



TAX TRANSPARENCY REPORT

2023

INTRODUCTION

Achmea stands for Sustainable Living, Together. As one of the largest financial services providers in the Netherlands, we are conscious of our role in society. We want to work with others on solving major social challenges in the area of health, mobility, housing, work and income. In this way, we create sustainable value for our customers, our employees, our organisation and society. We believe transparency in the area of tax is an important social value and one of the pillars that support a sustainable society. This is the foundation of our tax policy.

This Tax Transparency Report for 2023 provides insight and commentary on Achmea as a taxpayer and how we contribute to Sustainable Living, Together. Every year, we succeed in our aim of further enhancing transparency and our account of how Achmea acts as a taxpayer. This is reflected in our ranking in the VBDO Tax Transparency Benchmark, which improved from 52nd place in 2021 to fourth place in 2023.

This Tax Transparency Report also puts the Global Reporting Initiative Tax Disclosure 207 and the VNO-NCW Tax Governance Code into practice. Our participation in the VNO-NCW Tax Governance Code has provided us with new insights that enable us to improve our reporting. We are already working hard on new ways to improve our next report, but for now we are very proud to present this Tax Transparency Report for 2023 to you.

Michel Lamie

Vice-chair of the Executive Board, CFO

Erik Michielsens

Tax Director

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ACHMEA'S TAX POLICY

Sustainable Living, Together, according to Achmea

Achmea stands for Sustainable Living, Together. As one of the largest financial services providers in the Netherlands, we are conscious of our role in society. We want to work with others on solving major social challenges in the area of health, mobility, housing, work and income. In this way, we create sustainable value for our customers, our employees, our organisation and society. We believe transparency in the area of tax is an important social value and one of the pillars that support a sustainable society.

Responsible taxpayer

Given our roots and our role in society, we are naturally motivated to be a responsible taxpayer. This means that we promptly file all our tax returns correctly and fully and pay the tax that we owe on time. If we discover that a tax return was not correct, it is rectified and we then pay the right amount of tax.

As a responsible taxpayer we obey the tax laws and regulations in every country where we operate, respecting the intent and the spirit of the rules. We take the substance of a transaction as the guiding principle, with profits being taxed where the profitable activity takes place. We also commit ourselves to overarching international regulations, such as OECD guidelines and EU directives.

Relationship with the tax authorities

We set great store by a sound and open relationship with the tax authorities. Sometimes, the law and the way it should be interpreted is not entirely clear. In that case, we will enter into talks with the relevant authority. We present all the facts and figures, express our interpretation, and enable the authorities to provide their perspective. We expect the tax authorities to have an open and transparent approach that does justice to a reasonable application of the law and to the rights and obligations of Achmea as a taxpayer.

Tax planning

The basic principle is that our profits are subject to a fair rate of tax. We do not engage in transactions whose main aim is to reduce the tax burden. For example, we do not operate in specific jurisdictions because they have a favourable tax regime or because they do not exchange tax information. We also shun transactions that are essentially designed to enable third parties to avoid tax. We do not offer our customers transactions designed principally for tax avoidance. We do not, however, wish to incur unnecessary tax expense.

If tax law offers an intentional tax break we will take the opportunity to save tax. Some transactions may lead to double taxation on profits and we want to prevent tax being levied more than once.

Types of tax

Our tax policy extends to all types of tax. The disclosures on our tax position in the financial statements relate to income tax (also referred to as corporate tax in the financial statements), but there are other taxes that we have to deal with, such as payroll tax and social security contributions, VAT and insurance tax. This applies not only to taxes payable by Achmea itself but also to taxes Achmea remits on behalf of third parties.

Tax risk management

Our Tax Control Framework (TCF) is part of the Achmea Control Framework and describes the entire package of policies, procedures, methods, controls and organisational measures concerned with Achmea's Tax Department. The purpose of the TCF is to manage tax behaviour at Achmea, monitor tax-related processes, support management in managing tax risks, and ensure that correct returns are filed for all taxes and that the tax due is paid, in full and on time.

Transparency

We set great store by openness and transparency in tax matters and so we publish information on this in accordance with relevant national regulations and reporting requirements and standards, including EU-IFRS, Solvency II and GRI 207¹.

Broad support

Achmea's tax policy has been approved by Achmea's Executive Board. The policy is made known throughout the organisation so that we act in accordance with it.

1. Global Reporting Initiative Tax Disclosure 207

IMPLEMENTATION OF THE TAX POLICY

A. TAX GOVERNANCE

The implementation of the tax policy is briefly described on the basis of Achmea's tax governance. A more detailed explanation of the implementation of the tax policy is provided in the subsequent sections.

With respect to Achmea's governance, final responsibility for the tax function rests with Achmea's Tax Department. The Tax Department is responsible for the tax policy and its implementation, and for achieving the tax policy objectives. This policy document is managed by the Tax Department. The 'Tax Policy' document has been approved by Achmea's Executive Board and is publicly available.

The Tax Department's responsibility encompasses a chain-management role. With regard to this chain-management role, the basic rule is that the Tax Department manages the entire tax process (the chain): recording the necessary data in the source system up to and including submission of correct and full returns on time.

The related first-line and second-line responsibilities for each business segment are set out explicitly in Service Level Agreements. The board's responsibility under the articles of association applies in full. The owners of the operational and compliance processes are the owners of any tax risks and the related tax controls in those processes.

Internal control of the tax function is set out in the Tax Control Framework (TCF), which describes the entirety of Achmea's tax-related policy, procedures, methods, controls and organisational measures. The essence of this framework is laid down in two interrelated documents: the Tax Charter and the Tax Department's Charter.

As the first line, the Tax Department is responsible for the management of the TCF. The controls within this framework are carried out under the final responsibility of the relevant business segment, and the Tax Department monitors the quality of the information supplied by the business segments (monitoring of the controls).

In countries other than the Netherlands, Achmea has operating companies (OpCo). These are independent legal entities or branches that are subject to local legislation and have local management, their own CEO and their own supervisory

structure (internal and external). From a tax perspective, a separate policy document - the Group Tax Policy for OpCos - applies to those operating companies.

B. ASSESSMENT OF THE TAX POLICY

The tax policy is our 'moral compass on taxes'. Among other things it states what we understand as 'paying tax responsibly', when we regard tax planning as justified and how we regard the relationship with the tax authorities. The policy is made known throughout the organisation, in the Netherlands and also in other countries, to enable us to act in accordance with it.

The guiding principle is that we comply with tax laws and regulations and our tax policy. Achmea's Tax Department is in charge of ensuring that we actually do this and are a responsible taxpayer.

Assessment framework

Our tax policy is assessed using the following objective questions²:

1. Does the transaction have a genuine commercial purpose, other than achieving a current or future tax benefit?
2. Is the transaction, or a combination of transactions, not such that form is selected above content to achieve a tax benefit?
3. Can the tax position be expected to stand up to legal scrutiny with a favourable outcome on the basis of an interpretation of appropriate national and international tax laws (NB: the tax position can at least be defended)?
4. Would the planned transaction or structure be implemented irrespective of whether the relevant tax authorities know all the facts and circumstances?

If these four questions cannot all be answered in the affirmative, the transaction has to be reconsidered and/or alternatives have to be examined. The above assessment framework does not mean that a transaction is not by definition in keeping with the tax policy. Additional attention must, however, be given to its social acceptability.

In addition to the objective questions, the following subjective question must be considered:

5. Are there any other reasons to assume that policymakers or relevant stakeholders would regard the tax position as unacceptable?

2. These questions are based on the assessment framework for Tax Principles drawn up by the Dutch Association of Tax Advisers.

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The answer to this subjective question can provide a further indication of the degree of acceptance or non-acceptance of the tax position and be included when deciding on the applicability of the tax policy to the proposed transaction.

C. TAX RISK MANAGEMENT

Tax risk

Tax risk is the risk of adverse effects from not being able to comply fully with all conditions/principles in the tax policy. This effect could, for example, arise because we pay too little or too much tax, or pay late, or because penalties become payable for failing to meet our obligations or meeting them late, or because our reputation is damaged.

Structure of Achmea's Tax Department

General responsibilities within the Achmea organisation are set out in the Organisational and Management Guidelines (Hoofdlijnen van Organisatie en Besturing - HvOB). Under the HvOB, the boards within Achmea Group (where appropriate under the supervision of a supervisory board) have complete responsibility for tax policy and other policies (including policy implementation), tax reporting, risk management and compliance.

The HvOB states that the Executive Board can issue instructions on the policy to be followed and that the relevant board must follow those instructions. Achmea's tax policy and the Tax Charter are examples of such designated group policy.

To ensure a practical bundling of expertise, Achmea has delegated various activities to staff service departments. With respect to Achmea's governance, final responsibility for the tax function is centralised in our Tax Department. As a policy-making department, Achmea's Tax Department is part of Group Finance and reports to the Head of Group Finance, the CFO and Achmea's Executive Board. In general terms, the Tax Department is responsible for thorough knowledge of current and proposed tax legislation and insight into its impact on Achmea. It deploys this knowledge internally and externally (in particular in dealings with the tax authorities) to ensure that Achmea has a sound and manageable tax position.

Our Tax Department's responsibility encompasses a chain-management role. This role means that the Tax Department manages the entire tax process (the chain), from recording the necessary data in the source systems up to and including submission of correct and full returns on time. The Tax

Department thus has first-line responsibility for managing the TCF and monitors the quality of information provided by the business segments.

The Tax Department is managed by the Tax Director and is made up of teams by type of tax and/or activity:

- Tax Accounting & Compliance;
- Corporate Income Tax (CIT) Advice;
- VAT & Insurance Tax; and
- Payroll Tax, Social Security Contributions & Information Reporting.

The teams and their current duties and responsibilities are outlined below.

Tax Accounting & Compliance

The Tax Accounting & Compliance team is responsible for the accurate presentation of tax positions and results for tax purposes in the financial statements and other reporting (including Solvency II). The team also has first-line responsibility for preparing and submitting corporate income tax returns. It has a chain-management role with respect to the structure of the operational and compliance processes at the business segments that provide information.

CIT Advice

The CIT Advice team has a first-line corporate income tax advisory role towards the business segments. It highlights and advises at the strategic, tactical and operational level, on its own initiative and on request, on:

- Optimising the tax burden within the boundaries of the tax policy;
- Using tax opportunities and guarding against risks; and
- Structuring processes, services and products to comply with tax laws and regulations.

VAT & Insurance Tax

This team has a first-line advisory role focusing on VAT and insurance tax. The team also has a chain-management role in the VAT and insurance tax returns process focusing on the correctness and completeness of the return.

Payroll Tax, Social Security Contributions & Information Reporting

The Payroll Tax, Social Security Contributions & Information Reporting team has a first-line advisory role towards the business segments in respect of payroll tax, social security contributions and information reporting. The team also has a chain-management role for processes for reporting information to the tax authorities and for payroll tax and social security

IMPLEMENTATION OF THE TAX POLICY

contribution returns, advising on the proper structure of the operational and compliance processes to meet the tax requirements.

The role and responsibility of Achmea's Tax Department departs from the above outline when it comes to the large cash flows that Achmea manages for third parties and the operating companies (OpCos) abroad. As explained below, in these situations the Tax Department focuses on compliance with tax policy although the operating company involved has actual responsibility for this.

Large cash flows for third parties

With respect to services, some business segments differentiate between small cash flows (those relating to Achmea's resources, income and expenses) and large cash flows (those relating to the resources, income and expenses of customers of those business segments). These large cash flows do not affect Achmea's tax position or its resources. Achmea does, however, run a potential reputational risk with respect to these large cash flows and so the tax policy also applies to them. The business segments concerned are responsible for complying with tax laws and the tax policy. This is reviewed using the TCF. The Tax Department has responsibility for managing the setup, maintenance and review of this TCF.

Foreign operating companies (OpCos)

The policy and procedures with respect to the foreign OpCos are developed in the Group Tax Policy for OpCos. The guiding principle for that policy is that Achmea's tax policy is leading in all circumstances. Achmea's Tax Department supervises compliance with the tax policy, supports and advises local first-line management (for example, on the structure of the TCF) and coordinates and monitors whether management actually takes responsibility. The Tax Department ensures that the Group Tax Policy for OpCos is reviewed annually and amended as necessary.

Cooperation and reporting within the group

The following guiding principles are used within our tax governance:

- Our Tax Department is responsible for carrying out the tax function;
- The board's responsibility for the tax function under the articles of association applies in full;
- Various parts of the organisation are tasked with carrying out operational activities of the tax function (primary processes);
- Process owners are also owners of residual tax risks and the associated controls within those processes;
- The Tax Department manages the tax position from the

group perspective, and this includes identifying risks and monitoring activities;

- The Tax Department notifies the business segments and provides binding guidance on tax policy, procedures, systems and controls;
- The Tax Director is the primary contact for tax matters, both internally (Executive Board, boards, staff services / other services, etc.) and externally (tax authorities, DNB, auditor, etc.).

The Tax Department enters into Service Level Agreements with the relevant group operating companies. It also holds regular meetings (in addition to ad hoc discussions) with the financial management of those companies. The Service Level Agreements are reviewed each year with the management of the relevant operating companies.

Tax matters with considerable significance (financial/reputational) are discussed with the Head of Group Finance and Achmea's CFO. The Head of Group Finance and the CFO examine the corporate income tax return in detail each year before it is submitted.

The Tax Department prepares a quarterly report, including a commentary on the group's tax position, key areas of attention and main tax risks, returns that have been prepared and submitted, and the current position with respect to tax dossiers with high materiality or possible reputational impact. The report also refers to possible effects of announced and/or expected legislation/regulations and case law. Finally, the Tax Department reports on policy, advice, management of the TCF and monitoring of controls. These reports are discussed by the Executive Board (every quarter) and the Audit & Risk Committee (at least once a year) and are shared with the financial directors of the largest operating companies.

As part of these services, the Tax Department has the objective of raising awareness of tax throughout the group, not just at management level but at all levels within the organisation. In addition to the ongoing assessment of the implementation of the tax policy, awareness may be raised through internal sessions during which knowledge is shared and explained and ethical dilemmas are discussed.

Risk appetite

The risk appetite is our attitude to taking risks and an indication of our willingness to accept a high or low level of risk. The guiding principle is that we act in accordance with legislation and regulations, and within the tax policy and Achmea's risk

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appetite³. The risk appetite with respect to tax is low, for both financial and non-financial risks (internal control, compliance and reputation). The aim of our tax policy is that Achmea complies with the letter and the spirit of the law. As a multinational business with a range of activities, however, we are inherently exposed to potential tax risks. We record those risks in the tax risk register and attempt to minimise them, in part by performing periodic ORAs⁴ and SIRAs⁵ under the supervision of the second and third lines (see also below under 'Risk management').

We distinguish between gross and net risks. Gross risks are expressed as a score based on the probability of a risk occurring multiplied by the impact on our reputation. A gross risk is a risk without the effect of control measures being taken into account, i.e. the risk before control measures have been implemented. A net risk is a risk after the effect of control measures has been taken into account, i.e. the risk after control measures have been implemented. These control measures are included in our TCF. Additional control measures are established and introduced if the net risk exceeds our risk appetite. Any identified breaches are rectified in accordance with the incident policy. A provision is formed for tax risks and uncertainties with possible financial consequences if the likelihood they will occur is greater than 50%⁶.

Risk management

Our governance structure is based on the 'three lines model'. The line organisation (the first line) has primary responsibility for risk management. The first line is supported by the second line, which also monitors implementation by the first line. The third line supplements this by regularly testing and reporting on the effectiveness of internal controls, governance and risk management⁷.

The first-line role for tax risk management is performed by our Tax Department. The business segments have the first-line risk management role for payroll tax and social security contributions and information reporting. Internal control of the tax function is set out in the TCF, which describes the entirety of our taxation policy, procedures, methods, controls and organisational measures. Final responsibility for applying the

controls in this framework rests with the relevant business segment. The Tax Department is responsible for managing the TCF and monitors the quality of the information supplied by the business segments. The Tax Department monitors the information supplied by the business segments and the scores that the business segments give for key risks and key controls. It also looks at the key controls that receive negative scores from the business segments and determines whether positive scores were correctly given to the other key controls. The findings are discussed by the Tax Department management team before they are sent to the relevant business segment. If necessary, the findings are also referred to in the quarterly report issued by the Tax Department.

The TCF and the controls in place may indicate a shortcoming or inadequate quality. If so, the Tax Department and the relevant business segment keep each other up to date. The Tax Department assumes the management role to resolve such findings. To this end, the Tax Department provides binding advice on request and on its own initiative.

The guiding principle is that all tax-related matters are dealt with internally, and all qualifications and competencies needed for this are present within the Tax Department. From a risk management viewpoint, additional tax support is brought in if:

- A specific competence is not - or not sufficiently - available for a short period;
- A subject-specific technical review is needed with respect to external stakeholders.

The second-line function is performed by Achmea's Compliance department. The second line supports the Tax Department in performing strategic, tactical and operational risk analyses. Risk assessments (ORAs) of the Tax Department's tax processes and activities are carried out at least once every three years. The SIRA is performed once a year. Further to these assessments, key risks and key controls are established and they are tested and reported on each quarter. The results of tests on the checks and controls and management measures in place for ongoing tax work are monitored by Compliance every quarter and are discussed with the Tax Department. Improvements are implemented.

3. See also page 147 et seq. of the Achmea Annual Report 2023

4. ORA: Operational Risk Assessment

5. SIRA: Systematic Integrity Risk Analysis

6. See also section 3.2 under Provisions for income tax

7. See also page 87 of the Achmea Annual Report 2023

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The third-line role is performed by Internal Audit. Tax governance and all tax categories are assessed by Internal Audit once every three years. If an internal audit report includes points for improvement and/or recommendations, they are followed up by the Tax Department. Progress on these points is monitored and reported in quarterly reports to the Executive Board and the Audit & Risk Committee.

Whistleblower's scheme

It is important to us that events involving a breach of the frameworks of the tax policy within or by the organisation can be reported in a trusted environment. Consequently, our general whistleblower's regulations apply. The regulations are available on Achmea's website⁸.

D. STAKEHOLDER ENGAGEMENT

Our approach is to create sustainable value for customers, employees, business partners, shareholders and regulators. This also means that our stakeholders must be able to rely on the fact that we act within the parameters of our tax policy. We live in a rapidly-changing environment, and so the relationship with our stakeholders is also evolving continuously and we regularly offer new products and services to respond to new situations. As every change can have consequences for our taxes and our customers' taxes, our Tax Department is in close contact with the business segments to ensure that our stakeholders' interests are also taken into consideration.

A good relationship with regulators such as the Tax and Customs Administration (referred to below as 'the Tax Authorities') is essential. In the Netherlands, we are in permanent, transparent and up-to-date communication with the Tax Authorities for this purpose. Since 2020 we have been in the 'Top 100' and we are covered by the monitoring protocol of the Tax Authorities. The Tax Authorities prepare an Individual Supervision Plan (Individueel Toezichtplan - ITP) each year. The ITP is a next step in the pre-existing 'Horizontal Monitoring' system for the top 100 for-profit businesses in the Netherlands. Key to the ITP is the information to be provided by Achmea, the monitoring work of the Tax Authorities and the professional working relationship between us and the Tax Authorities. That working relationship is based on mutual respect, transparency and trust, and as part of that working relationship Achmea's Tax

Department and the Tax Authorities frequently discuss all types of tax. Progress and the contents of current dossiers are addressed during these discussions. If a difference of opinion arises on the interpretation of a point of law, we try to reach agreement with the Tax Authorities on the tax consequences. There is at least one meeting per year at the highest management level. We aim for an open and constructive dialogue with the local tax authorities and other government bodies in all the countries where we operate.

Our Tax Department also maintains direct or indirect contact with other regulators, including DNB, and the external auditor. The Tax Department assists other departments with information requests from DNB concerning Solvency II reporting. The substantiation of the tax position in full year and interim financial statements is discussed in detail with the external auditor.

To maintain good connections with the industry, we participate in the tax committees of various umbrella organisations, such as the Dutch Association of Insurers (VvV), Dufas⁹, the Confederation of Netherlands Industry and Employers (VNO-NCW) and Zorgverzekeraars Nederland. The staff working in Achmea's Tax Department must maintain their membership of professional bodies (such as the Dutch Association of Tax Advisers and Register Belastingadviseurs). Achmea is also included in various tax benchmarks such as those maintained by the Fair Insurance Guide (Eerlijke Verzekeringswijzer) and VBDO¹⁰.

We act as a discussion partner for ministries and the Tax Authorities through our participation in various umbrella organisations. In this role we can, for example, draw attention to key points that could improve sustainability and feasibility when it comes to new or existing legislation.

As one of the largest businesses in the Netherlands, we are a member of VNO-NCW, which has drawn up a Tax Governance Code for listed companies. Achmea is committed to that Code. The staff working in Achmea's Tax Department are also required to comply with the codes of conduct of their professional bodies.

8. <https://www.achmea.nl/-/media/achmea/documenten/duurzaam/klokkenluideregeling-achmea.pdf>

9. Dutch Fund and Asset Management Association

10. Dutch Association of Investors for Sustainable Development (Vereniging van Beleggers voor Duurzame Ontwikkeling)

IMPLEMENTATION OF THE TAX POLICY

E. RELATIONSHIP WITH THE BUSINESS / SUSTAINABILITY

Each year the Tax Policy is assessed and adopted by the Executive Board. Where necessary, changes are made by our Tax Department. Such changes are then submitted to and agreed with the Head of Group Finance and Achmea's CFO. In this way we can ensure that the assumptions and principles in the policy remain in line with the company's values and strategy. In addition, the policy is publicly accessible so that we can be held accountable for ensuring the tax policy and our actions are in line with those values and that strategy.

We want to create sustainable value for our customers, our staff, our business and society as a whole. Our value creation model shows the relationship between the input of stakeholders, our business operations, their output and the impact we are making, for stakeholders and for society¹¹. Within our business operations, we believe that transparency in the area of taxation is crucial¹². Paying tax is one of the pillars that supports a sustainable society and so it goes without saying that we meet all our tax obligations. This is the essence of our tax policy. Our Tax Department is presenting this policy specifically to our most important stakeholders in order to make the sustainable nature of our tax policy more widely known and develop it further. In this context, our initial focus is on the shareholders of Achmea and NGOs. We are convinced that actively sharing our approach to tax has a positive impact in terms of awareness of the role tax plays in facilitating a more sustainable society.

In other areas too, we play a role in tackling social challenges. For example, we co-founded the 'Werkcode Uitgangspunten voor het realiseren van één arbeidsmarkt voor alle werkenden', a code that aims to create a single labour market for everyone. In our opinion, the decisions that we make when it comes to being a good employer and a good commissioner of work contribute to the positive performance of the role of responsible taxpayer for Achmea and also for the flexible workers (and their organisations) and the self-employed people we work with.

Sustainability is a major theme for us. This is partially reflected in the inclusion of a net climate budget of €2,500 that is available to our employees in the collective labour agreement (CAO). We bear the tax consequences so that all employees can take a step towards sustainability. In addition, Achmea is launching a new mobility scheme that is focused on encouraging sustainable travel. This scheme is also designed to respond more flexibly to today's variable travel patterns (pay per use), and offers an allowance that is sounder from a tax perspective.

F. TAX PLANNING

Achmea uses the following major guiding principles for tax planning.

- a) Profit must be taxed at a responsible rate:
We do not use structures whose main purpose is to reduce the effective tax burden. For example, we do not operate in jurisdictions because they have a favourable tax regime or because they do not exchange tax information. We apply the arm's length principle in accordance with OECD guidelines, taking account of local legislation. This also means that if we are involved in transactions in or through developing countries, that involvement must not lead to lower tax remittances in those countries.
- b) The substance of a transaction is leading: profits are taxed where the profit-generating activity occurs.

Section 2.a explains how transactions are assessed against Achmea's tax policy using an established assessment framework.

11. Achmea annual report 2023, page 25

12. Achmea annual report 2023, page 82

IMPLEMENTATION OF THE TAX POLICY

Our policy on tax remittance is based on these guiding principles. In some circumstances, and provided that we comply with the formulated guiding principles, we may operate in a country with low tax rates (tax haven). The fact that a proposed transaction passes through a country on a blacklist may, however, be a reason to reconsider it. The blacklists we actively use, for example for monitoring our investments, are the lists of non-cooperative and low tax jurisdictions compiled by the EU¹³ and the Dutch Regulation on Low Tax States and Non-Cooperative Jurisdictions for Tax Purposes¹⁴.

Within the context of the guiding principles used by us, we do not want to incur unnecessary tax expense, such as double taxation of the same income. If legislation offers an intentional tax break, we will use it. This may be in the form of a tax benefit or a different type of subsidy or government incentive.

G. INNOVATION

Change and renewal are key words at Achmea. This means that we take a fresh look at everything in our processes concerned with tax.

Achmea's Tax Department is working on extensive automation of the tax processes to avoid manual intervention as far as possible both in the management role for processes at the business segments and with respect to its own processes. A requirement in this context is the accuracy and completeness of source data. The automatic processes must be defined, transparent and auditable. Knowing and understanding how information and data flow through the chain, and which data elements are tax-critical, are essential for paying the right amount of tax. Consequently, more and more staff working in our Tax Department have specific data analytics know-how.

13. https://taxation-customs.ec.europa.eu/common-eu-list-third-country-jurisdictions-tax-purposes_en

14. The Regulation on Low Tax States and Non-Cooperative Jurisdictions for Tax Purposes (Regeling laagbelastende staten en niet-coöperatieve rechtsgebieden voor belastingdoeleinden) contains the Dutch list of designated low tax jurisdictions for the application of legislation in relation to controlled foreign corporations (CFC legislation), and in the context of conditional taxes levied at source on interest payments and royalties and (with effect from 1 January 2024) dividend distributions. This list is updated on a regular basis.

TAX DEVELOPMENTS IN 2023

3.1 DEVELOPMENTS AND LEGISLATIVE CHANGES

Tax audits, agreement and risk management

- At the end of 2023 the Tax Authorities shared the Individual Supervision Plan (ITP) for 2024, in which it articulates the customer view. It also referred to the tax policy approved by Executive Board and established that the tax policy is actually applied. The Tax Authorities have confirmed their positive impression of Achmea's transparency, attitude and behaviour. The frequency of Achmea's regular meetings with the departments of the Tax Authorities has been reduced to once a year. The Tax Authorities and Achmea maintain an open dialogue on their cooperation, in part by means of regular meetings on work in progress. This allows both of us to facilitate working on current matters.
- With effect from 1 January 2023, Achmea uses IFRS 9 and 17 as a basis for determining taxable results for the non-life insurers. This change simplifies the process of preparing the corporate income tax return and makes it easier to deduce the effective tax rate (ETR) for the Minimum Tax Rate Act 2024¹⁵. The transition has had a positive one-off effect on the group's Solvency II ratio. The change in the tax base was discussed with the Tax Authorities and is being laid down in writing.
- With effect from 2024, the substantiation of the payment of insurance tax must be based on the IFRS 17 entry processes. Achmea's Non-Life division has set up its records in such a way that it will still be possible to submit an accurate, complete and timely return when applying IFRS 17.
- Under EU DAC 7, starting from 1 January 2023 digital marketplaces in the EU must automatically provide information on sellers using their platforms to the tax authorities. National tax authorities are required to exchange that information with other member states automatically. This new directive applies to some of Achmea's digital platforms. The platforms in question are digital platforms offered by Achmea that customers use to purchase prevention services from external providers. Achmea supplied information reports on these platform activities for the first time in January 2024.
- Pursuant to the EU Pillar 2 Directive, the Minimum Tax Rate Act 2024 came into effect on 31 December 2023. The essence of the EU Directive and the act is that businesses must pay tax at a minimum rate of 15%. These rules apply to groups with minimum annual turnover of €750 million. This new Act is explained in more detail in section 3.2. Health insurers are specifically mentioned as exempt entities in the notes to the EU Directive and the Minimum Tax Rate Act 2024. The exemption under the Minimum Tax Rate Act 2024 is also applicable to Achmea's health insurers, but the conditions set for this exemption in the act differ from the conditions that apply for the corporate income tax exemption. The Tax Department has entered into discussions with the Tax Authorities (as part of Zorgverzekeraars Nederland and separately) on how these differences are to be interpreted and what that means in practice.
- In 2022, agreement was reached with the Tax Authorities on the system to be used for determining the pro rata deduction of VAT for previous years. In 2023, the Tax Authorities indicated that this system could also be applied for the years 2022, 2023 and 2024.
- The 2022 corporate income tax return for the Achmea BV fiscal unit was submitted in 2023. In the current year, final assessments for 2020 and 2021 have been imposed in accordance with the submitted returns and supplementary returns.
- Starting from 2023, staff can make use of the net climate budget. Their expenditure can be reimbursed as a net amount from the work-related expenses scheme up to a specified maximum amount. As this maximum amount had been exceeded at year-end 2023, a provision has been formed for the additional payroll tax due on the allocated climate budget.
- Achmea committed to the VNO-NCW Tax Governance Code in 2022. As an extension of this, in 2022 Achmea started to publish an annual Tax Transparency Report. As a result, Achmea has risen to fourth place in VBDO's annual EU Tax Transparency Benchmark¹⁶. In 2023, Achmea participated in VNO NCW peer review. The outcome of that peer review was that we comply with almost all of the principles contained in the VNO-NCW Tax Governance Code. It was, however, recommended that we provide a more detailed explanation and clarification on several points. The report of the outcome can be found on the website of VNO-NCW¹⁷.

Regulations and case law

- Proposed legislation on Public Country-by-Country Reporting was submitted on 1 July 2022, under which enterprises with consolidated revenues above €750 million would be required to publish an income tax report each year. The legislation has

15. See section 3.2 for a more detailed explanation of the minimum tax rate

16. https://www.vbdo.nl/wp-content/uploads/2023/11/Transparency-Benchmark-rapport-2023_def.pdf

17. <https://www.vno-ncw.nl/taxgovernancecode>

TAX DEVELOPMENTS IN 2023

to take effect by 22 June 2024 and will first apply to the financial year 2025. As we have included a list showing income tax by country in this Tax Transparency Report since 2022, we materially comply with this draft legislation.

Ongoing proceedings

- In its corporate income tax return for 2019, Achmea reported a liquidation loss related to the liquidation of an Irish participating interest. The Tax Authorities have taken the view that the loss cannot be deducted because of the application of the Irish group relief rules. A very similar case has been the subject of legal proceedings for several years. The Supreme Court's decision on those proceedings is expected in the second quarter of 2024.
- On behalf of its customers, Achmea is conducting legal proceedings that concern the VAT exemption for administrative services and asset management. Questions concerning this matter were submitted by the court to the European Court of Justice in 2022. A favourable judgement in these proceedings would be in the interests of Achmea's customers, but it would also mean that Achmea would have to repay to the Tax Authorities some of the VAT it has deducted (pro rata refund). The European Court of Justice is expected to give its decision in the course of 2024.
- Achmea has been conducting various tax-related proceedings in Portugal since 2010. Banco Commercial Portugues (BCP) distributed dividends to Achmea in the years 2003 up to and including 2007. Portuguese withholding tax was deducted from these dividends. Achmea takes the view that the deduction of withholding tax is in contravention of EU law or the double taxation treaty signed by the Netherlands and Portugal. Since 2010, Achmea has submitted a total of 18 legal claims, 17 of which have been settled in Achmea's favour. Civil proceedings are still ongoing for one claim. A provision was formed for this in 2010 as a precaution.
- In the years 2001-2009, Achmea's Greek subsidiary offset withholding and transfer tax relating to Greek government bonds, and the accuracy of that offset is disputed by the Greek government. Appeal proceedings are currently ongoing. A provision was formed for this in 2018 as a precaution.

3.2 2023 IN FIGURES

In the following section under A. we provide an explanation of the tax position in the financial statements. Some of this information can also be found in the financial statements¹⁸. Under B., we comment on the tax that we pay to the tax authorities. The amounts in the tables are in millions of euros.

A. Income tax in the financial statements

The income tax position, which encompasses corporate income tax as well as minimum taxation, is recognised and disclosed in the financial statements under 'Corporate tax'. Because the Minimum Tax Rate Act 2024 came into effect on 31 December 2023, the minimum tax rate had no impact on the income tax position in 2023. Nonetheless, the effect of the Minimum Tax Rate Act is explained below.

Corporate income tax

Current vs. deferred tax

Corporate income tax can be broken down into current tax and deferred tax. Current tax relates to items payable to or receivable from the tax authorities in 2023. These amounts will be incorporated in the corporate income tax return for 2023.

Deferred tax relates to future tax assets or liabilities. Deferred taxes occur because of differences between accounting policies for commercial and tax purposes. As a result of these (temporary) differences between accounting policies, there are income and expenses that are recognised commercially in the result in years before or after the year in which they are included in the tax return. In addition unrelieved tax losses are recognised as a deferred tax asset in the balance sheet (i.e. statement of financial position). Importantly, a deferred tax asset may only be recognised if sufficient future taxable profit is available. A detailed substantiation must be provided for this.

The movements in the balance sheet items for current and deferred corporate income tax are recognised through the income statement unless:

- They relate to payments to the tax authorities; or,
- The movements relate to items that are recognised through equity.

In the latter case, they are recorded net (after tax) in equity.

18. Consolidated financial statements 2023, notes 15 and 25.

TAX DEVELOPMENTS IN 2023

Effective tax rate in 2023 (income statement)

The effective tax rate in the financial statements is the tax disclosed in the income statement expressed as a percentage of the commercial profit before tax. This percentage usually differs from the nominal rate (25.8% in the Netherlands). A significant reason for the difference is that the commercial profit is calculated using different rules from the taxable profit in the corporate income tax return. Consequently, it may be that the commercial profit contains elements that are exempt under the

Corporate Income Tax Act, or, alternatively, elements included in the taxable result are not recognised for commercial purposes through the income statement but through equity ('permanent differences'). Other reasons why there may be a difference include prior-year adjustments or changes to the measurement of the deferred tax position as a result of changes in tax rates. The table below shows a reconciliation between the nominal and effective tax burden.

RECONCILIATION OF EFFECTIVE TAX AMOUNT	€ MILJOEN	
	2023	2022
Result before tax	954	-1,054
	25.8%	25.8%
Corporate income tax- Dutch rate 2	246	-272
Effect of tax rates in foreign jurisdictions	-2	1
Tax effect on:		
Non-deductible expenses	1	9
Tax exempt revenues	-71	2
Participation exemption	-2	6
Non-deductible losses	4	5
Perpetuals	-14	-14
Other	-22	12
Regular (temporary) differences	-104	20
Change in tax rate	-	4
Effective tax amount	140	-247

The table shows that the effective tax burden in 2023 was €140 million. Since the profit before tax for that year is €954 million, the effective tax rate is 14.7%.

The principal differences between the nominal tax amount (€246 million) and the effective tax amount (€140 million) were:

- A large part of Achmea's operations consists of insuring healthcare expenses. The profits on these operations are exempt from corporate income tax provided they are used to the benefit of public healthcare institutions. This exemption applies to Achmea and in 2023 it led to a lower effective corporate income tax charge of €71 million.
- The participation exemption applies to shareholdings of 5% or more. Results that are covered by the participation exemption do not lead to any tax charge or gain. On balance, a gain of €9 million that is covered by the participation exemption, and therefore not subject to tax, was recognised in the income statement. In connection with this, an exemption of €2 million was recognised;
- Tax losses were incurred but not recognised on operations in Australia and Canada. This led to unrelieved tax losses and a higher corporate income tax expense of €4 million;
- Achmea issued perpetual bonds in 2015 and 2019. The interest on those loans (€55 million on balance) is deductible for corporate income tax purposes. In the financial statements, the interest payments on these loans are charged directly to equity rather than being recognised in the income statement, in spite of the fact the tax gain is recognised in the income statement. This led to a lower corporate income tax charge of €14 million.
- The item 'Other' (gain of €22 million) is the balance of various positive and negative effects. Most of them relate to foreign activities: Part of the tax losses incurred on our activities in Greece were written down in previous years. As a result of the improved profitability of the combined activities from a tax perspective, these losses were revalued in 2023. This led to a tax gain of € 26 million. Our activities in Turkey were affected by the volatility of the Turkish lira's exchange rate. Mandatory accounting for the consequences of this exchange

TAX DEVELOPMENTS IN 2023

rate volatility resulted in a tax charge of some €4 million. The decline in the tax provision (tax gain of €4 million) is also included in this item. Finally, this item includes an amount relating to various adjustments made in previous years (expense of €4 million on balance).

The table below breaks down the corporate income tax in the income statement (€140 million) into current and deferred tax.

SPECIFICATION OF CURRENT AND DEFERRED CORPORATE INCOME TAX

€ MILJOEN

	2023	2022
Current corporate income tax		
Current year	65	-346
Over/(under) provided in prior years	4	-3
Deferred corporate income tax		
Origination and reversal of timing differences	37	102
Offset of losses	34	
Total corporate income tax expense in income statement	140	-247

Most of the current corporate income tax relates to 2023 (€65 million), and a small portion relates to the adjustment of prior years (€4 million) based on, among other things, the returns that were actually submitted.

Changes in deferred corporate income tax comprises the balance of many changes in deferred tax assets and liabilities. With respect to the financial year 2023, these can be broken down as follows:

€ MILJOEN

	BALANCE AT 1 JANUARY 2023	RECOGNISED IN INCOME	RECOGNISED IN EQUITY	BALANCE AS AT 31 DECEMBER 2023
Intangible assets	-6	2		-4
Investments	293	-533	7	-233
Bank assets				
Reinsurance	7	-3		4
Deferred acquisition costs				
Other assets	431	-34		397
Insurance liabilities	596	455		1,051
Pension provisions	3	4	19	26
Other provisions	-29	6		-23
Other liabilities	-514	69		-445
Right of use- assets	-23			-23
Right of use- liabilities	29	-2		27
Fiscal goodwill				
Tax losses	227	-34		193
Amortisation and equalisation reserve	-9	-1		-10
	1,005	-71	26	960
Includes:				
Deferred tax assets				971
Deferred tax liabilities				11

TAX DEVELOPMENTS IN 2023

At Achmea, deferred taxes in 2023 related largely to (temporary) differences in the measurement of investments and insurance liabilities. In both cases, the difference between the tax and accounting bases has resulted on balance in a deferred tax asset. It follows from both of the above breakdowns that a decrease (on balance) in this deferred tax asset of €71 million has been recorded in the income statement and an increase of €26 million has been recorded through equity. This includes an item for unrelieved tax losses from 2022 that was recognised in 2023. Of these losses, an amount of €132 million can be set off against the taxable profit for 2023. As a result, the tax payable for 2023 can be reduced by an amount of €34 million, and consequently the deferred tax asset has been reduced by that amount.

The tax rates used to calculate deferred tax assets and liabilities differ between countries and ranged between 10% and 36% in both 2023 and 2022. In the Netherlands, the rate is 25,8%.

Of the total deferred tax asset, Achmea has substantiated an amount of €971 million. It is expected that most of this amount (€794 million) will be settled in 2025 and subsequent years. In addition, an amount of €58 million in deferred tax assets has not been recognised. This amount relates to tax losses in prior years incurred in Greece (€11 million), Australia (€34 million) and in Canada (€13 million). It is improbable that future taxable profits will be available against which these losses can be utilised. The recognised deferred tax assets relating to offsettable losses from previous years are valued on the basis of current tax laws.

Provisions for income tax

It may not be certain how a specific provision of tax law applies to a given transaction or situation, in which case there is an uncertain tax position (UTP) in the balance sheet. If it is likely that the tax will be payable, accounting rules require an estimate to be made of whether that likelihood is greater than 50%. If so, after estimating the level of the risk, a tax provision must be formed.

Such uncertainties are taken into account when computing the current corporate income tax position in the financial statements. The tax provision for the Dutch business segments (in 2023: €53 million) relates mainly to possible non-recoverable foreign withholding tax (€38 million) and, to a lesser extent (€15 million), the risk that liquidation losses are not fully deductible. A provision for the foreign operating companies has been formed for withholding tax deducted and settled in Greece (in 2023: €14 million). All provisions concern exclusively the valuation of a financial risk.

The formation of a tax provision may mean that the actual current corporate income tax results in other cash flows by virtue of the tax position.

Minimum tax rate (Pillar 2)

The Minimum Tax Rate Act 2024 came into effect on 31 December 2023. In May 2023, the IASB¹⁹ introduced in IAS 12 a mandatory temporary exception for the recognition and disclosure of deferred tax effects arising from the Pillar 2 tax legislation. Achmea applies this mandatory exception and it also mentions this in the financial statements. With effect from 2024, the new act might have an influence on the income tax position reported in the financial statements.

The Minimum Tax Rate Act is based largely on the OECD's Pillar 2 model text and the proposed EU directive. Under Pillar 2, with effect from 2024 large multinational enterprises must pay income tax at a minimum effective rate of 15% in every country in which they achieve a profit. If they do not, the countries in which the multinational enterprise is active may levy top-up tax to bring the effective tax rate up to that minimum rate of 15%. The country in which the ultimate parent entity's registered office is located is the first in line. If no top-up-tax, or an insufficient amount of top-up tax, is levied in that country, the countries in which the subsidiaries' registered offices are located are next in line (to put matters simply). It is expected that most of the countries in which Achmea has operations will transpose the Pillar 2 model into national legislation.

The effective tax rate (ETR)

According to Pillar 2, the ETR is calculated on a country-by-country basis by dividing the balance of all adjusted covered taxes owed by group entities established in that country by the balance of the qualifying income of the group entities. The adjusted covered taxes and the qualifying income are derived from the profit and tax expense reported in the income statement for accounting purposes. Several adjustments need to be made to these amounts in order to arrive at the right base and the right amount of tax for the purpose of Pillar 2. Moreover, in addition to having its own base and tax, which differ from those under the commercial accounting standards as well as the Corporate Income Tax Act, Pillar 2 it also has its own ETR, which is different from the effective tax rate reported in the financial statements.

Top-up tax

A top-up tax comes into play in situations where the recalculated ETR is lower than 15%. Suppose the ETR in a particular country

19. International Accounting Standards Board

TAX DEVELOPMENTS IN 2023

is, say, 12%. In that case, the top-up tax must be levied and paid at a rate equal to that difference (3%).

According to Pillar 2, a top-up tax is also possible in cases where the qualifying income is negative. Now, imagine that the qualifying income is a loss (negative amount of 100) and the adjusted covered taxes are a negative amount of 20. According to Pillar 2, in the event of a loss of 100 a maximum tax asset of 15 (15%) is expected. As a consequence, top-up tax amounting to 5 must be levied and paid in this example.

Transitional arrangement

Only a few countries are expected to be able to introduce the new rules on time. In addition, the application of the new law means that taxpayers and the tax authorities will have to make many administrative and technical adjustments. For this reason, the legislation includes a transitional rule that will apply for a period of three years. During that period, the ETR may be determined on the basis of information obtained from the country-by-country report (Cbcr) (the safe harbour test). The complicated calculation can then be omitted unless the ETR based on the Cbcr is below a specific norm in any year, in which case a full calculation must be made.

Consequences for Achmea

Under the Minimum Tax Rate Act, a number of entities are excluded and can consequently be omitted from the calculation. In the case of Achmea, these entities include the health insurers.

It is expected that a top-up tax will be owed by Achmea on the basis of the new legislation in only a very small number of cases. This assumption is based on the consideration that the nominal income tax rate in almost every country in which Achmea is active is much higher than 15%. Moreover, in most of the countries there are hardly any factors (permanent differences) that could lead to a top-up tax being imposed. We performed analyses for the years 2020 up to and including 2023 based on the assumption that the new rules had already come into effect. The simplified calculation based on the current safe harbour test revealed that Achmea exceeded the required threshold in almost every country, and so it would not have owed any top-up tax. In addition, a more extensive calculation was performed for the Netherlands (the country where more than 90% of revenue is generated) on the assumption that the required threshold for the application of the safe harbour would not be met in those years. Based on that extensive calculation, it was determined that Achmea would have owed hardly any top-up tax in the Netherlands in those years.

B. TAX PAYMENTS

Income tax

The table below shows information on income tax by country.

€ MILLION											
Country	Principal activities	Income from unrelated parties	Income from related parties	Total	Profit (loss) before income tax	Corporate income tax paid (cash basis)	Corporate income tax for 2021 recognised in the financial statements	Paid-up capital	Employees	Tangible assets other than cash and cash equivalents	Effective tax rate
Netherlands	Health; Non-life; Pension and life	21,834.1	19.9	21,854.0	931.0	54.0	153.0	11,001.0	12,681.0	267.3	16.4%
Greece	Non-life; Pension and life	446.0	.0	446.0	24.0	3.2	-19.6	106.1	1,329.0	30.6	-81.7%
Turkey	Non-life	332.0	.0	332.0	-1.4	9.7	2.9	36.2	690.0	20.0	-207.1%
Slovakia	Non-life	790.0	.0	790.0	14.6	10.3	3.9	47.0	680.0	8.8	26.7%
Australia	Non-life	65.0	.0	65.0	-5.0	.0	.0	.0	128.0	.3	0.0%
Other		.0	.0	.0	-9.0	.0	.0	65.0	.0	.0	0.0%
Total		23,467.1	19.9	23,487.0	954.2	77.2	140.2	11,255.3	15,508.0	327.0	14.7%

The table includes a column headed 'Income tax paid (cash basis)'. This shows the balance of all amounts paid to and refunds received from the tax authorities and may relate to more than one year. Consequently, the income tax paid in a year will normally differ from the tax payable in that year. The table shows

that we remitted a net amount of €77.2 million of income tax to the Tax Authorities in 2023.

Every year, we have to submit a similar statement to the Dutch Tax Authorities (country report). The table above is based on the

TAX DEVELOPMENTS IN 2023

rules in the GRI 207 Tax standard and differs from the country report.²⁰

Another difference between the GRI statement and the country report is that the country report contains information on all non-related revenues while the GRI rules require inclusion only of intra-group revenues between jurisdictions are not material (less than 0.1%) compared with the rest of the revenue. There are almost no cross-border transactions and services within the value chains of each local business. As a consequence, within the value chain profits in each jurisdiction are, by definition, taxed almost entirely in the jurisdiction where they were achieved.

The above table does not report separate Achmea companies. Achmea's 2023 financial statements list the principal companies²¹. A full list of participating interests pursuant to Sections 379 and 414 of Book 2 of the Dutch Civil Code has been filed with the Trade Register of the Chamber of Commerce.

VAT

VAT is a tax that we charge to customers for services and/or products supplied. It is an indirect tax and we ensure that the VAT paid by the customer is remitted to the tax authorities. As a general rule, the VAT on purchases may be deducted from the VAT to be remitted. This system means that tax is only paid on the added value.

VAT legislation provides for different VAT rates and an exemption. The exemption applies to a significant proportion of our services and products, and means that we do not charge VAT to customers and cannot deduct VAT on purchases. In such cases, the VAT payable on purchases is part of our operating expenses. When purchases are used for activities both subject to and exempt from VAT ('general expenses'), we deduct the VAT on purchases in accordance with the proportion of deductible and total revenue. This is called the pro rata approach.

The table below shows how much VAT we have charged our customers in total (VAT remitted) and how much VAT on general expenses we cannot deduct. The total VAT burden consists of the VAT remitted and non-deductible VAT on general expenses.

€ MILLION			
Country	VAT remitted	Non-deductible VAT on general expenses	Total VAT burden
Netherlands	39.7	119.1	158.8
Greece	2.6	10.8	13.4
Turkey	0.0	4.0	4.0
Slovakia	0.0	0.5	0.5
Australia	6.2	0.0	6.2
Other	0.0	0.0	0.0
Total	48.5	134.4	182.9

Insurance tax

Insurance tax is a tax levied on insurance products that we charge to our customers directly or through an insurance agent. Exemptions from insurance tax include healthcare and life insurance.

The table below shows how much insurance tax we paid to the tax authorities in 2023.

€ MILLION	
Country	Insurance tax remitted
Netherlands	612.9
Greece	57.7
Turkey	22.0
Slovakia	3.0
Australia	7.7
Other	0.0
Total	703.3

Payroll tax and social security contributions

In the Netherlands, we withhold payroll tax, social security contributions and Health Insurance Act contributions from our employees' salaries and from various payments. The payments from which we make payroll deductions in the Netherlands are pension payments, bank and other annuities, and income insurance payments. Employee insurance premiums, employers' Health Insurance Act contributions and pseudo final tax levies are also collected. These amounts are declared in the payroll tax and social security contributions return and remitted to the Dutch Tax Authorities. The employee insurance contributions and employers' Health Insurance Act contributions form part of our operating expenses.

20. In other words, figures are reported in consolidated form for each jurisdiction in the GRI statement while figures are aggregated in the country report. In this case, aggregation means that all information for all companies within a jurisdiction is combined without eliminating intra-group transactions. This means that the information in the GRI statement is more closely aligned to the financial statements.

21. See note 31 'Interests in subsidiaries' to Achmea's consolidated financial statements.

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In other countries, we deduct and remit payroll tax and/or social security contributions in accordance with local regulations.

The table below shows the remittances by country.

€ MILLION			
Country	Remitted by the employer	Remitted by the insurer or bank	Total
Netherlands	415.6	368.5	784.1
Greece	18.4	0.0	18.4
Turkey	9.3	0.5	9.8
Slovakia	9.3	0.0	9.3
Australia	3.7	0.0	3.7
Other	0.2	0.0	0.2
Total	456.5	369	825.5

Other taxes/subsidies

Bank tax: Bank tax applies to banking institutions operating in the Netherlands. At Achmea this is Achmea Bank. As we are below the threshold for levying this tax, to date we have not paid bank tax.

As a financial institution, we are not subject to industry-related environmental or similar ESG levies.

In 2023, we did not have operations in countries where there were special tax incentives (tax holidays) nor did we receive any other tax or other subsidies of note.

Achmea's total tax contribution

The table below shows Achmea's total tax contribution in 2023.

This amount includes taxes:

- incurred and recognised as part of our operating expenses (€324.2 million), and
- those deducted and remitted on behalf of third parties.

€ MILLION	
Country	Totaal bijdrage belastingen
Netherlands	1,609.8
Greece	92.7
Turkey	45.5
Slovakia	23.1
Australia	17.6
Other	0.2
Total	1,788.9

OBJECTIVES AFTER 2023

This report puts our ambition to communicate transparently on tax matters into practice and we intend to expand it in future years.

Ambitions for 2024 and beyond

- We set great store by the fact that the Tax Authorities have established that Achmea actually applies the tax policy approved by the Executive Board. Nevertheless, we also seeking other forms of assurance. The ambition of Achmea's Tax Department for 2024 is to issue a tax in-control statement.
- We want to bring our tax policy to the attention of our stakeholders in a more effective way. We intend to accomplish this by stepping up the dialogue with our stakeholders. In this context, our initial focus is on the shareholders of Achmea and NGOs. We are convinced that actively sharing our approach to tax has a positive impact in terms of awareness of the role tax plays in facilitating a more sustainable society.

APPENDIX GRI INDEX

TTR: TAX TRANSPARENCY REPORT
AR: ANNUAL REPORT 2023

Indicator	Description of indicator	Reference
207-1 Approach to tax		
207-1 a	A description of the approach to tax, including	TTR: section 1 Achmea's tax policy
207-1 a i	Publicly available tax strategy	TTR: section 1 Achmea's tax policy
207-1 a ii	Approval and review of tax strategy	TTR: section 1 Achmea's tax policy/para 2 Implementation of the tax policy
207-1 a iii	The approach to regulatory compliance	TTR: section 1 Achmea's tax policy/para 2 Implementation of the tax policy
207-1 a iv	Relation with company's business and sustainable development strategies	TTR: section 1 Achmea's tax policy
207-2 Tax Governance, control and risk management		
2017-2 a	Description of the tax governance and control framework including:	
2017-2 a i	Internal governance of compliance with the tax strategy	TTR: section 2 c. Tax risk management
2017-2 a ii	Embedding of approach to tax within the organisation	TTR: section 2 c. Tax risk management
2017-2 a iii	Description of tax risk policy	TTR: section 2 c. Tax risk management
2017-2 a iv	Evaluation of compliance with the tax governance and control framework	TTR: section 2 c. Tax risk management
2017-2 b	Whistleblower policy	TTR: section 2 c. Tax risk management
2017-2 c	A description and reference to the assurance process for disclosures on tax	AR, supplement A
207-3 Stakeholder engagement and management of concerns related to tax		
207-3 a	A description of the tax governance and control framework, including:	
207-3 i	The approach to engagement with tax authorities	TTR: section 2 d. Stakeholder engagement
207-3 ii	The approach to public policy advocacy on tax	TTR: section 2 d. Stakeholder engagement
207-3 iii	The processes for collecting and considering the views and concerns of (external) stakeholders	TTR: section 2 d. Stakeholder engagement
207-4 Country by Country reporting		
207-4 a	All tax jurisdictions where the entities included in organisation's audited consolidated financial statements are resident for tax purposes	TTR: section 3.2 Tax payments
207-4 b	For each tax jurisdiction reported in disclosure 207-4-a:	
207-4 b i	Names of the resident entities	AR: Note 31 to the consolidated financial statements "Interests in subsidiaries"
207-4 b ii	Primary activities of the organisation	TTR: section 3.2 Tax payments
207-4 b iii	Number of employees and the basis of calculation of this number	TTR: section 3.2 Tax payments
207-4 b iv	Revenues from third-party sales	TTR: section 3.2 Tax payments
207-4 b v	Revenues from intra-group transactions with other tax jurisdictions	TTR: section 3.2 Tax payments
207-4 b vi	Profit/loss before tax	TTR: section 3.2 Tax payments
207-4 b vii	Tangible assets other than cash and cash equivalents	TTR: section 3.2 Tax payments
207-4 b viii	Corporate income tax paid on a cash basis	TTR: section 3.2 Tax payments
207-4 b ix	Corporate income tax accrued on a profit/loss	TTR: section 3.2 Tax payments
207-4 b x	Explanation of the difference between the nominal rate and the effective tax rate	TTR: section 3.2 2023 in figures
207-4 c	The time period covered by the information reported in Disclosure 207-4	TTR: section 3.2 2023 in figures
207-4 Reporting recommendation		
2.3.1	Total employee remuneration	Not specified
2.3.2	Taxes withheld and paid on behalf of employees	TTR: section 3.2 Tax payments
2.3.3	Taxes collected from customers on behalf of a tax authority	TTR: section 3.2 Tax payments
2.3.4	Industry-related and other taxes or payments to governments	TTR: section 3.2 under Other taxes/subsidies
2.3.5	Significant uncertain tax positions	TTR: section 2 c. Tax risk management
2.3.6	Balance of intra-company debt held by entities in the tax jurisdiction and the basis of calculation of the interest rate paid on the debt	Cross-border debts: not material

APPENDIX TAX GOVERNANCE CODE VNO-NCW

TTR: TAX TRANSPARENCY REPORT
AR: ANNUAL REPORT 2023

Description	Reference
A. Approach to Tax: Tax Strategy & Tax Principles	
The Company sees tax not as a cost factor only, but as a means for social economic cohesion, sustainable growth and long-term prosperity	
1. Approval of tax strategy/principles by the Board of Directors	TTR: section 1 Achmea's tax policy
2. Reporting and accountability to board	TTR: section 2 c. Tax risk management
3. The Company's tax strategy and principles apply to all group entities.	TTR: section 2 c. Tax risk management
4. Tax principles applicable in relation to all stakeholders	TTR: section 2 d. Stakeholder engagement
B. Accountability & Tax Governance	
Tax is a core part of corporate social responsibility and governance and is overseen by the Board.	
1. The Board is accountable for the tax strategy, principles and tax risk management.	TTR: section 2 c. Tax risk management
2. The Company has a tax control framework.	TTR: section 1 Achmea's tax policy
3. Internal or external auditors regularly review the Company's tax controls as part of the audit of its financial results.	Internal evaluation but not in the context of financial statements. Not any external evaluation.
C. Tax Compliance	
The Company is committed to comply with the letter, the intent and the spirit of the tax legislation of the countries in which it operates and to pay the right amount of tax at the right time.	
1. Required returns and complete/timely disclosures to tax authorities	TTR: section 1 Achmea's tax policy
2. Reasonable interpretations of law and economic and commercial activity is starting point.	TTR: section 1 Achmea's tax policy
3. No transactions with tax benefit as sole purpose, reasonable interpretation of law.	TTR: section 1 Achmea's tax policy
4. The Company will only claim tax incentives in line with the policy intent of such tax incentives and provided such incentives are generally available.	TTR: section 1 Achmea's tax policy
5. If the Company seeks certainty in advance from tax authorities to confirm an applicable tax treatment, it does so based on full disclosure of all relevant facts and circumstances.	TTR: section 1 Achmea's tax policy
D. Business Structure	
The Company will only use business structures that are driven by commercial considerations, are aligned with business activity and have genuine substance.	
1. No use of tax havens for tax avoidance.	TTR: section 1 Achmea's tax policy/section 2, e Tax planning
2. Tax is paid where the profits are made	TTR: section 2, f: Tax planning
3. The arm's length principle-in line with OECD guidelines- is consistently applied.	TTR: section 2, f: Tax planning
E. Relaties met fiscale autoriteiten en andere externe belanghebbenden	
Mutual respect, transparency and trust drive the Company's relationships with tax authorities and other relevant external stakeholders.	
1. The Company seeks to develop cooperative relationships with tax authorities, and relevant other authorities, based on mutual respect, transparency and trust.	TTR: section 1 Achmea's tax policy
2. Pursue constructive dialogue with governments/interest groups in support of tax systems, legislation and administration	TTR: section 2 d. Stakeholder engagement
3. Collaborate with tax authorities on reconciliation. Resolve disputes with tax authorities applying the above principles	TTR: section 2 d. Stakeholder engagement
F. Fiscale transparantie en rapportage	
The Company regularly provides information to its stakeholders, including investors, policy makers, employees, civil society and the general public, about its approach to tax and taxes paid. The Company will therefore publish the following information:	
1. A tax strategy or policy and its tax risk management strategy.	TTR: section 1 and 2
2. A list of entities, with ownership information and a brief explanation of the type and geographic scope of activities.	AR: Note 31 to the consolidated financial statements "Interests in subsidiaries"
3. Annual information on the corporate income tax the Company accrues and pays on a cash basis at a country level.	TTR: section 3: Tax payments
4. The total tax borne and collected by the Company.	TTR: section 3.2
5. Information on financially material tax incentives (e.g. tax holidays), including an outline of the incentive requirements and when it expires.	TTR: section 3.2: Other taxes/subsidies
6. An outline of the advocacy approach the Company takes on tax issues, the channels through which the Company engages in regard to policy development and the overall purpose of its engagement.	TTR: section 2 d. Stakeholder engagement

COLOPHON AND CONTACT INFORMATION

This is the English version of the Achmea Tax Transparency Report for 2023. A Dutch version of this report is also available. In the event of any discrepancies between the Dutch and English versions of this report, the Dutch version will take precedence. The annual report can be downloaded from the Achmea website (www.achmea.nl).

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