

11. Sustainable development at the Triglav Group

- The integration of the business and ESG strategies was further enhanced by the Sustainable Development Policy of Zavarovalnica Triglav and the Triglav Group, and the Sustainable Investment Policy of Zavarovalnica Triglav and the Triglav Group.
- In pursuit of its ESG strategic ambitions, the Company entered into a partnership with the Chapter Zero Slovenia platform, became a signatory to the United Nations Principles for Responsible Investing (UN PRI) and a member of CER, the Slovenian Partnership for Sustainable Economy.
- By redesigning its twelve mutual funds and pursuing a sustainability strategy in the discretionary mandate services segment, the value of assets under management that incorporate sustainability aspects increased significantly; at the 2023 year-end, the value of these assets reached EUR 1.1 billion.
- Education and training were systematically provided, and a number of activities were implemented to ensure a healthy and safe environment for our employees.
- Scope 1 and Scope 2 carbon footprint and electricity consumption decreased by 6%.

11.1 Our approach to sustainability

In the Triglav Group's strategic ambitions for sustainable development (ESG) covering the period of 2021–2025, it is set out that by pursuing sustainability goals the Group is creating a long-term stable basis for its profitable and safe operations, promoting the transition to a sustainable society and reducing its impact on climate change. This approach is pursued across all four key areas: insurance and asset management, own business processes, responsible stakeholder engagement and effective corporate governance.

In 2023, the Group's strategic ambitions were further developed with the adoption

of its **Sustainable Development Policy**. Serving as the overarching document for the Group's sustainability-related activities, it outlines the method of implementing the strategic ambitions, establishes the system for managing ESG aspects and risks, defines key corporate governance policies and provides guidelines for sensitive economic activities.

At Group level, sustainability-related activities, which are carried out by all Group companies, are coordinated by the

Sustainable Development Department and monitored by the Compliance and Sustainable Development Committee. Decisions are made by the parent company's Management Board, as described in more detail in the [Sustainable Development Policy](#).

Key stakeholders are involved in identifying the material impacts of the Group's operations and related non-financial disclosures. The main sustainability impacts are presented in the materiality matrix for ESG topics, which is revised based on regular surveys on the impacts on stakeholders, their interests and satisfaction factors. It includes quantitative and qualitative surveys of employees, individual clients, NGOs, local communities and corporate clients as key stakeholders of the Group, as well as an internal evaluation of the importance of various topics.

In 2023, the materiality assessment of topics was reviewed and updated based on a quantitative survey conducted among more than 600 clients and other respondents from Slovenia, in addition to a study of regulatory trends in the EU and information obtained from domestic and foreign investors. See [Section 11.1.1 Key stakeholders](#) for more information about stakeholders and their engagement.

Take a look at some of the key documents on sustainability management.



Sustainable Development Policy of the Triglav Group



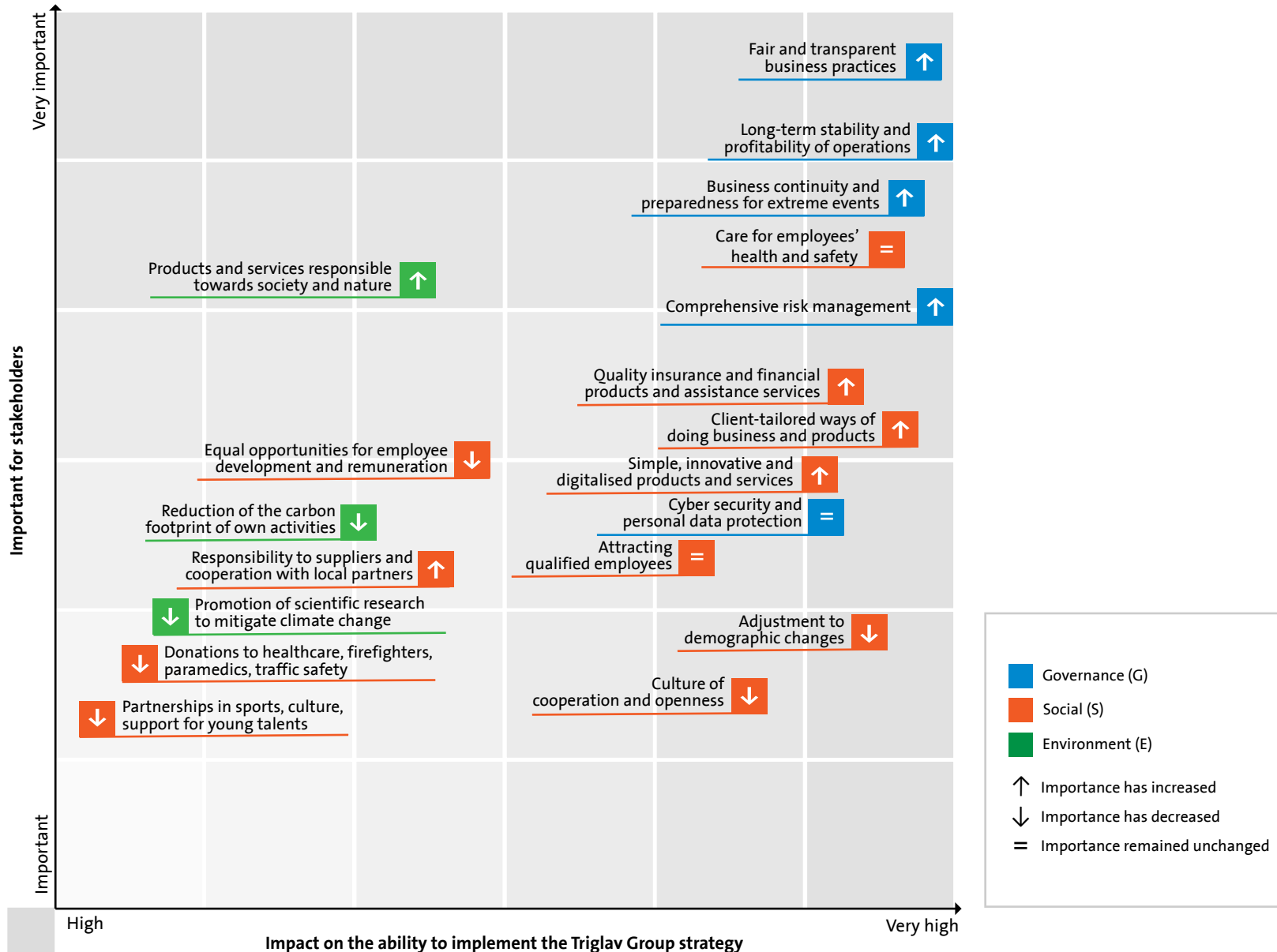
Sustainable Investment Policy of the Triglav Group

About the report²³

This report was compiled in accordance with International Financial Reporting Standards (IFRS), the Companies Act (ZGD-1J) and the Insurance Act (ZZavar-1). Its content and data are collected by the competent departments of the Company's, which is responsible for reporting in cooperation with the respective departments at subsidiaries. Reporting refers to a particular financial and calendar year.

The report is integrated and includes sustainability disclosures, i.e. environmental, social and governance (ESG) disclosures. It was compiled by using GRI standards (Global Reporting Initiative) and their guidelines for the financial sector as well as SASB standards (Sustainability Accounting Standards Board). The range of topics and disclosures is presented in the GRI and SASB indices and the materiality matrix. Progress in ESG areas is presented mainly in Section *Sustainable development at the Triglav Group*, but it is also described in other sections, as evident from the GRI and SASB references. In doing so, the information required by the EU Taxonomy Regulation (Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852) is disclosed. The financial reporting for the Group comprises all companies included in the consolidated financial statements (See [Section 2.3 of the Accounting Report](#) for more information). Reporting of environmental and human resource data refers to all Group companies that are fully consolidated and have office space and/or employees. For the remaining ESG disclosures, notes to individual disclosures indicate which companies are included. The calculation methodology for individual indicators is described in the text and notes.

Importance of ESG topics for stakeholders and the Triglav Group²⁴



²³ GRI 2-2, 2-3, 2-4, 2-14, 3-1, 3-2 | ²⁴ GRI 3-2, 2-12, 2-13, 2-16

11.1.1 Implementation of strategic guidelines and sustainable development goals of the Triglav Group

In achieving the ambitions regarding the ESG goals for 2025, progress was made in all four key areas.

■ Insurance and asset management

The share of green, sustainable and social impact bonds in the Group's investment portfolio grew. Guidelines for sustainable investments and investments in sensitive economic activities in terms of sustainability risks were outlined in the Sustainable Development Policy and the Sustainable Investment Policy of Zavarovalnica Triglav d.d. and the Triglav Group. The Group does not have any investments from issuers at which at least 20% of electricity generation or income stems from coal (Coal Exit List).

With respect to clients' assets under management, 12 mutual funds were redesigned to incorporate newly defined sustainability aspects of investments, ensuring compliance with the criteria specified in Article 8 of the SFDR. The value of these assets rose from EUR 49.2 million in 2022 to EUR 1.1 billion by the end of 2023. Plans are underway to extend this approach to the entire range of funds in 2024. Additionally, efforts are being made to implement sustainability in the investment processes within the discretionary mandate services segment.²⁵

Social and environmental benefits are further promoted through product development within the insurance business. Utilising the internal sustainability assessment methodology, clear, comprehensive and up-to-date information on the sustainability of products throughout their entire lifecycle is provided, i.e. spanning from the development phase to the promotion and distribution of the insurance product.

■ Own business processes

The Group's Scope 1 and Scope 2 carbon footprint decreased by 6% in 2023. Awareness about energy conservation and the importance of sustainable practices is raised among employees, while promoting sustainable mobility. Solar power plants began to operate on the roofs of five of the Company's office buildings in 2023 and will cover around 10% of its annual electricity consumption. The share of electric and hybrid vehicles in the fleet grew from 8% to 12%. The Group companies took many additional measures related to digitalisation and paperless operations. The total quantity of waste generated at Group level declined by 6%. The Group effectively reduced office paper consumption per employee by 32%.

■ Responsible stakeholder engagement

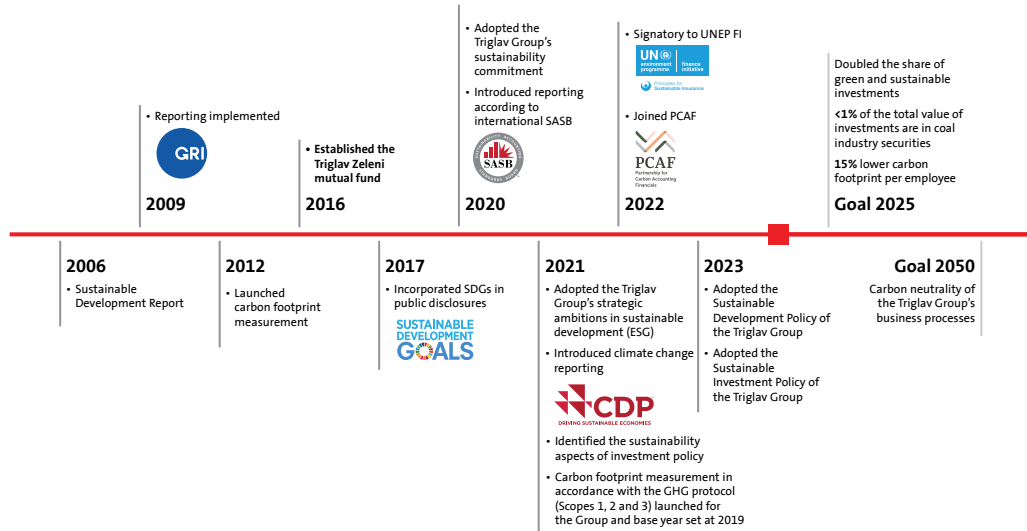
Measures were taken to support both the professional and personal development of employees, promote active leisure time and foster a healthy work-life balance. Training on ESG topics is provided through the e-learning portal. Both employee and client satisfaction scores experienced a slight decline compared to previous years, attributed to the impact of major CAT events and inflationary pressures. Efforts were made to ensure that shareholders and investors had sufficient information on which to base their investment decisions, to encourage them to attend the general meeting of shareholders and to actively engage with them. Corporate social responsibility partnerships and projects, such as the Let's Clean the Mountains drive and the volunteering activities within the Insure Our Future project, were continued. Safe mobility activities are described in [Section 11.3.3.1 Investment in prevention](#). Sustainability criteria were integrated into all of our events, including the Triglav Run and Our Day.

■ Effective corporate governance

The Group aims to achieve high corporate governance standards, while improving the public disclosures of its sustainable business and operations. In 2023, several important steps were taken for the long term. Preparations for the requirements of the Corporate Sustainability Reporting Directive (CSRD) were initiated, while the international GRI and SASB standards have been applied for several years. The Group disclosed through CDP's climate change questionnaire for the third year in a row. The Company joined the **Partnership for a Sustainable Economy (CER)** and received the Green Star 2022 certificate for effectively incorporating sustainability principles in its business. The adoption of the Group's **Sustainable Development Policy** and the **Sustainable Investment Policy** outlined its approach to considering ESG factors in the investment process. Following the Group's guidelines, all companies prepared and approved their own sustainable development policy. Furthermore, the Company entered into a partnership with the **Chapter Zero Slovenia platform** for responsible corporate governance and became a signatory to the **United Nations Principles for Responsible Investing (UN PRI)**, which encourage asset managers to invest responsibly for a fairer and greener future.

See [Section 4. Triglav Group strategy and plans](#) for more details about the achievement of strategic ambitions in sustainable development (ESG).

Sustainable development milestones of Zavarovalnica Triglav and the Triglav Group



²⁵ SASB: FN-IN-410a.2, FN-AC-410a.2

Delivering on sustainable development goals

Transition to a climate-neutral and resilient circular economy

↓ 1.54

tCO₂e (the carbon footprint) per employee in the Group and 1.46 tCO₂e at Zavarovalnica Triglav (Scopes 1 and 2)

99%

of electricity consumed at Zavarovalnica Triglav comes from renewable sources (62% at Group level)

↑ 19%

rise in premium written by the Group from products with environmental and social impacts

Integrating ESG aspects into product development and the execution of own business processes. By 2025, to reduce the carbon footprint (Scopes 1 and 2) of own activities using the location-based method by 15% per employee. Implementing the European Green Deal on carbon neutrality by 2050.

Responsible stakeholder and community engagement

↓ 73

for the Group, ↓ 69 NPS for Zavarovalnica Triglav – high client satisfaction

↓ 3.94

the ORVI index, high satisfaction of the Group's employees

1.4 bil.

km driven with the DRAJV safe driving apps

Maintaining high employee and client satisfaction. Developing an open culture of diversity and cooperation. Promoting projects that contribute to the achievement of the United Nations Sustainable Development Goals (SDGs).

Comprehensive corporate governance

↑ 43%

of women at 1st and 2nd management levels under the Management Board, 25% in management and supervisory bodies



Adopted the Sustainable Development Policy and the Sustainable Investment Policy.

Upgrading high corporate governance standards by integrating ESG aspects and effectively managing sustainability risks. Increasing the scope of public disclosures related to main aspects of sustainable business (according to GRI, SASB, CDP/TCFD methodologies).

Sustainable aspects of asset management

↑ 11.1%

share of social impact, green and sustainable bonds in debt securities of the Group's investment portfolio

12

mutual funds redesigned to incorporate sustainability aspects of investments. The value of these assets under management increased to EUR 1.1 billion.

To double the share of social impact, green and sustainable bonds in debt securities by 2025. The Group does not have any investments from issuers at which at least 20% of electricity generation or income stems from coal (Coal Exit List).

11.1.2 Key stakeholders²⁶

The following were identified as the Group's key stakeholders: **clients, employees, suppliers and partners, shareholders and investors, state and supervisory bodies, local communities and the media.** They are proactively included in the Group's operations, thereby strengthening mutual trust and understanding.

Their needs and interests, as well as the impacts of the Group's operations on them, are identified through mutual relationships at strategic and operational levels. In doing so, the Company measures reputation, satisfaction and Net Promoter Score (NPS), monitors regulatory changes and implements their requirements and recommendations, analyses complaints and compliments, maintains daily contact with investors and clients, regularly communicates with the media and so on.

Interests, opinions, and suggestions are regularly monitored by **analysing the needs and interests of stakeholders.** Based on this analysis, the scope of disclosures is outlined. See [Section 11.1 Our approach to sustainability](#) for further information.

Gained knowledge and guidelines are taken into account as much as possible in the Group's business and operations. The table below shows the key stakeholder interests identified, the forms of engagement with them and the key results of the engagement.

Stakeholders	Key interests	Engagement method	Engagement results
Clients	<ul style="list-style-type: none"> ■ Understanding the needs of clients ■ Rapid claim settlement ■ Innovative financial and insurance products and services ■ Clear terms and conditions ■ Quality insurance and financial products and services ■ A broad range of quality assistance services ■ Financial literacy ■ Digital ways of doing business and an easy-to-use online presentation of products/services ■ Raising awareness of users about risky behaviour and promoting prevention 	<ul style="list-style-type: none"> ■ Personal contact with insurance experts, asset managers ■ Recording complaints and compliments and responding thereto ■ Email ■ Telephone conversations ■ Opinion polls and surveys ■ Websites, blogs and e-newsletters ■ Social networks ■ Mobile apps ■ Marketing communication 	<ul style="list-style-type: none"> ■ 773,699 telephone conversations in Zavarovalnica Triglav's call centres. ■ 86,209 replied electronic messages in Zavarovalnica Triglav. ■ More than 31,000 subscribers to the newsletters <i>Vozim se</i> (I'm driving) and <i>Vse bo v redu</i> (Everything Will Be Alright). ■ 228,174 users of the i.triglav digital office. ■ More than 50,000 regular users of the <i>Vse bo v redu</i> and the <i>Vozim se</i> portals. ■ NPS of the Group is 73 and 69 of Zavarovalnica Triglav. ■ 327,200 processed claim files at Zavarovalnica Triglav. ■ 3,897 complaints and 46 compliments in Zavarovalnica Triglav: the rate of complaints was 1.16% compared to 1.22% in the previous year.²⁷
Employees	<ul style="list-style-type: none"> ■ Internal culture of cooperation ■ Rewarding of performance ■ Personal and professional development ■ Career advancement system ■ Information about important milestones and changes in the Company ■ Business strategy ■ Work-life balance ■ Education and additional training ■ Care for safety and health ■ Employee loyalty 	<ul style="list-style-type: none"> ■ Participation in management ■ Career development and training system ■ Measurement of organisational vitality ■ Opinion polls and surveys ■ <i>Triglav.smo</i> programme ■ In-house print and online media ■ In-house events, professional training, sports and recreational events ■ Personal contact ■ Email 	<ul style="list-style-type: none"> ■ 3.94 – the ORVI index at a high level ■ 25% of employees are members of the Triglav Group mountaineering and sports clubs. ■ Supplemental pension insurance for 59% employees of the Group and 95% of the Company. ■ The group insurance package Comprehensive Medical Care (<i>Celostna zdravstvena oskrba</i> – CZO), in which 50% of all employees of the Group and 82% of the parent company are included. ■ 32 training hours per employee at Group level. ■ A family-friendly enterprise
Shareholders/ investors	<ul style="list-style-type: none"> ■ Business strategy and its implementation ■ The Group's operations, financial position and plans ■ The implementation of the dividend policy and ZVTG share profitability ■ Capital adequacy and risk management ■ Implementation of growth and development activities ■ Performance by particular market, situation in the markets and outlook ■ Corporate governance and sustainable operations ■ Cost-effectiveness ■ Achievement of the target credit rating ■ Effective organisation and governance of the Group 	<ul style="list-style-type: none"> ■ General Meetings of Shareholders ■ Sessions of the Supervisory Board and its committees ■ Quality and up-to-date information on the SEOnet ■ Presentation for Investors ■ Active contact and relations with institutional investors (investor conferences, individual meetings, conference calls) ■ Organised presentations for retail shareholders (individual investors) and provision of information ■ Corporate website, LinkedIn and Twitter ■ Minority shareholders' associations 	<ul style="list-style-type: none"> ■ 77% of all voting rights at the annual General Meeting of Shareholders. ■ The Company provides organised collection of proxies to vote at the General Meeting of Shareholders. ■ 29 publications of controlled information (all in Slovenian and English). ■ 9 events held for institutional investors. ■ 2 organised presentations for retail investors. ■ Cooperation with minority shareholders' associations. ■ An available financial calendar of all key announcements. ■ An available calendar of events for investors.
State and supervisory bodies	<ul style="list-style-type: none"> ■ Ensuring capital adequacy ■ Safety of policyholders and/or users of insurance services ■ Efficient risk management system ■ Compliance of operations and insurance and financial services and products ■ Complying with all obligations of a public company ■ Responsible and sustainable operations 	<ul style="list-style-type: none"> ■ Regulatory reporting (to the Insurance Supervision Agency, the Securities Market Agency) ■ Regular reviews by inspection and supervisory bodies ■ Audits by certified auditors 	<ul style="list-style-type: none"> ■ 11 complaints with respect to personal data protection at the Triglav Group, 5 of which were partially grounded. ■ 1,119 fraud cases confirmed out of 1,771 reported cases of suspected insurance fraud insurance.
Suppliers	<ul style="list-style-type: none"> ■ Long-term cooperation ■ Reliable and timely payments ■ Upgrading the existing cooperation ■ Delivery times, prices of services and goods ■ Delivery of environmentally friendly material ■ Paperless operations 	<ul style="list-style-type: none"> ■ Public tenders and competitions ■ Working meetings ■ Email and electronic operations ■ Telephone conversations ■ Assessment of suppliers according to ESG criteria 	<ul style="list-style-type: none"> ■ 865 assessments of suppliers according to regulatory and expanded sustainability criteria to check suppliers' compliance with employee rights, human rights and environmental legislation.
The local and wider community	<ul style="list-style-type: none"> ■ Traffic safety ■ Fire safety ■ Health protection and care ■ Co-development of projects in the areas of culture, sport, prevention, health, art, charity ■ Infrastructure investments ■ Access to services for people with various disabilities ■ Insurance and financial literacy ■ Fair business practices ■ Disaster relief 	<ul style="list-style-type: none"> ■ Partnerships with non-profit organisations and educational institutions and execution of joint projects ■ Joint projects with local communities, particularly in traffic safety ■ Funds allocation system for sponsorships and donations ■ Cooperation with local decision-makers ■ Email ■ Telephone conversations 	<ul style="list-style-type: none"> ■ The Insure Our Future communication platform brings together more than 200 partners to implement sustainability-related activities to achieve UN goals. ■ Support for 141 young talents in eleven years of the Young Hopes project. ■ 2,200 motorcyclists attended safe driving workshops over ten years. ■ A total of 113 events to promote insurance literacy, risk awareness, presentation of products and services were held. ■ 24 sponsored top athletes in Slovenia. ■ EUR 3.3 million for prevention activities, EUR 4.7 million for sponsorships and EUR 0.9 million for donations.
Media	<ul style="list-style-type: none"> ■ Transparent information about the operations, events and changes in the Triglav Group ■ Information about insurance and financial products and services ■ Cooperation with local and broader communities ■ Professional insurance and financial topics 	<ul style="list-style-type: none"> ■ Press releases and statements ■ Meetings with media representatives ■ Answers and explanations ■ Email ■ Telephone conversations ■ Websites 	<ul style="list-style-type: none"> ■ 55 press releases by Zavarovalnica Triglav. ■ 388 answers to the questions of the press by Zavarovalnica Triglav. ■ 9,217 publications related to key topics about the Triglav Group in the media.



Solar power plants were installed on the roofs of five of the Company's buildings.

11.2 Environmental aspects

11.2.1 Protection of the environment in business processes²⁸

In realising its responsibility to the natural environment, the Group focuses on areas on which it, as an insurance and financial institution, has the most significant influence. This objective is achieved by adhering to its Sustainable Development Policy and strategic ambitions. In its business processes, the Group reduces its environmental impact primarily through the efficient use of energy and by limiting greenhouse gas emissions. It strives for careful waste management, lower consumption of water and other resources.

The share of electric and hybrid company cars at Group level stood at 12% in 2023 (8% in 2022) and 30% at the parent company (18% in 2022). At Group level, 52 electric vehicles, 23 hybrid vehicles and 25 company bicycles are available to employees, in addition to 32 electric scooters for short trips. In Ljubljana, the less-used company cars are being gradually replaced with electric cars as part of the car sharing service. To encourage eco-friendly mobility, 22 own electric car charging stations were set up at all key locations. Two locations in Ljubljana have space for electric bicycles from the public bike rental system, and a secure bicycle storage facility was set up at Dunajska cesta 22.

Employees are encouraged to drive safely and reduce fuel consumption by using the DRAJV app and taking part in safe driving courses. Paper consumption is reduced by developing software, through electronic archiving and digitalisation of business processes. The quantity of plastic waste is reduced by using company mugs and water bottles.

11.2.2 Carbon footprint²⁹

In 2023, the Group's carbon footprint (Scopes 1 and 2) **decreased by 6%** year-on-year, and by 25% compared to the 2019 base year.

The Group's **Scope 1 carbon footprint** was at the same level as the previous year, but at the Company it increased by 5% due to the higher consumption of energy from own capacities. Compared to the 2019 base year, Scope 1 carbon footprint at Group level declined by 4%.

Scope 2 carbon footprint fell by 8% at Group level according to the location-based method and by 9% at the Company. The Group's Scope 2 carbon footprint decreased by 11% according to the market-based method, which takes into account emission factors obtained from the energy supplier, and that of the Company by 13%. The decrease is due to lower overall electricity consumption and, at Group level, an increase in the share of green electricity purchased. The Company purchased almost all of the electricity used for its own premises from renewable energy providers.

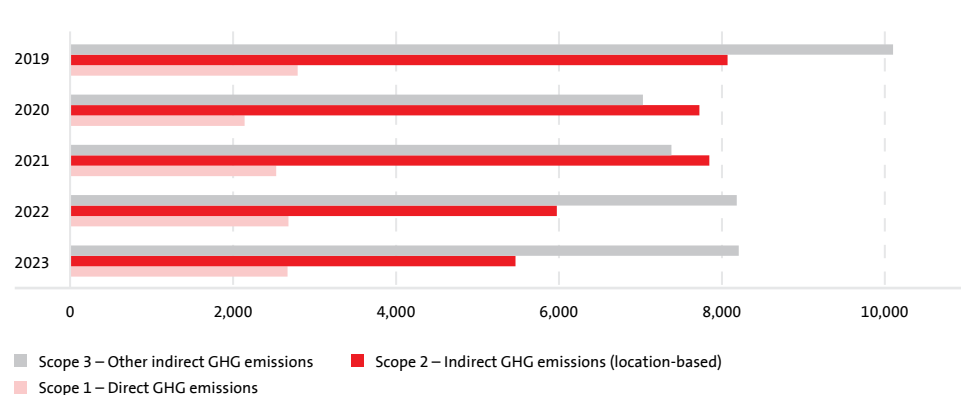
Scope 3 carbon footprint at Group level remained at the same level year-on-year and 19% lower compared to 2019. The largest share of Scope 3 carbon footprint was accounted for by employees commuting to work, business trips and purchases of computer equipment. Both the Group and the parent company increased their business trip emissions by 7%. Emissions from employees commuting to work decreased by 1% both at Group level and at the parent company.

The Triglav Group's carbon footprint by scope

	GHG emissions in tCO ₂ e			Index	
	2023	2022	2019 base year	2023/2022	2023/2019
Scope 1 – Direct GHG emissions	2,667	2,678	2,790	100	96
- Scope 1.1 – Consumption of energy products from own capacities	688	580	810	119	85
- Scope 1.2 – Fuel consumption of company cars	1,978	2,098	1,981	94	100
Scope 2 – Indirect GHG emissions (location-based)	5,464	5,971	8,068	92	68
Scope 2 – Indirect GHG emissions (market-based)	4,011	4,485	7,345	89	55
Scope 3 – Other indirect GHG emissions	8,206	8,180	10,098	100	81
- Business travel (plane, train, bus, car)	1,451	1,360	1,963	107	74
- Purchase of computer equipment	545	388	705	140	77
- Waste management	204	200	47	102	435
- Employee commuting to work	5,849	5,928	6,565	99	89
- Paper consumption – internal	86	130	431	66	20
- Paper consumption – external	58	165	364	35	16
- Water consumption	13	11	24	126	56
Total Scope 1–2 GHG emissions	8,131	8,649	10,859	94	75
Total Scope 1–3 GHG emissions	16,336	16,829	20,957	97	78
Carbon footprint (Scope 1–2) per employee	1.54	1.63	2.00	94	77

Following the change in data capture, the data for 2019 and 2022 were adjusted.

The Triglav Group's carbon footprint by scope in 2019–2023 in tCO₂e



Carbon footprint per Triglav Group employee (Scopes 1 and 2) 2023/2019



In the 2019 base year, the Group's carbon footprint was 2.0 tCO₂e per employee. With the implementation of commitments and comprehensive actions, it decreased to 1.63 in 2022. The main contributors to the further decrease to 1.54 tCO₂e per employee in 2023 were the reduction in electricity consumption and the increase in the share of green energy.

Zavarovalnica Triglav's carbon footprint by scope

	GHG emissions in tCO ₂ e			Index	
	2023	2022	2019 base year	2023/2022	2023/2019
Scope 1 – Direct GHG emissions	724	693	938	105	77
- Scope 1.1 – Consumption of energy products from own capacities	286	180	393	159	73
- Scope 1.2 – Fuel consumption of company cars	438	513	546	85	80
Scope 2 – Indirect GHG emissions (location-based)	2,555	2,806	3,719	91	69
Scope 2 – Indirect GHG emissions (market-based)	1,269	1,452	3,676	87	35
Scope 3 – Other indirect GHG emissions	5,263	5,310	5,565	99	95
- Business travel (plane, train, bus, car)	1,047	983	1,369	107	77
- Purchase of computer equipment	283	210	315	135	90
- Waste management	82	83	20	99	418
- Employee commuting to work	3,792	3,837	3,463	99	109
- Paper consumption – internal	13	48	69	27	19
- Paper consumption – external	41	146	322	28	13
- Water consumption	3	3	8	102	38
Total Scope 1–2 GHG emissions	3,280	3,499	4,657	94	70
Total Scope 1–3 GHG emissions	8,543	8,809	10,223	97	84
Carbon footprint (Scope 1–2) per employee	1.46	1.57	1.95	93	75

Following the change in data capture, the data for 2019 and 2022 were adjusted.

Based on an independent verification carried out in accordance with the ISO 14064-3 standard, the verifier, SIQ Ljubljana, gave a **positive opinion** on the carbon footprint report of Zavarovalnica Triglav d.d. and the Triglav Group and confirmed that the report:

- was prepared in accordance with the GHG protocol for GHG emission reporting (Scopes 1 and 2 emission reporting guidelines),
- was correct in terms of content and fairly presents GHG data (Scopes 1 and 2) from 1 January 2023 to 31 December 2023 for Zavarovalnica Triglav d.d. and the Triglav Group.

The Triglav Group's carbon footprint calculation was prepared in accordance with the methodology for calculating Zavarovalnica Triglav's and the Triglav Group's carbon footprint, defining in greater detail the scope and limits, the method of data collection and analysis, and emission factors. For year-on-year comparisons and setting targets to reduce the carbon footprint, 2019 was set as the base year, when the epidemic situation had not yet affected the total volume of greenhouse gas emissions (GHG). The carbon footprint calculation according to the location-based method includes all Group companies that are fully consolidated and have office space or employees and therefore meet the materiality criterion.

The methodology follows the guidelines of the internationally recognised Greenhouse Gas Protocol and takes into account the release factors of the international database, which classifies emissions into three scopes (Scopes 1, 2, 3). The calculation of the Group's carbon footprint included the following scopes and categories of emissions.

- **Scope 1:** direct emissions from sources owned or controlled by the company (e.g. boilers, stoves, painting chambers, company vehicles) and fugitive emissions associated with air-conditioning units.
- **Scope 2:** indirect emissions resulting from purchased district heating and electricity.
- **Scope 3:** indirect emissions resulting from business trips by air, train, bus and car not owned or leased by the company, from purchases of IT equipment, generated waste, employee commuting, consumption of paper and water.

In accordance with the carbon footprint calculation methodology, certain data of the parent company and its subsidiaries were adjusted up to the 2019 base year. The adjustments mainly relate to taking into account data relating to the consumption of tenants of office premises.

Use of energy products

The Group consumed 1,552 tonnes of oil equivalent (TOE) of energy on heating, cooling, lighting and electrical and electronic equipment, down by 4% relative to 2022, while the Company reduced its energy consumption by 2%. Both the Group and the parent company saw the largest increases in gas consumption, while consumption of fuel oil, electricity and water for heating decreased.

Solar power plants were installed on the roofs of five of the Company's office buildings at the end of the year, which will cover around one tenth of its annual electricity consumption. Employees were educated on the more rational use of energy (proper ventilation, consistent switching off of appliances after use), in addition to limiting the temperature in offices and sales areas and domestic hot water temperature.

When renovating premises, priority is given to highly energy-efficient equipment. Additionally, for new forced-air ventilation installations, integrated heat recovery systems are used. All new premises and advertising signs are fitted with LED lighting. When replacing lighting in basements and garages, lighting sensors are installed in addition to LED lights (see [Section 8.5 Investment in own-use real property and equipment](#) for further information).

Use of energy products at the Triglav Group and Zavarovalnica Triglav in energy product unit

Quantities		Index				
		2023	2022	2019 base year	2023/2022	2023/2019
Triglav Group						
Heating water	kWh	4,347,328	4,943,441	4,713,720	88	92
Fuel oil	L	13,115	29,410	89,790	45	15
Gas	kWh	2,970,584	2,221,206	2,581,140	134	115
Wood pellets	kg	38,750	49,030	26,000	79	149
Electricity	kWh	10,341,736	11,015,428	11,269,874	94	92
Green electricity	kWh	6,374,018	6,500,791	117,659	98	5,417
Green electricity (%)	%	61.6	59.0	1.0	104	5,904
Zavarovalnica Triglav						
Heating water	kWh	3,634,507	4,167,600	4,043,670	87	90
Fuel oil	L	7,959	15,520	23,414	51	34
Gas	kWh	1,330,257	723,129	1,732,335	184	77
Wood pellets	kg	0	0	0	0	0
Electricity	kWh	5,701,785	5,991,621	6,291,109	95	91
Green electricity	kWh	5,667,141	5,965,093	117,659	95	4,817
Green electricity (%)	%	99.4	99.6	1.9	100	5,314

Following the change in data capture, the data for 2019 and 2022 were adjusted.

Use of energy products at the Triglav Group and Zavarovalnica Triglav in tonne of oil equivalent (TOE)³⁰

	TOE (ton equivalent)			Index	
	2023	2022	2019 base year	2023/2022	2023/2019
Triglav Group					
Heating water	374	425	405	88	92
Fuel oil	11	25	77	45	15
Gas	262	196	228	134	115
Wood pellets	16	20	11	79	149
Electricity	889	947	847	94	105
Green electricity	548	559	8	98	6,772
Total	1,552	1,614	1,568	96	99
Zavarovalnica Triglav					
Heating water	313	358	348	87	90
Fuel oil	7	13	20	51	34
Gas	117	64	153	184	77
Electricity	490	515	433	95	113
Green electricity	487	513	8	95	6,021
Total	927	951	954	98	97

Following the change in data capture, the data for 2019 and 2022 were adjusted.

³⁰ The calculation for a tonne of oil equivalent (TOE) is based on the assumption that 10 kWh of electricity are generated from one litre of fuel oil and 9.5 kWh from a m³ of natural gas. GRI 302-1.

Waste management³¹

The waste separation and disposal system depends on the waste management system at the local level or at the level of the country in which a particular Group company operates. Full waste separation is carried out in Slovenia, whereas in some other countries waste separation and disposal is not yet fully regulated, therefore the quantity and type of waste are often not available. Employees in all companies are encouraged to reduce their consumption of water, paper, and packaging, and to consistently separate waste.

Compared to the year before, the total quantity of waste generated in 2023 decreased by 6% at Group level and by 8% at the Company. The higher quantity of paper waste resulted from an increase in the volume of archival material. The share of recycled waste increased to 34.3% at Group level and 44.5% at the Company.

Waste management at the Triglav Group and Zavarovalnica Triglav

Triglav Group	Unit	Index				
		2023	2022	2019 base year	2023/2022	2023/2019
Paper	kg	117,353	113,796	85,443	103	137
Biological waste	kg	31,906	41,232	12,567	77	254
Packaging	kg	57,411	65,957	53,328	87	108
Glass	kg	6,535	3,960	5,396	165	121
Mixed waste	kg	399,723	436,509	415,353	92	96
Electrical equipment and other	kg	8,251	2,327	5,861	355	141
Total recycled waste	kg	213,205	224,945	156,734	95	136
Total waste intended for removal	kg	407,974	438,836	421,214	93	97
Total waste generated	kg	621,179	663,781	577,948	94	107
Water consumption	m ³	75,142	70,873	68,847	106	109
Waste per employee	kg	118	125	110	94	107

Zavarovalnica Triglav	Unit	2023	2022	2019 base year	2023/2022	2023/2019
Paper	kg	80,968	72,670	38,818	111	209
Biological waste	kg	26,569	36,247	9,849	73	270
Packaging	kg	23,215	36,448	29,929	64	78
Glass	kg	2,951	724	971	408	304
Mixed waste	kg	159,584	179,400	180,327	89	88
Electrical equipment and other	kg	7,258	1,777	5,852	408	124
Total recycled waste	kg	133,703	146,090	79,567	92	168
Total waste intended for removal	kg	166,842	181,177	186,179	92	90
Total waste generated	kg	300,544	327,267	265,746	92	113
Water consumption	m ³	18,088	21,134	23,071	86	78
Waste per employee	kg	134	146	120	92	112

In 2023, too, the consumption of paper for internal purposes was reduced. The average daily consumption of office paper (A4 and A3 formats) in sheets per employee fell to 13 at Group level (compared to 19 in 2022) and to 5 at the Company (compared to 18 in 2022).

Paper consumption at the Triglav Group and Zavarovalnica Triglav

Triglav Group	Paper consumption in kg			Index	
	2023	2022	2019 base year	2023/2022	2023/2019
Total paper consumption*	158,728	321,002	817,114	49	19
Paper consumption by employees (A4 and A3)	88,920	131,356	369,200	68	24
Average daily office paper consumption per employee (sheets)	13	19	53	68	24

Zavarovalnica Triglav	2023	2022	2019 base year	2023/2022	2023/2019
Total paper consumption*	59,640	211,006	409,710	28	15
Paper consumption by employees (A4 and A3)	14,266	52,460	72,090	27	20
Average daily office paper consumption per employee (sheets)	5	18	25	27	20

* Includes paper consumption for internal and external purposes, including envelopes, promotional material, printed material, insurance documentation, etc.



Triglav Group employees participated in tree planting and reforestation activities in several countries.

Care for the wider natural environment

Under the expert guidance of the Slovenia Forest Service, Group employees once again participated in the **reforestation of the Karst region after the devastation** caused by the catastrophic fires in 2022. Approximately 8,000 seedlings of diverse tree species were planted in the area affected by the fire. In North Macedonia, the **Green League** app (Zelena liga) was launched to promote a healthy lifestyle for employees and clients, while also raising awareness about the importance of reducing CO₂ emissions into the environment.

11.2.3 Services and products promoting social and environmental impacts³²

Sustainability criteria are taken into account when designing insurance products, and each product is properly assessed already in the development and approval phase in accordance with the internal methodology of sustainability impact assessment. Presented below are the most important services and activities that promote social and environmental benefits.

- **Solar power plant insurance:** This insurance provides adequate insurance cover to all owners and users of energy from renewable sources.
- **Micromobility insurance:** Insurance for small electric means of transport, which is designed to promote the use of zero-emission means of transport.
- **Comprehensive car insurance and roadside assistance insurance:** These insurance products include all the necessary covers for electric and hybrid vehicles (insurance of the entire charging infrastructure).
- **The DRAJV app:** Promotes safe, economical and responsible driving, allowing clients who use it to qualify for a reduced car insurance premium.
- **The range of agricultural insurance products:** Greater emphasis is being placed on plant production insurance and insurance of small and medium-sized livestock farms, which are a significantly smaller burden on the environment than intensive animal farming.
- **The range of co-financed agricultural insurance products:** Promotes the supply of locally produced food. This helps to shorten supply chains and contributes to preserving agricultural production and rural settlements, especially in more remote areas with more difficult farming conditions (less favoured areas for agriculture). In order to preserve Slovenian fruit production and business sustainability, the Company presented to the government a proposal to upgrade the agricultural insurance co-financing system, where the government would also be involved through co-financing in the event of damage.
- **The premium policy** for agricultural insurance products promotes the importance of establishing preventive protection against increasing production risks as a result of climate change. The Company participates in **prevention programmes** for sustainable food production (irrigation systems to protect against summer drought, sprinkler systems to protect against spring frost, anti-hail nets, greenhouses, tunnels). **Gradually launching index insurance products**, such as crop insurance against drought with remote sensing technology to detect a lack of moisture in the soil, helps to reduce the burden on the environment in the claim settlement process. Modern damage assessment procedures in the field using tablets and drones are also more environmentally friendly.
- **Special benefits for young farmers:** Young farmers receive special benefits when concluding insurance upon taking over a farm. In cooperation with the Slovenian Rural Youth Association, the Company supports young farmers in innovative and preventive projects such as Innovative Young Farmer,

(Un)safe Driving with Tractors and participation in the publication of the Entrepreneurial Farmer (Podjetni kmet) manual.

- **Activities in insurance companies outside Slovenia:** In Serbia, an agreement was signed with a solar panel provider, with the Triglav Group engaged as the insurance provider. In North Macedonia, the Kasko Green promotion was launched, running until the end of September. Owners of electric and hybrid vehicles received up to a 50% discount on their comprehensive car insurance. Furthermore, the My Home (Moj dom) product was launched, offering a 10% discount to policyholders using cost-effective devices, and a 50% discount to policyholders with installed power generation devices such as solar panels (30% for legal entities).

The volume of premium written from insurance products promoting general social and environmental benefits increased to EUR 24.8 million (index 119) in 2023.

The value of assets under management that comply with sustainability criteria increased to EUR 1.1 billion, as a result of the aforementioned redesign of twelve mutual funds and the incorporation of a sustainability strategy in the discretionary mandate services segment. Sustainable bonds represent 11.1% of the Group's debt investments.

Written premium from the Triglav Group insurance products that promote social and environmental benefits, along with assets under management in funds and discretionary mandate assets that incorporate sustainability aspects

	Written premium and assets under management			Index	
	2023	2022	2021	2023/2022	2022/2021
Crop insurance	17,738,167	17,056,736	13,392,760	104	127
Electric vehicle insurance	4,699,300	2,427,251	1,920,092	194	126
Micromobility insurance	527,467	550,591	484,875	96	114
Solar power plant insurance	1,816,700	773,394	537,912	235	144
Total written premium	24,781,634	20,807,972	16,335,639	119	127
Assets under management in funds that incorporate sustainability aspects*	1,139,026,941	49,246,838	41,833,991	2.303	118

* Comprise assets from mutual funds (Triglav Aktivni, Triglav Evropa, Triglav Obvezniški, Triglav Okoljska perspektiva, Triglav Renta, Triglav Severna Amerika, Triglav Sklad denarnega trga EUR, Triglav Svetovni razviti trgi, Triglav Tehnologije prihodnosti, Triglav Top Brands, Triglav Trgi v razvoju, Triglav Zdravje in dobro počutje) and discretionary mandate assets that incorporate sustainability aspects.

The disclosures required by Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 are presented in [the appendix Disclosures under the EU Taxonomy Regulation](#).

11.3 Social aspects

11.3.1 Responsibility to clients³³

The Company aims to cultivate long-term relationships with its clients, built on principles of fairness, trust and ongoing follow-up. Client needs are promptly addressed with an emphasis on quality, convenience and transparency. Suggestions and comments from clients are professionally and fairly addressed not only to enhance business models and processes but also to develop new products, services and ecosystems.

The client experience is improved through the development of digital solutions and modern communication channels. Client relationships are reinforced through direct contact with insurance agents, ensuring clients are informed about insurance products and their personal data and rights are protected.

Insurance products are developed in line with the procedures for their approval and testing before they are sold or distributed. Each product must meet clients' needs and goals in its lifetime and correspond to their characteristics. The adequacy of distribution strategies is checked and tested on a regular basis, thereby maintaining client focus and product satisfaction. When any deviations are identified, the respective product or its distribution is appropriately adjusted.

The sale of insurance is centrally managed through various sales channels and appropriate communication platforms, aiming to cover all target groups – from young people to pensioners – by using a multi-channel approach.

Informing clients³⁴

Clients are provided with easy access to all the necessary information about the Company's products and services. Its insurance and general terms and conditions are fair and transparent, with special attention given to informing clients when underwriting financial and insurance contracts remotely.

Any complaint, which may be filed in various ways, is resolved quickly according to the prescribed procedures. The Company complies with the guidelines of supervisory bodies and carefully implements its policy of management and control of insurance services and products and their distribution.

Marketing approaches and campaigns are consistently implemented in compliance with statutory and other consumer protection regulations. No proceedings for violations related to marketing communication were initiated against Zavarovalnica Triglav and its subsidiaries in 2023.

Availability of services

A wide array of digital solutions and multiple sales channels is utilised to offer clients easily accessible services and streamline business transactions. See [Section 13. Business network of the Triglav Group](#) for more information on the expansive business network.

- **Communication channels:** Toll-free telephone numbers are available for the Company's services (general information and technical assistance: 080 555 555, info@triglav.si; and assistance services: 080 2864 in Slovenia, 080 2222 2864 abroad). The toll-free telephone number 080 2664 and info@triglavzdravje.si are available for information on health insurance; the toll-free telephone number 080 1019 and info@triglavskladi.si of Triglav Skladi are available for information on investment solutions. Call centres also operate in Croatia, Serbia and North Macedonia. The **TRIA virtual assistant** was upgraded with artificial intelligence (AI) to offer clients a more natural, flexible and interactive communication experience.
- **The DRAJV mobile app:** The app is used by approximately 66,000 drivers every month, who have driven a total of over 1.4 billion kilometres since its launch. By driving safely, users are rewarded with a discount when taking out motor vehicle insurance or insurance for young drivers and receive a discount on motorcycle insurance. In 2023, a single Triglav login for the i.triglav digital office and the DRAJV app was implemented. See [Section 10. Development activities](#) for more information.
- **The i.triglav mobile app:** Using the app, clients can sort out most things related to insurance contracts and access the Company's other services (taking out or renewing insurance policies, reporting a claim and monitoring the status of their claim, ordering assistance, reviewing details of insurance and benefits, etc.). The mobile app, which is used by more than 228,000 users, allows clients to check the balance of their savings at Triglav Skladi and the balance of their life and pension insurance assets.
- **The Triglav Vreme mobile app:** Provides access to reliable weather information and forecasts provided by the Slovenian Environment Agency.
- **Online insurance underwriting:** Motorcycle insurance was added to the digital insurance portfolio, and most of the existing online products were redesigned for an improved digital experience.
- **Mobile appraisal units at CAT events:** In the affected areas, mobile appraisal units are set up for a quick and prompt damage assessment. In 2023, ten mobile appraisal units were set up after seven major and several small hailstorms in Slovenia, which carried out a total of over 12,000 appraisals of damaged vehicles (compared to 4,000 in 2022).
- **Claims settlement:** Users can submit a claim through a number of digital reporting channels (online reporting, mobile reporting, B2B, i.triglav, chatbot, etc.) with electronic signing of claims documents and reporting of assistance cases without a phone call. See [Section 10.2 Digital transformation](#) for more information on the new innovative solutions.



Triglav Lab has set up the first e-scooter driving simulator in Slovenia.

- **An app for inspection of the object insured:** Remote inspection is possible using a client's smartphone, a drone and 360° cameras, as well as by capturing data using OCR technology. Damage reporting and inspection procedures are therefore simpler and faster.
- **The Triglav Skladi mobile app and Moj račun (My Account) online app** for easy and transparent management of investors' investments and access to up-to-date information on financial markets and asset management.
- **Remote consultation with a specialist physician under the Zdravstveni nasvet (Medical Advice) insurance product:** Clients can consult with a specialist physician by telephone or video call.
- **A safe driving simulator at Triglav Lab:** A practical driving test on the simulator provides a discount on the young driver's insurance policy, and participating in a safe driving workshop also provides a reduced price.

Access to Zavarovalnica Triglav's insurance services for people with various disabilities³⁵

Improving the services provided to persons with disabilities and ensuring their social integration

- A total of 75% of our points of sale provide independent access to people with different types of disabilities. In 2023, during the renovation of the premises to accommodate the medical centre's requirements, tactile floor signs were installed in the lobby of the building at Dunajska cesta 22 in Ljubljana to assist the visually impaired. In addition, an inductive hearing loop was installed at the reception desk there.
- 100% of the points of sale are equipped with aids for partially sighted persons.
- 100% of the regional units' head offices are fitted with FM devices for hard-of-hearing persons.
- Partnership with the Sports Federation for the Disabled of Slovenia and the Vozim Institute.

11.3.1.1 Client satisfaction³⁶

Client satisfaction is measured using the Net Promoter Score (NPS) methodology in all markets where the Group operates, with the range of participating companies being expanded. In the reporting year, the underwriting process was included in addition to assistance services and claim payments.

In 2023, despite a decline, the NPS score for both the Group and the Company remained at high levels. **The NPS for the Group** decreased by 4 points year-on-year to 73, while **the NPS for the Company** fell by 7 points year-on-year to 69. The decline was observed across all points of contact, particularly in the area of information and underwriting. Despite the general decrease, however, we still achieved the highest level of satisfaction in assistance services. The decline in NPS is attributed to the rise in premiums resulting from inflation and catastrophic weather events, leading to a significant increase in the number of claims and their settlement time. The results of the measurements and negative client experiences are communicated to the relevant departments on a daily basis.

Client satisfaction with **healthcare service providers** is measured at the Zdravstvena točka health information office. Scores always exceed target values. All clients who left negative feedback are contacted, which is also communicated to partner healthcare service providers. The best rated partner healthcare service providers are awarded awards of excellence, and the Ambassador of Excellence award is given to the providers who were awarded five years in a row.

Client feedback is also obtained through an anonymous survey when reporting a claim, mail and electronic complaints, responses on various social networks and own websites, as well as directly from agents in the field. A book of complaints and compliments is available at points of sale.

Individual **complaints and compliments** are monitored and managed with effective software. The complaint handling rules define the individual stages of the complaints procedure and the duties of the responsible persons. Once a year, a report on the handling of complaints and compliments is drawn up and presented to the Company's management. It also specifies measures to improve the complaints procedure and processes. The Company ensures that clients are transparently informed about the complaints procedure, both with appropriate explanations in the insurance documentation and on the Company's website, where they can find all information related to the handling of complaints.

In 2023, the Company received 3,897 complaints, a 14% increase compared to the previous year. Most complaints related to non-life insurance claims (91%). The most common (91%) were substantive complains in which clients expressed their dissatisfaction with the handling of their claims. Of all complaints received, two-thirds were unfounded, 10% were founded and 15% were partly founded. Apart from that, 46 compliments were received, with particular praise for the attitude of staff in handling claims and service delivery. In the Group members outside Slovenia, complaints are handled in accordance with complaint committee's rules; records are kept in the prescribed form, mostly digital.

The client retention rate in Zavarovalnica Triglav was 88.2% in 2023. Together with new clients acquired this year, their total number increased by 10.3%.³⁷ **The rate of complaints** in relation to the number of claims at Zavarovalnica Triglav and Triglav, pokojninska družba was 1.16% compared to 1.22% in the previous year.³⁸

11.3.1.2 Assessment of effectiveness and market research

Various market analyses are performed to monitor our visibility among the general and business public, assess client satisfaction, evaluate user experience, and understand the purchasing habits and intentions of both existing and potential clients.

In 2023, 45 in-house surveys were conducted, covering a wide range of business areas. These surveys are aimed at enhancing the quality of our products, services and applications, tailor them to clients' needs and expectations, strengthen our competitive advantage and deepen our understanding of the market. Topics included analysing target audience and products, designing and testing the bases for application development, exploring the potential of new product concepts, evaluating existing products and understanding clients' buying patterns.

Regular surveys on the **Triglav brand's reputation** are also conducted among the general public. In all countries where the Group operates, except Serbia, the brand ranks among the top five brands in terms of reputation. With a brand excellence index of 81, Triglav scored one percentage point lower than in 2022.

Brand management and marketing communication

Rebranding took place both at the Triglav brand level and the employer brand level. At the brand level, a graphic guidelines and rules manual was developed, outlining the rules and principles of the new brand archetype, a sovereign guardian. Additionally, an employer brand strategy was formulated, defining the guidelines for cultivating a blue culture at Group level, establishing the employer brand identity and defining the employer brand promise. To this end, a content and graphic manual for unified HR advertising across the entire Group was adopted, with its implementation scheduled to begin in early 2024.



“Triglav is a strong, time-honoured brand, yet flexible in adapting to changes in the environment.

In line with our business strategy, it is now assuming the role of custodian for our clients while bolstering its reputation as an employer brand.”

Tjaša Kolenc Filipčič, Director of Marketing Department, Zavarovalnica Triglav



The DRAJV app received an Effie Award for marketing excellence.

Through the **Insure Our Future** sustainability project, all sponsors and partnerships from various fields, including sport, culture, healthcare, prevention and business, were brought together on a single communication platform. Our joint efforts were focused throughout the year on achieving the 17 UN Sustainable Development Goals (SDGs). By disseminating the content of each SDG, awareness of their significance was raised among online users, primarily through the Company's channels (Facebook, Instagram, zavarujmoprihodnost.si website, etc.) and the digital channels of selected ambassadors. An e-newsletter was sent to all partners twice a month to provide the latest news about the Company and encourage their involvement. Furthermore, information about the Company's activities was shared with employees via the intranet to underscore the importance of sustainability.

As part of its long-standing partnership with the Ski Association of Slovenia, the Company held the **Create a Cup for Planica** competition for children, for the first time actively engaging teenagers and young people in a nationwide event at the FIS Ski Jumping World Cup Finals. In the competition, young creators designed a real trophy for the Planica 7 winner – the best ski jumper, with the trophy subsequently produced using a 3D printer.

11.3.1.3 Awards and acknowledgements received

Awards and acknowledgments of the Triglav Group in 2023

- **WEBSI 2023:** 2nd place for Triglav Skladi in the "Product and landing pages and a website intended for individuals" category and 3rd place in the "Financial sector" category.

- **TOP investor in education:** Zavarovalnica Triglav was awarded a certificate for its systematic investment in employee education and training.
- **European Commission Award** (under the European Road Safety Charter): Top prize in the “Fitness to drive” category for the *Refresher ride with a driving instructor for the elderly* project.
- **HRM project 2023:** The winner of the HRM project in the “Large Companies” category, recognised at the HR&M conference for the exemplary practice showcasing how volunteering at Triglav fosters connection, unity and resilience within the organisation.
- **Marketing Excellence:** The winner in the “Sustainability excellence” category for the *Refresher ride with a driving instructor for the elderly* project.
- **Effie:** Gold Award in the “Long-term effectiveness and efficiency” category for the DRAJV mobile app.
- **Diggit:** Grand Prize in the “Effective marketing, design and user experience” category for the i.triglav mobile app.
- **IADA:** Gold Award for the 2022 annual report of the Triglav Group and the parent company for the integrated communications solution on the annual report’s cover photo.
- **Arc Awards:** Gold Award for the 2022 annual report of the Triglav Group and the parent company for the integrated communications solution in the “PDF Version of Annual Reports” and “Photography/Video” categories.

- **Gold Quill:** The International Association of Business Communicators (IABC) awards for excellence in strategic communication for the *Refresher ride with a driving instructor for the elderly* project in two categories (“Safety communication” and “Corporate social responsibility”).
- **Excellence Award:** Triglav, Zdravstvena zavarovalnica received a special award for excellence, having been chosen by clients as one of the best healthcare service providers.
- **Reputable Employer 2022:** For the fifth year in a row, Zavarovalnica Triglav was awarded the title of *Reputable Employer* in the insurance industry for its dedication to caring for its employees and the flexibility it demonstrates as an employer in a challenging labour market.
- **NETKO Award** (by the Chamber of Commerce and Industry of Slovenia): 1st place for Triglav Skladi for the best presentation of a company or start-up, for the best presentation of a product or service and a “Top Project!” special award.

11.3.2 Responsibility to employees³⁹

Strategic employee management guidelines and the recruitment policy

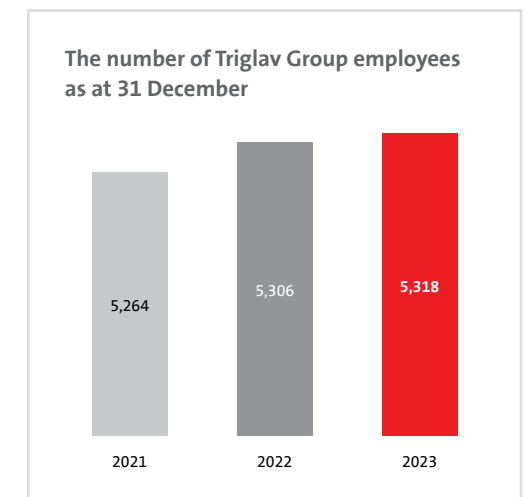
- The Group attracts, retains and develops top talent on an ongoing basis, continually improving the selection procedures. Standardised employee management processes are introduced within the Group by implementing minimum standards and transferring good practices.

- A uniform organisational culture is being created at Group level based on constructive behaviour, teamwork, initiative, responsibility and cooperation. The employer brand is systematically redesigned. Mobility within areas of work and among Group companies is promoted. Onboarding mentoring for new hires and development mentoring for promising employees are carried out, thereby strengthening intergenerational cooperation.
- Employees’ know-how is being upgraded in all areas of work and the competencies necessary for the effective achievement of individuals’ goals are developed on an ongoing basis. In 2023, the main competency – initiative was strengthened at Group level.
- The development of key and promising employees and leaders is an ongoing process.
- Employee satisfaction and commitment are a priority, which is monitored using an annual ORVI survey.
- Modern, hybrid forms of work are being implemented that enable employees to work more flexibly and efficiently, facilitate networking and cooperation, and improve their work-life balance.
- In 2023, the Group completed a project to implement development modules in the Gecko HRM human resource information system.

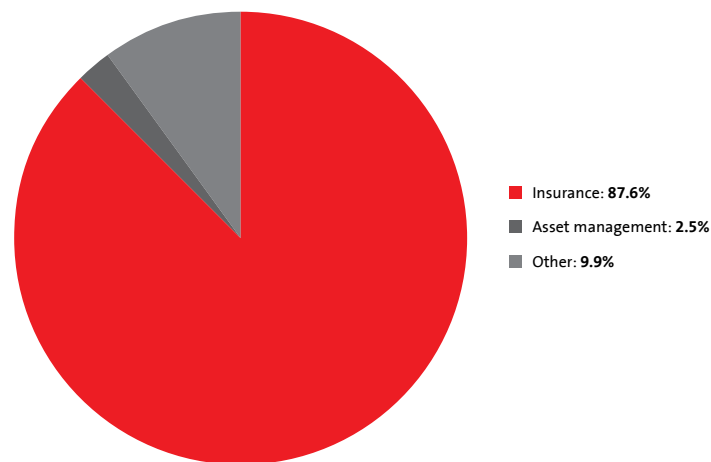
11.3.2.1 Recruitment and employee structure⁴⁰

The Triglav Group had **5,318 employees** as at 31 December 2023, up by 12 over the preceding year. The number of employees increased due to new hires in the Serbian and Croatian insurers.

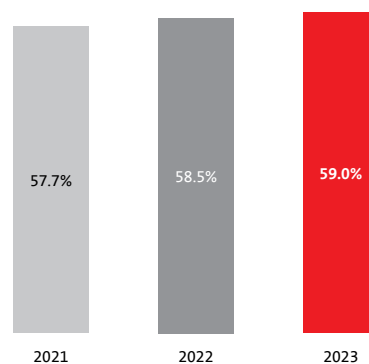
The majority, i.e. 87.6%, of all employees worked in the insurance activity, down by 0.7 percentage point compared to the year before, due to a decrease in the number of employees at the health insurer. The share of employees in asset management activity increased by 0.1 percentage point, while in other activities it rose by 0.6 percentage point.



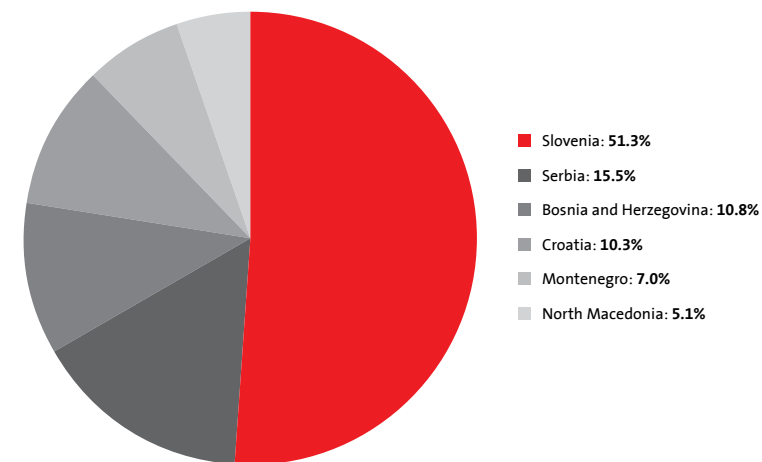
Employees by Triglav Group activity as at 31 December 2023



Proportion of employees at the Triglav Group with at least level VI education according to the Bologna Process study programmes as at 31 December



Employees by Triglav Group market as at 31 December 2023



A total of 51.3% of all Group employees are employed in Slovenia, up by 0.1 percentage point relative to the preceding year. The share of employees in Serbia increased the most (by 0.4 percentage point), whereas in North Macedonia it decreased the most (by 0.3 percentage point).

The proportion of employees with at least level VI education according to the Bologna Process study programmes has been steadily increasing.

Employees at the Triglav Group and Zavarovalnica Triglav by type of employment (full-time, part-time) as at 31 December 2023⁴¹

Type of employment	Triglav Group						Zavarovalnica Triglav					
	2023		2022		2021		2023		2022		2021	
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Part-time	258	4.5	241	4.5	221	4.2	73	3.3	74	3.3	74	3.3
Full-time	5,060	95.1	5,065	95.5	5,043	95.8	2,170	96.7	2,169	96.7	2,172	96.7
Total	5,318	100.0	5,306	100.0	5,264	100.0	2,243	100.0	2,243	100.0	2,246	100.0
Type of employment agreement												
Fixed-term	593	11.2	607	11.4	624	11.9	17	0.8	33	1.5	41	1.8
Permanent	4,725	88.8	4,699	88.6	4,640	88.1	2,226	99.2	2,210	98.5	2,205	98.2
Total	5,318	100.0	5,306	100.0	5,264	100.0	2,243	100.0	2,243	100.0	2,246	100.0

The turnover rate⁴² at Group level rose to 12.0% (compared to 11.6% in 2022) and to 5.5% at Zavarovalnica Triglav (compared to 5.3% in 2022). A total of 649 new employees were hired in 2023; most new hires were aged between 26 and 35 years. A total of 637 employees left; most leavers were aged over 56 years (due to retirement) and 41–45 years.

The average age of employees in the Group rose to 45.1 years (compared to 44.8 years in 2022); at the parent company it was 46.9 years (compared to 46.7 years in 2022). The average age of Zavarovalnica Triglav's Management Board members was 47.8 years.⁴³ In Slovenia, senior management is hired from the local community, as is the majority of senior management in markets outside Slovenia.⁴⁴

The proportion of women among all employees increased both at the Company and in the Group, where it reached 55.0%. The proportion of women among the Management Board members of Zavarovalnica Triglav was 20.0%, and in the management and supervisory bodies of all Group companies it stood at 25.5%.⁴⁵ In all employee categories, activities and countries where the Group operates, the basic salary of men and women is equal.⁴⁶

The share of employees employed under the collective agreement was slightly higher in both the Group and the parent company. It was 88.6% in the Group (compared to 88.5% in 2022) and 89.7% at the parent company (compared to 89.6% in 2022). The remaining 11.4% were employees with individual agreements.⁴⁹ Benefits are the same for all employees, be it permanent full-time employees, fixed-term employees or part-time employees.⁵⁰

The Company does not employ any employees without a guaranteed minimum or fixed number of working hours.⁵¹ In 2023, in accordance with the law, the Company had 26 employees under a work contract and 11 temporary or non-guaranteed hours employees.⁵²

Gender representation by various categories at the Triglav Group and Zavarovalnica Triglav as at 31 December 2023 (%)⁴⁷

	Share in %			Index	
	2023	2022	2021	2023/2022	2022/2021
Triglav Group					
Women employees to total employees ratio	55.0	54.7	53.5	101	102
Proportion of women at the first management level under the Management Board	46.5	45.1	45.8	103	98
Proportion of women at first and second management levels under the Management Board	42.6	41.2	42.1	103	98
Proportion of women in management and supervisory bodies	25.5	23.6	20.9	108	113
Proportion of the underrepresented gender in management and supervisory bodies	18.7	17.1	17.2	109	100
Women in management to women employees ratio	5.0	4.9	5.3	103	92
Zavarovalnica Triglav					
Women employees to total employees ratio	51.4	51.1	50.4	100	102
Proportion of women on the Management Board of Zavarovalnica Triglav	20.0	25.0	33.3	80	75
Proportion of women on the Supervisory Board of Zavarovalnica Triglav	25.0	0.0	0.0	0	0
Proportion of women at the first management level under the Management Board	32.0	25.9	25.9	123	100
Proportion of women at first and second management levels under the Management Board	39.1	40.2	37.9	97	106
Women in management to women employees ratio	3.2	3.5	3.4	92	104

Employees at the Triglav Group and Zavarovalnica Triglav by age and gender as at 31 December 2023⁴⁸

	Triglav Group						Zavarovalnica Triglav					
	2023		2022		2021		2023		2022		2021	
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
Age group												
From 18 to 19	5	0.1	3	0.1	6	0.1	0	0.0	0	0.0	1	0.0
From 20 to 25	131	2.5	127	2.4	125	2.4	30	1.3	24	1.1	21	0.9
From 26 to 30	360	6.8	361	6.8	371	7.0	96	4.3	88	3.9	94	4.2
From 31 to 35	515	9.7	555	10.5	569	10.8	179	8.0	191	8.5	194	8.6
From 36 to 40	719	13.5	741	14.0	771	14.6	268	11.9	268	11.9	264	11.8
From 41 to 45	876	16.5	904	17.0	885	16.8	333	14.8	367	16.4	393	17.5
From 46 to 50	964	18.1	940	17.7	882	16.8	443	19.8	438	19.5	422	18.8
From 51 to 55	844	15.9	828	15.6	821	15.6	441	19.7	446	19.9	455	20.3
56 and over	904	17.0	847	16.0	834	15.8	453	20.2	421	18.8	402	17.9
Total	5,318	100.0	5,306	100.0	5,264	100.0	2,243	100.0	2,243	100.0	2,246	100.0
Gender												
Men	2,391	45.0	2,401	45.3	2,426	46.1	1,091	48.6	1,096	48.9	1,104	49.2
Women	2,927	55.0	2,905	54.7	2,838	53.9	1,152	51.4	1,147	51.1	1,142	50.8
Total	5,318	100.0	5,306	100.0	5,264	100.0	2,243	100.0	2,243	100.0	2,246	100.0

11.3.2.2 Employee training and development⁵³

The Group's strategic guidelines are implemented also by pursuing a training policy, thereby ensuring the employees' expertise, sustainable business, digitalisation and an outstanding user experience.

In-house training is available to all generations and target groups of employees, with special attention paid to leaders, sales staff, promising employees, in-house coaches and mentors. Employees from all Group companies and employees at external points of sale are included in in-house training. Training in insurance, sales, business communication, digitalisation and other relevant business topics was provided to employees. Workshops on leading a healthy lifestyle were organised as part of the Triglav.smo in-house programme in cooperation with various experts.

The majority, i.e. 52%, of the Group's training sessions were delivered online (compared to 62% the previous year). Some more extensive training programmes:

- **Specialised in-house training.**
- **Summer School.**
- **New training topics in the context of the leadership license.** New leaders were included in the **Leadership School** programme. **The Effective Leadership and Communication** training programme was organised for the leaders of the companies in the Adria region.
- **An emotional intelligence development training programme.**
- **The Triglav Guide**, a programme for new hires.
- **The Triglav Ambassadors** programme to exchange knowledge, skills and experience of the best insurance agents.
- **Sales Academy.**



This year's summer school was attended by 28 employees from all Group companies.

- Compulsory training to maintain a licence to conduct insurance agency business.
- A new group of in-house coaches.
- A total of 21 expert meetings were held either at the parent company or within the Group.

The **total number of functional training hours** at Group level was down by 4%, while in the parent company it remained at the same level as last year (index 100). Employees at Group level participated in 32 training hours on average (index 96). Company employees participated in 51 training hours (the same as last year), most in the in the age group of 26–30 years. In terms of gender, both men and women received the same amount of training.⁵⁴

The Group' training costs amounted to EUR 2.5 million, up by 4%, due to the higher number of training hours in traditional form and related costs.

Employees are also encouraged to continue their formal education; **work study** was funded for 148 Group employees and **scholarships** were provided to 48 pupils and students. **Obligatory work placement was provided** to 61 pupils and students. A total of 14 young employees completed **traineeship** under the guidance of mentors. During the three-day **Great Challenge (Hud izziv)**, held in cooperation with the Career Centre of the Faculty of Economics, students proposed solutions on how to use new technologies to design innovative insurance products. Partnering with various societies under the motto **Together for a Safer Future**, the Company held volunteering campaigns in early 2023. Teambuilding activities were enhanced by integrating volunteering themes. As a result of these efforts, the Company was honoured with the HR&M Project 2023 award for good practice and received the "TOP Investor in Education" certificate for systematic investment in employee education and training.

Management by objectives and development of competences⁵⁵

The management-by-objectives system is implemented by all Group insurance companies and some non-insurance companies. The share of employees included in this system increased to 55% in 2023 (compared to 49% the year before), while the share of employees in the parent company rose by 3 percentage points to 75%. Employees set their objectives at an annual development interview with their superior, and their achievement is monitored and rewarded quarterly. Due to the nature of their work, agents and heads of sales teams who are rewarded on the basis of sales targets are excluded from the management-by-objectives system.

The competency model is integrated into annual development interviews in order to define individual competency profiles and an individual's development activities. **The DNLA tool** is used in some Group companies for the selection and development of new employees.

11.3.2.3 Occupational health and safety⁵⁶

At the Company, a comprehensive and strategic approach to occupational health and safety is prioritised, with numerous activities aimed at managing and preventing risks. Great emphasis is placed on workplace health promotion, as well as providing employee training in occupational health and safety as well as fire safety. Various activities that further contribute to greater satisfaction and better health of employees take place in the context of the Family-Friendly Enterprise Certificate.

Occupational health and safety system⁵⁷

The well-functioning and comprehensive system in the parent company is gradually being transferred to other Group companies, particularly by establishing common minimum occupational health and safety standards and by strictly complying with local legislation. In addition, the goal is to identify, mitigate and manage risks arising from duties and the work environment.

Occupational safety and health ensures the smooth provision of a healthy work environment for the employees.

The aspects of hazards and negative effects that could impact the health of employees are identified in **the Safety Statement and Risk Assessment** for all job categories, which includes measures to prevent and reduce negative impacts. As part of a continuous process, in which employees actively participate, assessments are revised and measures upgraded on an ongoing basis. Health risk assessments are revised in cooperation with occupational health specialists. Based on the assessment, employees are referred to periodic medical examinations and every new hire is required to undergo a statutory medical examination before taking up employment.

Participation in training and passing a test on **fire safety and occupational health and safety** are mandatory for employees. At **Zavarovalnica Triglav**, employees are made aware of these topics via various communication channels, **the Protecting Health (Zavarujmo zdravje)** health promotion programme, the measures related to the full Family-Friendly Enterprise Certificate and the **Triglav.smo** programme. Best practices are implemented at Group level.

Health promotion⁵⁸

The Group's health promotion programme is developed in collaboration with authorised occupational medicine specialists, based on the most common health problems detected among employees through a sick leave analysis. Activities are therefore designed to contribute to the mental and physical health of employees of all ages, including active breaks, **Healthy Mind, Healthy Body** training workshops, **the Days of Health (Dnevi zdravja)** four-day preventive health programme for the fifth year running, and a wide range of activities in **sports and mountaineering clubs**.

Fire safety

With regard to fire safety, a **plan on emergency response and actions in the case of an emergency and other security events** is in place at Group level. The Company regularly improves fire safety, monitors its compliance with legislative requirements and provides for training and education of employees; security patrols, inspections of buildings and premises and evacuation drills are carried out according to the annual plan. Due to a change in legislation, new fire risk assessments were performed in 2023 for all Company facilities. Fire inspectors carried out inspections at two locations in Slovenia and found no major irregularities.

Occupational health and safety topics covered in formal agreements with trade unions and in the collective agreement⁵⁹

Safe working conditions at the parent company are defined in Zavarovalnica Triglav's collective agreement and the applicable legislation, while the subsidiaries adhere to the applicable local legislation. Before starting their work, employees are familiarised with the dangers at work and work safety measures that they are obligated to follow. Employees are provided with the prescribed work equipment and personal protective equipment, and periodic medical examinations are carried out in line with the planned timeline and the scope defined for individual job categories.

Injuries at work⁶⁰

The number of accidents in the Group remains low – 20 in 2023, and 6 at the parent company. The number of lost work days in the Group was at the same level as last year, while at the Company it was much lower due to fewer cases of prolonged absenteeism.

Injuries at work at the Triglav Group and Zavarovalnica Triglav

Triglav Group	2023		2022		2021		Index	
	Number	Percentage	Number	Percentage	Number	Percentage	2023/2022	2022/2021
At work	15	75.0	14	70.0	10	76.9	107	140
On business trips	5	25.0	6	30.0	3	23.1	83	200
Total	20	100.0	20	100.0	13	100.0	100	154

Zavarovalnica Triglav	2023		2022		2021		Index	
	Number	Percentage	Number	Percentage	Number	Percentage	2023/2022	2022/2021
At work	2	33.3	1	25.0	4	57.1	200	25
On business trips	4	66.7	3	75.0	3	42.9	133	100
Total	6	100.0	4	100.0	7	100.0	150	57

Lost work days and lost time incident rate due to injuries at work at the Triglav Group and Zavarovalnica Triglav

	2023	2022	2021	Index	
				2023/2022	2022/2021
Triglav Group					
Lost work days due to work-related injuries	1,281	1,279	543	100	236
Lost time incident rate – LTIR*	0.38	0.37	0.24	101	155
Zavarovalnica Triglav					
Lost work days due to work-related injuries	238	578	321	41	180
Lost time incident rate – LTIR*	0.26	0.18	0.31	149	58

* The number of work-related incidents/total number of hours of all employees x 200,000

Each injury which would render an employee unfit for work for more than three working days, each dangerous occurrence and each established occupational disease must be reported to the Labour Inspectorate of the Republic of Slovenia. The Company recorded one dangerous occurrence (compared to 2 in 2022) and no occupational diseases in 2023.⁶¹

Absenteeism⁶²

The Group's absenteeism rate decreased by 0.65 percentage point to 4.39%. The share of absenteeism for which sickness benefits are borne by the employer decreased by 0.11 percentage point (medical leave up to 30 days), while the share of lost work days for which benefits are borne by other organisations increased by 0.55 percentage point (medical leave longer than 30 days, sick nursing, accompanying a sick person). The absenteeism rate at the Company was also lower and stood at 5.02% (compared to 5.86% in 2022). As a result, the share of work days lost borne by the employer rose by 0.19 percentage point, whereas the share of work days lost borne by the Health Insurance Institute of Slovenia decreased by 1.03 percentage points.

11.3.2.4 Care for employee satisfaction

Organisational vitality (climate) and organisational culture⁶³

The 2023 results of the **organisational vitality survey (ORVI)**, which measures employee satisfaction, were slightly lower than last year. The ORVI index was 3.94 **at Group level** and 3.95 **at the parent company**. A total of 89% of employees from 17 Group companies participated in the survey (compared to 86% of employees in 2022). The aggregate ORVI index is composed of four indicators (indices), which are further broken down into ten categories.

The indicators for **operational leadership** and **engagement** once again recorded the highest values. Employees trust their supervisors and perform their work with a high degree of personal commitment.



Our work was presented through a game to our employees' children in all six countries. Pictured here are children and employees from our Montenegrin company Lovćen osiguranje.

Their satisfaction with regular employment, direct supervisors, working time and co-workers were also rated high. Employees stated that they feel **safe and accepted** among their colleagues and they feel comfortable seeking help and cooperation from their team members. They are satisfied with the benefits of working for the Group, especially the activities that support both professional and personal development, as well as promote active leisure and a healthy work-life balance.

The challenge in 2023 was the fall in specific satisfaction scores and the higher proportion of non-engagement, which was not unexpected and is assumed to be due to general inflationary pressures and the increased volume of work resulting from CAT claims and the consequent increased workload. In response to the changes, the Company will intensify its efforts to bolster and maintain satisfaction levels, thus cultivating the desired organisational culture.

Benefits and opportunities for employees

The **Triglav.smo** overarching programme is designed to improve the satisfaction of the Company's employees, bringing together various workshops and events to strengthen the awareness and knowledge of all important aspects of our lives, with a focus on health. Some of these activities also take place in other Group companies. The programme involves taking care of employees' children by organising holiday camps and traditionally giving gifts to children at the end of the year. All Triglav Group employees are included in the Greeting the Seasons events.

Employees at Zavarovalnica Triglav have access to individual psychological counselling provided by two in-house experts as part of the **Psychological Pulse** (*Psihološki utrip*) group. They conducted 104 interviews in 2023.

The Family-Friendly Enterprise Certificate facilitates a better work-life balance of the parent company's employees. The constructive organisational culture is strengthened through providing numerous benefits (21 are currently being offered) and implementing best practices. In addition, best practices from the certificate are progressively implemented in other Group subsidiaries.

Employee volunteering is consistently promoted as it fosters stronger ties between employees and society. Throughout 2023, several volunteering campaigns were conducted, assistance was provided during the catastrophic summer floods in Slovenia, basic CPR training was held, and participation in blood donation drives was facilitated. Furthermore, through the Triglav.smo programme, the Company is gradually taking part in the **Insure Our Future** project.

Additional benefits for employees:⁶⁴

- supplemental pension insurance for 59% of employees of the Triglav Group and for 95% of employees of the parent company;
- payment of group accident insurance premium;
- favourable conditions for taking out complementary accident insurance for employees and their family members;
- complementary accident insurance for all business trips;
- after one year of employment in the parent company, employees may opt for supplemental voluntary pension insurance and voluntary pension insurance;
- the group insurance package Comprehensive Medical Care (*Celostna zdravstvena oskrba – CZO*), in which 50% of all employees of the Group and 82% of the parent company are included.

The Group companies operating outside Slovenia provide benefits to their employees such as supplemental voluntary pension insurance premium, discounts on medical examinations, the payment of accident insurance premium and discounts on other types of insurance.

Work from home, parental leave and part-time work

At Zavarovalnica Triglav and some Group companies, employees whose nature of work allows it may work from home, and their proportion is on the rise. At the 2023 year-end, 36% of Group employees and 65% of Company employees had this option available to them.

Circumstance and work requirements permitting, working hours can be adapted to the needs and wishes of employees. Employees who are parents of first graders can take advantage of a day's paid leave on the first school day. Employees can take unpaid leave in certain cases and in agreement with their supervisors.

Proportion of employees who worked from home and proportion of hours of working from home in the Triglav Group and Zavarovalnica Triglav in 2023 and in 2022

	Triglav Group			Zavarovalnica Triglav		
	2023	2022	2023/2022	2023	2022	2023/2022
Number of employees allowed to work from home	1,930	1,757	110	1,447	1,412	102
Proportion of employees allowed to work from home	36.3	33.1	110	64.5	63.0	102
Number of hours of working from home	651,768	634,846	103	444,861	437,583	102
Proportion of hours of working from home	6.1	5.9	103	9.8	9.7	101

Parental leave or part-time work at the Triglav Group and Zavarovalnica Triglav in 2023⁶⁵

Triglav Group	Women	Men	Total
Maternity leave, child care leave	171	8	179
Paternity leave of 20 days		47	47
Paternity leave of 75 days (up to the child's age of three years)		4	4
Option of part-time working	40	3	43
Number of employees who returned to work after maternity leave in the reporting year	83	3	86
Return rate after parental leave	51%	150%	57%

Zavarovalnica Triglav	Women	Men	Total
Maternity leave, child care leave	41	4	45
Paternity leave of 20 days		41	41
Paternity leave of 75 days (up to the child's age of three years)			0
Option of part-time working	25	0	25
Number of employees who returned to work after maternity leave in the reporting year	46	0	46
Return rate after parental leave	90%		96%

* The calculation includes employees who took parental leave in the previous year and returned to work in 2023, as well as employees who took parental leave in 2023.



As part of the “Let’s Clean Up Our Mountains” campaign we co-financed playground at the hut on Naravske ledine.

Relationships among employees and management, trade union activities⁶⁶

The employees exercise their management rights in line with the Worker Participation in Management Act and based on the agreement on worker participation in the management of Zavarovalnica Triglav. The Act sets out in greater detail the manner of exercising the rights referred to in said Act and lays down other rights and the manner of workers’ participation in management, which is both individual and collective. Two representative trade unions and the Works Council are active in the Company. The Company concluded a special agreement and cooperates well with both. Before adoption, any document relating to the organisation of work or laying down the obligations that workers must be aware of to fulfil their contractual and other obligations is submitted to both trade unions to give their opinion.

Respecting the workers’ rights and human rights⁶⁷

The Triglav Group Code defines the ethical principles of its operations, including respect for human rights, which is based on respect for and protection of internationally recognised human rights and fundamental freedoms. The Group creates a stimulating work environment that respects and protects the dignity and integrity of employees at the workplace, regardless of any personal circumstances or affiliation. Any reported or detected suspected violation is dealt with according to a predetermined procedure, in which professionalism, confidentiality and protection of the reporting person are guaranteed. The reporting person is protected from any retaliatory action and is given an opportunity to informally resolve the issue.

In addition to the Code, insurance companies outside Slovenia take into account local

legislation. These companies have internal resolution mechanisms in place, and reporting of Code violations takes place in the context of compliance.

Discrimination and unwanted conduct at Zavarovalnica Triglav are additionally governed by the Rules on the protection of workers' dignity at work, under which a confidant is appointed with the approval of the Works Council. The rules regulate the manner of recognising, preventing and eliminating the consequences of discrimination, sexual and other harassment and workplace mobbing.

In 2023, three employee reports of inadmissible conduct were received at Group level, one of which in the Company. In addition to these, the confidant dealt with two other reports received at the end of 2022; No violations were identified after investigating them.

The Company also incorporated its **commitment to respect human rights in business operations** into its business processes by pledging to avoid and prevent any potential negative impacts on ensuring human rights throughout the entire business process. Due diligence of respect for human rights is carried out on a regular basis as part of risk assessment in compliance, human resources and procurement.

11.3.3 Responsibility to the community⁶⁹

The aim is to play an active role in economic development through our business activities and in efforts to improve the quality of life of employees and their families, as well as the local community and society in general. In partnership with its stakeholders, the Group provides support to sports, cultural, educational, environmental and health activities.

The volume of generated assets distributed among various stakeholders of the Group is shown by economic value distributed, which amounted to EUR 1,682.9 million in 2023.

Economic value distributed of the Triglav Group⁷⁰

	in EUR million		
	2023	2022	2023/2022
Economic value generated	1,642.4	1,318.9	125
Economic value distributed	1,682.9	1,409.9	119
Gross written premium and reinsurance result	1,151.9	1,013.9	114
Finance expenses from financial and insurance contracts	207.0	46.2	448
Other expenses	65.2	77.0	85
Dividend payments	56.8	84.0	68
Tax expense	-4.8	3.1	
Investments into the community (prevention, donations, sponsorships)	8.9	10.2	87
Employee payments, allowances and benefits	197.9	175.5	113
Economic value retained	-40.5	-91.0	

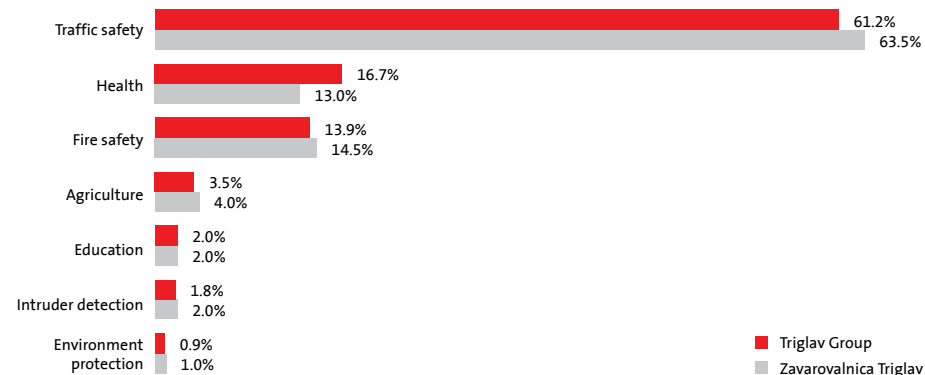
The Group's **responsibility to the community** is fulfilled primarily through investments in prevention, sponsorships and donations, as well as investments in infrastructure at national and local levels, which are presented below. Their content is defined based on:

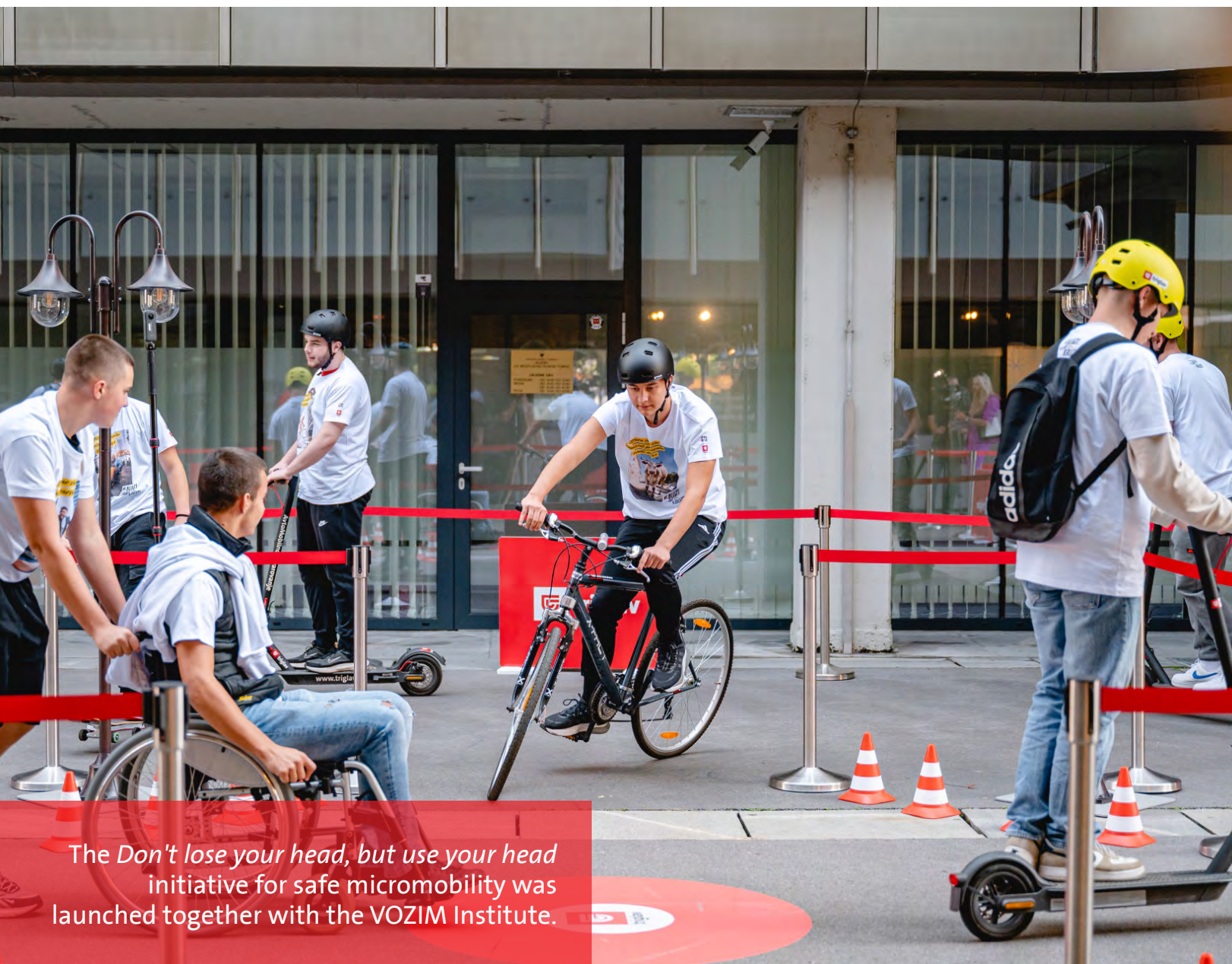
- sponsorships and donor partnerships and participation in investments in prevention;
- the needs identified in local environments by the Group's companies and business units;
- direct contact with local communities;
- performance analyses, especially risks and claims experience, published data of specialised organisations and institutions;
- market research and public opinion polls.

11.3.3.1 Investment in prevention

Prevention programmes are an important social aspect of sustainable impacts of the insurance industry, as they reduce risks and are also prescribed by law. The bulk of funds is allocated to **improving traffic, health and fire safety**.

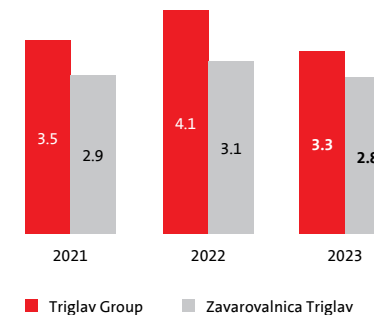
The share of the Triglav Group's and Zavarovalnica Triglav's funds for preventive activities by purpose in 2023





The *Don't lose your head, but use your head* initiative for safe micromobility was launched together with the VOZIM Institute.

Funds allocated to preventive activities of the Triglav Group and Zavarovalnica Triglav in EUR million



Prevention projects⁷¹

Prevention projects and activities aimed at preventing accidents and mitigating the effects of damage were focused on the areas that experienced the greatest impact during the year.

In the context of the traditional New Year's prevention campaign **For a Better Tomorrow** (Za boljši jutri), 25 prevention projects were carried out in local communities across Slovenia. Funds were allocated to firefighters, healthcare institutions, a care home, an education, rehabilitation and training centre and municipalities. Over 250 prevention projects were supported in ten years.

High profile and comprehensive prevention projects of the Triglav Group in Slovenia in 2023 by area⁷²

Health prevention	Impact
Assistance in the event of a sudden cardiac arrest	<ul style="list-style-type: none"> Co-financing or purchase of 26 defibrillators in local communities – 210 since 2014. Co-financing of training in first aid.
Training in healthcare and rapid response	<ul style="list-style-type: none"> Co-financing of the 26th national competition of secondary schools in nursing. Organising the <i>Safe winter walking in the mountains for families</i> course in cooperation with the Avalanche Warning Institute.
Purchase of medical and therapeutic equipment	<ul style="list-style-type: none"> Purchase and co-financing of a device for non-invasive respiratory support of newborns with respiratory distress for the Hospital for Gynaecology and Obstetrics in Kranj. Purchase and co-financing of devices to help treat jaundice in newborns in Postojna and Ptuj maternity hospitals. Purchase of a swing for wheelchair users.
Prevention and early detection of disease and mental health	<ul style="list-style-type: none"> Holding 11 events in the field of physical and mental health protection. Continued implementation of the <i>Najdi.si</i> project, which normalises mental health topics among young people. Co-financing of the <i>Roza</i> (Pink) programme for psychosocial support for patients with breast or reproductive cancer and their relatives. Support for the <i>Sranje</i> (Shit) campaign on gastrointestinal cancer awareness of the Slovenian Oncology Society for Men – OnkoMan.
Prevention of accidents at work, partner: Radovljica Fire Fighting Association	<ul style="list-style-type: none"> Financing a chainsaw safety course for firefighters.
Traffic safety	Impact
Refresher ride with a driving instructor for the elderly, partners: AMZS, <i>Avtomobilnost</i> TV show	<ul style="list-style-type: none"> A refresher ride with a driving instructor for the elderly was taken by 287 drivers over 60 years of age. In the five years of implementing this campaign, more than 1,000 experienced drivers have taken a refresher course with a driving instructor. At the <i>Anatomy of Elderly Driving</i> event, the topic was explored with experts. Journalists were given an opportunity to take a special ride using an aging simulator, fostering empathy when reporting on elderly driving.
Vozimse.si – a road traffic prevention portal, partners: AMZS, Atmosferci	<ul style="list-style-type: none"> In total, 97,241 drivers passed the road rules renewal test and thus improved their knowledge of road traffic rules and etiquette. In cooperation with the Atmosferci group, video content was used to raise awareness about safe driving practices and handling a tractor.
Safe micromobility, partners: Zavod Vozim, Institute of Civilisation and Culture, Radio Center	<ul style="list-style-type: none"> Launch of the <i>Don't lose your head, but use your head</i> (Ne bluzi, z glavo kruzni) initiative for safer micromobility of young people, with an emphasis on the use of e-scooters. A total of 15 workshops at schools and 15 workshops at open events for the safe use of an e-scooter using a simulator. Two major events <i>Crossroads of micromobility</i> (Kranj, Celje) were held to examine the behaviour in micromobility among all generations.
Together for Road Safety project, partner: COPS system	<ul style="list-style-type: none"> At blackspots throughout Slovenia, 16 COPS@zebra and COPS@road systems were installed (over 80 systems in Slovenia).
Together for Road Safety project, partners Sipronika and Zavod Vozim (I'm Driving Institute)	<ul style="list-style-type: none"> A total of 106 speed display signs in local communities, at high-risk road sections and in the vicinity of schools and kindergartens were set up (within eight years), 12 of which in 2023. Students from 12 schools with displays were researching speeding and submitted proposals to the mayors of their municipalities to reduce speed. The implementation of proposals will be monitored on an annual basis.
Interactive workshops for secondary school students "I still drive but I no longer walk", partners: Zavod Vozim (I'm Driving Institute) and Sipronika	<ul style="list-style-type: none"> At 180 workshops in person or online, 8,541 young people listened to personal stories of traffic accident victims and became acquainted with the DRAJV safe driving app. 211 young people researched the influence of speed on impact load and braking distance at 12 specialised workshops and technical days. 283 young people attended the Alcohol=Change of Life workshop.
The safety of preschool children and first graders in road traffic and other dangerous situations, partner: the Slovenian Traffic Safety Agency	<ul style="list-style-type: none"> 22,000 first graders were equipped with yellow neckerchiefs. The road safety mascot Kuža Pazi (Watch Out Doggy) visited 48 elementary schools.
Training events and topics for motorcyclists, partners: AMZS and Q VEJTR WAJDUŠNA Motorcycle Club	<ul style="list-style-type: none"> 2,200 motorcyclists attended accident prevention workshops over the period of ten years. In 2023, two days of free workshops for motorcyclists were held to refresh knowledge of first aid in the event of an accident. Implementation of the first <i>Refresher ride for motorcyclists</i> workshop. 1,800 motorcyclist regularly use the DRAJV safe driving app. They drove more than 3.5 million safer kilometres.
Ongoing development of the DRAJV safe driving app	<ul style="list-style-type: none"> 1.4 billion kilometres travelled with the DRAJV app since its launch. The app was upgraded to include traffic information. Overview of the monthly statistics with the most common errors and a link to the content of the Vozim.se portal, which helps to eliminate errors by giving advice.
Promotion of forming an emergency lane on motorways, partner: Zavod Reševalni pas (Emergency Lane Institute)	<ul style="list-style-type: none"> Raising awareness of drivers using footage of ambulances on emergency calls and their problems on common communication channels.
Emergency response driving workshops for emergency response drivers, partner: AMZS.	<ul style="list-style-type: none"> Safe driving training for emergency response drivers was attended by more than 30 drivers.
Traffic regulation of hunting areas, partners: Markovci Hunting Club, Križevci Hunting Club	<ul style="list-style-type: none"> Funding of traffic signs. Funding of wildlife-friendly roadside bollards to prevent accidents.
Young drivers	<ul style="list-style-type: none"> A subpage for young drivers »Mission: pass your driver's test and be a safe driver« was developed on the Vozim.se portal. The DRAJV safe driving simulator offers young drivers the opportunity to assess for free their safe driving skills.
Being Safe on a Bike, partners: Butan plin, Slovenian Traffic Safety Agency, National Education Institute of Slovenia	<ul style="list-style-type: none"> 250 schools participated in cycling literacy over 10 years.
Fire prevention	Impact
Purchase of fire protection equipment, partners fire services, associations and brigades	<ul style="list-style-type: none"> Co-financing of the purchase of protective equipment, fire-fighting equipment and fire engines as well as investments in fire stations for 103 volunteer fire brigades and associations.
Financing of training and competitive activities of firefighters, partners: Fire Fighting Association of Slovenia and Ljubljana Fire Brigade	<ul style="list-style-type: none"> Co-financing of national firefighting competitions and several other competitions. The video entitled <i>A child dialling 112</i> was recorded with Saša Kapitanovič and the Ljubljana Fire Brigade.
Fire safety awareness	<ul style="list-style-type: none"> The event entitled <i>Prepared for the (un)predictable: If your home catches fire</i> held at Triglav Lab.
Protection of the natural environment	Impact
Sustainable visiting of Triglav National Park, partner: the Triglav National Park Public Institute	<ul style="list-style-type: none"> Promoting sustainable practices in the area of the Triglav National Park using the DRAJV app.
Study and conservation of dolphins, partner: Morigenos – Slovenian Marine Mammal Society	<ul style="list-style-type: none"> The development of a research and education centre about dolphins for the public, alongside activities aimed at raising awareness about dolphin life.
Keeping mountain trails well-maintained and safe, partner: the Alpine Association of Slovenia	<ul style="list-style-type: none"> Support for the arrangement of the Hansa route, the winner of the Best Mountain Trail competition. Support for the restoration of the challenging mountain trail from Kamniška koča mountain hut on Kamniško sedlo mountain saddle to the Brana and Planjava mountains.
Reforestation, partner: the Slovenian Forest Service	<ul style="list-style-type: none"> Participation of employees in the Karst reforestation campaign after the fire and co-financing of the reforestation campaign.
Sustainable visit to the mountains, partners: the Alpine Association of Slovenia and AMZS	<ul style="list-style-type: none"> Co-financing of mountain playgrounds at Gospodična na Gorjancih and at the hut on Naravske ledine.
Raising ecological awareness, partner: Ecologists Without Borders	<ul style="list-style-type: none"> Support for projects aimed at raising environmental awareness.
Awareness raising in safety during extreme weather events	<ul style="list-style-type: none"> The event entitled <i>Prepared for the (un)predictable: Extreme weather events</i> held at Triglav Lab.

High profile and comprehensive prevention projects of the Triglav Group in the markets outside Slovenia in 2023 by area

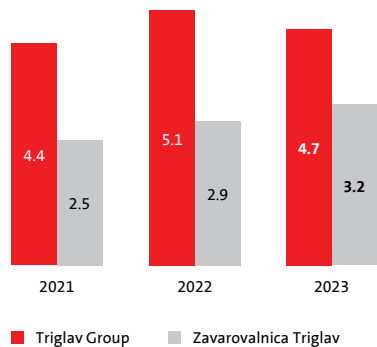
Health prevention	Impact
Health of urological patients, partner: Adriatic Urological Forum, North Macedonia	■ Support for the 7th Adriatic Urology Forum.
Strengthening the health of paralympic athletes, partner: Paralympic Committee of Macedonia, North Macedonia	■ Support and strengthening of the health of para-athletes, purchase of sports equipment.
Protection of the natural environment	Impact
Energy efficiency and sustainability, partner: National Biomass Association SERBIO, Serbia	■ Co-financing of the 6th SEE Energy regional energy conference.
Ecological and energy conference, partner: Elixir Group, Serbia	■ Co-financing of the 2nd Look Up 2 regional ecological and energy conference.
Fire safety	Impact
Protective and firefighting equipment, partners: various firefighting organisations and companies, Bosnia and Herzegovina	■ Co-financing of fire protection and firefighting equipment.
Fire protection in tunnels, partner: Lipa drvo, Bosnia and Herzegovina	■ Co-financing of fire protection measures in road tunnels.

11.3.3.2 Sponsorships and donations⁷³

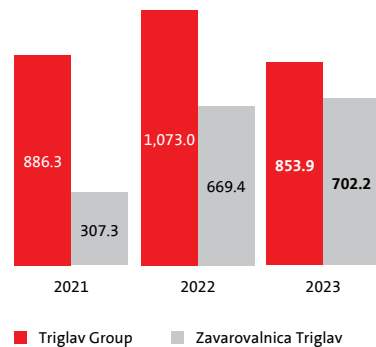
The Triglav Group engages in sponsorships and donations in accordance with standardised guidelines, ensuring alignment with the Group's values, guidelines and brand. In 2023, the volume of sponsorships and donations slightly decreased compared to the previous year. The focus was on expanding sponsorship partnerships, particularly in sports, supporting the development of young athletes and promoting the benefits of a healthy lifestyle. The Triglav Group is a renowned partner of national sports associations, international sports events and numerous sports clubs in its markets.

In 2023, the bulk of donations went to humanitarian projects, with a significant portion allocated to flood relief efforts, and healthcare.

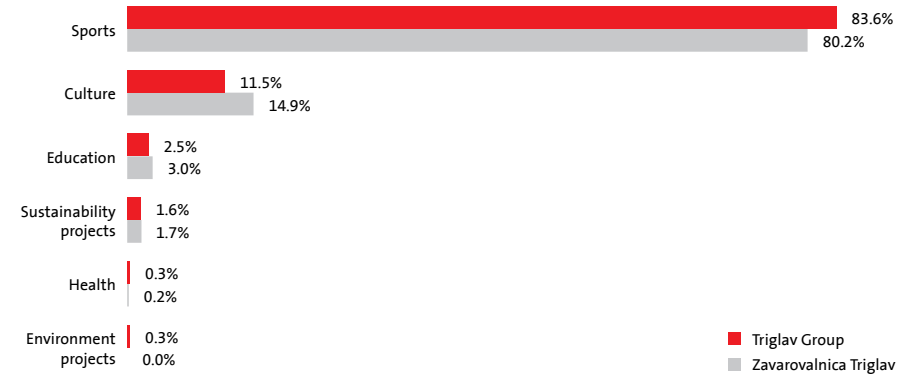
Funds for sponsorships of the Triglav Group and Zavarovalnica Triglav in EUR million



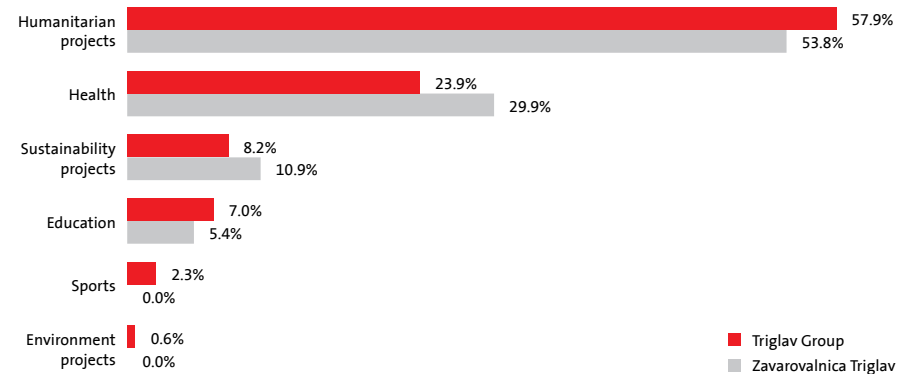
Funds for donations of the Triglav Group and Zavarovalnica Triglav in EUR thousand



Sponsorships of the Triglav Group and Zavarovalnica Triglav in 2023 by content



Donations of the Triglav Group and Zavarovalnica Triglav in 2023 by content





Triglav Lab held a number of prevention and awareness-raising events for young people.

Triglav Lab's activities

The Triglav Lab's technology development and demonstration centre serves as a venue for a diverse array of events and workshops for education, prevention, business and awareness-raising purposes. In 2023, a total of 113 events were held on-site, some of which were streamed online. These events included in-house workshops, workshops for sharing best practices, training sessions, meetings and recordings. In addition, there were 13 press conferences covering various Zavarovalnica Triglav projects, sports and tourism events, and health-related topics, with an emphasis on promoting good psycho-physical fitness.

A total of 600 young people attended 13 events aimed at enhancing financial and insurance literacy and raising awareness about preventive actions. These events included the traditional Finance School for Young People in collaboration with *Moje Finance* magazine, LIT Hackathon and others. Furthermore, our efforts to promote psycho-physical fitness among young people were expanded to include the increasingly popular gaming community.

Everything Will Be Alright Institute

The main projects of the Company's Everything Will Be Alright Institute (Zavod Vse bo v redu), which is active in the field of preventive actions and corporate social responsibility activities aimed at providing support and help to socially disadvantaged, included:

■ Helping those affected by floods

Fundraising initiatives were launched to aid those impacted by floods and storms, with the fundraising efforts remaining open until their conclusion in January 2024. In addition, in-house pre-New Year's Eve gatherings were cancelled, and a dedicated charity fundraiser was held during the Managers' Concert for the same cause.

■ The Young Hopes project – support to young talents

The 11th Young Hopes open call was launched in 2023, receiving 69 applications, up by 25% compared to the previous year. A panel of judges selected 14 young and promising talents in sports, para-sports, arts and sciences, with one individual chosen by the public through online voting. An alumni gathering was held on the topic of physical activity as a form of meditation.

Information on corporate social responsibility partnerships:

Zavarovalnica Triglav d.d., Ljubljana
Miklošičeva cesta 19, 1000 Ljubljana
Email: sponzorstva@triglav.si

11.3.4 Responsibility to suppliers

Procurement practices⁷⁴

The Company's procurement procedures follow a well-defined selection process with built-in internal controls. Procurement procedure management is supported by a **standardised software solution**, which increases the transparency and reduces the operational risks of non-compliance with good business practices. The procurement procedures above a certain amount are performed by the Strategic Sourcing Department, which is responsible for coordination and communication between the relevant departments in need of procurement and suppliers.

Only verified suppliers who meet the **legal compliance** criteria can participate in procurement procedures. The *supplier compliance assessment* assesses the risks of corrupt practices, conflicts of interest and political exposure, while the business *sustainability assessment* is used to assess respect for human rights, provision of a safe and healthy work environment for employees and other workers, compliance with Slovenian legislation and international human rights documents and environmental legislation requirements. In 2023, the procurement criteria were revised to incorporate a quantitative assessment of suppliers' ESG maturity through scoring. New suppliers undergo assessment in the selection process, while existing suppliers are reviewed annually. The updated criteria were applied to evaluate 865 suppliers and potential suppliers participating in the selection process.

Furthermore, Zavarovalnica Triglav's general terms and conditions for suppliers were revised and upgraded. These terms and conditions are now integrated into new procurement agreements, thereby further binding our business partners to a high level of compliance with ESG standards. The revised general terms and conditions, along with the upgraded assessment method for partners based on ESG criteria, will be extended to other Group companies.

Locally-oriented procurement⁷⁵

The majority of the Company's suppliers are from the local, Slovenian market, with the share of suppliers based outside Slovenia being less than 10%. Market trends in key procurement groups, such as IT, property management, general procurement, intellectual services, marketing, labour and general affairs, are regularly monitored. The Company seeks offers outside the local market only when it is economically feasible or there is no appropriate supplier in the market for the goods or services in demand.

The Group companies also carry out most of their procurement in local markets by complying with the common minimum procurement standards. Where possible and reasonable, some of the same types of materials, raw materials and services are procured centrally at Group level at more favourable purchasing terms and conditions. The parent company's Strategic Sourcing Department centrally manages procurement procedures with a value of more than EUR 25,000 for all Slovenian companies in the Group.

Remuneration of insurance agency companies and sales staff

Our sales network is extensive and continually expanding. In 2023, it included **over 1,860 outsourcers**.⁷⁶ See [Section 13. Business network of the Triglav Group](#) for further information. Before signing an agreement with a new contractor, the standardised selection procedure is carried out, while the business results of existing contractors are regularly monitored and measures are taken for enhancing cooperation and improving sales.

Non-life insurance agency companies are rewarded based on the following criteria: exclusivity, written premium, size of the area of operation, volume of sales of insurance products and fulfilment of planned obligations. A bonus is awarded for the fulfilment of monthly targets and the renewability and growth of the insurance portfolio. The commission rate of contractors selling **life insurance** products depends on exclusivity, portfolio balance, client loyalty indicator and the effectiveness of maintaining the portfolio. Contractors are also rewarded for exceeding the annual non-life and life insurance sales targets (volume bonus); furthermore, special additional rewards are made available during the year. The first agreement with a new partner is concluded for a fixed term. Priority is given to exclusive sales, as insurance distributors can offer policyholders a comprehensive range of products of the Group members.

The productivity of our own sales network in companies outside Slovenia is also monitored. In awarding a bonus, linear bonus schemes are used, which are upgraded with bonus commissions depending on the value of insurance policies, financial discipline and the claims ratio. Premium rates are universal (regardless of whether an insurance policy is new or renewed), whereas exclusive partnerships are additionally rewarded with benefits. In some countries where the Group operates, additional incentives were used to promote sale to retail clients.

In order to maintain and promote loyalty, contractors may attend training sessions, workshops, and sales and motivational events, Thus gaining new insurance and sales knowledge and skills, which improves not only relations between contractors and the Company but also increases client satisfaction.

11.4 Governance aspects⁷⁷

Fair business practices⁷⁸

Through the **Triglav Group Code**, which was amended in 2023 to include a commitment to sustainable development, thirteen main ethical principles guiding the Group's operations are implemented (more information available at <https://www.triglav.eu/en/about-us/compliance/documents-and-commitments>). Employees in all Group companies are made aware of and educated about the Code to ensure compliance with the adopted principles at all levels.

In 2023, the Group dealt with 11 reports of alleged Code violations and 6 cases of suspected internal fraud. In all cases examined, no violations or internal fraud were found. No monetary losses directly related to the marketing and provision of information on insurance products were identified.⁷⁹ Two of the covered employees from the Group were involved in investment-related investigations, consumer complaints, private civil disputes or other regulatory proceedings.⁸⁰ A final court decision on the legality of the entry of the Company's Supervisory Board member – employee representative in the register of companies is still pending. A total of EUR 33,022 in monetary losses directly related to legal proceedings involving fraud, insider trading, antitrust, anticompetitive behaviour, market manipulation, abuse or violations of other laws or regulations related to the financial industry were recorded. As a result, business processes were already updated and modified accordingly.⁸¹

Insurance fraud management⁸²

An effective insurance fraud management system is in place, based on ethical conduct, rapid risk identification and fraud prevention. Advanced technological systems are used to detect suspected fraud, which are regularly updated to stay ahead of new forms of fraud. The effectiveness of internal control systems is also monitored and improved.

Employees are the first line of defence against fraud, which is why they undergo regular training to educate about identifying suspected insurance fraud. Cooperation with relevant government bodies and other insurance companies in the fight against fraud is ensured as necessary.

Reporting and dealing with suspected fraud is regulated by the Group's Code, while the Rules on dealing with internal fraud and violations provide a framework for handling anonymous reports as well as for ensuring the protection of the reporting person's identity and protection against retaliatory actions.

Bona fide reporting persons or **whistleblowers** are also protected under the Rules.

At least one communication channel for reporting violations (an online form, a hotline for reporting fraud or the email address prevare@triglav.si) is established in all insurance and financial companies of the Group. In companies with at least 50 employees, the reporting person can also use an application to report violations, which is available and accessible on the <https://prevare.triglav.eu/whistleblower/#/zt> website.

Insurance fraud was confirmed in 1,119 cases out of 1,771 reported cases of suspected fraud in 2023. Of these, 28 reports of suspected fraud were received from external and internal reporting persons

(whistleblowers), which were confirmed in 13 cases. The number of confirmed cases of suspected fraud was 7% higher relative to the previous year.

Anti-corruption behaviour⁸³

The anti-corruption policy sets a minimum standard of conduct in proceedings with an identified corruption risk for the Group companies. When entering into an agreement or contract, mandatory contractual clauses are included, such as an anti-corruption, a conflict of interest, restrictive covenants, fraud prevention, reputation, the protection of human rights, personal data, inside information and business secrets.

In 2023, the Company's employees attended training sessions on corruption prevention, respect for human rights, consumer protection and preventing money laundering and terrorist financing for an average of 1.5 teaching hours. No cases of corrupt practices were confirmed in the Group in 2023.

In line with the Political Parties Act, Zavarovalnica Triglav may not and does not finance political parties. Such financing and other political activities are also banned by the corruption risk management policy of the Triglav Group; therefore, neither are carried out by any of its members.⁸⁴

Personal data protection⁸⁵

The Company adopted a personal data protection policy and more detailed rules for the lawful processing of data in specific business segments. These rules are also transferred to other Group companies through minimum standards for personal data protection. All Group companies have designated personal data protection officers or coordinators.

At Group level, 11 cases of potential violations of privacy or personal data protection were dealt with, with five being identified as substantiated. The internal control system was subsequently upgraded to prevent similar violations in the future. No material sanctions due to non-compliance were imposed on the Group.⁸⁶

On average, the Company's employees received half a teaching hour of training on personal data protection.

Protection of competition⁸⁷

The Group is committed to respecting consumer rights and good business practices in its operations, product development and marketing. When choosing suppliers, it aims for transparency and respects the protected interests of its competitors, while avoiding the risk of violating regulations and the principles of fair competition. In the markets where the Group holds a dominant position, consumers are advised to be cautious when taking out insurance and business partners when entering into business relationships. One proceeding for alleged non-compliance with competition protection rules has been initiated against a Group subsidiary company, and it is still pending.



Insurance fraud was confirmed in 1,119 cases out of 1,771 reported cases of suspected fraud in 2023.

Commitments to external initiatives and membership in associations⁸⁸

Zavarovalnica Triglav is a member of the United Nations Environment Programme Finance Initiative (UNEP FI), as well as a signatory to the United Nations Principles for Sustainable Insurance (UN PSI) and a signatory to the Partnership for Carbon Accounting Financials (PCAF) initiative.

The main standard of professional business practices is implemented by complying with the Insurance Code of the Slovenian Insurance Association and other industry codes. The Company is also active in the American Chamber of Commerce, especially in the Corporate Ethics and Transparency Committee and the Sustainable Growth Committee. As one of the first Slovenian companies, it committed itself to respecting the Declaration on Fair Business Practices, joined Transparency International Slovenia and became a signatory to the Commitment to Respect Human Rights in Business.

The Company is an active member of the Slovenian Insurance Association and its committees, the Chamber of Commerce and Industry of Slovenia and other local and interest chambers. It has representatives in several professional associations, such as the Slovenian Directors' Association, the Managers' Association of Slovenia, the Association of Employers of Slovenia, the European Institute of Compliance and Ethics, the Slovenian Association of Actuaries and the Institute of Internal Auditors – IIA Slovenia. Furthermore, representatives of the Company are members of many international industry and professional associations, particularly in the fields of finance, actuaries and compliance. Subsidiaries are members of industry and professional associations in the countries where they operate and participate in various committees.



Adjustment to regulatory changes

In 2023, processes were aligned with the new Personal Data Protection Act, and efforts continued to harmonise these practices within the Group. Amendments to the Insurance Act, the Labour and Social Security Registers Act and other labour law regulations were adhered to. Compliance with restrictive measures or sanctions resulting from the aggression against Ukraine and the situation in Gaza (e.g. in-depth client screening) was consistently upheld. All Group subsidiaries were double-checked in this regard.

Additional guidance from the European Insurance and Occupational Pensions Authority (EIOPA) on outsourcing to cloud service providers was implemented, and additional frameworks were established to enhance the management of risks related to cloud services.

Preparations for the EU Digital Operational Resilience Act (DORA), effective from 2023 and applicable from January 2025, are underway. Some DORA requirements were already partially implemented in the revised outsourcing policy, which the Group subsidiaries are required to incorporate into their operations. In accordance with EIOPA guidelines and to ensure uniform treatment of the Company's partners, general terms and conditions for Zavarovalnica Triglav's suppliers were drafted to comply with the specified outsourcing requirements.

Legislative developments in sustainability, including the process of adopting the proposed corporate sustainability due diligence directive (CSDDD), are closely monitored. Emphasis is placed on fulfilling the requirements of the Sustainable Finance Disclosure Regulation (SFDR), the EU Taxonomy and the Corporate Sustainability Reporting Directive (CSRD). The majority of Group companies adopted a sustainable development policy and a methodology for calculating their carbon footprints.

In addition, the IFRS 17 and IFRS 9 accounting standards continued to be implemented.

The definitions of the target market and the distribution strategy for more complex products were reviewed and updated in line with the respective EIOPA's guidelines. Amendments to the Commission Delegated Regulation on PRIIPs and the Slovenian Insurance Supervision Agency's notices were taken into account in drafting key information documents for products.

Group subsidiaries not only adapt to changes but are also actively involved in regulatory procedures and amendments to local legislation. In the countries where EU legislation does not apply, the minimum standards of the parent company are followed.

Government grants and other forms of government assistance⁸⁹

The Triglav Group received EUR 3.5 million (index 102) in grants and other forms of government assistance in 2023, of which Zavarovalnica Triglav received EUR 2.8 million (index 96). The largest share of government grants in the Group, 83.8%, was accounted for by reimbursements of labour costs by the state. Government incentives for the employment of specific categories of workers accounted for 6.6%, other forms of government assistance and grants for 5.5% and funds obtained in public tenders for the acquisition of assets for 4.1%. See [Section 4.3 of the Accounting Report](#) for more information on government grants.