

# GRI Index

GWLRA has reported the information cited in this GRI content index for the period January 1, 2024 to December 31, 2024 with reference to the GRI Standards.

GRI 1 used – GRI 1: Foundation 2021.

GRI 2 – General Disclosures (2021)		Section/Location	Annual Review Page
<b>1. The Organization and Its Reporting Practices</b>			
2-1	Organizational details	2024 Annual Review – Approach to Reporting, About Us, GWLRA website	2-3, 4-5, <a href="#">website 1</a> , <a href="#">website 2</a>
2-2	Entities included in the organization's sustainability reporting	2024 Annual Review – Approach to Reporting GWLRA's financial reporting is consolidated and reported under its parent company, Canada Life.	3
2-3	Reporting period, frequency and contact point	2024 Annual Review – Approach to Reporting, back cover, Canada Life website GWLRA's financial reporting is consolidated and reported annually by its parent company, Canada Life.	3, back cover, <a href="#">website</a> (p. 115)
2-4	Restatements of information	In 2024, GWLRA restated charitable giving in 2022 and 2023. For further details refer to footnotes 1 and 2 in the Community Investments data table.	45
2-5	External assurance	2024 Annual Review – Approach to Reporting "Data Coverage", Great-West Lifeco CDP Report	3, <a href="#">website</a>
<b>2. Activities and Workers</b>			
2-6	Activities, value chain and other business relationships	2024 Annual Review – Approach to Reporting, About Us, How We Create Value, GWLRA website In 2024, there were no other significant changes to the organization or supply chain.	2-3, 4-5, 7-8, <a href="#">website 1</a> , <a href="#">website 2</a>
2-7	Employees	2024 Annual Review – Data Tables	43-44
2-8	Workers who are not employees	2024 Annual Review – Data Tables In 2024, there were no other significant fluctuations in the number of workers who are not employees.	43
<b>3. Governance</b>			
2-9	Governance structure and composition	2024 Annual Review – Governance, GWLRA website, Great-West Lifeco Inc. website GWLRA is a wholly owned subsidiary of The Canada Life Assurance Company, an entity owned and controlled by Great-West Lifeco Inc., a publicly traded company. Information about GWLRA's executive team is available on the GWLRA website, while information relating to the Great-West Lifeco Board of Directors and Board committees are available on the Great-West Lifeco website.	9, <a href="#">website 1</a> , <a href="#">website 2</a> , <a href="#">website 3</a> , <a href="#">website 4</a>
2-10	Nomination and selection of the highest governance body	Great-West Lifeco Inc. website (see note for 2-9 above)	<a href="#">website</a> (p. 2)

GRI 2 – General Disclosures (2021)		Section/Location	Annual Review Page
2-11	Chair of the highest governance body	2024 Annual Review – Governance, GWLRA website	9, <a href="#">website 1</a> , <a href="#">website 2</a>
2-12	Role of the highest governance body in overseeing the management of impacts	2024 Annual Review – Governance, Risk Management, Strategy, GWLRA website	9, 10, 11, <a href="#">website 1</a> , <a href="#">website 2</a> , <a href="#">website 3</a>
2-13	Delegation of responsibility for managing impacts	2024 Annual Review – Approach to Reporting, Governance, Risk Management, GWLRA website	3, 9-10, <a href="#">website</a>
2-14	Role of the highest governance body in sustainability reporting	2024 Annual Review – Approach to Reporting	3
2-15	Conflicts of interest	GWLRA website, Great-West Lifeco Inc. Code of Conduct	<a href="#">website</a> , <a href="#">Code of Conduct</a> (pp. 9-11)
2-16	Communication of critical concerns	GWLRA website	<a href="#">website</a>
2-18	Evaluation of the performance of the highest governance body	2024 Annual Review – Approach to Reporting, Performance, 2024 Highlights	3, 12, 13-14
2-19	Remuneration policies	Canada Life website GWLRA follows the remuneration and compensation policies of its parent company, Canada Life.	<a href="#">website</a>
2-20	Process to determine remuneration	Canada Life website GWLRA follows the remuneration and compensation policies of its parent company, Canada Life.	<a href="#">website</a>
<b>4. Strategy, Policies and Practices</b>			
2-22	Statement on sustainable development strategy	2024 Annual Review – President's Message, Strategy	6, 11
2-23	Policy commitments	2024 Annual Review – Operate with Integrity and Trust, GWLRA website	15-16, <a href="#">website</a>
2-24	Embedding policy commitments	2024 Annual Review – Risk Management, Operate with Integrity and Trust, GWLRA website	10, 15-16, <a href="#">website</a>
2-25	Process to remediate negative impacts	2024 Annual Review – Risk Management GWLRA website, Great-West Lifeco website (Code of Conduct, Ethics Hotline)	10, <a href="#">website 1</a> , <a href="#">website 2</a> , <a href="#">website 3</a> (p. 22), <a href="#">website 4</a>
2-26	Mechanisms for seeking advice and raising concerns	2024 Annual Review – Performance, 2024 Highlights, Operate with Integrity and Trust GWLRA website, Great-West Lifeco website (Code of Conduct, Ethics Hotline)	12, 13, 16, <a href="#">website 1</a> , <a href="#">website 2</a> , <a href="#">website 3</a>
2-27	Compliance with laws and regulations	Due to the size and nature of GWLRA's operations, it is subject to examinations, investigations, administrative and civil proceedings in the normal course of business. Such matters are dealt with in accordance with all applicable laws, policies, standards and guidelines.	N/A

GRI 2 – General Disclosures (2021)		Section/Location	Annual Review Page
2-28	Membership associations	2024 Annual Review – Attract and Retain Top Talent, Contribute to Stronger, Livable Communities, GWLRA website	27, 29-32, <a href="#">website</a>
<b>5. Stakeholder Engagement</b>			
2-29	Approach to stakeholder engagement	GWLRA website	<a href="#">website</a>
2-30	Collective bargaining agreements	2024 Annual Review – Data Tables	43
<b>GRI 3 – Material Topics (2021)</b>			
3-1	Process to determine material topics	2024 Annual Review – Approach to Reporting, Risk Management, 2023 Annual Review – Setting the Right Priorities, GWLRA website	2-3, 10, <a href="#">2023 AR website</a> (pages 9-11), <a href="#">website</a>
3-2	List of material topics	2024 Annual Review – How We Create Value, Risk Management, Strategy, GWLRA website	7-8, 10, 11, <a href="#">website</a>
3-3	Management of material topics	See the Topic Standards Index for the management approach of each material topic, GWLRA website	49-52, <a href="#">website 1</a> , <a href="#">website 2</a>

Topic Standards		Section/Location	Annual Review Page
<b>GRI 200: Economic Standard Series</b>			
<b>201 – Economic Performance (2016)</b>			
3-3	Management approach	2024 Annual Review – How We Create Value, Risk Management, Strategy, GWLRA website	7-8, 9, 10 <a href="#">website 1</a> , <a href="#">website 2</a>
201-1	Direct economic value generated and distributed	2024 Annual Review – Performance, 2024 Highlights, Deliver Strong, Long-term Returns, Data Tables	12, 13, 17-22, 45
201-2	Financial implications, risks and opportunities due to climate change	2024 Annual Review – Reduce Our Environmental Footprint	33-36
<b>203 – Indirect Economic Impacts (2016)</b>			
3-3	Management approach	2024 Annual Review – Strategy, GWLRA website	11, <a href="#">website 1</a> , <a href="#">website 2</a>
203-1	Infrastructure investments and services supported	2024 Annual Review – Performance, Deliver Strong, Long-term Returns, Contribute to Stronger, Livable Communities, GWLRA website	12, 17, 20, 29-32, <a href="#">website</a>
203-2	Significant indirect economic impacts	2024 Annual Review – Performance, 2024 Highlights, Contribute to Stronger, Livable Communities, GWLRA website	12, 13-14, 29-32, <a href="#">website</a>
<b>204 – Procurement Practices (2016)</b>			
3-3	Management approach	2024 Annual Review – Strategy, Achieve Performance Excellence, GWLRA website	11, 25, <a href="#">website 1</a> , <a href="#">website 2</a>
<b>205 – Anti-Corruption (2016)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Operate with Integrity and Trust, GWLRA website	10, 12, 15-16, <a href="#">website</a>
205-2	Communication and training on anti-corruption policies and procedures	2024 Annual Review – Performance, Operate with Integrity and Trust, Data Tables, GWLRA website	12, 15-16, 44, <a href="#">website</a>
<b>206 – Anti-Competitive Behaviour (2016)</b>			
3-3	Management approach	GWLRA website	<a href="#">website</a>
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	In 2024, there were no such legal actions served.	N/A
<b>GRI 300: Environmental Standard Series</b>			
<b>302 – Energy (2016)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Strategy, Reduce Our Environmental Footprint, GWLRA website	10, 11, 33-36, <a href="#">website</a>
302-1	Energy consumption within the organization	2024 Annual Review – Data Tables	39-40

Topic Standards		Section/Location	Annual Review Page
302-3/ CRE 1	Energy intensity	2024 Annual Review – Performance, Reduce Our Environmental Footprint, Data Tables	12, 36, 40
302-4	Reduction of energy consumption	2024 Annual Review – Reduce Our Environmental Footprint, Data Tables	35, 40
<b>303 – Water and Effluents (2018)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Strategy, Reduce Our Environmental Footprint, GWLRA website	10, 11, 33-36, <a href="#">website</a>
303-3	Water withdrawal	2024 Annual Review – Data Tables	41
303-5	Water consumption	2024 Annual Review – Reduce Our Environmental Footprint, Data Tables	36, 41
CRE 2	Building water intensity	2024 Annual Review – Performance, Reduce Our Environmental Footprint, Data Tables, GWLRA website	12, 36, 41, <a href="#">website</a>
<b>305 – Emissions (2016)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Strategy, Reduce Our Environmental Footprint, GWLRA website	10, 11, 33-36, <a href="#">website</a>
305-1	Direct greenhouse gas (GHG) emissions (Scope 1)	2024 Annual Review – Data Tables	38
305-2	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	2024 Annual Review – Data Tables	38
305-3	Other indirect greenhouse gas (GHG) emissions (Scope 3)	2024 Annual Review – Data Tables	39
305-4/ CRE 3	Greenhouse gas (GHG) emissions intensity	2024 Annual Review – Performance, Reduce Our Environmental Footprint, Data Tables, GWLRA website	12, 35-36, 39, <a href="#">website</a>
305-5	Reduction of greenhouse gas (GHG) emissions	2024 Annual Review – Data Tables	38-39
<b>306 – Waste (2020)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Strategy, Reduce Our Environmental Footprint, GWLRA website	10, 11, 33-36, <a href="#">website</a>
306-3	Waste generated	2024 Annual Review – Reduce Our Environmental Footprint, Data Tables	36, 40
306-4	Waste diverted from disposal	2024 Annual Review – Data Tables	40
306-5	Waste directed to disposal	2024 Annual Review – Data Tables	40
<b>308 – Supplier Environmental Assessment (2016)</b>			
3-3	Management approach	GWLRA website	<a href="#">website 1</a> , <a href="#">website 2</a>

Topic Standards		Section/Location	Annual Review Page
<b>GRI 400: Social Standard Series</b>			
<b>401 – Employment (2016)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Attract and Retain Top Talent, GWLRA website	10, 26-28, <a href="#">website 1</a> , <a href="#">website 2</a>
401-1	New employee hires and employee turnover	2024 Annual Review – Data Tables	43-44
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	GWLRA website	<a href="#">website</a>
<b>403 – Occupational Health and Safety (2018)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Achieve Performance Excellence, GWLRA website	10, 25, <a href="#">website</a>
403-1	Occupational health and safety management system	2024 Annual Review – Data Tables, GWLRA website	42, <a href="#">website</a>
403-8/ CRE 6	Workers' representation in formal joint management-worker health and safety committees	2024 Annual Review – Data Tables	42
403-9	Work-related injuries	2024 Annual Review – Data Tables	42
<b>404 – Training and Education (2016)</b>			
3-3	Management approach	2024 Annual Review – Attract and Retain Top Talent, GWLRA website	26-28, <a href="#">website</a>
404-1	Average hours of training per year per employee	2024 Annual Review – Data Tables	44
404-2	Programs for upgrading employee skills and transition assistance programs	2024 Annual Review – Attract and Retain Top Talent, Data Tables	26-28, 44, <a href="#">website</a>
404-3	Percentage of employees receiving regular performance and career development reviews	2024 Annual Review – 2024 Highlights All GWLRA employees participate in mid and end-of-year performance reviews with their leader.	14
<b>405 – Diversity and Equal Opportunity (2016)</b>			
3-3	Management approach	2024 Annual Review – Performance, Attract and Retain Top Talent	12, 26-28
405-1	Diversity of governance bodies and employees	2024 Annual Review – Data Tables, GWLRA website	43, <a href="#">website</a>

Topic Standards		Section/Location	Annual Review Page
<b>406 – Non-Discrimination (2016)</b>			
3-3	Management approach	Great-West Lifeco Code of Conduct	<a href="#">Code of Conduct</a> (p. 24)
406-1	Total number of incidents of discrimination and corrective actions taken	Due to the size and nature of GWLRA's operations, it is subject to examinations, investigations, administrative, and civil proceedings in the normal course of business. Such matters are dealt with in accordance with all applicable laws, policies, standards and guidelines.	N/A
<b>410 – Security Practices (2016)</b>			
3-3	Management approach	GWLRA website	<a href="#">website</a> , see Topic Standard 416, disclosure 3-3
<b>413 – Local Communities (2016)</b>			
3-3	Management approach	2024 Annual Review – Strategy, 2024 Highlights, Contribute to Stronger, Livable Communities, GWLRA website	11, 14, 29-32, <a href="#">website</a>
<b>416 – Customer Health and Safety (2016)</b>			
3-3	Management approach	GWLRA website – Building Security and Life Safety, Health, Safety and Security	<a href="#">website 1</a> , <a href="#">website 2</a>
416-1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	2024 Annual Review – Data Tables	42
416-2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes	Due to the size and nature of GWLRA's operations, it is subject to examinations, investigations, administrative, and civil proceedings in the normal course of business. Such matters are dealt with in accordance with all applicable laws, policies, standards and guidelines.	N/A
<b>418 – Customer Privacy (2016)</b>			
3-3	Management approach	2024 Annual Review – Risk Management, Operate with Integrity and Trust, GWLRA website	10, 15-16, <a href="#">website</a>
<b>417 – Marketing and Labelling/Product and Service Labelling (2016)</b>			
CRE 8	Type and number of sustainability certification, rating and labelling schemes for new construction, management, occupation, and redevelopment	2024 Annual Review – Data Tables	41