



## **Independent Practitioner's Limited Assurance Report to The Royal London Mutual Insurance Society Limited**

### **Report on Royal London Asset Management's Portfolio Emissions for the year ended 31 December 2024**

#### **Conclusion**

We have performed a limited assurance engagement on whether selected information in The Royal London Mutual Insurance Society Limited's ("Royal London" or the "Company") Entity-level reporting section of Royal London's Climate Report (the "Report") for the year ended 31 December 2024 has been properly prepared in accordance with Royal London's Reporting Criteria 2024 as set out at <https://www.royallondon.com/siteassets/site-docs/about-us/annual-reports/2024-emissions-metrics-reporting-criteria.pdf> (the "Reporting Criteria"). The information within the Report that was subject to assurance is indicated with the symbol "◆" (the "Selected Information") and is also listed in Appendix 1.

Based on the procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Selected Information has not been properly prepared, in all material respects, in accordance with the Reporting Criteria.

Our conclusion is to be read in the context of the remainder of this report, in particular the "Inherent limitations in preparing the Selected Information" and "Intended use of our report" sections below.

Our conclusion on the Selected Information does not extend to other information that accompanies or contains the Selected Information and our assurance report (hereafter referred to as "Other Information"). We have not performed any procedures with respect to the Other Information.

#### **Basis for conclusion**

We conducted our engagement in accordance with International Standard on Assurance Engagements (UK) 3000 *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ("ISAE (UK) 3000") issued by the Financial Reporting Council ("FRC") and, in respect of the greenhouse gas emissions information included within the Selected Information, in accordance with International Standard on Assurance Engagements 3410 *Assurance Engagements on Greenhouse Gas Statements* ("ISAE 3410") issued by the International Auditing and Assurance Standards Board ("IAASB"). Our responsibilities under those standards are further described in the "Our responsibilities" section of our report.

We have complied with the Institute of Chartered Accountants in England and Wales ("ICAEW") Code of Ethics, which includes independence and other ethical requirements founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour, that are at least as demanding as the applicable provisions of the International Ethics Standards Board for Accountants ("IESBA") International Code of Ethics for Professional Accountants (including International Independence Standards).

Our firm applies International Standard on Quality Management (UK) 1 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements* ("ISQM (UK) 1"), issued by the FRC, which requires the 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.

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



## **Comparative information**

The comparative information for the years ended 31 December 2020 (baseline year for Portfolio Emissions) and 31 December 2023 is not subject to assurance as part of this engagement, accordingly, we have not expressed a conclusion, nor provided any assurance on such information.

Our conclusion is not modified with respect to these matters.

## **Inherent limitations in preparing the Selected Information**

The nature of non-financial information; the absence of a significant body of established practice on which to draw; and the methods and precision used to determine non-financial information, allow for different, but acceptable, evaluation and measurement techniques and can result in materially different measurements, affecting comparability between entities and over time.

As described on page 2 of the Reporting Criteria, the greenhouse gas (“GHG”) emissions quantification process is subject to: scientific uncertainty, which arises because of incomplete scientific knowledge about the measurement of GHGs; and estimation (or measurement) uncertainty resulting from the measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.

For Scope 3 GHG emissions, there are also significant limitations in the availability and quality of GHG emissions data from third parties, resulting in Royal London’s reliance on proxy data in determining estimated Scope 3 GHG emissions. Over time better information may become available from third parties and the principles and methodologies used to measure and report Scope 3 GHG emissions may change based on market practice and regulation.

The Reporting Criteria has been developed to assist Royal London in reporting ESG information selected by Royal London as key performance indicators (KPIs) to measure the progress of their ESG strategy. As a result, the Selected Information may not be suitable for another purpose.

## **Directors’ responsibilities**

The Directors of Royal London are responsible for:

- designing, implementing and maintaining internal controls relevant to the preparation and presentation of the Selected Information that is free from material misstatement, whether due to fraud or error;
- selecting and developing suitable Reporting Criteria for preparing the Selected Information;
- properly preparing the Selected Information in accordance with the Reporting Criteria; and
- the contents and statements contained within the Report and the Reporting Criteria.

## **Our responsibilities**

We are responsible for:

- planning and performing the engagement to obtain limited assurance about whether the Selected Information is free from material misstatement, whether due to fraud or error;
- forming an independent limited assurance conclusion, based on the procedures we have performed and the evidence we have obtained; and
- reporting our conclusion to Royal London.



## **Summary of the work we performed as the basis for our conclusion**

We exercised professional judgment and maintained professional scepticism throughout the engagement. We planned and performed our procedures to obtain evidence that is sufficient and appropriate to obtain a meaningful level of assurance over the Selected Information to provide a basis for our limited assurance conclusion. Planning the engagement involves assessing whether Royal London's Reporting Criteria are suitable for the purposes of our limited assurance engagement. Our procedures selected depended on our judgement, on our understanding of the Selected Information and other engagement circumstances, and our consideration of areas where material misstatements are likely to arise.

In carrying out our engagement, we performed procedures which included:

- Performing walkthroughs and conducting interviews with Royal London's management to understand any manual overrides to the input data used to calculate the Selected Information;
- Performing risk assessment procedures over the aggregated Selected Information, including a comparison to the prior period amounts having due regard to changes in business volume and the business portfolio;
- Selected limited substantive testing across the input data used to calculate the Selected Information by agreeing the input data to the corresponding supporting documentation, including Royal London's internal IT systems and third-party sources where applicable;
- Considering the appropriateness of the carbon conversion factor calculations and other unit conversion factor calculations;
- Re-performing the mathematical calculation of the Selected Information in accordance with the Reporting Criteria;
- Recalculating the intensity metrics, where applicable, by dividing total emissions by the relevant denominator; and
- Reading the Report with regard to the Reporting Criteria and for consistency with our findings over the Selected Information.

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

## **Intended use of our report**

Our report has been prepared for Royal London solely in accordance with the terms of our engagement. We have consented to the publication of our report at <https://www.rlam.com/globalassets/media/literature/reports/RLAM-TCFD-Independent-Limited-Assurance-Statement-2024.pdf> for the purpose of Royal London showing that it has obtained an independent assurance report in connection with the Selected Information.

Our report was designed to meet the agreed requirements of Royal London determined by Royal London's needs at the time. Our report should not therefore be regarded as suitable to be used or relied on by any party wishing to acquire rights against us other than Royal London for any purpose or in any context. Any party other than Royal London who obtains access to our report or a copy and chooses to rely on our report (or any part of it) will do so at its own risk. To the fullest extent permitted by law, KPMG LLP will accept no responsibility or liability in respect of our report to any other party.



Joshua Olomolaiye  
**for and on behalf of KPMG LLP**  
*Chartered Accountants*  
15 Canada Square,  
London,  
E14 5GL  
25 June 2025

The maintenance and integrity of Royal London's website is the responsibility of the Directors of Royal London; the work carried out by us does not involve consideration of these matters and, accordingly, we accept no responsibility for any changes that may have occurred to the reported Selected Information, Reporting Criteria or Report presented on Royal London's website since the date of our report.



## Appendix 1 – Selected Information

The underlying selected information for the year ended 31 December 2024 that constitutes the Selected Information is listed below. The information in this appendix needs to be read together with the limited assurance report and the Reporting Criteria.

| Asset Class  | KPI   | Unit   | Value |
|--|---|--|-------|
| Corporate Fixed Income and Listed Equity (Scope 1 and 2) | Financed Emissions  | MtCO <sub>2</sub> e  | 5.1   |
|  | Carbon Footprint  | tCO <sub>2</sub> e/\$m invested                            | 31    |
|  | Data Coverage – Financed Emissions and Carbon Footprint Scope 1 and 2 | %  | 87    |
|  | Weighted Average Carbon Intensity (“WACI”)                            | tCO <sub>2</sub> e/\$m revenue                             | 68    |
|  | Data Coverage – WACI Scope 1 and 2                                    | %  | 88    |
| Sovereign Debt   | Financed Emissions  | MtCO <sub>2</sub> e  | 6.0   |
|  | Production Emissions Intensity  | tCO <sub>2</sub> e/\$m PPP-adjusted Gross Domestic Product | 148   |
|  | Consumption Emissions Intensity                                       | tCO <sub>2</sub> e/capita                                  | 11    |
|  | Data Coverage – Sovereign Debt  | %  | 99    |