265**	**-1,209**	**-762**

All intra-group cashflows are eliminated.

Cash flows according to contractual maturity

If, 31 December 2023

EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	Cash flows 2024	2025	2026	2027	2028	2029-2038	2039-
Financial assets	**11,296**	**1,485**	**9,812**	**1,605**	**1,835**	**2,142**	**2,561**	**1,400**	**1,487**	**—**
Financial assets (non-derivatives)	11,275	1,485	9,791	1,585	1,835	2,142	2,561	1,400	1,487	—
Interest rate swaps	2	—	2	2	—	—	—	—	—	—
FX derivatives	19	—	19	19	—	—	—	—	—	—
Asset for incurred claims	**527**	**—**	**527**	**328**	**108**	**44**	**19**	**11**	**18**	**1**
Financial liabilities	**-550**	**—**	**-550**	**-402**	**-31**	**-137**	**—**	**—**	**—**	**—**
Financial liabilities (non-derivatives)	-492	—	-492	-344	-31	-137	—	—	—	—
FX derivatives	-58	—	-58	-58	—	—	—	—	—	—
Lease liabilities	**-148**	**—**	**-148**	**-27**	**-26**	**-23**	**-20**	**-14**	**-47**	**—**
Liability for incurred claims and other insurance related payables	**-6,443**	**—**	**-6,443**	**-2,483**	**-794**	**-471**	**-339**	**-262**	**-1,301**	**-795**

Market risks at Topdanmark

In general, long-term value creation shall be based mainly on the acceptance of insurance risks. To supplement the profit from insurance activities, Topdanmark accepts a certain level of market risks, given its strong liquidity position and stable, high earnings from insurance operations. Hence, in addition to fixed income instruments, Topdanmark has invested, among other things, in equities and fixed income assets to improve the average investment return.

Market risks are kept on an appropriate level in order to limit negative profit and loss effects to very unfavourable financial market scenarios. The investment portfolio shall be managed to ensure that market risks will not endanger the insurance operations, even in unfavourable market conditions.

To achieve company level targets, the investment policy sets the company's objectives, strategies, organisation, and reporting practices on investments. The investment strategy is more precisely determined in terms of market risk limits, and specific requirements for certain investments and sub-portfolios (risk appetite). The investment strategy is determined by the Board and revised at least once a year. Appropriate financial risk mitigation techniques are used.

When selecting the investment assets, a portfolio composition that matches the risk features of the corresponding liabilities is sought. The purpose of the investment policy is also to ensure that the company has effectively implemented the organisation, systems, and processes necessary to identify, measure, monitor, manage, and report on investment risks to which it is exposed.

When market risks are measured and managed, all exposures are included, regardless of whether they arise from active portfolio management of investments or from annuities, which are considered market risk.

Investment allocation

The equity portfolios, excluding associated companies, are well-diversified and without large concentrations.

Investment assets are mostly comprised of government and Danish mortgage bonds. These assets are interest rate sensitive and to a significant extent equivalent to the total interest rate sensitivity of the non-life insurance liabilities. Consequently, the return on government and mortgage bonds should be assessed in connection with return and revaluation of non-life insurance liabilities.

The small allocation to credit bonds is through an ETF, and is primarily exposed to European issuers.

Index-linked bonds comprise primarily, Danish mortgage bonds, for which the coupon and principal are index-linked.

Market risks of balance sheet

Interest rate risk

Interest rate risk is calculated for assets, liabilities, and derivative instruments, for which the carrying amount is dependent on the interest rate level. Regarding insurance liabilities, Topdanmark is exposed to interest rate risk due to provisions for outstanding claims.

Shifting the market yield curve upwards and downwards or changing its shape leads to changed market values of assets and derivatives, and thus to unrealised gains or losses.

When assessing the value and sensitivity of insurance provisions, Topdanmark has used the Solvency II discount curve that is based on the market yield curve.

Generally, the interest rate risk is limited and controlled by investing in interest-bearing assets in order to reduce the overall interest rate exposure of the assets and liabilities to the desired level. Therefore, the Danish mortgage bonds and government bonds have a central role in the asset portfolios. To further reduce the interest rate sensitivity of the balance sheet, interest rate swaps have been used for hedging purposes - especially in the long end as the Danish fixed income market presents few alternative assets.

Equity risk

The Danish part of the equity portfolio is based on the OMXCCAP index and is approximated by the ETF Xact OMXC25. The rest of the equity holdings are in the foreign equity portfolio that seeks to track the MSCI World DC index by the relevant geographical ETF in USA, Europe, and Japan. As a result, Topdanmark's equity holdings are well-diversified, both in terms of geographical and company-specific risks.

Real estate risk

Real estate risk is limited to one property in own use and is located in Ballerup. The property is valued in accordance with Danish accounting rules.

Spread risk

Most of Topdanmark's interest-bearing assets comprise of AAA rated Danish mortgage bonds. The risk of credit losses is minor due to the high credit quality of the issuers and because investments have been made at spreads that are in balance with Topdanmark's desired risk ratio levels. The portfolio is well-diversified by issuer, issuer type, and capital centres, and therefore, the exposure to concentration risk is insignificant.

The investment policy stipulates that the portfolio must be well-diversified by the number of counterparties and by the amount of exposure to individual counterparties. The main source of spread risk is the mortgage bonds.

Due to high allocation of these investments in the portfolios, spread risk is the most material source of market risk SCR.

Currency risk

In practice, the investment assets are the only source of currency risk, while the insurance liabilities are in Danish krones. The currency risk is mitigated by derivatives, and net exposures in different currencies are minor except in the euro.

The currency risk is assessed based on the SCR. The value of the base currency is shocked by 25 per cent against most currencies, except against the euro, where the largest exposure exists, and the shock is 0.39 per cent because the Danish krone is pegged to the euro.

Inflation risk

Future inflation is implicitly included in the models Topdanmark uses to calculate its insurance liabilities. The insurance liabilities are calculated based on the expected future indexation of wages and salaries.

An expected higher future inflation rate would generally be included in the insurance liabilities with a certain time delay, while, at the same time, the result would be impacted by higher future indexation of premiums. To reduce the risk of inflation within Workers' compensation, Topdanmark uses index-linked bonds and inflation derivatives to hedge a proportion of the expected cash flows sensitive to future inflation. The inflation sensitivity of capitalisation factors is not hedged.

Liquidity risk

Topdanmark has a strong liquidity position. Firstly, as premiums are paid in the beginning of the coverage period, liquidity risk related to customers' payments is very limited. Secondly, the nature of a diversified insurance business means that it is highly unlikely that a liquidity shock could occur. Insurance liabilities are quite stable and on the investment side, money market investments are complemented by a large portfolio of liquid listed Danish government and mortgage bonds.

The maturities of cash flows from financial instruments, insurance liabilities and reinsurance contracts are presented in the tables Cash flows according to contractual maturity, Topdanmark, 31 December 2024 and 31 December 2023.

Cash flows according to contractual maturity

Topdanmark, 31 December 2024

EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	Cash flows 2025	2026	2027	2028	2029	2030-2039	2040-
Financial assets	**2,278**	**—**	**2,278**	**668**	**485**	**347**	**314**	**211**	**374**	**142**
Financial assets (non-derivatives)	2,276	—	2,276	668	485	347	314	211	373	142
Interest rate swaps	2	—	2	0	0	0	0	0	1	0
FX forwards	0	—	0	0	—	—	—	—	—	—
Asset for incurred claims	**73**	**—**	**73**	**52**	**9**	**5**	**3**	**2**	**4**	**—**
Financial liabilities	**-348**	**-175**	**-172**	**-9**	**-103**	**-60**	**-2**	**-2**	**-18**	**-2**
Financial liabilities (non-derivatives)	-323	-175	-148	-7	-101	-57	—	—	—	—
Interest rate swaps	-25	—	-25	-2	-2	-2	-2	-2	-18	-2
FX derivatives	0	—	0	0	—	—	—	—	—	—
Lease liabilities	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**
Liability for incurred claims and other insurance related payables	**-1,596**	**—**	**-1,596**	**-606**	**-261**	**-175**	**-124**	**-90**	**-306**	**-169**

All intra-group cashflows are eliminated.

Cash flows according to contractual maturity

Topdanmark, 31 December 2023

EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	Cash flows 2024	2025	2026	2027	2028	2029-2038	2039-
Financial assets	**1,861**	**—**	**1,861**	**420**	**424**	**321**	**170**	**166**	**505**	**113**
Financial assets (non-derivatives)	1,859	—	1,859	420	424	321	170	166	504	113
Interest rate swaps	1	—	1	0	0	0	0	0	1	0
FX forwards	0	—	0	0	—	—	—	—	—	—
Asset for incurred claims	**79**	**—**	**79**	**58**	**9**	**4**	**3**	**2**	**4**	**0**
Financial liabilities	**-299**	**-128**	**-172**	**-10**	**-9**	**-102**	**-59**	**-1**	**-21**	**-1**
Financial liabilities (non-derivatives)	-275	-128	-148	-9	-7	-101	-57	—	—	—
Interest rate swaps	-24	—	-24	-1	-2	-1	-1	-1	-21	-1
FX derivatives	0	—	0	0	—	—	—	—	—	—
Lease liabilities	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**	**—**
Liability for incurred claims and other insurance related payables	**-1,582**	**—**	**-1,582**	**-603**	**-249**	**-183**	**-118**	**-87**	**-303**	**-184**

Market risks at Hastings Group

Hastings' investment portfolio has been designed to generate a targeted return whilst operating within the conservative risk appetite parameters set by the Board. Management aims to prudently operate within its risk appetite. The risk appetite includes a low appetite for losses arising from volatility of market prices affecting values of assets and liabilities, and for assets not matching the profile of liabilities. As a result, the investment strategy includes only a very limited amount of equity exposure.

The total market value of Hastings' investment portfolio at 31 December 2024 was EUR 2,263 million (1,680). The investment portfolio was dominated by investment grade fixed income investments, which comprised 60 per cent of total investment assets. The rest was invested in money market securities and cash amounting to 15 per cent, government bonds amounting to 18 per cent, and high yield and alternative investments with a combined allocation of 6 per cent.

Investment allocation

The core investment portfolio of debt securities, supplemented by a diversified portfolio of holdings in collective investment schemes, is held by Advantage. The Advantage Board works with the investment managers and investment consultants to maximise return, whilst minimising risk and preserving capital. The criteria for the portfolio structure, classes of holdings, and individual limits are consistent with a very low risk appetite. These investment rules are monitored on a quarterly basis internally and using an external consultancy. The monitoring outputs are provided to the Investment Committee and Risk & Compliance Committee quarterly.

Advantage made no direct use of derivatives during the period. Derivatives are, however, utilised within Investment Funds, in which Advantage has a share, both for hedging purposes and to generate additional return.

Interest rate risk

Hastings manages balance sheet interest rate risk principally through matched duration of assets and liabilities, meaning that interest rates are aligned as far as possible, and interest rate risk is reduced. This is monitored in the quarterly Investment Committee meetings and includes adherence to tight duration mismatch tolerances which form part of the relevant risk appetite statement.

Liquidity risks

Hastings maintains a short duration and highly liquid portfolio, in line with its low risk appetite. Liquidity Risk is largely managed at Advantage. Cash and cash equivalent balances are held in current accounts or short-term money market instruments. These are generally less than 60 days in duration, with low sensitivity to movements in interest rates compared to longer duration assets.

The liquidity profile and cashflow of investments is monitored at the quarterly Investment Committee to ensure Advantage can meet its liabilities into the future.

Advantage's investment managers actively manage liquidity risk in the portfolio to ensure that bonds can be sold efficiently to meet cash needs. Informed by market data, they look to purchase bonds with less than 5 years since issue date, larger issue sizes, and which trade regularly. Liquidity scoring is conducted by Advantage's investment managers, based on time since issue, issue size, traded volumes, and observed bid-ask spreads.

Cash flows according to contractual maturity

Hastings, 31 December 2024

EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	Cash flows 2025	2026	2027	2028	2029	2030-2039	2040-
Financial assets	**2,263**	**438**	**1,825**	**438**	**497**	**373**	**391**	**103**	**13**	**11**
Financial assets (non-derivatives)	2,263	438	1,825	437	497	373	391	103	13	11
FX forwards	0	—	0	0	—	—	—	—	—	—
Asset for incurred claims	1,537	1,537	—	409	264	225	64	99	169	307
Financial liabilities	**-355**	**—**	**-355**	**-22**	**-85**	**-305**	**—**	**—**	**—**	**—**
Financial liabilities (non-derivatives)	-354	—	-354	-21	-85	-305	—	—	—	—
Interest rate swaps	-1	—	-1	-1	—	—	—	—	—	—
FX derivatives	-0	—	-0	-0	—	—	—	—	—	—
Lease liabilities	**-5**	**—**	**-5**	**-3**	**-1**	**-0**	**-0**	**-0**	**—**	**—**
Liability for incurred claims and other insurance related payables	**-2,683**	**-2,683**	**—**	**-908**	**-493**	**-390**	**-154**	**-151**	**-227**	**-358**

Cash flows according to contractual maturity

Hastings, 31 December 2023

EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	Cash flows 2024	2025	2026	2027	2028	2029-2038	2039-
Financial assets	**1,869**	**704**	**1,165**	**143**	**341**	**349**	**179**	**154**	**—**	**—**
Financial assets (non-derivatives)	1,869	704	1,165	143	341	349	179	154	—	—
Asset for incurred claims	1,333	1,333	—	349	236	183	61	96	169	240
Financial liabilities	**-187**	**—**	**-187**	**-73**	**-71**	**-43**	**—**	**—**	**—**	**—**
Financial liabilities (non-derivatives)	-185	—	-185	-71	-71	-43	—	—	—	—
Interest rate swaps	-2	—	-2	-2	—	—	—	—	—	—
Lease liabilities	**-10**	**—**	**-10**	**-6**	**-3**	**-1**	**-0**	**-0**	**-0**	**—**
Liability for incurred claims and other insurance related payables	**-2,125**	**-2,125**	**—**	**-670**	**-404**	**-302**	**-127**	**-137**	**-211**	**-275**

Counterparty risks at If Group

In If, the major sources of counterparty risk stem from reinsurance recoverables and investments. Counterparty default risk arising from receivables from policyholders and other receivables related to commercial transactions is limited, as non-payment of premiums generally results in cancellation of insurance policies.

Reinsurance counterparty risk

The distribution of reinsurance recoverables and pooled solutions is presented in the table below. In the table, EUR 220 million (206) is excluded, which mainly relates to captives and statutory pool solutions.

Reinsurance recoverables and pooled solutions

If, 31 December 2024 and 31 December 2023

	31 Dec 2024		31 Dec 2023	
Rating	**Total EURm**	**% of total**	**Total EURm**	**% of total**
AAA	—	— %	—	— %
AA+ - A-	633	100 %	450	100 %
BBB+ - BBB-	—	—	—	— %
BB+ - C	—	— %	—	— %
D	—	— %	—	— %
Non-rated	—	— %	—	— %
Total	**633**	**100 %**	**450**	**100 %**

The amount of the recoverables reported above is exposed to counterparty default risk, as recoverables are typically not covered by collaterals.

To limit and control credit risk associated with ceded reinsurance, the Reinsurance Policy sets requirements for the reinsurers' minimum financial strength ratings and the maximum exposure limits to individual reinsurers. Credit ratings from rating agencies are used to determine the creditworthiness of reinsurance companies.

Counterparty risk related to investments

Before investing, potential investments are analysed thoroughly. The creditworthiness and outlook of the issuer are assessed together with any collateral and structural details of the potential investment. Internal risk indicators are important factors in the assessment, although the macroeconomic environment, market trends, and external opinions of analysts and credit ratings by rating agencies are also taken into account. In addition, the portfolio performance and the counterparties' credit standings are monitored continuously.

Counterparty risks at Topdanmark

Topdanmark is exposed to counterparty risk in both its insurance and investment activities. The default risk related to fixed income and equity investments is covered by spread-risk and equity-risk models in SCR calculations, and hence are not discussed in this context.

The main sources of counterparty risk are deposits made to individual banks, derivative contracts with banks, and current receivables from reinsurance companies, with the addition of potential receivables that will arise in case of a 1-in-200-year catastrophe event. Topdanmark's counterparty risk is assessed by the SCR standard formula

Reinsurance

Within insurance activities the reinsurance companies' ability to pay is the most important counterparty risk factor. Topdanmark minimises this risk by primarily buying reinsurance cover from reinsurance companies with a minimum rating of A-, and by spreading reinsurance cover over many reinsurers.

For reinsurance counterparties, the Board approves security guidelines which determine the maximum size of reinsurance contract cover per a separate reinsurer. This portion is dependent on the reinsurer's rating as well as on Topdanmark's own assessment of the reinsurer. The largest risk concentrations may occur in case of major catastrophe events, including storms and cloudbursts.

Investments

Topdanmark may suffer losses due to their counterparties' inability to meet their obligations on bonds, loans, and other contracts including derivatives. The majority of Topdanmark's interest bearing assets comprise of Danish mortgage bonds.

To limit the counterparty risk of financial contracts, including derivative contracts, the choice of counterparties is restrictive, and collateral is required when the value of the financial contracts exceeds the predetermined limits. The size of the limits depends on the counterparty's credit rating and the terms of the contract.

Counterparty risks at Hastings Group

Hastings is exposed to counterparty risk through reinsurance assets, financial assets and cash, and cash equivalents. A number of controls exist within the Hastings Group to mitigate against counterparty default, such as annual reviews of reinsurance panels, credit rating tolerances in line with a low-risk appetite, and a low-risk, diversified investment portfolio.

Reinsurance counterparty risk

A key component of risk mitigation is reinsurance. Advantage manages the tender of the reinsurance programme, which consists of both non-capitalised Excess of Loss ("XoL") and Quota Share ("QS") protection. Under the 2024 arrangements, the Motor exposure risk to Advantage is capped at GBP 2 million per loss, net of XoL reinsurance, and Household exposure is capped at GBP 17.5 million (approximately EUR 21.1 million) per event loss. In 2024, the Advantage Board maintained the motor QS participation at 30 per cent. Advantage's reinsurance strategy will continue to be reviewed in line with risk appetite.

Reinsurance recoverables

Hastings, 31 December 2024 and 31 December 2023

	2024		2023	
Rating	**Total, EURm**	**% of total**	**Total, EURm**	**% of total**
AAA	—	— %	—	— %
AA	1,232	65 %	1,031	63 %
A	664	35 %	608	37 %
BBB	—	— %	2	0 %
Less than BBB	—	— %	—	— %
Unrated	—	— %	—	— %
Total	**1,896**	**100 %**	**1,640**	**100 %**

To mitigate the inherent counterparty and credit risk posed by the reinsurance programme to Advantage's balance sheet, Advantage has set criteria for the minimum credit quality of the reinsurance counterparties and for concentration limits. These tolerances are monitored and mitigated on a continual basis, with line of sight to the Board quarterly, or ad-hoc as needed.

To better protect itself where possible, Advantage aims to:

- Place with parent entities within reinsurance groups to mitigate counterparty risk in accepting reinsurance from small regional branches
- Where exposure to non-parent reinsurers is unavoidable, seek to put in place collateralisation of cut-through terms and/or parental guarantees to mitigate counterparty risk
- Ensure special termination clauses are in place in the event of rating downgrade or reorganisation of reinsurance groups to which Advantage is exposed
- Historically, Advantage has sought to increase the number of reinsurance partners on its panels to facilitate the growth of the product exposure and reinsurance capacity from the market.

Capitalisation

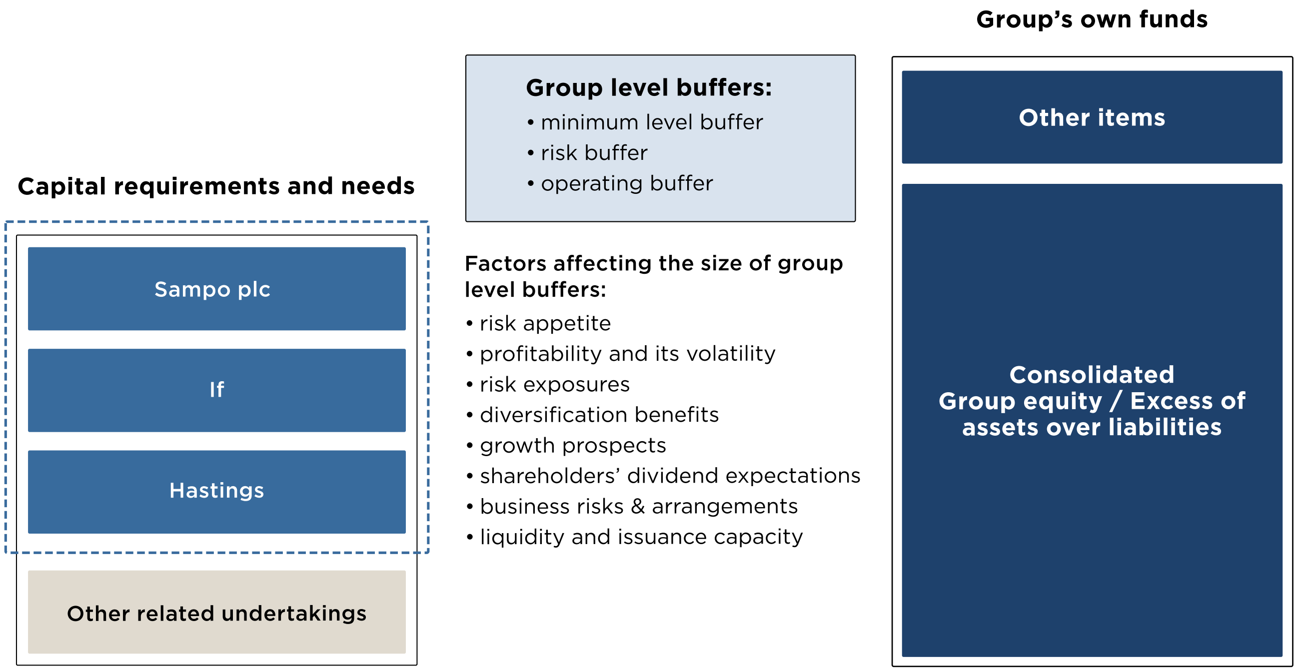
Sampo's core business competences are skilful pricing of risks inherent in business operations and high-quality management of arising risk-exposures, and capital needed to cover these risks. A balance between earnings, risks, and capital contributes positively to return on equity and to stakeholder confidence, facilitating the creation of shareholder value.

Sampo plc is responsible for the group's capital management activities. These actions are guided by targets set for group-level solvency and financial leverage, and they include decisions on group-level investment exposures, business growth and performance targets, reinsurance strategies, capital distributions, and capital instrument issuances.

Group level capitalisation is managed within Sampo's capital management framework, which sets targets for solvency and informs potential risk management actions.

Group-level capitalisation and the factors affecting it are illustrated in the graph Sampo Group's capitalisation framework.

Sampo Group's capitalisation framework



The Group's capital requirement is dependent mainly on the capital requirements of the insurance entities. The parent company's contribution to the Group capital need is relatively small, because Sampo plc does not have any business activities of its own, other than the management of its capital structure and liquidity portfolio. Sampo still holds two private equity investments on the parent company's balance sheet, also contributing to the Group's capital requirement.

Diversification benefit exists at two levels, within the companies and between the companies. The former is included in the companies' solvency capital requirement (SCR).

Conceptually, the Group's own funds equals the difference between the market value of assets and liabilities plus the subordinated liabilities. This difference has accrued during the lifetime of the Group and it includes the following main components:

- accrued profits that have not been paid as dividends over the years
- valuation differences between IFRS and Solvency II
- issued capital and subordinated liabilities meeting Solvency II requirements.

At the Group level, the capital requirement and own funds are both exposed to foreign currency translation risk. The actual capital and the capital needs of If, Topdanmark, and Hastings are converted from their reporting currencies to the euro. When the reporting currencies of the subsidiary companies depreciate, the actual amount of the Group's capital in euros decreases, and the capital requirements of the subsidiary companies will be lower in euro terms. Translation currency risk is monitored internally, and its effect on Sampo Group's solvency on a going concern basis is analysed regularly. However, internally, no capital need is set for translation risk, because it is realised only when a subsidiary company is divested.

The Group-level buffers equal, in total, to the difference between the amount of the Group's own funds and the Group capital requirement. In addition to insurance entity level factors – expected profits and their volatility, business growth prospects, volatility of the balance sheet due to fluctuations in the market value of investments and insurance liabilities, and the ability to issue Solvency II compliant capital instruments – there are factors that are additionally relevant when considering the size of the Group-level buffers. The most material of them are correlation of Group companies' profits, parent company's capacity to generate liquidity, probability of business arrangements, and shareholders' dividend expectations.

The role of Sampo plc

As the Group's parent company, Sampo plc is responsible for the Group's capital management activities. These actions are guided by targets set for group-level solvency and financial leverage, and they include decisions on group-level investment exposures, business growth and performance targets, reinsurance strategies, capital distributions, and capital instrument issuances. In addition, group-level risk accumulations and concentrations are monitored regularly, and managed by adjusting aggregated risks, where necessary.

The parent company Sampo plc is also a source of liquidity within the Group. Hence, the healthy funding structure and the capacity to generate funds, if needed, are a continuous focus. Sampo plc needs liquidity to manage the group's financing needs, enable dividend security, and to finance potential transactions. Sampo plc funding is mainly limited to internal dividends and investment returns but can be periodically complemented with new debt, and capital or asset sales. Hence, the parent company liquidity needs to be managed holistically, together with the dividend policy, strategic ambitions, and balance sheet targets.

As at 31 December 2024, Sampo plc had long-term strategic holdings of EUR 7,431 million in the subsidiary companies, and they were funded mainly by capital of EUR 7,989 million. Sampo plc had outstanding senior debt of EUR 954 million and subordinated debt of EUR 1,491 million. Average remaining maturity of senior debt was 3.8 years and EUR 395 million of it had a maturity longer than five years. Funding structure of strategic holdings and other holdings can be considered strong.

The capacity to generate funds is dependent on leverage and liquidity buffers, which can be inferred from the table Balance sheet structure, Sampo plc, 31 December 2024 and 31 December 2023.

Balance sheet structure

Sampo plc, 31 December 2024 and 31 December 2023

EURm	31 Dec 2024	31 Dec 2023
Assets total	**10,508**	**7,970**
Liquidity	**626**	**1,352**
Investment assets	**2,408**	**980**
Other investments	3	3
Fixed income	1,826	101
Equity & private equity	580	876
Equity holdings	**7,431**	**5,618**
Subsidiaries	7,431	5,618
Other assets	**44**	**20**

EURm	31 Dec 2024	31 Dec 2023
Liabilities total	**10,508**	**7,970**
Long-term senior debt	**954**	**959**
Bonds issued	954	959
Subordinated debt	**1,491**	**1,490**
Capital	**7,989**	**5,445**
Undistributable capital	98	98
Distributable capital	7,891	5,347
Other liabilities	**75**	**76**

The amounts in the table are IFRS numbers, including the internal loan with If.

Regarding liquidity, Sampo plc held EUR 626 million (1,352) in bank account balances and short-term money market investments. Liquidity is mainly affected by received and paid dividends, as well as changes in issued debt instruments and changes in investments. Sampo's dividend payment takes place in May and it will significantly lower the liquidity position of the holding company. A part of the investment assets can be sold in case liquidity is needed. Short-term liquidity can be considered adequate.

All in all, Sampo plc is in a good position to refinance its current debt and even issue more debt. This capacity, together with the tradable financial assets, means that Sampo plc can generate liquid funds.

Sampo plc is able to balance risks within Sampo Group. When Sampo plc is managing its funding, capital structure, and liquidity, it takes into account that most insurance entities in the Group have other base currencies than the euro (the Swedish krona, the Danish krone, pound sterling), and the Group is exposed to lower interest rates. These risks may affect Sampo's decisions on the issuance of debt instruments and the composition of the liquidity portfolio.

The maturities of financial assets and liabilities, and lease liabilities are presented in the table Cash flows, according to contractual maturity, Sampo plc, 31 December 2024 and 31 December 2023.

Cash flows according to contractual maturity

Sampo plc, 31 December 2024 and 31 December 2023

31 Dec 2024	Carrying amount total			Cash flows						
EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	2025	2026	2027	2028	2029	2030-2039	2040-
Financial assets	**1,307**	**828**	**479**	**395**	**2**	**2**	**30**	**36**	**29**	**—**
Financial assets (non-derivatives)	1,307	828	479	395	2	2	30	36	29	—
Financial liabilities	**-2,520**	**—**	**-2,520**	**-232**	**-58**	**-59**	**-475**	**-551**	**-1,481**	**—**
Financial liabilities (non-derivatives)	-2,495	—	-2,495	-229	-59	-59	-456	-551	-1,481	—
Interest rate swaps	-25	—	-25	-2	1	—	-19	—	—	—
Lease liabilities	**-1**	**—**	**-1**	**-1**	**—**	**—**	**—**	**—**	**—**	**—**

Intra-group cashflows are eliminated.

31 Dec 2023	Carrying amount total			Cash flows						
EURm	Carrying amount total	Carrying amount without contractual maturity	Carrying amount with contractual maturity	2024	2025	2026	2027	2028	2029-2038	2039-
Financial assets	**2,325**	**1,623**	**702**	**617**	**14**	**2**	**2**	**30**	**65**	**0**
Financial assets (non-derivatives)	2,325	1,623	702	617	14	2	2	30	65	0
Financial liabilities	**-2,527**	**—**	**-2,527**	**-72**	**-223**	**-59**	**-59**	**-475**	**-2,032**	**—**
Financial liabilities (non-derivatives)	-2,507	—	-2,507	-70	-223	-59	-59	-461	-2,032	—
Interest rate swaps	-20	—	-20	-2	0	0	0	-14	0	—
Lease liabilities	**-2**	**—**	**-2**	**-1**	**1**	**—**	**—**	**—**	**—**	**—**

Sampo plc's Financial Statements

Sampo plc's income statement

EURm	Note	1-12/2024	1-12/2023
Sales		2	1
Staff expenses			
Salaries and remunerations		-17	-14
Social security costs			
Pension costs		-2	-2
Other		-3	-3
Other operating expenses	1	-21	-39
Operating profit		**-42**	**-57**
Financial income and expense	3		
Income from shares in Group companies		768	1,039
Income from other shares		—	23
Other interest and financial income			
Group companies		12	—
Other		26	23
Other investment income and expense		1,130	-9
Other interest income		30	37
Interest and other financial expense		-74	-95
Exchange result		14	3
Profit before appropriations and taxes		**1,863**	**963**
Income taxes		0	0
Profit for the financial year		**1,862**	**963**

Sampo plc's balance sheet

EURm	Note	2024	2023
Assets			
Intangible assets		1	1
Tangible assets		3	3
Investments			
Shares in Group company	20	7,448	5,635
Receivables from Group companies	4	1,725	—
Other shares and participations	5	524	876
Other investments	6	479	706
Short-term receivables			
Other receivables	7	25	20
Prepayments and accrued income	8	18	2
Cash and cash equivalents		248	747
Total assets		**10,469**	**7,990**

EURm	Note	2024	2023
Liabilities			
Equity	9,10		
Share capital		98	98
Invested unrestricted equity		3,527	1,527
Other reserves		273	273
Retained earnings		2,189	2,604
Profit for the financial year		1,862	963
Liabilities			
Long-term liabilities	12		
Bonds		792	959
Subordinated debt securities		1,491	1,490
Short-term liabilities			
Bonds		162	—
Other liabilities		2	5
Accruals and deferred income	11	72	71
Total liabilities		**10,469**	**7,990**

Sampo plc's statement of cash flows

EURm	1-12/2024	1-12/2023
Operating activities		
Profit before tax	1,863	963
Adjustments		
Realised gains and losses on investments	-18	9
Other adjustments[1]	-1,118	-14
Adjustments total	**-1,136**	**-5**
Change (+/-) in assets of operating activities		
Investments	529	341
Other assets	47	11
Total	**576**	**351**
Change (+/-) in liabilities of operating activities		
Financial liabilities	-2	-2
Other liabilities	4	1
Paid interests	-66	-72
Paid taxes	0	0
Total	**-65**	**-73**
Net cash from operating activities	**1,238**	**1,237**
Investing activities		
Investments in subsidiaries	-356	-108
Net cash used in investing activities	**-356**	**-108**

EURm	1-12/2024	1-12/2023
Financing activities		
Dividends paid	-903	-1,321
Purchase of own shares	-475	-555
Repayments of debt securities in issue	-2	-334
Received group contribution	—	29
Net cash used in financing activities	**-1,380**	**-2,180**
Total cash flows	**-499**	**-1,051**
Cash and cash equivalents at 1 January	747	1,798
Cash and cash equivalents at 31 December	248	747
Net change in cash and cash equivalents	**-499**	**-1,051**

Additional information to the statement of cash flows

EURm	1-12/2024	1-12/2023
Interest income received	54	63
Interest expense paid	-66	-72
Dividend income received	768	1,062

[1] *Other adjustments include items related to the acquisition of Topdanmark A/S minority shares and the sale of the Topdanmark A/S shares to If P&C Insurance Holding Ltd.*

Sampo plc's notes to the financial statements

Sampo plc's notes to the financial statement

Summary of significant accounting policies

Sampo plc (business ID 0142213-3) is Sampo Group's parent company and a Finnish public company listed in Helsinki Nasdaq. Sampo has a dual listing in Nasdaq Stockholm and in Nasdaq Copenhagen. It is domiciled in Helsinki, and the headquarters are at Fabianinkatu 27, 00100 Helsinki, Finland.

The presentation of Sampo plc's financial statements have been prepared in accordance with the Finnish Accounting Act and Ordinance, and in compliance with other regulations on the preparation of financial statements.

The acquisition of Topdanmark A/S minority shares and related sale of shares to If P&C Insurance Holding

On 17 June 2024, Sampo announced that Sampo and Topdanmark had entered into a combination agreement, based on which Sampo made a public exchange offer to acquire all of the outstanding shares in Topdanmark not already owned by Sampo. The transaction was completed by the compulsory acquisition of the remaining Topdanmark minority shares on 25 October 2024. For more detailed description of the acquisition, please see Sampo Group financial statements' note 28.

In the public offer, minority shareholders were issued, as a compensation, new Sampo A shares. The share issue amounting to EUR 2,000 million was recognised in the invested unrestricted equity.

In the compulsory acquisition, the total acquisition cost of the remaining minority shares amounted to EUR 325 million. Compensation was paid in cash.

The measurement of the acquired Topdanmark A/S shares was based on the compensation given as an exchange of those shares. The acquisition costs directly related to the acquisition were activated to the balance sheet value of the acquired shares.

After the completion of the acquisition of minority shares, Sampo plc sold all the issued shares in Topdanmark A/S to If P&C Insurance Holding Ltd. The transaction was completed at an arm's length basis.

The sale price was based on the recent market value and amounted to EUR 4,659 million. The sale price was paid in full by way of a loan agreement and a shareholder's contribution between Sampo plc and If P&C Insurance Holding Ltd. The shareholder's contribution was recognised as an increase in the carrying amount of If Holding's shares in Sampo plc's balance sheet.

Partial demerger 2023

The Annual General Meeting of Sampo Group approved the partial demerger on 17 May 2023. The partial demerger was completed as planned on 1 October 2023. In the demerger, all shares in Mandatum Holding Ltd, amounting to EUR 538 million, were transferred without a liquidation procedure to Mandatum plc, a company incorporated in the demerger on the effective date.

In addition, a part of Sampo's general liabilities, not allocated to any specific business operations, were allocated to Mandatum plc. The recognition of a loan receivable had an impact on the parent company's equity amounting to EUR 102 million during the comparative period.

Foreign currency translation

Foreign currency transactions are translated using the prevailing exchange rate at the date of transactions or the average rate for the month. The Balance sheet items denominated in foreign currencies are translated at the prevailing rate at the balance sheet date. The exchange differences are recognised in the income statement.

Non-current assets

Intangible and tangible assets

Intangible and tangible assets are stated at acquisition cost less depreciation or amortisation.

Investments

In Sampo plc financial instruments are measured in accordance with Chapter 5 section 2 § of the Finnish Accounting Act and are part of non-current assets. Investments are measured at acquisition cost and, in case there is objective evidence of an impairment, and the fair value is expected to be permanently lower than the book value, the impairment is recognised through profit or loss. Impairment recognition cannot be not reversed.

Derivatives

Financial derivatives held for trading are initially recognised at fair value. If the difference between the acquisition value and the fair value at reporting date is negative, the difference is recognized as a loss for the period in the income statement and as a liability in the balance sheet. Positive difference is not recognized.

In addition, interest income and expense as well as income and expense related to the closing or expiry of a contract is recognised in the financial income and expense.

If an interest rate swap or a cross currency interest rate swap is used to hedge a separate loan or a similar balance sheet item, and the floating rate cash flows net each other, the net interest expense of the transaction is recognised in the income statement, amounting to the fixed interest rate amount. Also, any potential exchange rate differences are netted. Financial derivatives are used only for operational hedging, hedge accounting is not applied.

Revenue recognition

Revenue is recognised when it occurs.

Financial income and expense

Financial income and expense includes income from shares in the Group companies, interest income and expense on investments, and financial derivatives allocated for the reporting period, sale profits and losses on investments, income and expense related to the closing or expiry of derivative contracts, as well as impairment losses recognized on investments.

Leases

Lease payments are treated as rentals.

Income taxes

The income statement includes the company's income taxes based on taxable profit for the period. Income tax includes tax expense based on taxable profit for the period as well as deferred tax. Tax expense is recognised in profit or loss except for the items recognised directly in equity, in which case tax is recognised accordingly. Tax is adjusted for possible items related to previous reporting periods.

Risk management

The risk management **note 34** includes detailed information on the risk management.

1 Other operating expenses

EURm	1-12/2024	1-12/2023
Rental expenses	-1	-1
IT expenses	-3	-1
External services	-10	-28
Other staff costs	-1	-1
Other	-5	-7
Total	**-21**	**-39**

Item Other includes e.g. administration fees.

2 Auditors' fees

EUR thousand	1-12/2024	1-12/2023
Auditing fees	-450	-1,166
CSRD assurance	-137	—
Other fees	-204	-53
Total	**-791**	**-1,219**

Auditing fees in 2023 include also fees related to IFRS 17 transition.

3 Financial income and expense

EURm	1-12/2024	1-12/2023
Dividend income	768	1,062
Interest income	67	60
Interest expense	-68	-72
Gains on disposal	1,199	—
Exchange result	14	3
Other	-74	-32
Total	**1,905**	**1,020**

The gains on disposal consist of the sale gain of the Topdanmark A/S shares to If P&C Insurance Holding Ltd, amounting to EUR 1 180 million, and the sale gain from the shares of Saxo Bank AS, amounting to EUR 18 million.

4 Receivables from Group companies

EURm	2024	2023
Carrying amount at the beginning of the year	—	100
Additions	1,725	—
Disposals	—	-100
Carrying amount at the end of the year	**1,725**	**—**

As part of the sale of shares in Topdanmark A/S, Sampo granted a loan of EUR 1,724 million to If Holding, which consisted of EUR nominated facility of EUR 862 million and DKK nominated facility of DKK 6,432 million (approx. EUR 862 million)

During the comparative period 2023, in connection with the partial demerger, Mandatum redeemed issued Capital Notes with the nominal value of EUR 100 million.

5 Other shares and participations

EURm	2024	2023
Acquisition cost 1 January	**876**	**961**
Increase	—	7
Decrease	-352	-92
Acquisition cost 31 December	**524**	**876**

Decrease in Other shares include the sale of Saxo Bank AS shares of EUR 284 million. In addition, a permanent impairment of EUR 68 million was recorded into H&F Evergood partners SA private equity fund.

During the comparative period 2023, in connection with the demerger, Sampo sold certain financial assets to Mandatum. These assets included holdings in Enento Group, guarantee shares of Kaleva Mutual Insurance Company and other smaller equity, debt, and alternative investments.

6 Other investments

EURm	2024	2023
Acquisition cost 1 January	**706**	**696**
Increase	1,659	2,325
Decrease	-1,886	-2,315
Acquisition cost 31 December	**479**	**706**

EURm	2024	2023
Bonds	75	15
Money market	303	590
Loan receivable	101	101
Total	**479**	**706**

Loan receivable consists of a loan from Mandatum plc in order to allocate general liabilities due to the demerger in 2023.

7 Other receivables

EURm	2024	2023
Other	25	20
Total	**25**	**20**

Item Other includes derivative guarantees EUR 25 (20) million.

8 Prepayments and accrued income

EURm	2024	2023
Accrued interest	15	2
Other	3	0
Total	**18**	**2**

EURm	2024	Fair value		2023	Fair value	
Derivatives	Contract /notional value	Assets	Liabilities	Contract /notional value	Assets	Liabilities
Derivatives held for trading						
Interest rate derivatives	85	—	25	89	—	20
Total	**85**	**—**	**25**	**89**	**—**	**20**

9 Movements in the parent company's equity

	Restricted equity	Unrestricted equity			
EURm	**Share capital**	**Invested unrestricted capital**	**Other reserves**	**Retained earnings**	**Total**
Carrying amount at 1 January 2023	**98**	**1,527**	**273**	**4,916**	**6,814**
Dividends	—	—	—	-1,321	-1,321
Acquisition of own shares	—	—	—	-555	-555
Partial demerger	—	—	—	-539	-539
Loan receivable due to partial demerger	—	—	—	102	102
Profit for the year	—	—	—	963	963
Carrying amount at 31 December 2023	**98**	**1,527**	**273**	**3,567**	**5,465**

	Restricted equity	Unrestricted equity			
EURm	**Share capital**	**Invested unrestricted capital**	**Other reserves**	**Retained earnings**	**Total**
Carrying amount at 1 January 2024	**98**	**1,527**	**273**	**3,567**	**5,465**
Dividends	—	—	—	-903	-903
Acquisition of own shares	—	—	—	-475	-475
Directed share issue	—	2,000	—	—	2,000
Profit for the year	—	—	—	1,862	1,862
Carrying amount at 31 December 2024	**98**	**3,527**	**273**	**4,051**	**7,949**

As part of the public exchange offer, the owners of Topdanmark's minority shares were given Sampo A shares in return. The share issue of EUR 2,000 million was recognised in the invested unrestricted equity fund.

Distributable funds

EURm	**2024**	**2023**
Parent company		
Profit for the year	1,862	963
Retained earnings	2,189	2,604
Invested unrestricted capital	3,527	1,527
Other reserves	273	273
Total	**7,851**	**5,367**

10 Share capital

Information on share capital is disclosed in Sampo Group's **note 25** in the consolidated financial statements.

11 Accruals and deferred income

EURm	2024	2023
Deferred interest	28	29
Derivatives	25	20
Other	19	23
Total	**72**	**71**

Additional information on derivatives is included in the note 8.

12 Long-term liabilities

EURm	2024	2023
Bonds	792	959
Subordinated debt securities	1,491	1,490
Total	**2,283**	**2,449**

More information can be found in Sampo Group's consolidated **note 22** Financial liabilities.

13 Deferred tax assets and liabilities

The parent company did not have any deferred tax liability or asset in the balance sheet at the end of 2024 or 2023.

14 Pension liabilities

The basic and supplementary pension insurance of Sampo plc's staff is handled through insurance policies in pension insurance companies in Finland and Sweden.

15 Rental commitments

EURm	2024	2023
Not more than one year	1	1
Over one year but not more than ten years	15	1
Total	**16**	**2**

During the reporting period 2024, Sampo plc has signed a ten-year rental agreement for new office premises commencing in June 2025.

16 Other liabilities and commitments

Sampo plc has granted a credit facility to Hastings Group Holdings Ltd of GBP 75 million, which will terminate in October 2026. The credit facility was undrawn at the end of the reporting period. More information is in Sampo Group's **note 22** Financial liabilities.

The fund commitments given amounted to EUR 7 (7) million.

17 Number of personnel

	2024 Average during the year	2023 Average during the year
Full-time personnel	61	54
Part-time personnel	—	1
Temporary personnel	4	—
Total	**65**	**55**

18 Salaries and remuneration of the Board and the Group CEO

EUR thousand		2024	2023
Group CEO	Torbjörn Magnusson	4,257	3,139
Members of the Board of Directors			
Antti Mäkinen		235	228
Christian Clausen		104	101
Fiona Clutterbuck		—	107
Georg Ehrnrooth		104	107
Jannica Fagerholm		164	159
Johanna Lamminen		—	45
Steve Langan		111	107
Risto Murto		104	101
Markus Rauramo		111	101
Annica Withchard		111	107
Astrid Stange		111	—

In accordance with the decision of the Annual General Meeting in 2024, the company has compensated the transfer tax related to the acquisition of the company shares, in total EUR 6,482.75 (EUR 1.758,66 pertaining to the Chairman and EUR 4.724,09 to the other members of the Board).

19 Pension contributions to the CEO, deputy CEO and the members of the Board

EUR thousand	Supplementary pension costs	Statutory pension costs	Total
Pension contributions paid during the year			
President/CEO[1]	905	615	1,520
Former Chairmen of the Board			
Kalevi Keinänen[2]	74	—	74
Former Presidents/CEO:s			
Harri Hollmen[3]	186	—	186
Total	**1,165**	**615**	**1,780**

[1] The Group CEO is entitled to a supplementary defined contribution pension in accordance with the present pension contract.

[2] Group pension agreement with a retirement age of 60 years and pension benefit of 66 per cent of the pensionable TyEL-salary (TyEL: Employees's Pension Act). The payment for 2024 is based on a TyEL index adjustment.

[3] Group pension agreement with a retirement age of 60 years and a pension benefit of 60 per cent of the pensionable TyEL-salary. The payment for 2024 is based on a TyEL index adjustment.

20 Shares held

	2024		2023	
Company name	**Percentage of share capital held**	**Carrying amount EURm**	**Percentage of share capital held**	**Carrying amount EURm**
Group undertakings				
P&C insurance				
If P&C Insurance Holding Ltd, Stockholm, Sweden	100.00	4,820	100.00	1,886
P&C insurance				
Topdanmark A/S, Copenhagen, Denmark	–	–	48.92	1,122
P&C insurance				
Hastings Group (Consolidated) Plc, London, United Kingdom	100.00	2,627	100.00	2,627

Sampo Plc has a branch located in Sweden.

During the financial year, Sampo plc sold the shares of Topdanmark A/S to If P&C Insurance Holding Ltd. For a more detailed description of the acquisition, please see Sampo Group financial statements' **note 28.**

As part of the sale of Topdanmark A/S shares, Sampo plc granted If P&C Insurance Holding Ltd a shareholder's contribution amounting to EUR 2 934 million. If Holding used the shareholder's contribution to set off a part of the sale price of the Topdanmark shares. The shareholder's contribution was recognised as an increase in the carrying amount of If Holding's shares in Sampo plc's balance sheet.

Approval of the Board of Directors' Report, the Sustainability Statement and the Financial Statements

The Financial Statements prepared in accordance with the applicable accounting regulations provide a true and fair view of the assets, liabilities, financial position, and profit or loss of both the company and the entities included in its consolidated financial statements.

The Board of Directors' Report includes a description of a true and fair view of the development and results of the business activities of both the company and the entities included in its consolidated financial statements, as well as a description of the most significant risks and uncertainties and other aspects concerning the company.

The Sustainability Statement included in the Board of Directors' Report has been prepared in accordance with the sustainability reporting standards referred to in Chapter 7 of the Accounting Act and Article 8 of the Taxonomy Regulation.

Helsinki, 12 March 2025

Sampo plc

Board of Directors

Christian Clausen **Georg Ehrnrooth** **Jannica Fagerholm**

Steve Langan **Risto Murto** **Markus Rauramo**

Astrid Stange **Annica Witschard**

Antti Mäkinen
Chairman

Torbjörn Magnusson
Group CEO

Auditor's note

An auditor's report on the audit performed has been issued today.

Helsinki, 13 March 2025

Deloitte Oy

Audit firm

Jukka Vattulainen

APA

Auditor's Report (Translation of the Finnish Original)

To the Annual General Meeting of Sampo plc

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of Sampo plc (business identity code 0142213-3) for the year ended 31 December, 2024. The financial statements comprise the consolidated balance sheet, income statement, statement of comprehensive income, statement of changes in equity, statement of cash flows and notes, including material accounting policy information, as well as the parent company's balance sheet, income statement, statement of cash flows and notes.

In our opinion

- the consolidated financial statements give a true and fair view of the group's financial position, financial performance and cash flows in accordance with IFRS Accounting Standards as adopted by the EU
- the financial statements give a true and fair view of the parent company's financial performance and financial position in accordance with the laws and regulations governing the preparation of financial statements in Finland and comply with statutory requirements.

Our opinion is consistent with the additional report submitted to the Audit Committee.

Basis for Opinion

We conducted our audit in accordance with good auditing practice in Finland. Our responsibilities under good auditing practice are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report.

We are independent of the parent company and of the group companies in accordance with the ethical requirements that are applicable in Finland and are relevant to our audit, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

In our best knowledge and understanding, the non-audit services that we have provided to the parent company and group companies are in compliance with laws and regulations applicable in Finland regarding these services, and we have not provided any prohibited non-audit services referred to in Article 5(1) of regulation (EU) 537/2014. The non-audit services that we have provided have been disclosed in note 6 to the consolidated financial statements and in note 2 to the parent company notes.

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

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

We have also addressed the risk of management override of internal controls. This includes consideration of whether there was evidence of management bias that represented a risk of material misstatement due to fraud.

Key Audit Matter	How our audit addressed the Key Audit Matter
Valuation of insurance contract liabilities We refer to Summary of Material Accounting policies in the financial statements as well as notes 18 and 19. As at 31.12.2024 Sampo Group has insurance contract liabilities totalling EUR 12,286 million (2023: EUR 11,716 million), consisting primarily of property and casualty (P&C) insurance contract liabilities. The measurement of insurance liabilities consists of the liability for remaining coverage (LRC) and the liability for incurred claims (LIC) including both reported but not settled claims as well as incurred but not reported claims (IBNR). The result of management's assessments regarding the calculation of the liability for incurred claims depends on inputs, the choice of actuarial methods and the precision of management judgment in determining actuarial assumptions. Key assumptions with the greatest impact on the carrying amount include inflation, discount rates as well as estimated future payments for claims. Valuation of insurance contract liabilities requires significant management judgment and accounting assumptions about uncertain future events, which may materially affect the carrying amount, and thus this is a key audit matter.	We have assessed the measurement of the provisions for insurance contracts as calculated by Management. Our audit procedures included testing of the key controls relating to valuation of insurance liabilities and key assumptions. We have involved Deloitte´s actuarial experts together with IFRS 17 subject matter experts in our audit procedures and evaluated methods and models used by the management. We have compared the information used in the calculations with the historical data and we have analysed the developments in risk, interest and cost trends. We have evaluated management's significant estimations and judgments and performed independent calculations based on actuarial methods for a substantial part of the insurance contract liabilities. We have evaluated and examined a selection of general IT controls linked to relevant systems and applications assessed as critical to the data that forms the basis for the calculation of the liability for incurred claims. On a sample basis we have examined input data used in the calculations of the liability for incurred claims. We have assessed the disclosures of the insurance contract liabilities in the financial statements.

Key Audit Matter	How our audit addressed the Key Audit Matter
Valuation of financial assets We refer to Summary of Material Accounting policies in the financial statements as well as notes 12-14. The Group's investments amount to EUR 16,090 million (2023: EUR 15,757 million). Financial assets represent a significant part of the group's balance sheet. Major part of the Group's financial assets are measured at fair value. At level 1, the valuation of the financial asset is based on the quoted price in an active market. Level 2 valuation also uses other verifiable prices as inputs, either directly or derived from them, using valuation techniques. At level 3, valuation is based on non-observable market data. Audit focus areas relate to valuations on level 2 and 3 in line with IFRS in which the valuation techniques include inputs which are not directly observable from the markets. The use of different valuation techniques and assumptions may result in different estimates of fair value and hence this is a key audit matter.	Our audit procedures have included the evaluation of the internal controls, appropriateness of accounting policies used and the reasonableness of accounting estimates made by management. We have evaluated the appropriateness of the valuation models and accounting policies used by the company to assess whether the fair value measurement is in accordance with generally accepted standards and industry practices. We have requested external confirmations to verify the existence of the investment. Together with our valuation specialists, we have assessed the assumptions used by management in the valuation calculation. We have utilized Deloitte´s valuation analytics and performed the recalculation of fair values based on the information available on the market. For financial assets that are valued on the basis of non-market information, we have also evaluated the practices and assumptions used by management in determining fair values. We have assessed the disclosures of the investments in the financial statements.

There are no significant risks of material misstatement referred to in EU regulation No 537/2014, point (c) of Article 10(2) relating to the parent company's financial statements.

Responsibilities of the Board of Directors and the Group CEO for the Financial Statements

The Board of Directors and the Group CEO are responsible for the preparation of consolidated financial statements that give a true and fair view in accordance with IFRS Accounting Standards as adopted by the EU, and of financial statements that give a true and fair view in accordance with the laws and regulations governing the preparation of financial statements in Finland and comply with statutory requirements. The Board of Directors and the Group CEO are also responsible for such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Board of Directors and the Group CEO are responsible for assessing the parent company's and the group's ability to continue as a going concern, disclosing, as applicable, matters relating to going concern and using the going concern basis of accounting. The financial statements are prepared using the going concern basis of accounting unless there is an intention to liquidate the parent company or the group or cease operations, or there is no realistic alternative but to do so.

Auditor's Responsibilities for the Audit of Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with good auditing practice will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

As part of an audit in accordance with good auditing practice, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. 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.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the parent company's or the group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of the Board of Directors' and the Group CEO's use of the going concern basis of accounting and based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the parent company's or the group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the parent company or the group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events so that the financial statements give a true and fair view.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the group as a basis for forming an opinion on the group financial statements. We are responsible for the direction, supervision and review of the audit work performed for purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Other Reporting Requirements

Information on our audit engagement

We were first appointed as auditors by the Annual General Meeting on 19 May, 2021, and our appointment represents a total period of uninterrupted engagement of 4 years.

Other information

The Board of Directors and the Group CEO are responsible for the other information. The other information comprises the report of the Board of Directors.

Our opinion on the financial statements does not cover the other information.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. Our responsibility also includes considering whether the report of the Board of Directors has been prepared in compliance with the applicable provisions, excluding the sustainability report information on which there are provisions in Chapter 7 of the Accounting Act and in the sustainability reporting standards.

In our opinion, the information in the report of the Board of Directors is consistent with the information in the financial statements and the report of the Board of Directors has been prepared in compliance with the applicable provisions. Our opinion does not cover the sustainability report information on which there are provisions in Chapter 7 of the Accounting Act and in the sustainability reporting standards.

If, based on the work we have performed, we conclude that there is a material misstatement of the report of the Board of Directors, we are required to report that fact. We have nothing to report in this regard.

Other opinions

We support that the financial statements should be adopted. The proposal by the Board of Directors regarding the use of the profit shown in the balance sheet is in compliance with the Limited Liability Companies Act. We support that the Members of the Board of Directors of the parent company and the Group CEO should be discharged from liability for the financial period audited by us.

Helsinki, 13 March 2025

Deloitte Oy
Audit Firm

Jukka Vattulainen
Authorised Public Accountant (KHT)

Assurance report on the Sustainability Statement (Translation of the Finnish Original)

To the Annual General Meeting of Sampo plc

We have performed a limited assurance engagement on the group sustainability report ("Sustainability Statement") of Sampo plc (0142213-3) that is referred to in Chapter 7 of the Accounting Act and that is included in the report of the Board of Directors for the financial year 1.1.–31.12.2024.

Opinion

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 Sustainability Statement does not comply, in all material respects, with

- the requirements laid down in Chapter 7 of the Accounting Act and the sustainability reporting standards (ESRS);
- the requirements laid down in Article 8 of the Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (EU Taxonomy).

Point 1 above also contains the process in which Sampo plc has identified the information for reporting in accordance with the sustainability reporting standards (double materiality assessment) and the tagging of information as referred to in Chapter 7, Section 22 of the Accounting Act.

Our opinion does not cover the tagging of the Sustainability Statement with digital XBRL sustainability tags in accordance with Chapter 7, Section 22, Subsection 1(2), of the Accounting Act, because sustainability reporting companies have not had the possibility to comply with that provision in the absence of the ESEF regulation or other European Union legislation.

Basis for Opinion

We performed the assurance of the Sustainability Statement as a limited assurance engagement in compliance with good assurance practice in Finland and with the International Standard on Assurance Engagements (ISAE) 3000 (Revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information.

Our responsibilities under this standard are further described in the Responsibilities of the Authorised Group Sustainability Auditor section of our report.

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

Other Matter

We draw attention to the fact that the group sustainability report ("Sustainability Statement") of Sampo plc that is referred to in Chapter 7 of the Accounting Act has been prepared and assurance has been provided for it for the first time for the financial year 1.1.–31.12.2024.

Our opinion does not cover the comparative information that has been presented in the Sustainability Statement. Our opinion is not modified in respect of this matter.

Authorised group sustainability auditor's Independence and Quality Management

We are independent of the parent company and of the Group companies in accordance with the ethical requirements that are applicable in Finland and are relevant to our engagement, and we have fulfilled our other ethical responsibilities in accordance with these requirements.

The authorised group sustainability auditor applies International Standard on Quality Management ISQM 1, which requires the authorised sustainability audit firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director of Sampo plc are responsible for:

- the Sustainability Statement and for its preparation and presentation in accordance with the provisions of Chapter 7 of the Accounting Act, including the process that has been defined in the sustainability reporting standards and in which the information for reporting in accordance with the sustainability reporting standards has been identified as well as the tagging of information as referred to in Chapter 7, Section 22 of the Accounting Act and
- the compliance of the Sustainability Statement with the requirements laid down in Article 8 of the Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088;
- such internal control as the Board of Directors and the Managing Director determine is necessary to enable the preparation of a Sustainability Statement that is free from material misstatement, whether due to fraud or error.

Inherent Limitations in the Preparation of a Sustainability Statement

In preparing the sustainability report, the company is required to conduct a materiality assessment to identify relevant matters to be reported. This process involves significant management judgement and choices. Due to the nature and characteristics of sustainability reporting, this type of information involves estimates and assumptions, as well as measurement and evaluation uncertainties.

In reporting forward-looking information, management 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. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

Responsibilities of the Authorised Group Sustainability Auditor

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

Compliance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised) requires that we exercise professional judgment and maintain professional scepticism throughout the engagement. We also:

- Identify and assess the risks of material misstatement of the Sustainability Statement, whether due to fraud or error, and obtain an understanding of internal control relevant to the engagement in order to design assurance procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the parent company's or the Group's internal control.
- Design and perform assurance procedures responsive to those risks to obtain evidence that is sufficient and appropriate to provide a basis for our opinion. 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.

Description of the Procedures That Have Been Performed

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. The nature, timing and extent of assurance procedures selected depend on professional judgment, including the assessment of risks of material misstatement, whether due to fraud or error. 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 procedures included for example the following:

- Performed inquiries of the company's management and personnel responsible for collecting and reporting the information contained in the Sustainability Statement at the group level and for subsidiaries, as well as at the different levels and business areas of the organization.
- Obtained an understanding of the company's sustainability reporting process, internal controls, and information systems related to the sustainability reporting process through inquiries.
- Reviewed the supporting documentation and records prepared by the company, where applicable, and assessed whether they support the information included in the Sustainability Statement.
- With respect to the double materiality assessment process, we evaluated the implementation of the process conducted by the company in relation to the requirements of the ESRS standards and assessed whether the disclosed information on the double materiality assessment is in accordance with the ESRS standards.
- Evaluated whether the Sustainability Statement meets the requirements of the ESRS standards, in all material aspects, regarding material sustainability matters to a significant extent.
- With respect to the EU taxonomy information, we obtained an understanding of the process by which the company has identified taxonomy-eligible and taxonomy-aligned economic activities and assessed the compliance of the related disclosed information with the regulations.

Helsinki, 13 March 2025

Deloitte Oy
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Jukka Vattulainen
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