2025 Environmental, Social & Governance (ESG) Survey for FSAA Members in the Insurance Industry

20 October 2025

Contents

If you require any further information or explanations, or specific advice, please contact us and we will be happy to discuss matters further.

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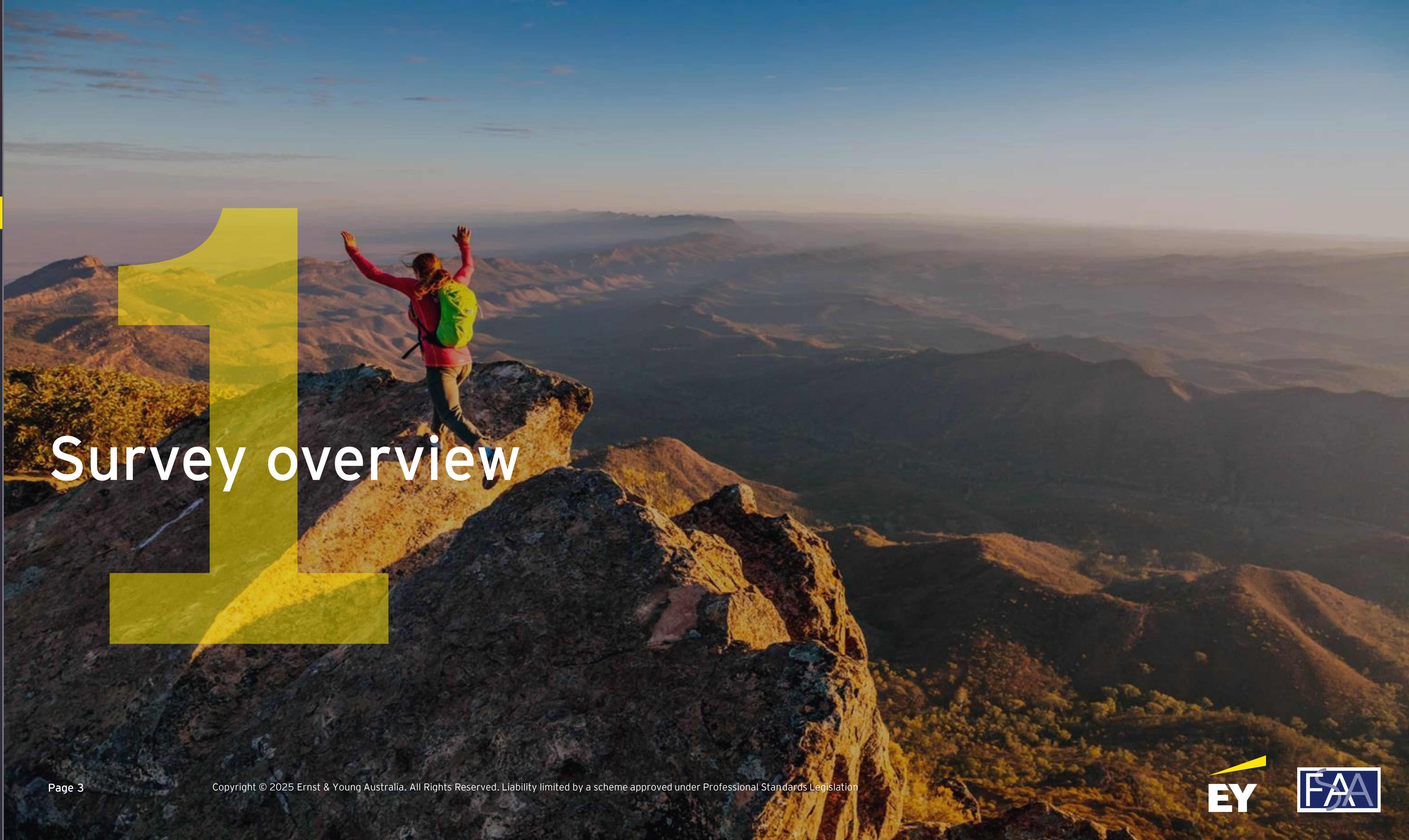


1 Survey overview

Survey overview

Introduction and purpose

Welcome to the **2025 Environmental, Social & Governance (ESG) Survey for Financial Services Accountants Association (FSAA) Members in the Insurance Industry**, a combined FSAA and EY survey conducted in 2025 and spanning 17 insurers and reinsurers. The key focus areas of this survey include:

- Insurers' readiness to meet Australian Accounting Standards Board's Australian Sustainability Reporting Standards (AASB S2)[1] and Auditing and Assurance Standards Board's (AUASB) assurance requirements and timelines[2]
- The approaches being adopted by Insurers to address wider ESG matters

The purpose of the survey is to provide information regarding the readiness of the insurance industry for upcoming mandatory reporting requirements as well as activity around broader ESG issues. This document reflects the collated results and observations on the key themes emerging from the results.

About the survey

This survey pack is split into six broad topics:

- **Survey overview:**
  - Key highlights
- **ESG governance:**
  - Climate reporting and assurance
  - Governance structure
  - Governance policies
- **ESG strategy:**
  - Climate reporting
  - ESG strategies
- **Risk management:**
  - Climate modelling capability
  - Scenario assessment
- **Metrics and targets:**
  - Scope 3 emissions
  - Third parties
- **Operational considerations:**
  - Data issues and technology solutions
  - Challenging aspects of AASB S2

Survey participants

18 insurance firms participated in this year's survey. This was made up of:

- 9 General insurers
- 3 Life insurers
- 2 Health insurers
- 4 Reinsurers

Survey results are shown on a no-names basis and all results show aggregated responses.

Survey methodology

The following approach was taken to develop this publication:

1. EY developed the questionnaire, leveraging questions used in a similar EY UK Sustainable Finance Survey. FSAA provided input and reviewed the final questionnaire.
2. FSAA shared the questionnaire among its members via an online survey and gathered responses between 17 March 2025 to 15 April 2025. Following this EY conducted a number of interviews with insurers during May and June 2025 to walkthrough the survey.
3. The responses were collated, analysed and anonymised, with insights from interviews and market observations added.
4. FSAA has facilitated this survey for the benefit of members. However, the content of the report, including interpretation of responses, and views on the requirements of the Sustainability Standards was prepared by EY.

[1]See slide 7 and Appendix 1 and 2 for further detail on AASB S2 requirements
[2]See slide 7 and Appendix 3 for further detail on assurance requirements

Key highlights

ESG governance

- Respondents surveyed were classified as either as Group 1, 2, 3 for climate-related disclosures based on the legislated size test which determines when entities need to begin publishing sustainability reports. Group 1 entities need to prepare their first report for financial years beginning on or after 1 January 2025. As expected, Group 1 reporters are significantly more prepared than other participants identified as Groups 2 or 3.
- For most respondents, the CFO is accountable for sustainability reporting.
- Many Boards are delegating climate-related responsibilities to specific individuals and/or working groups, such as climate or sustainability committees, to aid in embedding management and reporting of climate-related risks and opportunities throughout the organisation.

ESG strategy

- No insurers self-identified as market leaders actively driving positive change or defining the future market, with most respondents focusing on compliance in-line with reporting requirements in the short-term. Most respondents assessed as being either below current shareholder and insurance industry expectations (50%) or meeting current shareholder and insurance industry expectations (44%).
- Whilst top ESG priorities vary across insurers, insurers' top priorities include understanding regulatory requirements, building climate resilience, embedding sustainability and supporting people.

Risk management

- Group 1 insurers are enhancing their climate modelling capability (including physical risk) and ensuring readiness for the two mandatory scenarios released in AASB S2* as part of climate scenario analysis and resilience disclosures. Other insurers are still undecided on their modelling approaches, with the majority indicating limited capability for the climate modelling required under mandatory disclosures.
- Group 1 insurers are considering transition risks through consideration of the Standards, scenario analyses and potentially shifting away from fossil-fuel investments.

Metrics and targets

- All respondents are defining what should be captured in their Scope 3 emissions, with some insurers calculating and reporting some Scope 3 emissions internally. It should be noted that Scope 3 emissions disclosure is not required until the second year of mandatory reporting.
- Insurers plan to report across a range of Scope 3 Categories with the majority needing to report categories 1: Purchased goods & services, 3: Fuel and energy related activities, 5: Waste generated in operations, 6: Business travel, 7: Employee commuting; and 15: Investments.
- Only Group 1 insurers are currently using third-party providers to obtain ESG data and information.

Operational considerations

- Companies are facing a range of challenges with having the requisite data for the AASB S2 requirements, including requiring manual process(es) to extract data from multiple systems and data quality issues. The approach to Scope 3 emissions and risk modelling were selected as the most challenging aspects of AASB S2.
- Only Group 1 insurers have begun considering current technology solutions in the market, with the remaining believing it is too early to consider technology solutions to enable ESG reporting.

More details of the two mandatory scenarios are provided in Section 4: Risk Management

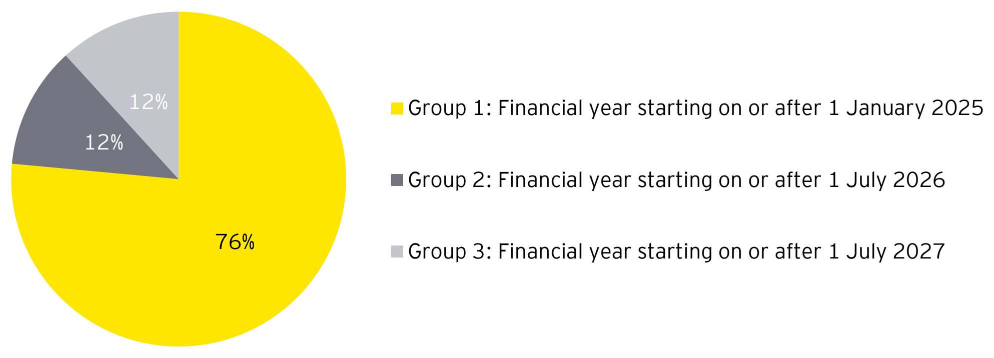
2 ESG governance

Climate reporting and assurance

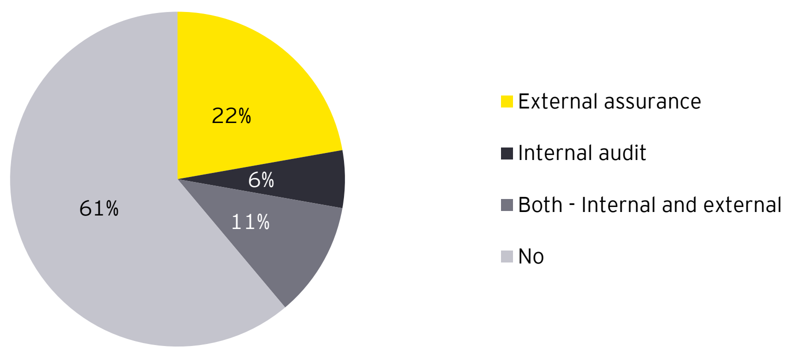
There are two sets of standards which companies need to comply with in the coming years.

- Reporting standards:
  - The Corporations Act 2001 has been amended to introduce a mandatory climate-related disclosure regime for large Australian businesses and financial institutions for financial years commencing 1 January 2025.
  - Under this regime, entities in scope are required to lodge a sustainability report containing climate-related disclosures prepared in accordance with AASB S2.
  - Insurers are required to have a fully compliant report for the first year of reporting with the exception of Scope 3 emissions and comparatives. ***See Appendix 1 and Appendix 2 for further detail.***
- Assurance standards:
  - Limited assurance for Scope 1 and 2 emissions, governance disclosures and certain strategy disclosures are required in the first reporting year, commencing for Group 1 entities for financial years beginning on or after 1 January 2025, with the entire report being subject to limited assurance in the second year of reporting. ***See Appendix 3 for further detail.***
  - ASSA 5010 Timeline for Audits and Reviews of Information in Sustainability Reports, under The Corporations Act 2001, requires companies to obtain reasonable, independent assurance from the same firm which audits their financial statements for financial years starting 1 July 2030.
- It is best practise for companies to obtain pre-assurance on their pro-forma sustainability reports, on all components subject to assurance, the year before the assurance becomes mandatory. As shown in the graph below, 36% of insurers surveyed are currently obtaining some level of assurance.

For the climate-related financial disclosure requirements, which group does your organisation sit in?



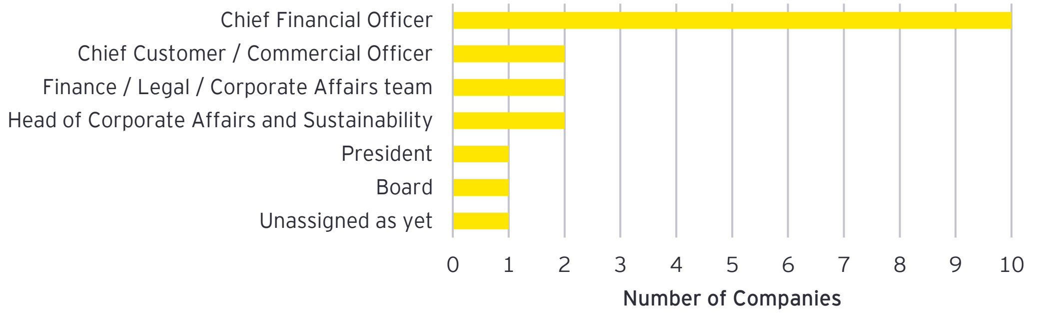
Do you currently obtain any internal or external assurance over your current climate-related data and disclosures, for example GHG emissions?



Governance structure

AASB S2 will require entities to report on how climate-related issues are embedded in governance of risks and opportunities, and in reporting of disclosures. Limited assurance is required in Year 1 for the governance section of the sustainability report. Directors have accountability for oversight of sustainability reporting and must sign off on the report with a director's declaration as required under The Corporations Act 2001. As climate-related risks, opportunities and reporting will affect the whole organisation, the Board will need to delegate some responsibilities to their executive and management teams, and standalone committees, to meet their various obligations.

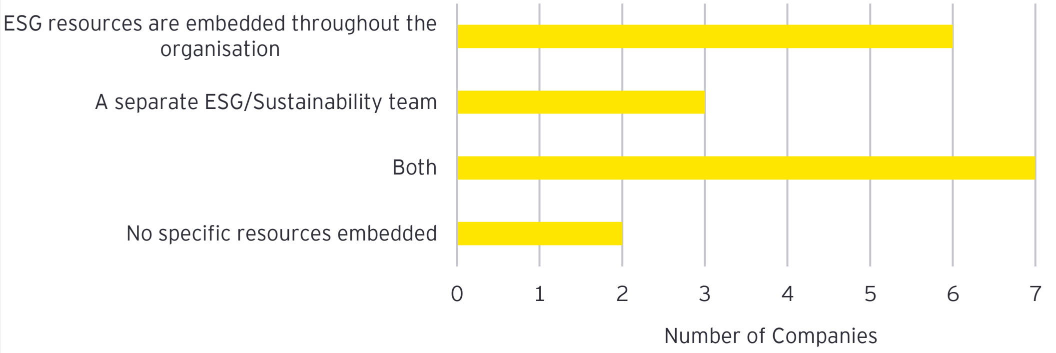
Who has accountability for sustainability reporting at your company?



Note: One respondent specified that the CFO and Head of Corporate Affairs and Sustainability hold joint accountability.

Most respondents have identified that their CFO holds accountability for sustainability reporting. This ensures consistency with the timing and reporting for financial reporting and uses many of the same skills associated with financial reporting (i.e. reporting against a framework, developing controls and processes).

Do you have a separate ESG or Sustainability team, or are ESG resources embedded throughout the organisation?



Some examples provided by respondents include the existence of a working group with participants from across the organisation or the involvement of individuals from Sustainability, Finance, Investor Relations and Procurement.

What is the number of full-time equivalent employees (FTEs) dedicated to matters relating to sustainability/ESG within your organisation?

- As expected, there is significant diversity in the number of FTEs dedicated to sustainability/ESG with larger general insurers having a larger number of dedicated ESG resources compared to a number of foreign subsidiaries with a small number of local ESG resources given their leverage from Group Sustainability teams.
- Insurers, particularly for Group 2 and 3, should evaluate the support required to comply with the standards for day one as well as ongoing reporting in accordance with AASB S2.

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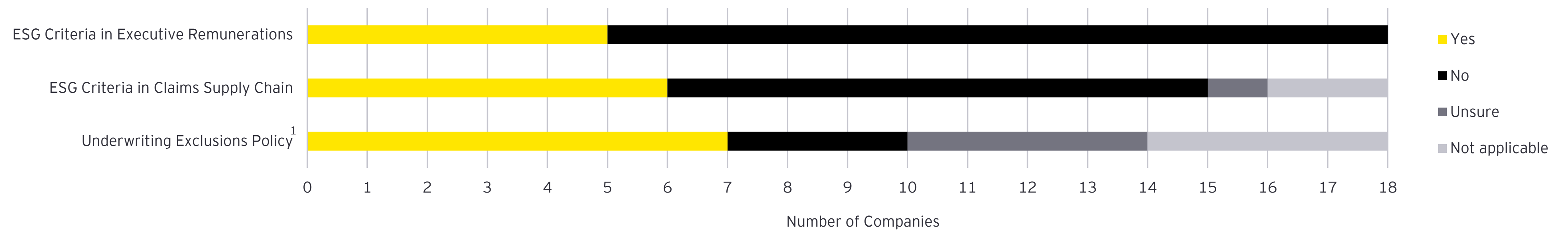
Governance policies

Boards need to consider how climate and broader ESG-related matters may impact the business and the various ways this can be integrated into risk and opportunity oversight, controls and management. For example:

- **ESG Criteria in Claims Supply Chain:** Amendments are being considered in both ISSB and AASB S2 standards to scope out insurance-related emissions as part of Scope 3 emissions. Further, given the current inflationary environment and geopolitical uncertainty, there are many complexities and challenges facing companies to integrate ESG related criteria into insurers' claims supply chains.
- **ESG Criteria in Executive Remunerations:** Disclosure is required if this link exists. Entities can also meet the disclosure requirements by disclosing that they do not link targets to executive compensation.

What ESG Policies are in force?



- Over half of the insurers surveyed have indicated that they aren't considering ESG criteria as part of their claims supply chains decisions. Given the possibility that the current standards may be amended to omit the requirement for insurance-related emissions (following recent consultations on proposed amendments by both the ISSB and AASB), this is not currently a high priority for respondents. More clarity is expected in the second year of implementation of the AASB S2.
- In addition, given that linking executive remuneration and climate-related targets is not mandatory, most respondents are choosing not do this at this time. This is a governance decision based on how climate-change is considered when compared to other business strategic priorities.

[1] *Underwriting exclusions policies are only applicable to general insurers; thus, that those who responded "Not applicable" are life insurers or reinsurers.*

3 ESG strategy

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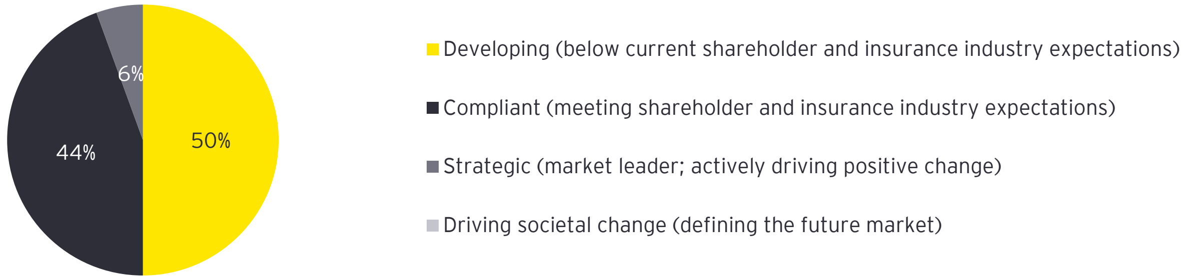
Climate reporting and ESG strategies

- Most respondents are still "developing" or focused on being "compliant" with insurers indicating they are not looking to drive societal change through climate reporting. In contrast, a similar survey conducted by EY for UK insurers showed a number of insurers are striving to drive societal change or be a leader through ESG reporting.
- Currently, a key priority for most respondents is preparing for reporting under AASB S2, however, as reporting becomes more mature and part of business as usual, the focus will turn to the integration of ESG factors.

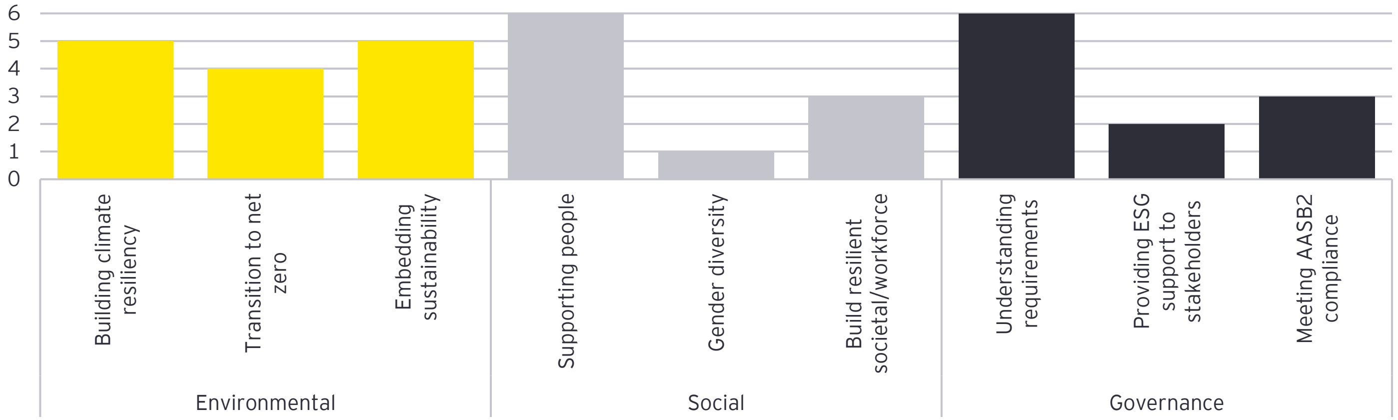
Which of the following maturity levels would best describe your current state of climate reporting?



- Group 1 insurers have generally selected "Compliant". In contrast, Group 2 and Group 3 insurers selected "Developing".
- Climate reporting requires insight from multiple parts of the business (e.g. systems uplift, claims management, reporting/communication) in order to meet shareholder and insurance industry expectations.

What are your company's top three strategic ESG priorities in the next year?

Respondents provided up to three priorities which we have categorised into E, S and G below:



- Insurers' top priorities across the E, S and G pillars include understanding requirements, building climate resiliency, embedding sustainability and supporting people.
- From an environmental perspective, these top three priorities are consistent with what we see across financial services.

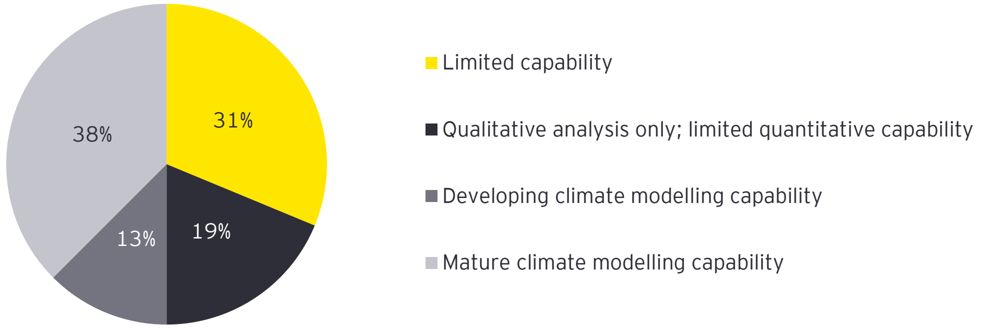
4 Risk management

Climate modelling capability

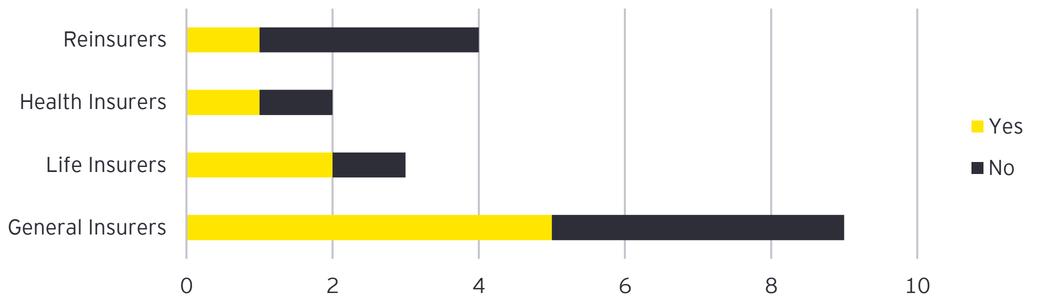
While insurance companies have extensive modelling capability as part of their core business, this has not necessarily translated into respondents being prepared for full quantitative analysis of material climate transition and physical risks. Appendix A of AASB S2 defines these risks as the following:

- **Climate-related physical risks:** Risks resulting from climate change that can be event-driven (acute physical risk) or from weather-related events such as storms, floods, droughts or heatwaves, which are increasing in severity and frequency.
- **Climate-related transition risks:** Risks that arise from efforts to transition to a lower-carbon economy. Examples include policy, legal, technological, market and reputational risks.

What is your organisation's level of climate modelling capability?



Are you currently modelling physical risk?



What considerations, if any, are you giving to transition risk?

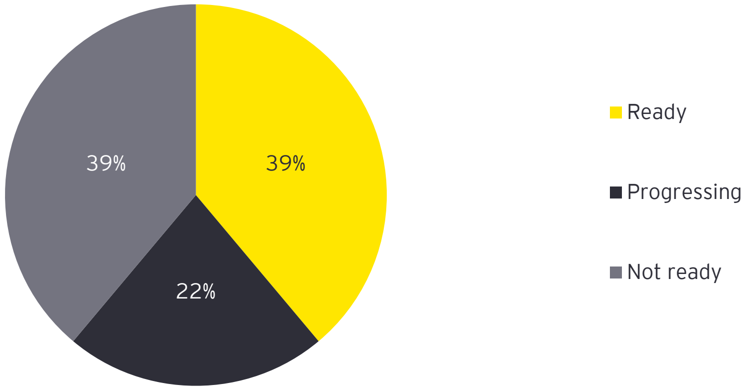
- Group 1 insurers have considered transition risks and are taking action, with the following examples provided:
  - Becoming familiar with the standards
  - Quantifying transition risks using scenario testing
  - Identifying lines of business and sectors subject to higher transition risk
  - Directing Investment Managers regarding consideration of ESG criteria in investment decisions
  - Selecting energy suppliers that provide green energy or considering purchase of carbon offsets
  - Implementing exclusions policies to move away from fossil fuels.
  - Evolving approach, with data limitations being considered
- The majority of Group 2 and 3 insurers have not yet given specific consideration to transition risks.

Scenario assessment

AASB S2 requires disclosure relating to scenario analysis including the assessment of at least the following two mandatory climate scenarios:

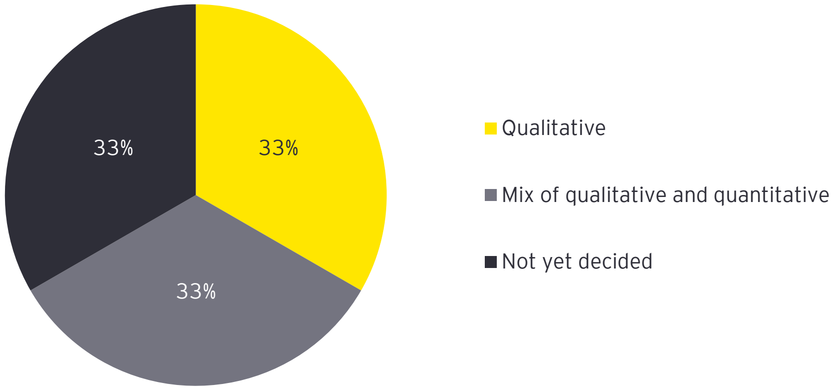
- **Scenario 1:** A low warming scenario consistent with the Paris Agreement testing the impact of a 1.5 degree increase in global temperatures over pre-industrial temperatures.
- **Scenario 2:** A higher warming scenario that well exceeds 2 degrees, with 2.5 degrees being an example of something that would meet this criteria. The Corporations Act 2001 states that an entity must do an assessment commensurate with their assessment of climate related risks and opportunities. RG 280 has clarified the meaning of "well exceeding 2 degrees" by stating that there is a risk that an entity would not be complying with the Act if it used a scenario based on an increase of less than 2.5 degrees.

What is your company's level of preparedness for modelling the two mandatory climate scenarios?



- Generally, Group 1 companies are "Ready" or "Progressing" towards preparing for assessing the two mandatory climate scenarios.
- Insurers who selected "Not Ready" are Group 2 and Group 3 insurers.

Have you, or are you planning to, take a qualitative or quantitative approach?



- The survey results revealed that only Group 1 insurers are using either qualitative measures or a mix of qualitative and quantitative approaches for modelling climate scenarios.
- Those who are still undecided are Group 2 or 3 insurers.
- Entities that are performing a qualitative assessment should ensure they have adequate support for the choice of how this meets The Corporations Act requirement and underpinned by the assessment of what is material for the insurer.

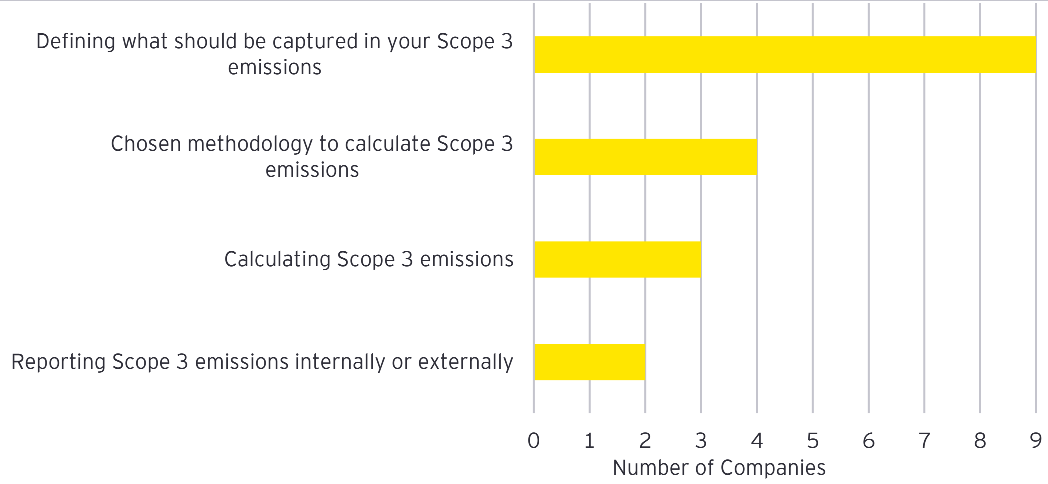
5 Metrics and targets

Scope 3 emissions

Material Scope 3 emissions are required to be disclosed in the second year of mandatory reporting. The Greenhouse Gas Protocol has 15 categories (disclosed below on the right) of Scope 3 emissions. However, there is proposed relief for specific GHG emission disclosures expected, with a recent ISSB consultation conducted to exclude insurance and reinsurance underwriting (insurance-associated emissions) from Category 15 (Investments) (see here).

Accessing data, determining calculation methodology and determining appropriate factors for Scope 3 emissions can be complex and may require amendments to contracts or consideration of use of specialists.

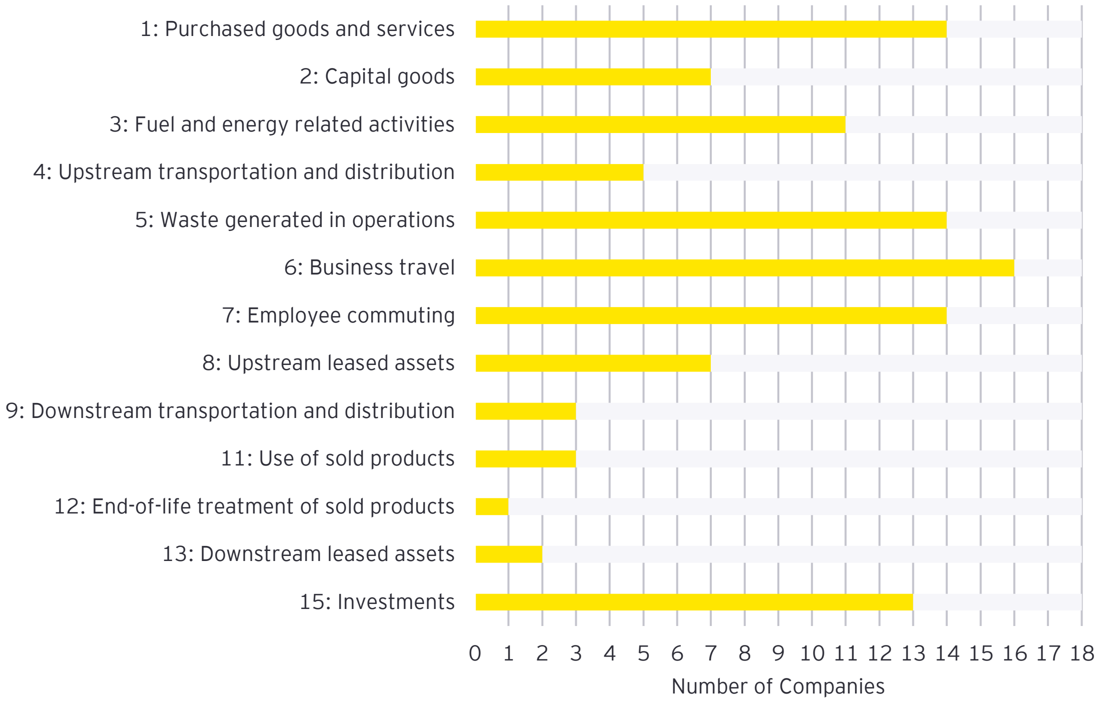
For Scope 3 emissions, which stage are you currently at?



Note: Respondents were asked to select 1 option (i.e. the most progressed stage), although, those who are more progresses noted that they are still defining what should be captured in parallel with later stages

- There were 5 Scope 3 categories that had broad consensus of being reported by most insurers.
- Scope 3 emissions are complex to navigate, particularly Category 15 which includes financed emissions. This category is material to most insurance entities, with approximately 70% of respondents planning to report on this category.

Which Scope 3 emissions will you need to report?

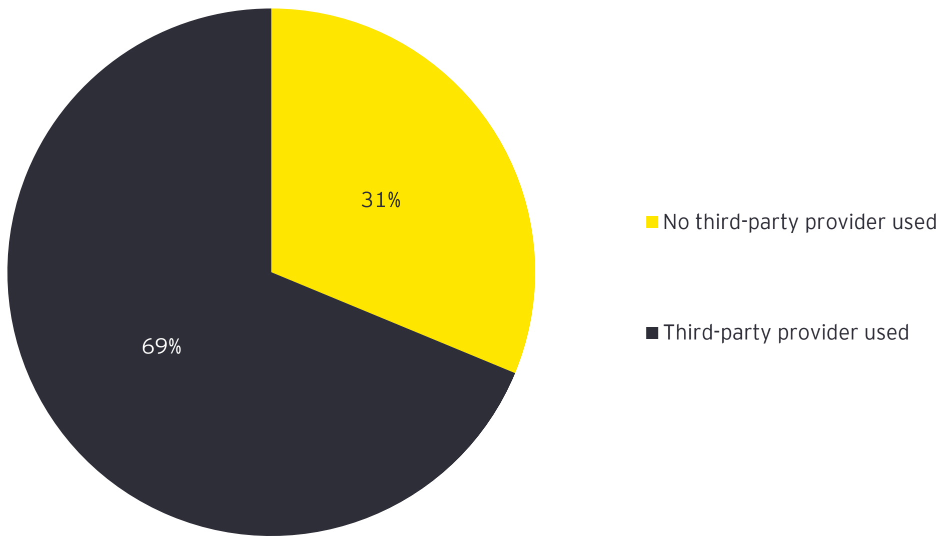


Note: Respondents selected all applicable categories

Third parties

While third-parties can be used to assist entities in accessing ESG data and preparing for climate-related reporting, the overall responsibility for sustainability reporting remains with management. Management should ensure there is adequate expertise to understand work performed by third parties. We are seeing third-party consultants used for the calculation of greenhouse gas emissions, scenario analysis, and identifying uplift needed to comply with the standards.

Do you use third-party provider(s) to obtain ESG data and information?



Note: 15 out of 18 surveyed responded to this question

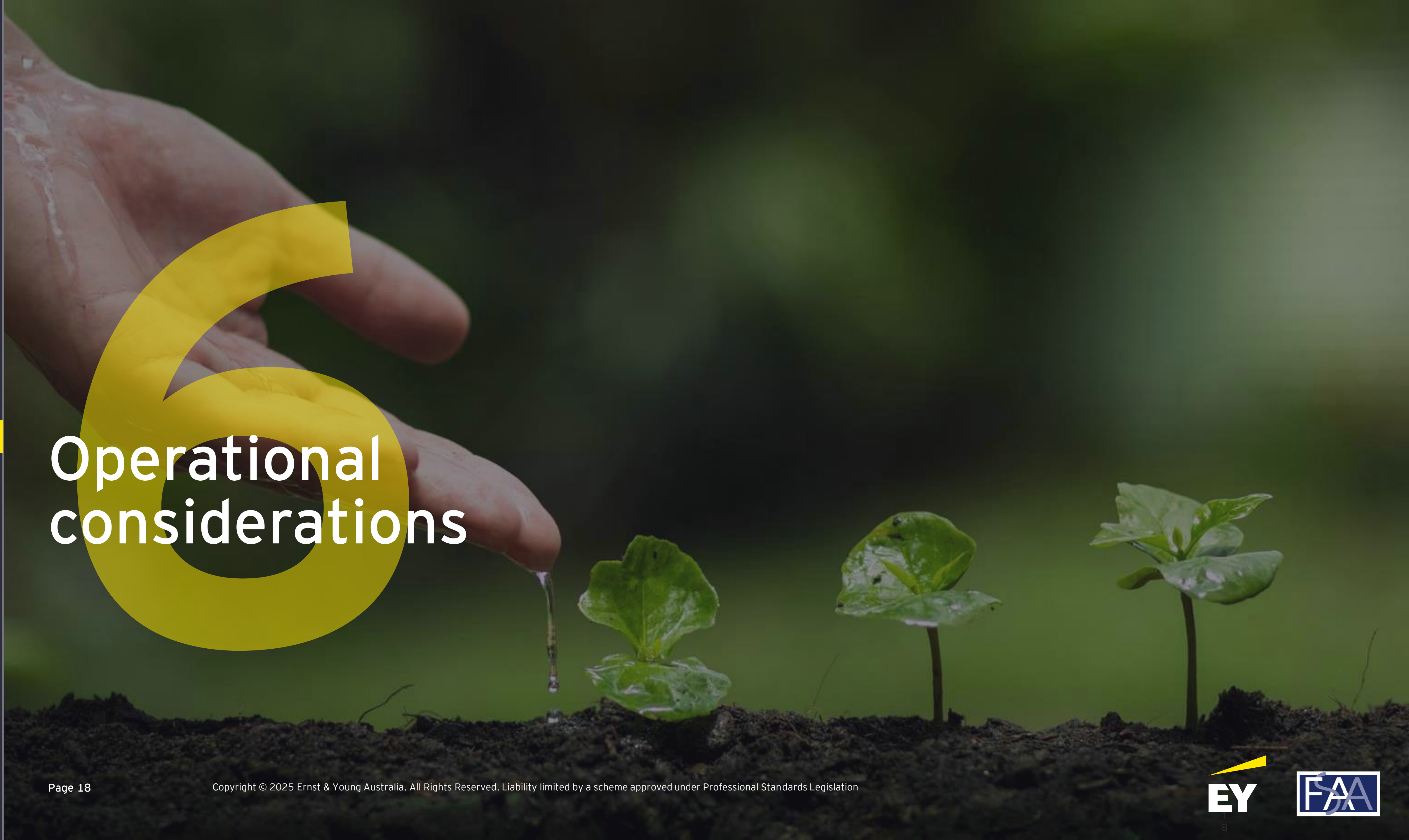
There was a large range of third parties being used by respondents including:

- Data sources such as MSCI Moodys and S&P Global
- Specialist climate consulting firms
- Working with external auditors to calculate emissions

For what purpose do you use external data?

10 insurers have specified that they use third-party providers to obtain ESG data and information for the following purposes:

- Collect investment related information
- Monitor investment ESG rating trends
- Gather information on supplier, operational and financed emissions
- Assist in performing catastrophe modelling
- Consider baselining and identifying data sources
- Gather electricity provider data and internal processes to assist with Scope 2
- Perform climate scenario analysis
- Perform part of the assessment of suppliers



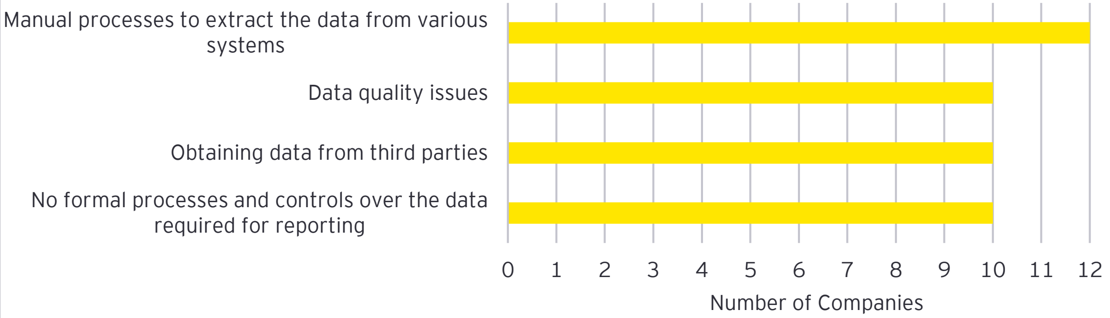
6 Operational considerations

Data issues and technology solutions

Data is one of the most complex aspects of ESG reporting, with sourcing and aggregating appropriate data sources being a key challenge for the industry. The Australian Securities and Investment Commission (ASIC), along with other stakeholders, are expecting year-on-year improvement in the availability and accuracy of data (see here).

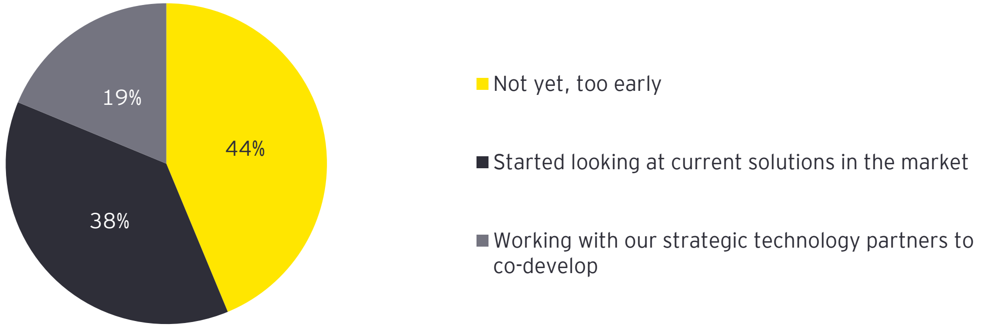
Sourcing appropriate and accurate data was also a key challenge in the implementation of IFRS17 and use of manual processes (instead of strategic solutions for data storage and manipulation) heightened operational risk and the robustness of reporting for insurers. This highlights the importance of insurers focusing on data for the implementation of AASB S2 disclosures.

Which of the following challenges are you facing with having the requisite data for the AASB S2 requirements?



Note: Respondents selected all that applied

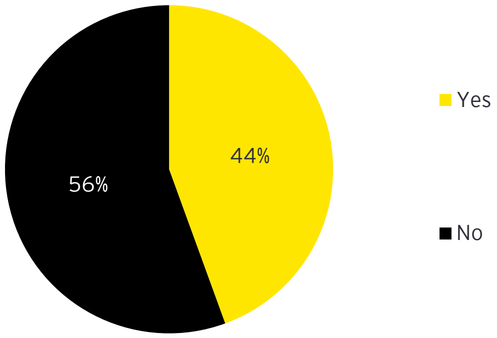
Have you started to consider technology solutions to enable ESG reporting?



Other data issues insurers are experiencing include:

- Concerns regarding interpretation of the requirements and judgement when quantifying values for scenario assessments and estimates to use when calculating GHG emissions.
- Proposed amendments to Scope 3 may cause issues if they do not go ahead in relation to the requirement to disclose insurance-related emissions
- Challenges to integrate value from the reporting and assurance readiness into the business.
- Identified lack of comparability due to entities applying requirements differently.
- Data processing is manual and whilst information may be available, the processes and controls could more robust.
- Multiple industry codes across jurisdictions

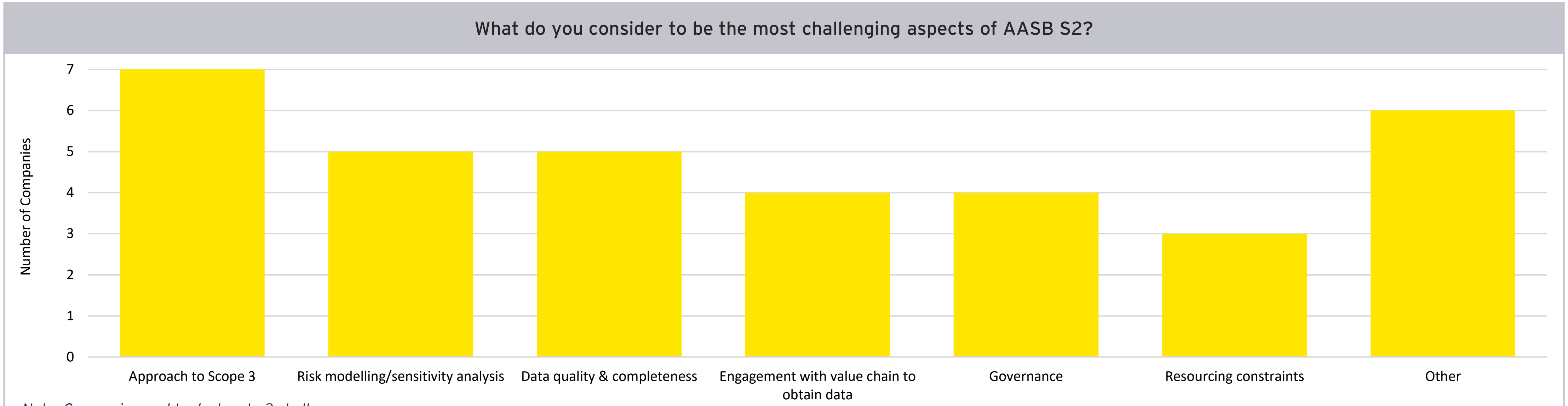
Have you mobilised cross functional teams for solutioning incorporated technology and data functions within your organisation?



Just under half of those surveyed have mobilised cross functional teams for solutioning incorporated technology and data functions within their organisation.

Challenging aspects of AASB S2

The top 5 challenges for AASB S2 include the approach to Scope 3 emissions, conducting risk modelling, engaging with the value chain to obtain data, data quality and governance. This is consistent with the challenges being faced more broadly in the financial services industry.



Note: Companies could select up to 2 challenges

Other challenging aspects identified were:

- Impacts on products and services going forward
- Ability to leverage from Group/parent sustainability programs and reporting
- Aligning Group-level climate disclosures with the specific requirements of local entity reporting, ensuring consistency while addressing jurisdictional nuances
- Concerns about uncertainty within the standard regarding the interpretation of certain elements, including insurance underwriting emissions
- Lack of data on the impact of climate on health relevant for life and health insurers

7 Appendix

Appendix 1: AASB S2 reporting requirements

The AASB S2 reporting requirements specify climate-related disclosures that an entity is required to make, with core content disclosures relating to the four pillars of: Governance, Strategy, Risk Management and Metrics and Targets, as shown in the table below. This is based on the requirements of the International Finanance Reporting Initiative (IFRS) S2 issued by the International Sustainability Standards Board (ISSB).

Reporting pillar	Description	Disclosures
Governance	Information about the governance processes, controls and procedures that a reporting entity uses to monitor and manage climate-related risks and opportunities.	• Board governance, including oversight of targets • Management's role in governance • Whether and how related performance metrics are included in the remuneration policies
Strategy	Information about an entity's strategy for managing climate-related risks and opportunities.	• Identify climate related risks and opportunities • Current and anticipated effects on the entity's business model and value chain • Strategy and decision-making, including information about the entity's transition plans (if any) • Current and anticipated effects on the entity's financial position, financial performance and cash flows • Climate resilience and scenario analysis
Risk Management	Information about how climate-related risks and opportunities are identified, assessed, prioritised and monitored, and whether and how these processes are integrated into its overall risk management framework.	• Processes and policies used to identify, assess, prioritise and monitor climate-related risks and opportunities • Assess the entity's overall risk profile and its overall risk management process

Metrics and Targets	Information about how an entity measures, monitors and manages climate-related risks and opportunities and assesses its performance, including progress towards the targets it has set.	• Climate-related metrics:
		  • Scope 1, 2 and 3 greenhouse gas emissions
		  • $/% assets or business activities vulnerable to climate-related risks and opportunities
		  • Capital deployment
		  • Internal carbon prices
		  • Remuneration
		• Climate-related targets set with supporting information on approach, scope and progress

Appendix 2: Legislative timeline for reporting

The amendments to the Corporations Act, made by the Treasury Laws Amendment (Financial Market Infrastructure and Other Measures) Act 2024, specify that an entity must prepare an annual sustainability report if the entity is required to lodge financial reports under Chapter 2M of the Corporations Act and the entity either:

- Meets the prescribed size thresholds (see below)
- Is a "registered corporation" under the NGER Act, or is required to make an application to be registered

A three-phased approach to implementation applies based on the thresholds in the table below.

Group	Timing of reporting	Climate reporting criteria and thresholds		
		Size test (two or more are met)	Asset owners [2]	NGER Act reporters
Group 1	1 January 2025 onwards	≥ 500 employees Consolidated total assets ≥ $1b Consolidated revenue ≥ $500m	Not applicable	Above NGER publication threshold
Group 2	1 July 2026 onwards	≥ 250 employees Consolidated total assets ≥ $500m Consolidated revenue ≥ $200m	Assets under management ≥ $5b [1]	All other NGER reporters
Group 3 [3]	1 July 2027 onwards	≥ 100 employees Consolidated total assets ≥ $25m Consolidated revenue ≥ $50m	Apply general size test	Not applicable

[1] Explanatory Memorandum, in para 3.58 states that "asset owners (registrable superannuation entities, registered schemes and retail CCIVs) are considered large if total assets under management are more than $5 billion".

[2] Asset owners with assets under management of less than $5 billion are required to apply the general sized test to determine whether they qualify as Group 2 or Group 3 entities

[3] Group 3 entities only need to provide climate-related financial disclosures if they identify material climate-related risks or opportunities for that reporting period. Group 3 entities that do not have material risks or opportunities are required to disclose the fact and how they reached this conclusion. These disclosures are subject to the same level of assurance as noted in the next section and form part of the directors' declaration.

Appendix 3: Assurance requirements

The amendments to the Corporations Act require entities to obtain independent assurance of their climate-related financial disclosures from the firm that is their financial statement auditor. Sustainability reports are subject to audit (i.e., reasonable assurance) for financial years commencing on or after 1 July 2030. The Act specified that, until that time, the extent to which a sustainability report is subject to audit or review (i.e., limited assurance) will be determined by an auditing standard that will be issued by the Auditing and Assurance Standards Board (AUASB).

On 28 January 2025, the AUASB approved ASSA 5010 Timeline for Audits and Reviews of Information in Sustainability Reports under the Corporations Act 2001, which specifies the minimum level of assurance that must be obtained on the various components of an entity's climate-related financial disclosures. The assurance phasing that the AUASB has prescribed is set out in the following table:

<table>
<tr><th></th><th>Year 1 [1]</th><th>Year 2</th><th>Year 3</th><th>Year 4</th></tr>
<tr><td>Scope 1 & 2 emissions</td><td rowspan="2">Limited</td><td rowspan="8">Limited</td><td rowspan="8">Limited</td><td rowspan="8">Reasonable</td></tr>
<tr><td>Governance</td></tr>
<tr><td>Strategy – risks and opportunities [2]</td><td>Limited [3]</td></tr>
<tr><td>Climate resilience assessments/ scenario analysis</td><td rowspan="4">None</td></tr>
<tr><td>Transition plans</td></tr>
<tr><td>Risk management</td></tr>
<tr><td>Climate – related metrics and targets</td></tr>
<tr><td>Scope 3 emissions</td><td>N/A</td></tr>
</table>

[1] The same assurance pathway applies to Groups 1, 2 and 3. Group 1 entities with annual reporting periods that commence between 1 January and 30 June will be able to apply the Year 1 assurance pathway for both their first and second sustainability reports.

[2] The phasing for assurance on Statements where there are no material climate-related financial risks and opportunities is the same as for 'Strategy – Risks and Opportunities'.

[3] Only paragraphs 9(a), 10(a) and 10(b) of AASB S2

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