

# Whistleblower policy



# Inhoud

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## Reporting a suspicion of abuse

Reporting a suspicion of abuse.



## Notification procedure

Describes who the reporting person can report to.



## Investigation procedure

Describes the procedure and decision-making in an investigation.



## Confidentiality

Describes the confidentiality obligation of all parties involved.



## Legal Protection

Describes that the reporting person receives legal protection.



## Reports outside Achmea

Describes the possibilities for making an external report.



## Coming into force

Describes the process of updating and internal alignment.



## Glossary

Gives a description of the most important concepts in the scheme.



## Version history

Describes when the Whistleblower Policy was last updated and when it was approved.

# 1. The Whistleblower Policy

**Anyone who works for Achmea (or one of the companies) can report a suspicion of abuse.**

The report will be handled with care.

There are no adverse consequences for the reporting person if the reporting person has reasonable grounds to believe that the information reported about the suspicion of abuse is correct at the time of the report.

A description of some words is given in the glossary in paragraph 9.

This policy is the English translation of the Achmea Klokkenluidersregeling. In case of contradictions or ambiguities, the Achmea Klokkenluidersregeling is leading.



## 2. Reporting a suspicion of abuse

### Who can make a report?

The following persons can make a report on the basis of this regulation:

- The person who performs work for Achmea on the basis of an employment contract or the person who performs work for Achmea in any way other than as an employee
- Applicants
- Shareholders and persons belonging to the administrative, management or supervisory body of a company, including members not involved in its day-to-day management
- Volunteers and interns
- Everyone who works for Achmea under the supervision and direction of contractors, subcontractors and suppliers

Achmea prefers to receive your report no later than 1 year after the end of your work for Achmea. Even after the period of 1 year, your report can still be processed if it is sufficiently concrete and relevant.

If you wish to report the suspicion of abuse, you can do so with the internal or external confidential adviser.

What constitutes abuse follows from the Whistleblower Protection Act and that definition can be found in the glossary in section 9.

Usually, the situation affects several people, the abuse occurs regularly and the consequences can be serious. There may also be a violation of the law, danger to public health, safety of persons or to the proper functioning of Achmea.

## 3. How can you report a suspicion of abuse?

### 3.1 You report a suspicion of abuse according to the Whistleblower Policy

- A. You can report a suspicion of abuse within Achmea on the basis of this Whistleblower Policy. You can submit a report if the interests of Achmea, third parties or the protection of your own position within Achmea so require. For example, because you fear that a report to your own management could have adverse consequences for your position or if previous reports have not been acted upon.
- B. The report can be made in writing, verbally (by telephone or another voice message system) or at your request by means of an on-site conversation. The on-site interview will take place within a reasonable period of time.
- C. A report by telephone, another voice message system or a conversation on location is recorded by means of a permanently retrievable recording of the conversation or accurate written reproduction thereof.

The conversation will only be recorded if you, as the reporting person, agree to record it. The written record may be checked and corrected by you. After that, the written copy will be signed by you for approval.

### 3.2 Where can you go if you want to make a report?

#### You can contact the internal confidential adviser

It is preferable to report the suspicion of abuse to the internal confidential adviser.

#### You can contact the external confidential adviser

You do not have to report the suspicion of abuse to the internal confidential adviser, but you can report it to the external confidential adviser.

The external confidential adviser will inform the internal confidential adviser anonymously about the receipt of the report, unless there are valid reasons not to do so.

### 3.3 Support in making a report

#### Someone can help you issue a report

The chairman of the Central Working Council ([COR](#)) can advise you on how to issue a report. An external adviser can also help you (in confidence) in making the report. You can also choose to have this adviser make the report on your behalf as an 'authorised representative'.

## If there is another procedure, we will be happy to help you there

If there is another procedure within Achmea where your report can be handled, you will be referred. If your report is not picked up there, your report will be dealt with under the Whistleblower Policy. For example: You can report a suspected incident in accordance with the Incident Management Guideline. Handling will continue on the basis of the Incident Management Guideline.

## Report anonymously

It is also possible to make an anonymous report. You may be asked to participate in the investigation. You are not obliged to participate.

## Publication

You may report the suspicion of abuse to a confidential adviser or make it public. Even if your (employment) contract with Achmea states that you are obliged to maintain confidentiality.

If you opt for disclosure, you must comply with the rules set out in the Whistleblower Protection Act.

## 3.4 What can you expect once you have made a report?

### Confidential treatment of your report

Every report will be treated confidentially. This means that your identity as a reporting person will not be included in the communication. In addition, each report is given a case number, which allows for confidential treatment.

Even if you do not mind that your name is mentioned, it will only be released in communication about the report, if there is a (legal) obligation to do so.

Achmea is not allowed to ask the internal and external confidential adviser to disclose your personal data as a reporting person.

### You will be asked to share relevant information

You provide all information that is known to you and that may be necessary to assess the report and, if necessary, to enable an investigation into the report. Article 3.6 also applies here.

### You will receive a confirmation of your report

If you have shared your personal data with the internal or external confidential adviser, you will receive a written confirmation of receipt within 7 days of receipt of the report. This will include at least your name as the reporting person, a short description of your report and the date on which your report was received.

No later than three months after sending this confirmation, you as the reporting person will be informed about the assessment of the report and the possible follow-up of the report.

### 3.5 What does the confidential adviser do with your report?

#### Registration and file creation

The internal or external confidential adviser registers your report with an anonymized file. This is where all the steps are recorded. The confidential adviser stores this file in a secure environment to which only the confidential adviser has access. The data will be destroyed as soon as this data is no longer necessary on the

#### Decision whether or not to do research

The internal or external confidential adviser decides whether or not to initiate an investigation. The confidential adviser is advised by the advisory committee on this decision and its implementation.

The confidential adviser may decide not to initiate an investigation if:

- It is known that the report does not relate to the suspicion of abuse
- The reported suspicion of abuse or the information about a violation is not sufficiently serious

- Insufficient information was provided by the reporting person to be able to assess the report.

If no investigation is initiated, you as a reporting person will be informed of this decision within 2 weeks of your report at the latest. The decision also explains why no investigation is being conducted. This decision will be confirmed in writing if you, as the reporting person, request it.

#### Informing the Board of Directors

The confidential adviser can, after consultation with you as the reporting person, inform the chairman of the Board of Directors of the report.

If the report relates to a member of the Board of Directors, the chairman of the Board of Directors of the report will be informed. If the report relates to the chairman of the Board of Directors, the chairman of the Supervisory Board will be informed.

This notification takes into account the confidential treatment. The external confidential adviser will only inform the chairman of the Board of Directors or the Supervisory Board if he has reasonable grounds to believe that further investigation is in Achmea's interest.

## 4. What does the investigation look like?

### 4.1 Execution of the research

If the confidential adviser has an investigation initiated, he/she will ensure that the investigation is carried out as soon as possible. The investigation can be carried out by Conduct Compliance, Internal Audit (IA) or another department of Achmea Compliance.

Achmea aims to complete the investigation within 6 weeks. The results of the investigation will be shared with the confidential adviser and the advisory committee.

The external confidential adviser will not share the results with the internal confidential adviser if there are good reasons for doing so.

The confidential adviser will inform you as the reporting person about the results of the investigation, unless the interests of the investigation do not allow this. In that case, the information shall be limited to the decision referred to in article 4.2 below.

### 4.2 A decision will be made based on the results of the investigation

The confidential adviser decides, after advice from the advisory committee, whether further action should be taken to remedy the abuse or violation of Union law.

This decision will be taken and communicated to the person or body of Achmea to whom the report relates. This shall be done within a period of two weeks from the date on which the results of the investigation were communicated to the reporting person.

### 4.3 Monitoring compliance with the advice

Together with the advisory committee, the internal confidential adviser supervises compliance with the advice. The person or body to whom the advice has been given must provide the internal confidential adviser with all the information necessary to determine whether and how the advice has been followed.

If the advice of the confidential adviser is not followed or is not followed sufficiently, she may decide to report this to the chairman of the Board of Directors, or the chairman of the Supervisory Board if the advice concerns the chairman of the Board of Directors.

If the Board of Directors does not follow a recommendation sufficiently, the confidential adviser may decide to report this to the chairman of the Supervisory Board.

#### 4.4 Annual reporting

The internal and external confidential advisers report on their activities to the Board of Directors and the COR within six months of the end of the calendar year.

The Board of Directors of the relevant group unit will receive a copy of the part of the report concerning it. The reports of the internal and external confidential adviser are general in nature and no personal data is reported.

The number of reports is included in Achmea's annual report.

## 5. Confidentiality

Everyone involved in the report must ensure complete confidentiality, unless they are allowed to share the information with a third party on the basis of this regulation or law.



## 6. Legal Protection

### 6.1 Protection of the reporting person

As a reporting person and third party involved, you will not be disadvantaged in your position with Achmea in any way as a result of a report. This is subject to the condition that you, as a reporting person, have reasonable grounds to believe that the information reported about the suspicion of abuse is correct at the time of the report.

### 6.2 Protection of the confidential adviser and the advisory committee

The internal confidential adviser and the members of the advisory committee are in no way disadvantaged in their position because of the performance of their duties under this regulation.

### 6.3 Involvement of the reporting person in a report

The legal protection described in Article 6.1 only applies to a reporting person who acts in good faith. The legal protection does not extend to a reporting person who has knowingly provided false information or who has participated in or caused an incident or violation of Union law.

### 6.4 Data subject in the event of an incident or violation of Union law

Achmea ensures that the person who is or appears to be involved in a report is treated carefully and receives at least the protection to which he is entitled on the basis of the law.



## 7. Reports outside Achmea (External reporting channels)

Achmeanet contains information on how to report abuse, suspicion of abuse or information about a violation of Union law outside Achmea to competent authorities and, where applicable, to institutions, bodies, offices and agencies of the European Union.

## 8. Coming into force

This regulation will enter into force on 12 November 2007. This regulation has been adopted by the Board of Directors of Achmea and has the approval of the Central Works Council (COR).

In June 2023, this regulation was updated by Compliance and legal affairs. The new regulation has been coordinated with the Board of Directors of Achmea. The Central Works Council approved the new regulation on 11 December 2023.

## 9. Glossary

This regulation contains the following concepts:

### Abuse

- A. a breach or a risk of breach of Union law, or
- B. an act or omission in which the public interest is at stake in:
  - 1. an event in the event of a (risk of) violation of a legal provision or internal rules,
  - 2. a danger to public health, a danger to the safety of persons, a danger to the deterioration of the environment, a danger to the proper functioning of Achmea as a result of an improper act or omission, and/or
  - 3. an event that poses a serious threat to Achmea's ethical business operations, caused by the conduct of a client, staff member, director, supervisor, supervisory director, qualified shareholder or by a natural or legal person who performs work for the institution, and/or
  - 4. an intentional act by one or more persons from the circle of management, the bodies in charge of governance, staff or third parties, using deception and/or theft, and/or embezzlement in order to obtain an unlawful or unlawful advantage (fraud)

In any case, the public interest is at stake if:

- the act or omission does not affect only personal interests, and
- there is a pattern or structural character, or
- the act or omission is serious or extensive.

### Achmea

Achmea B.V. and its group companies together or separately, as the context requires, insofar as they are established in the Netherlands.

### Advisory Committee

The consultative body that advises the internal confidential adviser and the external confidential adviser in decision-making. The following are in any case represented: the director of Human Resources, the manager of Legal Affairs Labor Law and the manager Conduct Compliance.

### Board of Directors of Achmea

The Executive Board of Achmea (Board of directors).

## Competent authority

- Authority for Consumers and Markets;
- The Dutch Authority for the Financial Markets;
- Central Bank of The Netherlands (the Dutch Central Bank)
- Dutch Healthcare Authority;
- Dutch Data Protection Authority;
- House for Whistleblowers.

## External confidential adviser

The independent officer appointed as such by the Board of Directors under these regulations.

In addition to the position of external confidential adviser, this person does not hold any other (formal) positions within Achmea. The external confidential adviser is Alfred Roosmale Nepveu ([conflictbeeindiging@roosmalenepveu.nl](mailto:conflictbeeindiging@roosmalenepveu.nl)).

## Incident

An event resulting from inadequate or failing processes, people or systems, or from external events that has resulted or could have resulted in financial loss (or accidental profit), reputational damage or other adverse effect for Achmea.

## Information on a breach

Information, including reasonable suspicions, about actual or potential breaches of Union law, which have occurred or are very likely to occur within the organization where the reporting person works or has worked or within any other organization with which he or she has been in contact in the course of his or her work, as well as attempts to conceal such breaches.

## Internal Confidential Adviser (investigation department)

The official employed by Achmea who has been appointed as such by the Executive Board in the context of these regulations. The internal confidential adviser is the permanent point of contact for the external confidential adviser and supports him in the performance of his duties. The internal adviser of Achmea is July Schrama ([July.Schrama@achmea.nl](mailto:July.Schrama@achmea.nl)).

## Report

Notification of Suspicion of Abuse.

## Reporting person

The following persons can make a report on the basis of this regulation:

- The person who performs work for Achmea on the basis of an employment contract or the person who performs work for Achmea in any way other than as an employee.
- Applicants
- Shareholders and persons belonging to the administrative, management or supervisory body of a company, including members not involved in its day-to-day management
- Volunteers and interns
- Everyone who works for Achmea under the supervision and direction of contractors, subcontractors and suppliers

Achmea prefers to receive your report no later than 1 year after the end of your work for Achmea. Even after the period of 1 year, your report can still be processed if it is sufficiently concrete and relevant.

## Suspicion of abuse

The suspicion of a reporting person that there is abuse within the organization in which he works or has worked or at another organization if he has come into contact with that organization through his work. It must be a presumption based on reasonable grounds, arising from the

knowledge that the reporting person has acquired from his employer or from the knowledge that the reporting person has acquired through his work at another company or organization.

## Third party concerned

- A. a third party that is connected to a reporting person and who may be disadvantaged by the employer of the reporting person or a person or organization with which the reporting person is otherwise connected in a work-related context, and
- B. a legal person owned by the reporting person, for which the reporting person works or with whom the reporting person is otherwise connected in a work-related way;

## Violation of EU law

Act or omission which:

- A. is unlawful and relates to Union acts and policies falling within the material scope referred to in Article 2\* of the Directive, or
- B. undermines the purpose or application of the rules contained in Union acts and policies falling within the material scope referred to in Article 2\* of the Directive;

\*See Annex: Article 2 Directive (EU 2019/1937)

# 10. Version history

## Change history

Date	Author	Version	Definition
Sept 2017	Achmea Compliance	1.0	Definitive
July 2023	Achmea Compliance	1.0	Definitive

## Approval of Achmea BV

Date	Organization/Department/Officer
18-07-2023	MT Compliance
05-09-2023	DO Compliance, Risk Management & Actuarial
13-09-2023	Group Risk Committee
11-12-2023	COR
11-12-2023	Raad van Bestuur

### Colophon

Version: 2.0  
 Status: Definitive  
 Date: 11 december 2023  
 Classification: External