Public Affairs

Charter



1. Introduction

NN Group's purpose is to help people care for what matters most to them. We are committed to creating sustainable long-term value for all our stakeholders. However, we cannot achieve this without solid laws and regulations that balance different societal needs. As financial services are often closely tied to many aspects of society, a broad scope of regulations could impact our stakeholders or our company. Therefore, by offering our knowledge and expertise during the legislative process, we aim to contribute to fair and effective regulations, and advocate for a level playing field in the legislative and regulatory process.

At NN Group, public affairs activities are performed by several experts who are part of the Public and Government Affairs team (PGA). PGA plays an important role in the effective positioning of NN Group and its businesses, its senior management, (board of) directors, and is focused on building and maintaining relationships with key stakeholders, particularly those in the political or governmental sphere, such as regulators, politicians, and civil servants. In addition, PGA is responsible, and functions as the first point of contact, for the coordination of all head office contacts with Dutch and foreign supervisory bodies. When it concerns group affairs (matters involving strategy, governance, remuneration, capital), this coordinating role extends to the international business units (BUs).

Next to PGA, different (senior) managers and specialists are involved in public affairs activities on behalf of NN, for example through their membership of (boards and working groups at) various institutions and trade organisations (see a non-exhaustive list of memberships below). In case the topics are deemed to be relevant to the company's Management Board, or in case of diverging expert views, PGA will be involved and informed about these activities.

PGA reports to the responsible member of the Management Board of NN Group (Chief People, Communications, and Sustainability Officer). The team regularly updates (members of) the Management Board and Supervisory Board of NN Group on relevant public affairs topics.

Principles and commitments

At NN Group, our public affairs policies are regularly evaluated against our values, the NN Code of Conduct, and applicable laws and regulations. We believe that content-driven contributions from an industry perspective are of benefit to the public debate, our customers, and other stakeholders, and can play a role in an effectively regulated market. To ensure that our contributions are meaningful and constructive, we follow the principles of transparency, integrity, and we abstain from support to political parties.

1.1 Transparency

We believe that the principle of transparency is essential for an effective public affairs approach. Transparency is about being open and honest with all our stakeholders. By being transparent, we build trust and credibility, which is crucial for maintaining relationships and an open dialogue.

- We provide reliable, verifiable, and updated information, involving specialists.
- We publicly communicate and regularly update the list of NN Group's main memberships in sector organisations and strive to promote our positions among them (see the NN Group Annual Report for the most recent overview).
- Employees involved in public affairs activities always identify themselves and make clear whom they are representing.
- NN Group is registered under number 493416718971-18 at the EU transparency register (Transparency Register (europa.eu)).

1.2 Integrity

We are committed to upholding the highest ethical standards and conducting our activities with integrity and professionalism. This means that we do not permit or tolerate any form of corruption or unethical behaviour, and we work to ensure that our lobbying activities are fair, transparent, and based on sound principles. We evaluate the viewpoints we communicate against our values. Viewpoints are the result of a balanced weighing of the interests of all stakeholders.

1.3 Abstaining from support to political parties

We work and communicate transparently with public authorities and maintain a neutral stance towards any political party. We do not support, financially or in any other form, any political party or candidate, and we do not seek to influence the outcome of any election. Our focus is on promoting policies that are in the best interest of all our stakeholders, and we aim to contribute to fair and effective regulations, advocating for a level playing field in the legislative and regulatory process. Engagement with policy makers could be achieved by organising round tables, offering position papers, working visits or participating in sector organisations and contributing to their advocating activities. Within these sector organisations, advocating activities are also periodically evaluated.

¹ Including but not limited to: customers, colleagues, investors/analysts, society: expert groups and industry associations, societal and network organisations, agents and intermediaries, regulators and government agencies.

2. Main topics of focus

NN Group's public affairs activities mainly focus on sector relevant legislative and regulatory developments in the Netherlands and the European Union. Examples include:

- Prudential Regulation (Solvency II)
- Retail Investment Strategy (RIS) & Insurance Distribution Directive (IDD)
- Digital Strategy (incl. Artificial Intelligence Act, Open Finance and Open Insurance, Data Protection)
- International Financial Reporting Standards (IFRS)
- Sustainable Finance policies (Taxonomy, SFDR, CSRD)
- Anti-money laundering (AML)
- Pension laws
- · Labour market regulation

Please refer to the NN Group Annual Report for the most recent overview of our public affairs activities.

3. List of Memberships:

- In the Netherlands: the Dutch Association of Insurers (Verbond van Verzekeraars); Dutch Banking Association (NVB); the Confederation of Netherlands Industry and Employers (VNO-NCW); and the Association of Enterprises Issuing Securities (VEUO).
- In Europe: national Insurance and Pension
 Associations in the countries where NN is active; the
 Pan-European Insurance Forum (PEIF); the European
 Financial Services Roundtable (EFR); the European
 Insurance CFO Forum (CFO Forum), and the CRO Forum
- International: The World Economic Forum (WEF); and the Geneva Association

Please refer to the NN Group Annual Report for the most recent overview of our monetary contributions and expenditure to trade associations.

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