# Instructions for insurers' climate risk disclosures

April 2025

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# 1.    Additional documents

The following files complete these instructions:

- **IC1_Sample disclosure.csv**
- **IC1_Technical specifications.xlsx**
- **IC2_Sample disclosure.csv**
- **IC2_Technical specifications.xlsx**
- **IC1_IC2_Field Applicability Matrices for Insurers.xlsx**

# 2.    Purpose

The purpose of the climate risk disclosures is to collect standardized climate-related emissions and exposure data directly from all insurers to enable the Autorité des marchés financiers (the "AMF") to carry out regulatory activities and prudential supervision as it pertains to climate risk management.

These disclosures capture data to enable quantification of insurers' potential and realized physical risk exposures and potential transition risk exposures as at fiscal year-end.

Specifically, these disclosures collect data on:

- underwritten physical risk exposures (claims, insurance revenue and Probable Maximum Loss ("PML")) for select lines of business by geophysical location
- absolute greenhouse gas ("GHG") emissions (Scopes 1, 2 and 3)

The data collected by the AMF are, and will remain, confidential.[1]

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[1]    Regulation respecting the supervisory information of authorized insurers, chapter A-32.1, r. 2

# 3. Scope of application

These disclosures apply to all Québec insurers[2] that are subject to the *Climate Risk Management Guideline*.[3]

The AMF expects all insurers to complete the IC1 and IC2 disclosures. The AMF is permitting insurers belonging to the same group to submit a single IC1 and IC2 disclosure aggregating the data of all the insurers of the group.

# 4. Frequency

The frequency of disclosure is annual.

# 5. Implementation date

The disclosures are effective December 31, 2025.

The disclosures must be completed on a fiscal year-end basis and be filed with the AMF within 180 days of the fiscal year-end date.

# 6. Filing format

Disclosures are to be filed electronically via AMF E-Services in ".csv" format.

Files must be encoded in UTF-8.

# 7. Units of measurement and data format

## 7.1. Financial figures

Disclosed financial figures, such as Insurance Revenue, Claims Paid, Reinsurance Recoveries, outstanding loan balances or investment security values, should be expressed in Canadian Dollars or Canadian Dollar Equivalent, with no decimals, unless otherwise specified.

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[2] *Insurers Act*, chapter A-32.1, section 6
[3] *Climate Risk Management Guideline*

Commas may not be used as field separators and periods must be used as decimal separators for specific fields, as specified in the files **IC1_Technical specifications.xlsx** and **IC2_Technical specifications.xlsx**.

Do not use commas or other separators to delimit thousands of dollars.

Field names are to be indicated on the first line of the file and separated by a comma.

### 7.2.    Greenhouse gas emissions

All reporting on Absolute GHG Emissions, including Scopes 1, 2 and 3 emissions, should be reported in metric tons of carbon dioxide-equivalent ("tCO$_2$-e").

### 7.3.    GHG emissions data quality score and maturity

GHG emissions data quality scores and maturities should be reported as their decimal equivalents using a period to delimit decimals. For example, a maturity of 3 years and 6 months should be expressed as follows: 3.5.

## 8.    Greenhouse gas emissions accounting

Regarding calculation of GHG emissions, the insurer is expected to use the latest *GHG Protocol Corporate Accounting and Reporting Standard* and the latest *GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard*.

Regarding calculation of the portion(s) of Scope 3 GHG emissions, pertaining to the Insurer's Financed, and/or Insurance-Associated GHG Emissions, the insurer is expected to use the latest Partnership for Carbon Accounting Financials' ("PCAF") *Global GHG Accounting* and *Reporting Standard for the Financial Industry* ("PCAF Standard").

The AMF recognizes that there is often a lag between financial reporting and required data becoming available, such as emissions data for an insured client. Accordingly, for Financed and Insurance-Associated GHG Emissions, the insurer may use the most recently available emissions-related data from entities within its value chain alongside its own current year financial

data. For example, when filing for fiscal year 2025, use financial data for fiscal year 2025 and GHG emissions data for fiscal year 2024.

# 9. Additional information

If you require further information, please e-mail your questions to: Info-Divulgations@lautorite.qc.ca.

# 10. Definitions

| Key terms | Definition |
|---|---|
| Absolute Emissions | Volume of GHG emissions expressed in tonnes of carbon dioxide-equivalent ($CO_2$-e). For the purposes of this disclosure, "absolute emissions" refers to generated emissions and not values relating to avoided emissions or emission removals. Also known as "Non-Financed GHG Emissions". |
| Asset Class | A group of financial instruments that have similar financial characteristics. |
| Carbon Dioxide-equivalent ($CO_2$-e) | The universal unit of measurement to show the global warming potential (GWP) of each of the seven GHG, expressed in terms of the GWP of one unit of carbon dioxide for 100 years. This unit is used to evaluate releasing different GHG against a common basis. |
| Claims Paid | Claims Paid are expressed in Canadian Dollars and include allocated loss adjustment expenses paid during the reporting period. Claims paid should be net of insureds' deductibles and gross of reinsurance recoveries. Claims paid include only amounts that were paid as a result of physical damage caused by climate-related perils. Payments due to non-natural causes, such as burst pipes or arson, as well as payments for liability-related and warranty-related claims are excluded. |
| Financed Emissions | Absolute GHG emissions that insurer and investors finance through their loans and investments. |
| Greenhouse Gas (GHG) Emissions | Emissions of the seven GHG listed in the Kyoto Protocol–carbon dioxide (CO2); methane (CH4); nitrous oxide (N2O); hydrofluorocarbons (HFCs); nitrogen trifluoride (NF3); perfluorocarbons (PFCs); and sulphur hexafluoride (SF6). |

| Key terms | Definition |
|---|---|
| Gross Probable Maximum Loss (PML) | The gross value of the maximum loss that could result from a peril, reported on an occurrence basis, in Canadian Dollars or Canadian Equivalent. Gross PML is applicable to P&C insurers only. |
| Insurance-Associated Greenhouse gas (GHG) Emissions | GHG emissions which are associated with specific re/insurance policies aggregated in the re/insurance portfolios of an insurer. |
| Insurance Classes | Insurance Classes are grouped as follows:<br>1. Personal Automobile<br>2. Commercial Property<br>3. Other Commercial Lines<br>4. Personal Property<br>5. Other Personal (physical damage coverages only; liability and warranted-related exposures are excluded).<br><br>Commercial insurance classes refer to insurance offered to commercial clients (i.e., businesses and associations). Personal insurance classes refer to insurance offered to individuals.<br><br>With respect to Commercial Automobile insurance:<br>• For IC1, any commercial automobile policies should be reported under Other commercial insurance class.<br>• For IC2, commercial automobile policies should not be reported within the insurance classes as the methodology for calculating insurance-associated GHG emissions (i.e., PCAF Standard Part C) only covered the "Personal motor lines" when this document was developed. |
| Insurance Revenue | The Canadian Dollar amount of revenue from insurance contracts for the reporting period, in accordance with IFRS 17 Insurance Contracts. |
| Net Probable Maximum Loss (PML) | The value of the maximum loss that could result from a peril, reported on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance expressed in Canadian Dollars. |
| Peril | For purposes of the IC1 disclosure, reportable perils are climate-related events that result in physical damage losses. The four types of perils used for the IC1 disclosure are: wildfire, flood, severe convective storms, and hurricanes.<br><br>1. Wildfire: A wide-area destructive fire that spreads quickly over (typically) woodland or brush.<br><br>2. Flood: Flooding of surrounding areas following heavy rainfall or other events.<br>Floods can include: |

| Key terms | Definition |
|---|---|
| | o   coastal or storm surges<br>o   riverine or fluvial floods<br>o   flash, surface, or pluvial floods<br>o   sewer backup<br><br>3.  Severe convective storms: Severe wind caused by severe convective weather activity including straight-line wind thunderstorms, tornadoes and hail. Severe convective storms are separate weather events from hurricanes.<br><br>4.  Hurricane: Hurricane winds, storm surge, and precipitation-induced flooding. |
| Physical Risks | Risks resulting from climate change that can be event-driven (acute) or from longer-term shifts (chronic) in climate patterns. These risks may carry financial implications for entities, such as direct damage to assets and indirect effects of supply-chain disruption. Insurers' financial performance may also be affected by changes in water availability, sourcing and quality; and extreme temperature changes affecting entities' premises, operations, supply chain, transportation needs, and employee safety. |
| Reinsurance Recoveries | Canadian Dollar amounts collected from the reinsurer by a ceding insurer during the report period related to claims paid. See above for the definition of "claims paid". |
| Scope 1 Greenhouse Gas (GHG) Emissions | Direct GHG emissions that occur from sources owned or controlled by the insurer, i.e., GHG emissions from combustion in owned or controlled boilers, furnaces, vehicles, etc. |
| Scope 2 Greenhouse Gas (GHG) Emissions | Indirect GHG emissions from the generation of purchased or acquired electricity, steam, heating, or cooling consumed by the insurer. |
| Scope 3 Greenhouse Gas (GHG) Emissions | All other indirect GHG emission (not included in Scope 2) that occur in the value chain of the insurer.<br><br>For the purposes of this disclosure, Scope 3 emissions include the following categories (consistent with the GHG Protocol):<br><br>**Insurer's Own Emissions/Non-Financed Emissions**<br>Upstream:<br>1.  purchased products and services<br>2.  capital goods<br>3.  fuel- and energy-related activities not included in Scope 1 emissions or Scope 2 emissions<br>4.  upstream transportation and distribution<br>5.  waste generated in operations |

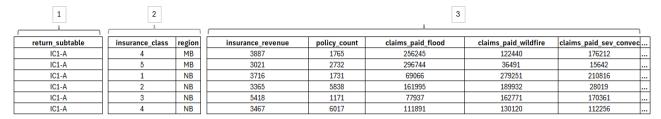| Key terms | Definition |
|---|---|
| | 6.  business travel<br>7.  employee commuting<br><br>Downstream:<br>8.  upstream leased assets<br>9.  downstream transportation and distribution<br>10. processing of sold products<br>11. use of sold products<br>12. end-of-life treatment of sold products<br>13. downstream leased assets<br>14. franchises<br><br>**Investments (a.k.a. "financed emissions")**<br>•  (Scopes 1 and 2) emissions of an insurer's investees<br>•  (Scopes 1 and 2) emissions of an insurer's borrowers<br><br>**Insurance-Associated Emissions**<br>•  (Scopes 1 and 2) emissions of an insurer's policyholders<br><br>Insurance-Associated Emissions are not to be aggregated with investments (also called "financed emissions") but are to be calculated and reported distinctly from investments. |
| Total-Insured-Value | The Canadian Dollar amount of total insured value of assets under insurance coverage. |
| Transition Risks | Moving to a lower-carbon economy may entail extensive policy, legal, technology and market changes to address mitigation and adaption requirements relating to climate change. Depending on the nature, speed and focus of these changes, transition risks may pose varying levels of financial and reputational risk to insurers. |
| Value Chain | The full range of activities, resources and relationships related to an insurer's business model and the external environment in which it operates. |

# 11.  Structure of the climate risk disclosures for insurers

Each disclosure (IC1 and IC2) contains three types of data fields:

| | |
|---|---|
| 1 | Sub-table field |
| 2 | Categorical data fields |
| 3 | Calculated data fields |

The following is an example from the structure of the IC1 disclosure.

| return_subtable | insurance_class | region | insurance_revenue | policy_count | claims_paid_flood | claims_paid_wildfire | claims_paid_sev_convec... | |
|---|---|---|---|---|---|---|---|---|
| IC1-A | 4 | MB | 3887 | 1765 | 256245 | 122440 | 176212 | ... |
| IC1-A | 5 | MB | 3021 | 2732 | 296744 | 36491 | 15642 | ... |
| IC1-A | 1 | NB | 3716 | 1731 | 69066 | 279251 | 210816 | ... |
| IC1-A | 2 | NB | 3365 | 5838 | 161995 | 189932 | 28019 | ... |
| IC1-A | 3 | NB | 5418 | 1171 | 77937 | 162771 | 170361 | ... |
| IC1-A | 4 | NB | 3467 | 6017 | 111891 | 130120 | 112256 | ... |

## 11.1. Sub-table field

This field is used to report the sub-table of the disclosure (disclosure_sub-table). For reporting purposes, each disclosure consists of a single data table that includes sub-tables A, B and C.

The applicable fields for each sub-table are outlined in the document **IC1_IC2_Field Applicability Matrices for Insurers.xlsx**. Non-applicable fields should be reported as blank on each row.

### IC1 Disclosure

| IC1 Disclosure sub-table name | Sub-table code | Applicable insurers |
|---|---|---|
| Insurance Claim and Revenue Metrics by Region (Canada and outside Canada) | IC1-A | P&C insurers<br><br>Reinsurers (optional) |
| Probable Maximum Loss (PML) by Region | IC1-B | P&C insurers |

The IC1 Disclosure is not applicable to life and health insurers.

### IC2 Disclosure

| IC2 Disclosure sub-table name | Sub-table code | Applicable insurers |
|---|---|---|
| Entity-level Insurer's Own GHG Emissions by Scope 1 to 3 | IC2-A | All |
| Financed GHG Emissions by Asset Class | IC2-B | All |
| Insurance-Associated GHG Emissions | IC2-C | P&C insurers |

## 11.2. Categorical data fields

These data fields are used to report qualitative data. Categorical fields used in the Climate Risk Disclosures for Insurers are as follows:

- IC1 Disclosure:     insurance class

                                        region

- IC2 Disclosure:     asset class

                                        insurance class

                                        sector

                                        region

                                        credit quality

**Values of categorical data fields**

The comprehensive list of the values for each of the categorical fields for the IC1 and IC2 disclosures are provided in the appendices to this document as follows:

- Appendix I – Asset Classes
- Appendix II – Insurance Classes
- Appendix III – Regions
- Appendix IV – Sectors
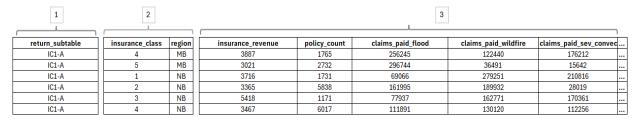- Appendix V – Credit Quality Ratings

and in the "Reference Data" tab in the following Excel files:

- IC1_Technical specifications.xlsx
- IC2_Technical specifications.xlsx

## 11.3. Calculated data fields

The data reported in these fields are to be calculated to reflect the maximum granularity established by the applicable Categorical Data Fields, unless otherwise noted.

In the following example, the policy count reported as 1765 in the first row in the field policy_count represents (is calculated as) the number of policies in the region (Manitoba) that are of the insurance_class code '4' (Personal Automobile).

| return_subtable | insurance_class | region | insurance_revenue | policy_count | claims_paid_flood | claims_paid_wildfire | claims_paid_sev_convec | ... |
|---|---|---|---|---|---|---|---|---|
| IC1-A | 4 | MB | 3887 | 1765 | 256245 | 122440 | 176212 | ... |
| IC1-A | 5 | MB | 3021 | 2732 | 296744 | 36491 | 15642 | ... |
| IC1-A | 1 | NB | 3716 | 1731 | 69066 | 279251 | 210816 | ... |
| IC1-A | 2 | NB | 3365 | 5838 | 161995 | 189932 | 28019 | ... |
| IC1-A | 3 | NB | 5418 | 1171 | 77937 | 162771 | 170361 | ... |
| IC1-A | 4 | NB | 3467 | 6017 | 111891 | 130120 | 112256 | ... |

# 12. Instructions for the Physical Risk IC1 Disclosure

This disclosure collects data on insurance revenues and paid claims losses to assess Insurers' historical loss experience due to Physical Risk from climate-related perils for select climate-exposed insurance classes. This disclosure also collects PML data at a regional granularity to assess Insurers' forward-looking loss exposures due to physical risk from climate-related perils.

The fields applicable for each sub-table are outlined in the document **IC1_IC2_Field Applicability Matrices for Insurers.xlsx**. Non-applicable fields should be reported as blank on each row.

The file **IC1_Technical specifications.xlsx** provides a sample template, a description of the data fields and the reference data for the categorical fields.

The document **IC1_Disclosure template.csv** contains a sample disclosure.

## 12.1. Overview of Disclosure Data Fields

The following fields are included in the IC1 Disclosure template:
**Sub-table field**
• disclosure_sub-table

**Categorical data fields**

- insurance_class

  Reinsurance companies should use code '6' for the insurance_class field. This code indicates that the data are aggregated because they are not available by insurance class. See Appendix II.

- region

**Calculated data fields**

Claims Paid, Counts of Claims Paid and Reinsurance Recoveries should include only amounts that were paid/received as a result of physical damage caused by climate-related perils, and exclude claims paid due to non-natural causes such as burst pipes or arson, as well as liability-related and warranty-related claims.

- insurance_revenue
- policy_count
- claims_paid_flood
- claims_paid_wildfire
- claims_paid_sev_convec_storm
- claims_paid_hurricane
- reinsur_claims_paid
- count claims_paid_flood
- count_claims_paid_wildfire
- count_claims_paid_sev_convec_storm
- count_paid_claims_hurricane
- reinsur_count_paid
- reinsur_recov_flood
- reinsur_recov_wildfire
- reinsur_recov_sev_convec_storm
- reinsur_recov_hurricane
- reinsur_recov
- total_insured_value
- gross_pml_flood_1_100
- gross_pml_wildfires_1_100
- gross_pml_wind_1_100
- gross_pml_hurricane_1_100

- gross_pml_flood_1_250
- gross_pml_wildfire_1_250
- gross_pml_sev_convec_storm_1_250
- gross_pml_hurricane_1_250
- net_pml_flood_1_100
- net_pml_wildfire_1_100
- net_pml_sev_convec_storm_1_100
- net_pml_hurricane_1_100
- net_pml_flood_1_250
- net_pml_wildfires_1_250
- net_pml_sev_convec_storm_1_250
- net_pml_hurricane_1_250

## 12.2. Sub-Table IC1-A: Insurance Claim and Revenue Metrics by Region (Canada and outside Canada)

Note: In future versions, the requirement to disclose "by region" will be replaced with an FSA-level of granularity for certain Insurance Classes, underwritten exposures and metrics. The AMF will notify insurers in a timely manner.

**Sub-table field**
- disclosure_sub-table – Set field value to 'IC1-A' on each row.

**Categorical data fields**
- insurance_class – Report the applicable Insurance Classes per table in Appendix II – Insurance Classes for each row. For multi-peril policies, include insurance written for commercial clients under 'Other Commercial Lines', and include insurance written for personal-lines clients under 'Other Personal'.
  Reinsurance companies should use code '6' for the insurance_class field.
- region – Report the applicable region, i.e., the location of the insured risk (not the location of the insurance policy) in Canada and/or outside of Canada per the table in Appendix III – Regions on each row.

**Calculated data fields**

- insurance_revenue – Report the Canadian Dollar amount of Insurance Revenue for the fiscal year, for the insurance_class in the reported region.

- policy_count – Report the number of active policies written for the insurance_class in the reported region.

  o For the purpose of the IC1 disclosures, multi-perils policies are considered as one policy.

  o For reinsurers "policy count" should be interpreted as "treaty" coverage which should be considered as one policy.

  o For multi-location policies such as large commercial policies that cannot be specifically attributed to a single physical location using the available insured data, insurers should report using the code 'C1' 'Canada-Other' for the region data field as per Appendix III – Regions.

- claims_paid_flood – Report the Canadian Dollar amount of flood-related claims paid for the fiscal year under coverage offered in the insurance_class in the reported region, net of deductible and gross of Reinsurance Recoveries.

- claims_paid_wildfire – Report the Canadian Dollar amount of wild fire-related claims paid for the fiscal year under coverage offered in the insurance_class in the reported region, net of deductible and gross of Reinsurance Recoveries.

- claims_paid_sev_convec_storm – Report the Canadian Dollar amount of Severe convective storms-related claims paid (excluding flooding related losses) for the fiscal year under coverage offered in the insurance_class in the reported region, net of deductible and gross of Reinsurance Recoveries.

- claims_paid_hurricane – Report the Canadian Dollar amount of hurricane related-claims paid for the fiscal year under coverage offered in the insurance_class in the reported region, net of deductible and gross of Reinsurance Recoveries.

- reinsur_claims_paid – Report the Canadian Dollar amount of climate-related claims paid for the fiscal year by the Reinsurer in the corresponding insurance_class field in the reported region. This field applies only to Reinsurance companies, which should use code '6'.

- count_claims_paid_flood – Report the number of flood-related claims paid for the fiscal year under coverage offered in the insurance_class in the reported region.

- count_claims_paid_wildfire – Report the number of wildfire-related claims paid for the fiscal year under coverage offered in the insurance_class in the reported region.

- count_claims_paid_sev_convec_storm – Report the number of severe convective storms-related claims paid for the fiscal year (excluding flooding-related losses) under coverage offered in the insurance_class in the reported region.
- count_claims_paid_hurricane – Report the number of hurricane claims paid for the fiscal year under coverage offered in the insurance_class in the reported region.
- reinsur_count_paid – Report the number of climate-related claims paid by the reinsurer for the fiscal year in the corresponding insurance_class in the reported region. This field applies only to Reinsurance companies, which should use code '6'.
- reinsur_recov_flood – Report the Canadian Dollar amount of reinsurance recoveries for the fiscal year pertaining to flood-related claims for the insurance_class in the reported region.
- reinsur_recov_wildfire – Report the Canadian Dollar amount of reinsurance recoveries for the fiscal year pertaining to wildfire-related claims for the insurance_class in the reported region.
- reinsur_recov_sev_convec_storm – Report the Canadian Dollar amount of reinsurance recoveries for the fiscal year pertaining to severe convective storms-related claims for the insurance_class in the reported region.
- reinsur_recov_hurricane – Report the Canadian Dollar amount of reinsurance recoveries for the fiscal year pertaining to hurricane claims for the insurance_class in the reported region.
- reinsur_recov – Declare the Canadian Dollar amount of reinsurance recoveries for climate-related claims paid for by the reinsurer for the fiscal year for the insurance_class in the reported region. This field applies only to Reinsurance companies, which should use code '6'.
- total_insured_value – Report the sum of the Canadian Dollar amounts of Total Insured Values ("TIV") on assets under coverage to insureds in the insurance_class in the reported region, net of deductible.

  This field should be completed by P&C insurance companies only.
  - A breakdown of TIV by category is not required.
  - For commercial property: report the total TIV, including Building, Content, and Business Interruption.
  - For personal property: P&C insurers may report either the total TIV figure or only the Building TIV, depending on data availability.
- Report the following fields as blank on each row:
  - gross_pml_flood_1_100
  - gross_pml_wildfires_1_100
  - gross_pml_wind_1_100
  - gross_pml_hurricane_1_100

- gross_pml_flood_1_250
- gross_pml_wildfire_1_250
- gross_pml_sev_convec_storm_1_250
- gross_pml_hurricane_1_250
- net_pml_flood_1_100
- net_pml_wildfire_1_100
- net_pml_sev_convec_storm_1_100
- net_pml_hurricane_1_100
- net_pml_flood_1_250
- net_pml_wildfires_1_250
- net_pml_sev_convec_storm_1_250
- net_pml_hurricane_1_250

## 12.3. Sub-Table IC1-B: Probable Maximum Loss by Region (Canada and outside Canada)

**Sub-table field**

- disclosure_sub-table – Set field value to 'IC1-B'.

**Categorical data fields**

- insurance_class – Report the defined insurance class per table in Appendix II – Insurance Classes.
- region – Report the applicable province or territory of Canada, Region of the USA and 'Other' geographic region per the table in Appendix III – Regions.

**Calculated data fields**

- Report the following fields as blank on each row:
  - insurance_revenue
  - policy-count
  - claims_paid_flood
  - claims_paid_wildfire
  - claims_paid_sev_convec_storm
  - claims_paid_hurricane
  - reinsur_claims_paid
  - count claims_paid_flood
  - count_claims_paid_wildfire

- o count_claims_paid_sev_convec_storm
- o count_paid_claims_hurricane
- o reinsur_count_paid
- o reinsur_recov_flood
- o reinsur_recov_wildfire
- o reinsur_recov_sev_convec_storm
- o reinsur_recov_hurricane
- o reinsur_recov
- o total_insured_value

- gross_pml_flood_1_100 – Report the Gross PML on an occurrence basis for a 100-year return period on Flood (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100, and region code 'U6' ('USA-Other') should address US-wide PML100 for Flood.

- gross_pml_wildfires_1_100 – Report the Gross PML on an occurrence basis for a 100-year return period on Wildfire (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100 and region code 'U6' ('USA-Other') should address US-wide PML100 for Wildfire.

- gross_pml_sev_convec_storm_1_100 – Report the Gross PML on an occurrence basis for a 100-year return period on Severe convective storms (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100 and region code 'U6' ('USA-Other') should address US-wide PML100 for Severe convective storms.

- gross_pml_hurricane_1_100 – Report the Gross PML on an occurrence basis for a 100-year return period for Hurricanes (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100 and region code 'U6' ('USA-Other') should address US-wide PML100 for Hurricanes.

- gross_pml_flood_1_250 – Report the Gross PML on an occurrence basis for a 250-year return period on Flood (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for Flood.

- gross_pml_wildfires_1_250 – Report the Gross PML on an occurrence basis for a 250-year return period on Wildfire (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for Wildfire.

- gross_pml_sev_convec_storm_1_250 – Report the Gross PML on an occurrence basis for a 250-year return period on Severe convective storms (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for Severe convective storms.

- gross_pml_hurricane_1_250 – Report the Gross PML on an occurrence basis for a 250-year return period on Hurricanes (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for hurricanes.

- net_pml_flood_1_100 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 100-year return period on Flood (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100 and region code 'U6' ('USA-Other') should address US-wide PML100 for Flood.

- net_pml_wildfires_1_100 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 100-year return period on Wildfire (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100 and region code 'U6' ('USA-Other') should address US-wide PML100 for Wildfire.

- net_pml_sev_convec_storm_1_100 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 100-year return period on Severe convective storms (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100 and region code 'U6' ('USA-Other') should address US-wide PML100 for Severe convective storms.

- net_pml_hurricane_1_100 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 100-year return period on Hurricanes (i.e., PML100) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML100 and region code 'U6' ('USA-Other') should address US-wide PML100 for Hurricanes.

- net_pml_flood_1_250 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 250-year return period on Flood (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to

region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for Flood.

- net_pml_wildfires_1_250 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 250-year return period on Wildfire (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for Wildfire.

- net_pml_sev_convec_storm_1_250 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 250-year return period on Severe convective storms (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for Severe convective storms.

- net_pml_hurricane_1_250 – Report the Net PML on an occurrence basis, net of all applicable reinsurance, deductibles and co-insurance for a 250-year return period on Hurricanes (i.e., PML250) for each region by insurance_class. If available, reporting on PML pertaining to region code 'C1' ('Canada-Other') should reflect Canada-Wide PML250 and region code 'U6' ('USA-Other') should address US-wide PML250 for hurricanes.

# 13. Instructions for the Transition Risk IC2 Disclosure

This disclosure collects Absolute GHG Emissions assigned on Investments and other Balance Sheet Assets and entity-wide ('Unattributable' emissions) from insurers. It also collects Insurance-Associated GHG Emissions to assess the emissions footprint enabled by insurers' underwritten insurance businesses.

The fields applicable for each sub-table are outlined in the document **IC1_IC2_Field Applicability Matrices for Insurers.xlsx**. Non-applicable fields should be reported as blank on each row.

The file **IC2_Technical specifications.xlsx** provides a sample template, a description of the data fields and reference data for categorical fields.

The document **IC2_Disclosure template.csv** contains a sample disclosure.

## 13.1. Overview of Disclosure Data Fields

The following fields are included in the IC2 Disclosure template:

**Sub-table field**

- disclosure_sub-table


**Categorical data fields**

- asset_class

- insurance_class

- sector

- region

- credit_quality


**Calculated data fields**

- scope_1_insurer_own_absolute_emissions

- scope_2_insurer_own_absolute_emissions

- scope_3_insurer_own_absolute_emissions

- scope_1_counterparty_absolute_emissions

- scope_2_counterparty_absolute_emissions

- weighted_avg_scope_1_counterparty_data_quality_score

- weighted_avg_scope_2_counterparty_data_quality_score

- weighted_avg_data_counterparty_quality_score

- scope_1_policyholder_own_absolute_emissions

- scope_2_policyholder_own_absolute_emissions

- weighted_avg_scope_1_policyholder_data_quality_score

- weighted_avg_scope_2_policyholder_data_quality_score

- weighted_avg_policyholder_data_quality_score

- asset_balance

- weighted_average_maturity

- balance_5_maturity

- balance_10_maturity

### 13.2. Sub-Table IC2-A: Entity-level Insurer's Own GHG Emissions by Scope 1 to 3

**Sub-table field**

- disclosure_sub-table – Set field value to 'IC2-A' on each row.

**Categorical data fields**

- asset_class – Set field value to code '9' ('Unattributable – GHG emissions unattributable to a specific asset') for each row reported. Reporting on other asset classes is not applicable for Sub-Table IC2-A.
- insurance_class – Report as blank.
- sector – Report as blank.
- region – Report the applicable province or territory of Canada, Region of the USA and 'Other' geographic region per the table in Appendix III – Regions.
- credit_quality – Report as blank.

**Calculated data fields**

- scope_1_insurer_own_absolute_emissions – Report the Insurer's Own Absolute Scope 1 GHG Emissions (in tCO2- Equivalent) produced within each reported region.
- scope_2_insurer_own_absolute_emissions – Report the Insurer's Own Absolute Scope 2 GHG Emissions (in tCO2-Equivalent) produced within each reported region.
- scope_3_insurer_own_absolute_emissions – Report the Insurer's Own Absolute Scope 3 GHG Emissions (in tCO2-Equivalent) produced within each reported region.
- asset_balance – Report as blank.
- weighted_average_maturity – Report as blank.
- balance_5_maturity – Report as blank.
- balance_10_maturity – Report as blank.

### 13.3. Sub-Table IC2-B: Financed GHG Emissions – Asset Class

**Sub-table field**

- disclosure_sub-table – Set field value to 'IC2-B'.

**Categorical data fields**

- asset_class – Report on each of the defined asset classes (see the table in Appendix I – Asset Classes for reference). Do not report using the 'Unattributable' classification of the asset_class for reporting on Financed GHG Emissions.

- insurance_class – Report as blank.

- sector – If applicable per the Field Applicability Matrices, report the applicable sector code for each asset per the table in Appendix I – Asset Classes; otherwise report the sector field as blank.

- region – If applicable for the asset_class per the Field Applicability Matrices, report the applicable province or territory of Canada, Region of USA or 'Other' geographic region per the table in Appendix III – Regions; otherwise report the region field as blank.

- credit_quality – If applicable per the Field Applicability Matrices, report the applicable credit_quality code per the table in Appendix V – Credit Quality Ratings; otherwise, report the credit_quality field as blank.

If an insurer has multiple assessment from multiple rating agencies, the insurer should disclose the credit ratings using guidance from the AMF's *Guideline on Capital Adequacy Requirements - Property and Casualty Insurance* (see section 6.1.1. Use of ratings in chapter 6) and *Capital Adequacy Requirements Guideline - Life and health insurance (CARLI)* (see Chapter 3, section 3.1.1. Use of ratings).

**Calculated data fields**

- scope_1_counterparty_absolute_emissions – Report the applicable amount of the Insurer's Counterparty Scope 1 Absolute GHG Financed emissions for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).

- scope_2_counterparty_absolute_emissions – Report the applicable amount of the Insurer's Counterparty Scope 2 Absolute GHG Financed emissions for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).

- weighted_avg_scope_1_counterparty_data_quality_score – Report the PCAF Standard Data quality score for the Insurer's Counterparty Total Absolute Emissions (Scope 1) weighted by outstanding amount for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).

- weighted_avg_scope_2_counterparty_data_quality_score – Report the PCAF Standard Data quality score for the Insurer's Counterparty Total Absolute Emissions (Scope 2) weighted by

outstanding amount for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).

- weighted_avg_counterparty_data_quality_score – Report the PCAF Standard Data quality score for the Insurer's Counterparty Total Absolute Emissions (Scopes 1 and 2) weighted by outstanding amount for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).

- asset_balance – Report the Canadian Dollar amount of the applicable financial balance for each asset_class by each region (if applicable) split by each sector (if applicable) by each credit_quality (if applicable).

- weighted_average_maturity – Report the applicable exposure weighted maturity, measured in years, for each asset_class split by each region by each sector (if applicable) by each credit_quality (if applicable).

- balance_5_maturity – Report the Canadian Dollar amount of the asset_balance with a remaining maturity of equal to or greater than 5 years and less than 10 years.

- balance_10_maturity – Report the Canadian Dollar amount of the asset_balance with a remaining maturity greater than or equal to 10 years.

## 13.4. Sub-Table IC2-C: Insurance-Associated GHG Emissions

Note that this Sub-Table is to be completed by insurers writing classes of insurance including personal automobile, commercial property and other commercial lines.

**Sub-table field**

- disclosure_sub-table – Set field value to 'IC2-C' on each row.

**Categorical data fields**

- asset_class – Report as blank.
- insurance_class – Report the applicable class of insurance code per Appendix II – Insurance Classes; for purposes of reporting on IC2-C, only include the following insurance classes: Personal Automobile, Commercial Property and Other Commercial Lines. Do not report on Personal Property.
- sector – Report the applicable Sector code for each insurance_class per the table in Appendix IV – Sectors; for insurance_class code '1' ('Personal Automobile'), report the sector field as blank.

- region – Report the applicable region for each insurance_class per the table in Appendix III – Regions.
- credit_quality – Report as blank.

**Calculated data fields**

- scope_1_policyholder_absolute_emissions – Report the applicable amount of the Insurer's Policyholder Absolute GHG Insurance-Associated Emissions (Scope 1) for each applicable insurance_class ('Personal Automobile', 'Commercial Property', 'Other Commercial Lines') for each region by each sector.
- scope_2_policyholder_absolute_emissions – Report the applicable amount of the Insurer's Policyholder Scope 2 Absolute GHG Insurance-Associated Emissions for each applicable insurance_class ('Personal Automobile', 'Commercial Property', 'Other Commercial Lines') for each region by each sector.
- weighted_avg_scope 1_policyholder_data_quality_score – Report the PCAF Standard Data quality score for the Insurer's Policyholder Total Absolute Emissions (Scope 1) weighted by outstanding amount for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).
- weighted_avg_scope 2_policyholder_data_quality_score – Report the PCAF Standard Data quality score for the Insurer's Policyholder Total Absolute Emissions (Scope 2) weighted by outstanding amount for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).
- weighted_avg_policyholder_data_quality_score – Report the PCAF Standard Data quality score for the Insurer's Policyholder Total Absolute Emissions (Scopes 1 and 2) weighted by outstanding amount for each asset_class by each region (if applicable) by each sector (if applicable) by each credit_quality (if applicable).
- Report the following fields as blank on each row:
  - asset_balance
  - weighted_average_maturity
  - balance_5_maturity
  - balance_10_maturity

# Appendix I – Asset Classes

The asset classes used are the same as those in the LIFE and P&C regulatory disclosures:

- Life Insurance (LF2): Exhibit 21.012

- Property & Casualty Insurance (PC2): Exhibit 40.08

## Sub-Table IC2-A: Entity-level Insurer's Own GHG Emissions by Scope

The following category is to be used for the asset_class field when completing the IC2-A Disclosure.

The "Unattributable – GHG emissions unattributable to a specific asset)" asset class is to be used for reporting on entity-wide emissions in IC2 disclosure sub-table 'IC2-A' only, and it is not intended to be used in lieu of reporting emissions by specific asset classes in IC2 disclosure sub-table 'IC2-B.'

| asset_class | Asset Class Name |
|---|---|
| 9 | Unattributable - GHG emissions unattributable to a specific asset |

## Sub-Table IC2-B: Financed GHG Emissions – Asset Class

| asset_class | Asset Class Name |
|---|---|
| 1 | Bonds and Debentures – Government – Federal |
| 2 | Bonds and Debentures – Corporate – Public |
| 3 | Bonds and Debentures – Corporate – Private |
| 4 | Mortgage Loans |
| 5 | Preferred Shares – Fixed Term |
| 6 | Preferred Shares – Equity Preferred |
| 7 | Common Shares |
| 8 | Investment in Subsidiaries |

# Appendix II – Insurance Classes

**IC1 – Physical Risk Disclosure**

Use the following codes to report in the sub-table IC1-A and IC1_B insurance_class categorical field:

| insurance_class | Insurance Class Names |
|---|---|
| 1 | Personal Automobile |
| 2 | Commercial Property |
| 3 | Other Commercial Lines |
| 4 | Personal Property |
| 5 | Other Personal |
| 6 | Aggregated Data: data not available by insurance class<br>This field is applicable only to Reinsurance companies. |

**IC2 – Transition Risk Disclosure**

Use the following codes to report in the sub-table IC2-C insurance_class categorical field:

| insurance_class | Insurance Class Names |
|---|---|
| 1 | Personal Automobile |
| 2 | Commercial Property |
| 3 | Other Commercial Lines |

The insurance classes in the table above have been reduced to three classes of insurance as the methodology for calculating Insurance-Associated GHG emissions (i.e., PCAF Standard Part C) only covered the "Commercial lines" and "Personal motor lines" when this document was developed.

# Appendix III – Regions

Use the following categorical codes for the region field when completing IC1 and IC2 disclosures.

| region | Region name | Region description |
|---|---|---|
| AB | Alberta, Canada | Alberta, Canada |
| BC | British Columbia, Canada | British Columbia, Canada |
| MB | Manitoba, Canada | Manitoba, Canada |
| NB | New Brunswick, Canada | New Brunswick, Canada |
| NL | Newfoundland and Labrador, Canada | Newfoundland and Labrador, Canada |
| NT | Northwest Territories, Canada | Northwest Territories, Canada |
| Nova Scotia, Canada | Nova Scotia, Canada | Nova Scotia, Canada |
| NU | Nunavut, Canada | Nunavut, Canada |
| ON | Ontario, Canada | Ontario, Canada |
| PE | Prince Edward Island, Canada | Prince Edward Island, Canada |
| QC | Québec, Canada | Québec, Canada |
| SK | Saskatchewan, Canada | Saskatchewan, Canada |
| YK | Yukon, Canada | Yukon, Canada |
| C1 | Canada-Other | Unattributable to a single location in Canada; for IC1-B reporting of Canada-Wide PML |
| U1 | USA West | Region of USA that includes the following US States: AK, CA, CO, HI, ID, MT, NV, OR, UT, WA, WY |
| U2 | USA Midwest | Region of USA that includes the following US States: IA, IL, IN, KS, MI, MN, MO, ND, NE, OH, SD, WI |

| region | Region name | Region description |
|---|---|---|
| U3 | USA Northeast | Region of USA that includes the following US States: CT, MA, ME, NH, NJ, NY, PA, RI, VT |
| U4 | USA Southwest | Region of USA that includes the following US States: AZ, NM, OK, TX |
| U5 | USA Southeast | Region of USA that includes the following US States: AL, AR, DE, FL, GA, KY, LA, MD, MS, NC, SC, TN, VA, WV as well as DC |
| U6 | USA-Other | Unattributable to a single location in the USA; for IC1-B reporting of USA-Wide PML |
| ZZ | Other | Other All other regions worldwide |

# Appendix IV – Sectors

The coding selections shown in the table below are to be used for the sector field when completing the IC2 Disclosure.

The table lists 25 sectors that are potentially sensitive to the transition toward a low-carbon economy.

Each sector code has a corresponding 2022 North American Industry Classification System (NAICS) code.

Note that there are NAICS codes that are used for more than one sector. This is because they have a lower level of granularity than the sectors defined below.

| Code | Sector | Sector Description | Industry | NAICS Code (Canada 2022) | NAICS Code (US 2022) |
|---|---|---|---|---|---|
| 1 | ELEC-RNEW | Electricity Production from Renewable Sources and Nuclear | Electricity Support and Distribution | 221113, 221119 | 221113, 221114, 221115, 221116, 221117, 221118 |
| 2 | ELEC-FOSS | ELEC-FOSS Fossil Fuel Electricity Production | Electricity Support and Distribution | 221112 | 221112 |
| 3 | ELEC-HYDR | Hydro Electricity Production | Electricity Support and Distribution | 221111 | 221111 |
| 4 | ELEC-OTHR | Electricity Support and Distribution | Electricity Support and Distribution | 22112, 23713, 335 | 22112, 23713, 335 |
| 5 | EINT-MANF | Manufacturing | Energy Intensive Industries | 325, 327, 331, 332 | 325, 327, 331, 332 |
| 6 | EINT-MINE | Mining | Energy Intensive Industries | 2122, 2123, 213117, 213119 | 2122, 2123, 213114, 213115 |
| 7 | EINT-PAPR | Paper and Pulp | Energy Intensive Industries | 322 | 322 |
| 8 | EINT-WATR | Water and Sewage System and Waste Management | Energy Intensive Industries | 2213, 23711, 562 | 2213, 23711, 562 |

| Code | Sector | Sector Description | Industry | NAICS Code (Canada 2022) | NAICS Code (US 2022) |
|---|---|---|---|---|---|
| 9 | COAL | Coal Industry and Support | Fossil Fuels | 2121, 213117, 213119 | 2121, 213113 |
| 10 | RFND | Fossil Fuel Refinery | Fossil Fuels | 324, 326, 412, 457, 486 | 324, 326, 4247, 457, 486 |
| 11 | GAS | Natural Gas Industry and Support | Fossil Fuels | 21111, 213111, 213118, 2212, 23712 | 21113, 213111, 213112, 2212, 23712 |
| 12 | OIL-EXTR | Oil Extraction | Fossil Fuels | 21111, 213111 | 21112, 213111 |
| 13 | OIL-OTHR | Oil Extraction Support | Fossil Fuels | 213118, 23712 | 213112, 23712 |
| 14 | OIL-SAND | Sand Oil Extraction and Support | Fossil Fuels | 21114 | 21112 |
| 15 | TRNS-AIR | Air Transportation | Transportation | 481, 4881 | 481, 4881 |
| 16 | TRNS-RAIL | Rail Transportation | Transportation | 482 | 482 |
| 17 | TRNS-OTHR | Other Transportation | Transportation | 336, 483, 484, 485, 487, 4882, 4883, 4884, 4885, 4889 | 336, 483, 484, 485, 487, 4882, 4883, 4884, 4885, 4889 |
| 18 | CROP | Crop Production and Support | Agriculture and Forestry | 111, 1151, 41112 | 111, 1151 |
| 19 | LIVE | Livestock Production and Support | Agriculture and Forestry | 112, 1152, 41111 | 112, 1152 |
| 20 | FORS | Forestry and Support | Agriculture and Forestry | 113, 1153, 321 | 113, 1153, 321 |
| 21 | FINC | Finance and Insurance | Other Sectors | 52 | 52 |
| 22 | FOOD | Food and Beverage | Other Sectors | 114, 311, 312, 4131, 4132, 445 | 114, 311, 312, 4244, 4248, 445 |

| Code | Sector | Sector Description | Industry | NAICS Code (Canada 2022) | NAICS Code (US 2022) |
|---|---|---|---|---|---|
| | | industry and support | | | |
| 23 | REST | Real Estate and Rental and Leasing | Other Sectors | 53 | 53 |
| 24 | SERV | Service Sectors | Other Sectors | 323, 41113, 41119, 4133, 4134, 414, 415, 416, 417, 418, 419, 441, 444, 449, 455, 456, 458, 459, 49, 51, 54, 55, 561, 61, 62, 71, 72, 81, 91 | 323, 423, 4241, 4242, 4243, 4245, 4246, 4249, 425, 441, 444, 449, 455, 456, 458, 459, 49, 51, 54, 55, 561, 61, 62, 71, 72, 81, 92 |
| 25 | OTHR | Other Industries | Other Sectors | 236, 2372, 2373, 2379, 238, 313, 314, 315, 316, 333, 334, 337, 339 | 236, 2372, 2373, 2379, 238, 313, 314, 315, 316, 333, 334, 337, 339 |

# Appendix V – Credit Quality Ratings

The coding selections shown in the table below are to be used for the credit_quality field when completing the IC2 Disclosure.

Externally assigned ratings of long-term borrower creditworthiness are assigned on debt security issuers and wholesale borrowers including corporates, banks and sovereigns. To facilitate comparison, ratings from recognized credit rating organizations should be mapped into the credit_quality categories shown in the table below.

In the IC2 Disclosure, investments should be grouped within each credit_quality; borrowers are not to be reported on an individual name basis.

| credit_quality | S&P | DBRS | Moody's | Fitch | KBRA |
|---|---|---|---|---|---|
| 1 | AAA to AA- | AAA to AA (low) | Aaa to Aa3 | AAA to AA- | AAA to AA- |
| 2 | A+ to A- | A (high) to A (low) | A1 to A3 | A+ to A- | A+ to A- |
| 3 | BBB+ to BBB- | BBB (high) to BBB (low) | Baa1 to Baa3 | BBB+ to BBB- | BBB+ to BBB- |
| 4 | BB+ to BB- | BB (high) to BB (low) | Ba1 to Ba3 | BB+ to BB- | BB+ to BB- |
| 5 | B+ to B- | B (high) to B (low) | B1 to B3 | B+ to B- | B+ to B- |
| 6 | Below B- | CCC or lower | Below B3 | Below B- | Below B- |
| 7 | Not Rated | Not Rated | Not Rated | Not Rated | Not Rated |