

Integrity

as the basis for lasting relationships

As a financial service provider, Achmea is at the heart of society. An inclusive society in which everyone participates and lives pleasantly and healthily with and next to each other. In a way that can last for a long time.

Together with our customers, strategic partners and relations, we solve major social issues related to health, living & working, mobility and income. Based on the vision of Sustainable Living Together, Achmea has the ambition to create sustainable value for customers, employees, the company and society.

Creating sustainable value means, among other things, that we work together on the basis of trust. Trust is essential for the functioning of Achmea and the financial system as a whole. Achmea wants to prevent this trust from being eroded. For example, Achmea does not enter into relationships with persons or organisations involved in illegal or unethical activities, money laundering, corruption and other forms of fraudulent or criminal activity. With the Risk Framework for the management of integrity, Achmea gives substance to protecting this trust.

Achmea has developed its Risk Framework for the management of integrity in several policy documents and processes. We highlight several of them using two angles:

- 1. Integrity from an organisational perspective:** integrity and fraud policies apply for the management of integrity risks by the organisation, its employees and products.
- 2. Integrity from the customer and relationship perspective:** for the management of relationship integrity risks - following from the obligations of the Dutch Financial Supervision Act (Wft), Sanctions Act 1977 (Sw) and Money Laundering and Terrorist Financing Act (Wwft) - the Customer Due Diligence policy (CDD policy) applies.

Together, both measures contribute to the way in which Achmea shapes and gives substance to its vision and strategy around the theme of integrity.

The explanatory memorandum below is a summary and not a complete overview of all existing measures.

1. Integrity from an organisational perspective

Based on the Sustainable Living Together vision, Achmea focuses on promoting a culture in which trust, integrity and establishing and maintaining sustainable relationships are central.

Code of conduct

This has been elaborated in Achmea's General Code of Conduct. This applies to all employees. The code of conduct sets out the standards of conduct that relates dealing with each other, customers and suppliers, company assets and company information. But also about dealing with (the appearance of) conflicts of interest, with errors and incidents and dealing with complaints.

An important starting point of the code of conduct is to safeguard internal integrity. Achmea does not accept integrity violations that may pose a threat to the (financial) interests of customers, employees and the continuity and/or integrity of Achmea, the financial sector and society.

Integrity and Fraud

For the elaboration on the components in the code of conduct, the Integrity and Fraud Policy has been drawn up and forms the basis for a framework that manages these risks. Elements of this policy ensure the control of external and internal fraud, corruption and bribery, including facilitating payments in relation to government bodies. Achmea does not accept some form of corruption, (appearance of) conflict of interest or bribery and applies contractual anti-corruption provisions.

Within the Acceptance Policy, potential customers are tested against referral registers such as EVA/EVR/IVR a mandatory component, because Achmea attaches great importance to financial integrity system. In the event of serious integrity violations or violations of laws and regulations by third parties Achmea can proceed to an IVR/EVR registration and report to the police and in the event of internal fraud, employment law measures are conceivable.

Conflicts of interest policy

This policy document describes how Achmea deals with (potential) conflicts of interest and which measures are taken within Achmea to identify, prevent and manage (potential) conflicts of interest. To report a conflict of interest, an employee should use the reporting form prepared for this purpose.

Promotional gifts

The Promotional Gifts and Invitations Policy sets out the standards and the reporting and assessment cycle when providing or receiving promotional gifts and/or invitations. Anti-corruption provisions (Procurement Code of Conduct) also apply to the procurement policy and a management cycle ensures correct implementation and control. The Sponsorship and Donations Policy and the associated assessment process ensure honest decision-making.

Integrity and Market

Inside trading or price manipulation is prevented by measures within the Market Abuse Policy and Insider Policy. The Competition Policy aims to prevent infringements of competition law.

Information security and privacy

Responsible use of data and privacy-sensitive data are laid down in the Information Security Policy and the Achmea Privacy Policy. These policy documents also provide for the prevention of (intentional) breaches.

Products and Duty of Care

The Product development Policy and the Achmea Guiding Principles are aimed at putting the customer's interests first, whereby fraud sensitivity or abuse are also part of the management cycle.

Integrity of employees

The Screening Policy and associated regulations are aimed at employing only honest and expert employees and directors and at guaranteeing ethical behaviour during employment. When employees may be guilty of an integrity violation (e.g. theft), an investigation can be initiated in accordance with the Personal Investigation policy.

Whistleblower policy

Achmea has a Whistleblower policy and (internal and external) confidential advisers where internal abuses and behaviour can be reported confidentially.

Outsourcing policy

The Outsourcing Policy ensures that Achmea employees act professionally, ethically and with integrity in procurement and outsourcing processes. The purchasing code of conduct applies to employees involved in a purchasing or outsourcing process.

2. Integrity from a customer and relationship perspective

In addition to customers, CDD also covers a larger group of relationships such as beneficiaries, suppliers, intermediaries and healthcare providers.

As mentioned earlier, Achmea stands for Sustainable Living Together. An inclusive society in which everyone participates and lives pleasantly and healthily with and next to each other. In a way that can last for a long time. This includes a safe society, without financial crime. That is why the integrity of Achmea's internal and external relations is a fundamental starting point in this endeavour. This is reflected in entering into relationships with, among others, employees, customers, suppliers, intermediaries, healthcare providers and financial companies. In order to guarantee our services, it is important that we know our relations well. The know-your-client principle forms the basis for this, with which the interests of the client as well as Achmea, as well as society, are served.

Relational integrity

To control relational integrity, Achmea periodically carries out risk analyses. In order to manage identified risks, Achmea conducts research into the identity, nature and background of business relationships, among other things. Both prior to the conclusion of the agreement or the service and during the term. This is part of the Customer Due Diligence (CDD) policy. In the CDD policy, Achmea sets out its principles, frameworks and guidelines for the management of relational integrity risks. The control framework is based on current laws and regulations and relevant policies or guidelines from public parties such as ministries and regulators.

Relationship Due Diligence

In order to prevent the risks of violation of, among others, the Sanctions Act, money laundering and terrorist financing, Achmea carries out a relationship research in advance. In doing so, we examine, among other things, who the relationship is, what activities it performs and who the ultimate stakeholders are within a legal entity. In the case of our Wwft institutions, the investigation focuses on determining whether the relationship is a Politically Exposed Person (PEP) and what the origin of the assets is. In this way we determine whether the relationship or ultimate stakeholder poses a (reputational) risk. We also carry out checks during the term of the agreement and in the event of payments. If there is a hit on the sanctions lists, we freeze the assets of the relationship and report to the regulator, and when unusual transactions are detected, we report to the Financial Intelligence Unit.

Suppliers

Supplier Due Diligence (SDD) focuses on screening potential business relationships with suppliers, while also managing risks related to corruption, bribery or forms of conflict of interest with our own employees. This includes internal integrity measures.

Tax policy

In addition, Achmea takes measures regarding the management of risks on the basis of international standards, such as tax legislation (FATCA/CRS), whereby the Tax Policy ensures that Achmea does not enable customers to evade tax regulations.