

GRI Index

GWLRA has reported the information cited in this GRI content index for the period January 1, 2025 to December 31, 2025 with reference to the GRI Standards.

GRI 1: Foundation 2021.

GRI 2 – General Disclosures (2021)	Section/Location	Page/Link	
1. The Organization and Its Reporting Practices			
2-1	Organizational details	2025 Reducing Our Environmental Footprint – About this Report, About Us, GWLRA website	2, 3, website 1 , website 2
2-2	Entities included in the organization’s sustainability reporting	2025 Reducing Our Environmental Footprint – About this Report. GWLRA’s financial reporting is consolidated and reported under its parent company, Canada Life.	2
2-3	Reporting period, frequency and contact point	2025 Reducing Our Environmental Footprint – About this Report, back cover, Canada Life website. GWLRA’s financial reporting is consolidated and reported annually by its parent company, Canada Life.	2, back cover, website (p. 114)
2-4	Restatements of information	In the 2025 report, GWLRA did not make any restatements for previous reporting periods.	N/A
2-5	External assurance	2025 Reducing Our Environmental Footprint – About this Report “Data Coverage”, Great-West Lifeco Inc. CDP Report	2, website
2. Activities and Workers			
2-6	Activities, value chain and other business relationships	2025 Reducing Our Environmental Footprint – About this Report, About Us, 2025 GWLRA by the Numbers, GWLRA website. In 2025, there were no other significant changes to the organization or supply chain.	2, 3, 4, website 1 , website 2
2-7	Employees	2025 Reducing Our Environmental Footprint – Data Tables	20-21
2-8	Workers who are not employees	2025 Reducing Our Environmental Footprint – Data Tables. In 2025, there were no other significant fluctuations in the number of workers who are not employees.	20
3. Governance			
2-9	Governance structure and composition	2025 Reducing Our Environmental Footprint – Doing What’s Right “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 Inc. Board of Directors and Board committees is available on the Great-West Lifeco Inc. website.	3, website 1 , website 2 , website 3 , website 4
2-10	Nomination and selection of the highest governance body	Great-West Lifeco Inc. website (see note 2-9 above)	website (pp. 3-5)
2-11	Chair of the highest governance body	2025 Reducing Our Environmental Footprint – Doing What’s Right “Governance”, GWLRA website	3, website 1 , website 2

GRI 2 – General Disclosures (2021)	Section/Location	Page/Link	
2-12	Role of the highest governance body in overseeing the management of impacts	2025 Reducing Our Environmental Footprint – Doing What’s Right, Strategy, GWLRA website	3, 5, website 1 , website 2 , website 3
2-13	Delegation of responsibility for managing impacts	2025 Reducing Our Environmental Footprint – About this Report, Doing What’s Right, GWLRA website	2, 3, website
2-14	Role of the highest governance body in sustainability reporting	2025 Reducing Our Environmental Footprint – About this Report	2
2-15	Conflicts of interest	GWLRA website, Great-West Lifeco Inc. Code of Conduct	website , Code of Conduct (pp. 9-11)
2-16	Communication of critical concerns	GWLRA website	website
2-18	Evaluation of the performance of the highest governance body	2025 Reducing Our Environmental Footprint – About this Report, GWLRA website	2, website (pp. 3-5)
2-19	Remuneration policies	Canada Life website. GWLRA follows the remuneration and compensation policies of its parent company, Canada Life.	website
2-20	Process to determine remuneration	Canada Life website. GWLRA follows the remuneration and compensation policies of its parent company, Canada Life.	website
4. Strategy, Policies and Practices			
2-22	Statement on sustainable development strategy	2025 Reducing Our Environmental Footprint – Strategy, Setting the Standard for Responsible Environmental Performance, 2025 Annual Review – President’s Message	5, 6, Annual Review (p. 4)
2-23	Policy commitments	2025 Reducing Our Environmental Footprint – Doing What’s Right, 2025 Annual Review – Ready, GWLRA website	3, Annual Review (p. 9), website
2-24	Embedding policy commitments	2025 Reducing Our Environmental Footprint – Doing What’s Right, Proactive Environmental Health and Safety Assessments, GWLRA website	3, 10, website
2-25	Process to remediate negative impacts	2025 Reducing Our Environmental Footprint – Doing What’s Right, GWLRA website, Great-West Lifeco Inc.’s website (Code of Conduct, Ethics Hotline)	3, website 1 , website 2 , website 3 (p. 22), website 4
2-26	Mechanisms for seeking advice and raising concerns	2025 Annual Review – Ready, GWLRA website, Great-West Lifeco Inc.’s website (Code of Conduct, Ethics Hotline)	Annual Review (p. 9), website 1 , website 2 , website 3
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
2-28	Membership associations	2025 Annual Review – Community Impact: Executing with Purpose, GWLRA website	Annual Review (p. 18), website

GRI 2 – General Disclosures (2021)		Section/Location	Page/Link
5. Stakeholder Engagement			
2-29	Approach to stakeholder engagement	GWLRA website	website
2-30	Collective bargaining agreements	2025 Reducing Our Environmental Footprint – Data Tables	20
GRI 3 – Material Topics (2021)			
3-1	Process to determine material topics	2025 Reducing Our Environmental Footprint – About this Report, Doing What’s Right, 2023 Annual Review – Setting the Right Priorities, GWLRA website	2, 3, 2023 Annual Review (pp. 9-11), website
3-2	List of material topics	2025 Reducing Our Environmental Footprint – Strategy, GWLRA website	5, website
3-3	Management of material topics	See the Topic Standards Index for the management approach of each material topic, GWLRA website	26-29, website 1 , website 2

Topic Standards		Section/Location	Page/Link
GRI 200: Economic Standard Series			
201 – Economic Performance (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Doing What's Right, Strategy, GWLRA website	3, 5, website 1 , website 2
201-1	Direct economic value generated and distributed	2025 Reducing Our Environmental Footprint – 2025 GWLRA by the Numbers, Data Tables, 2025 Annual Review – 2025 Performance Highlights, Go	4, 22, Annual Review (pp. 6, 14-15)
201-2	Financial implications, risks and opportunities due to climate change	2025 Reducing Our Environmental Footprint – Setting the Standard for Responsible Environmental Performance, Managing Climate Risks for our Clients and Tenants, Building Climate-Resilient Strategies, Improving Operating Eco-efficiency	6, 8, 12
203 – Indirect Economic Impacts (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Strategy, GWLRA website	5, website 1 , website 2
203-1	Infrastructure investments and services supported	2025 Reducing Our Environmental Footprint – 2025 GWLRA by the Numbers, 2025 Annual Review – 2025 Performance Highlights, Go, Community Impact: Executing with Purpose, GWLRA website	4, Annual Review (pp. 6, 14-15, 18), website
203-2	Significant indirect economic impacts	2025 Annual Review – 2025 Performance Highlights, Community Impact: Executing with Purpose, GWLRA website	6, 18, website
204 – Procurement Practices (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Strategy, 2025 Annual Review – Set, GWLRA website	5, Annual Review (p. 11), website 1 , website 2
205 – Anti-Corruption (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Doing What's Right, GWLRA website	3, website
205-2	Communication and training on anti-corruption policies and procedures	2025 Reducing Our Environmental Footprint – Strategy, Data Tables, 2025 Annual Review – Set, GWLRA website	5, 22, Annual Review (p. 12), website
206 – Anti-Competitive Behaviour (2016)			
3-3	Management approach	GWLRA website	website
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	In 2025, there were no such legal actions served.	N/A

Topic Standards		Section/Location	Page/Link
GRI 300: Environmental Standard Series			
302 – Energy (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – About this Report, Strategy, Elevating Our Sustainable Performance, Improving Operating Eco-efficiency, GWLRA website	2, 5, 9, 12, website
302-1	Energy consumption within the organization	2025 Reducing Our Environmental Footprint – Data Tables	16-17
302-3/ CRE 1	Energy intensity	2025 Reducing Our Environmental Footprint – Improving Operating Eco-efficiency, Data Tables	12, 16
302-4	Reduction of energy consumption	2025 Reducing Our Environmental Footprint – Data Tables	16-17
303 – Water and Effluents (2018)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – About this Report, Strategy, Elevating Our Sustainable Performance, Improving Operating Eco-efficiency, Continued Focus on Water Conservation and Waste Reduction, GWLRA website	2, 5, 9, 12, 13, website
303-3	Water withdrawal	2025 Reducing Our Environmental Footprint – Data Tables	18
303-5	Water consumption	2025 Reducing Our Environmental Footprint – Improving Operating Eco-efficiency, Data Tables	12, 18
CRE 2	Building water intensity	2025 Reducing Our Environmental Footprint – Elevating Our Sustainable Performance, Improving Operating Eco-efficiency, Continued Focus on Water Conservation and Waste Reduction, Data Tables, GWLRA website	9, 12, 13, 18, website
305 – Emissions (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – About this Report, Strategy, Managing Climate Risks for Our Clients and Tenants, Improving Operating Eco-efficiency, GWLRA website	2, 5, 8, 12, website
305-1	Direct greenhouse gas (GHG) emissions (Scope 1)	2025 Reducing Our Environmental Footprint – Data Tables	15
305-2	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	2025 Reducing Our Environmental Footprint – Data Tables	15
305-3	Other indirect greenhouse gas (GHG) emissions (Scope 3)	2025 Reducing Our Environmental Footprint – Data Tables	16
305-4/ CRE 3	Greenhouse gas (GHG) emissions intensity	2025 Reducing Our Environmental Footprint – Managing Climate Risks for Our Clients and Tenants, Improving Operating Eco-efficiency, Data Tables, GWLRA website	8, 12, 16, website
305-5	Reduction of greenhouse gas (GHG) emissions	2025 Reducing Our Environmental Footprint – Data Tables	15-16
306 – Waste (2020)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – About this Report, Strategy, Elevating Our Sustainable Performance, Improving Operating Eco-efficiency, Continued Focus on Water Conservation and Waste Reduction, GWLRA website	2, 5, 9, 12, 13, website

Topic Standards		Section/Location	Page/Link
306-3	Waste generated	2025 Reducing Our Environmental Footprint – Improving Operating Eco-efficiency, Data Tables	12, 17
306-4	Waste diverted from disposal	2025 Reducing Our Environmental Footprint – Data Tables	17
306-5	Waste directed to disposal	2025 Reducing Our Environmental Footprint – Data Tables	17
308 – Supplier Environmental Assessment (2016)			
3-3	Management approach	GWLRA website	website 1 , website 2
GRI 400: Social Standard Series			
401 – Employment (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Strategy, 2025 Annual Review – Ready, GWLRA website	5, Annual Review (pp. 8-9), website 1 , website 2
401-1	New employee hires and employee turnover	2025 Reducing Our Environmental Footprint – Data Tables	20-21
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	GWLRA website	website
403 – Occupational Health and Safety (2018)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Doing What’s Right, Proactive Environmental Health and Safety Assessments, 2025 Annual Review – Ready, GWLRA website	3, 10, Annual Review (p. 9), website
403-1	Occupational health and safety management system	2025 Reducing Our Environmental Footprint – Data Tables, GWLRA website	19, website
403-8/ CRE 6	Workers’ representation in formal joint management-worker health and safety committees	2025 Reducing Our Environmental Footprint – Data Tables	19
403-9	Work-related injuries	2025 Reducing Our Environmental Footprint – Data Tables	19
404 – Training and Education (2016)			
3-3	Management approach	GWLRA website	website
404-1	Average hours of training per year per employee	2025 Reducing Our Environmental Footprint – Data Tables	21
404-2	Programs for upgrading employee skills and transition assistance programs	2025 Reducing Our Environmental Footprint – Data Tables, 2025 Annual Review – Ready, GWLRA website	21-22, Annual Review (pp. 8-9), website
404-3	Percentage of employees receiving regular performance and career development reviews	All GWLRA employees participate in mid and end-of-year performance reviews with their leader.	N/A

Topic Standards		Section/Location	Page/Link
405 – Diversity and Equal Opportunity (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Strategy, Great-West Lifeco Inc. Code of Conduct	5, Code of Conduct (p. 24)
405-1	Diversity of governance bodies and employees	2025 Reducing Our Environmental Footprint – Data Tables, GWLRA website	20-21, website
406 – Non-Discrimination (2016)			
3-3	Management approach	GWLRA website – Great-West Lifeco Inc. Code of Conduct	Code of Conduct (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
410 – Security Practices (2016)			
3-3	Management approach	GWLRA website	website , see Topic Standard 416, disclosure 3-3
413 – Local Communities (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Strategy, 2025 Annual Review – Community Impact: Executing with Purpose, GWLRA website	5, Annual Review (p. 18), website
416 – Customer Health and Safety (2016)			
3-3	Management approach	GWLRA website – Building Security and Life Safety, Health, Safety and Security	website 1 , website 2
416-1	Percentage of significant product and service categories for which health and safety impacts are assessed for improvement	2025 Reducing Our Environmental Footprint – Data Tables	19
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
418 – Customer Privacy (2016)			
3-3	Management approach	2025 Reducing Our Environmental Footprint – Doing What's Right, 2025 Annual Review – Set, GWLRA website	3, Annual Review (p. 12), website
417 – Marketing and Labelling/Product and Service Labelling (2016)			
CRE 8	Type and number of sustainability certification, rating and labelling schemes for new construction, management, occupation, and redevelopment	2025 Reducing Our Environmental Footprint – Data Tables	18